

Supreme Court of Nova Scotia
In Bankruptcy and Insolvency

IN THE MATTER OF THE BANKRUPTCY OF ATLANTIC SEA CUCUMBER LTD.

Notice of Motion

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

Motion

Msi Spergel Inc., the Trustee in Bankruptcy ("**Trustee**") for the Atlantic Sea Cucumber Ltd. in this proceeding, moves for, *inter alia*, the following relief

- (a) an Order abridging and validating the time for service of this notice of motion and supporting materials pursuant to Rule 6 of the *Bankruptcy and Insolvency General Rules*, C.R.C. 1978, c. 368, as amended, and dispensing with further service thereof;
- (b) an Order for confidentiality pursuant to *Nova Scotia Civil Procedure Rule* 85.04 as regards the Confidential Supplement to the Third Report of the Trustee dated April 8, 2026; and
- (c) an Order pursuant to section 30 of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c B-3, as amended ("**BIA**"), approving the sale of the property, assets and undertakings of Atlantic Sea Cucumber Ltd. as set out in the Trustee's Third Report and in the Confidential Supplement, and grants an asset vesting order.

Time and place

The motion is to be heard by a judge on April 17, 2026, at 1:30 p.m. in The Law Courts, 1815 Upper Water Street, Halifax, Nova Scotia, B3J 1S7. The moving party has set the motion for hearing in a half-hour or less 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: BIA.

Evidence

The evidence in support of the motion is as follows: Third Report of the Trustee in Bankruptcy and its Confidential Supplement.

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 April 8, 2026



Signature

Print Name: Joshua J. Santimaw

Schedule "A"

SERVICE LIST

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