

Supreme Court of Nova Scotia  
In Bankruptcy and Insolvency

**IN THE MATTER OF THE BANKRUPTCY OF ATLANTIC SEA CUCUMBER INC.**

**Notice of Motion**

**To:** The Service List attached as Schedule "A"

**Motion**

msi Spergel Inc., the trustee in bankruptcy of Atlantic Sea Cucumber Ltd., moves for, *inter alia*, order to conduct a sale and investment solicitation process over the real property and assets of the Atlantic Sea Cucumber Ltd.

**Time and place**

The motion is to be heard by the registrar on September 19, 2025, at 10:00 a.m. in The Law Courts, 1815 Upper Water Street, Halifax, Nova Scotia, B3J 1S7. The moving party has arranged one half day in chambers. The moving party says that the motion will not require more time.

**References**

The moving party relies on the following legislation, Rules or points of law: *Bankruptcy and Insolvency Act* and *Bankruptcy and Insolvency Act General Rules*.

**Evidence**

The evidence in support of the motion is as follows: The report of msi Spergel Inc.

**Possible order against you**

You may file an affidavit and a brief, attend the hearing of the motion, and state your position on whether the proposed order should be made. If you do not attend, the judge may grant an order without further notice to you.

**Signature**

Signed September 11, 2025



Signature

FOR

Print Name: Joshua J. Santimaw

KAISLA A. RICHARDSON  
A Barrister of the Supreme  
Court of Nova Scotia

# Schedule "A"

## SERVICE LIST

<b>O'KEEFE &amp; SULLIVAN</b> 80 Elizabeth Ave. – 2 <sup>nd</sup> Floor St. John's, NL A1A 1W7  Attn: Darren O'Keefe Lawyer for Atlantic Sea Cucumber Ltd. darren@okeefesullivan.com	<b>EXPORT DEVELOPMENT CANADA</b> 150 Slater Street Ottawa, ON K1A 1K3  Attn: scallaghan@edc.ca
<b>COX &amp; PALMER</b> Nova Centre – South Tower 1500 1625 Grafton Street Halifax, NS B3J 0E8  Attn: Gavin MacDonald Lawyer for Weihai Taiwei Haiyang Aquatic Food Co. Ltd. gmacdonald@coxandpalmer.com	<b>CANADA REVENUE AGENCY</b> 4695 Shawinigan-Sud Blvd Shawinigan-Sud PQ G9P 5H9  Attn: mike.maclean@cra-arc.gc.ca
<b>LAWSON CREAMER</b> 133 Prince William Street – Ste 801 Saint John, NB E2L 2B5  Attn: Mel Norton Lawyer for Atlantic Golden Age Holding Inc. mnorton@lawsoncreamer.com	<b>ATLANTIC CANADA OPPORTUNITIES AGENCY</b> Blue Cross Centre 644 Main Street Moncton, NB E1C 9J8  Attn: christine.theriault@acoa-apec.gc.ca
<b>MSI SPERSEL INC.</b> Founders Square 1701 Hollis Street Halifax, NS B3J 3M8  Attn: Trevor Pringle, Trustee in Bankruptcy tpringle@spergel.com	<b>HALIFAX REGIONAL MUNICIPALITY</b> P.O. Box 1749 Halifax, NS B3J 3A5  Attn: proptax@halifax.ca
<b>UNISKY SHANGHAI LTD.</b>  Attn: jane@unisky.biz	<b>UFUK</b>  Attn: coco@ufuk.com
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