

2025 01G 1510
IN THE SUPREME COURT OF NEWFOUNDLAND AND LABRADOR
IN BANKRUPTCY AND INSOLVENCY

IN THE MATTER OF the *Companies*
Creditors Arrangement Act R.S.C., 1985 c.
C-36 as Amended (the "CCAA"); and

AND IN THE MATTER OF an application
by Calvin Cameron and Sheldon Cameron
(the "**Applicants**") for relief under s. 11 of
the CCAA

NOTICE OF MOTION

**Sheldon Cameron & Calvin
Cameron**
191 Goose Arm Road
Deer Lake, NL A8A 3H9

TO: **Supreme Court of Newfoundland & Labrador**
General Division (In Bankruptcy)
P.O. Box 937
309 Duckworth Street
St. John's, NL A1C 5M3

AND TO: The Service List attached as **Schedule "A"**

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RELIEF SOUGHT

1. The Applicants in this proceeding are making an Application to this Honourable Court seeking an order pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "**CCAA**") as set out below:
2. An Order releasing and forever discharging the Directors of Nemori Farms Ltd, Sheldon Cameron and Calvin Camerson (collectively the "Camerons"), from any and all obligations, liabilities, and enforcement rights arising from personal guarantees provided in favour of certain creditors of Nemori Farms Ltd, including but not limited to personal guarantees granted in favour of:
 - RBC;
 - Headline Holsteins Limited;
 - Bodkin, a Division of Bennington Financial Corp.;
 - Kubota Canada Ltd.
 - De Lage Landen Financial Services Canada Inc.
 - Meridian Onecap Credit Corp.
 - Greenbox Capital;
 - Any continuing guarantees or indemnity agreements

(collectively the "Personal Guarantees").

3. An Order declaring that any liability of the Camerons under the Personal Guarantees shall be released and extinguished by the Plan of Arrangement approved this Honourable Court.
4. Such further relief as this Honourable Court may deem just.

EVIDENCE TO RELIED UPON

- (a) Affidavits of Calvin Cameron and/or Sheldon Cameron.
- (b) Such additional evidence as counsel may advise and this Honourable Court may permit.

FACTS MATERIAL TO THIS MOTION

5. On or about March 7, 2025, Nemori Farms Ltd. sought and obtained protection pursuant to the provisions of the CCAA. A stay of proceedings was implemented, and Grant Thornton was appointed as the Monitor.
6. The stay of proceedings remains in place and the matter is scheduled for a status appearance on December 2, 2025.
7. Affidavit evidence shall be provided to address the issues and provide documents as may be relevant.
8. The Applicants request a hearing and declaratory relief as set out herein.

GROUND FOR THE MOTION

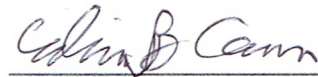
9. The Camerons have continually acted in good faith in this restructuring process.
10. There is no allegation of fraud, willful misconduct, of breach of their fiduciary duties.
11. In the Sixth Report of the monitor reviews the stay of proceedings and whether the Cameron Brothers should be included. At paragraph 46 the Monitor states:

The Monitor is of the view that Sheldon and Calvin Cameron are key personnel at the Company and are currently the sole management team for the

Company. Based on the Monitor's observation. The continued participation of Sheldon and Calvin Cameron is needed to avoid disruption of farm operations through the summer season, and their co-operation is needed to facilitate the closing of any transaction with any Bidder, should a transaction be approved.

12. The engagement in management of the farm throughout this process is essential to preserving the value for the stakeholders.
13. The Plan of Arrangement approved by court contemplated the Cameron's would continue to manage the farm and they have went above and beyond in their efforts to continue the daily operations of the farm throughout this difficult process.
14. It is only as a result of their efforts that there was business operation available for stakeholders at the end of this process.
15. This is detailed in the Affidavit of Sheldon Cameron attached to this application.
16. The bid process contemplated that the Camerons would receive equity in new company, and rights of first refusal moving forward. Given the significant scope of the Camerson's involvement, they relied on these options in anticipation they would have a vested interest in the farm moving forward. At present, no such options have been implemented, and currently they have no assurance these will be in place.

DATED at the City of St. John's, in the Province of Newfoundland and Labrador, this 18 day of December 2025



Calvin Cameron