

2023

Hfx No. 45461
Estate No. 51 - 2939212

SUPREME COURT OF NOVA SCOTIA
IN BANKRUPTCY AND INSOLVENCY

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

BETWEEN:

Weihai Taiwei Haiyang Aquatic Food Co. Ltd

Applicant

and

msi Spergel Inc. in its capacity as bankruptcy
trustee of Atlantic Sea Cucumber Ltd.

Respondent

Notice of Motion

To: the Service List at Schedule "A"

Motion

Weihai Taiwei Haiyang Aquatic Food Co. Ltd. ("WTH"), a creditor of the bankrupt and the Applicant in this proceeding, appeals to this Honourable Court from the acceptance by msi Spergel Inc. (the "**Trustee**") of the proof of claim of Atlantic Golden Age Holdings Inc. ("AGAH") in the bankruptcy of Atlantic Sea Cucumber Limited, and moves for an order varying the Proof of Claim amount, costs payable by the Trustee to WTH forthwith, and for such further and other orders as this Honourable Court may deem just.

Time and place

The motion is to be heard by the Registrar in Bankruptcy on _____ at _____ in the Law Courts, 1815 Upper Water Street, Halifax, Nova Scotia. The moving party has set the motion for hearing in a half-day 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:

1. *Bankruptcy and Insolvency Act*, ss 135(5); and
2. *Bankruptcy and Insolvency Act General Rules*

Evidence

The evidence in support of the motion is as follows:

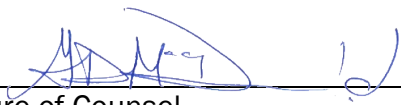
1. Affidavit of Gavin MacDonald to be filed.

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 October 8, 2025



Signature of Counsel

Gavin MacDonald as Counsel for Weihai
Taiwei Haiyang Aquatic Food Co. Ltd.,
Cox & Palmer
1500 – 1625 Grafton Street
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Service List – Schedule “A”

<p>O’KEEFE & SULLIVAN 80 Elizabeth Avenue, 2nd Floor St. John’s, NL A1A 1W7</p> <p>Darren D. O’Keefe Tel: 709.700.0911 darren@okeefeandcompany.com</p> <p>Lawyers for the Company</p>	<p>ATLANTIC SEA CUCUMBER LTD. 212 Pauls Point Road Hacketts Cove, NS B3Z 3K7</p> <p>Songwen Gao sam@atlanticseacucumber.ca</p> <p>The Company</p> <hr/> <p>COX & PALMER Nova Centre – South Tower 1500-1625 Grafton Street Halifax, NS B3J 0E8</p> <p>Gavin MacDonald Tel: 902.429.4464 gmacdonald@coxandpalmer.com</p> <p>Meaghan Kells Tel: 902.429.6829 mkells@coxandpalmer.com</p> <p>Lawyers for Weihai Taiwei Haiyang Aquatic Food Co. Ltd.</p>
<p>BOYNECLARKE LLP 99 Wyse Road, Suite 600 Dartmouth, NS B3A 4S5</p> <p>Joshua J. Santimaw Tel: 902.460.3451 jsantimaw@boyneclarke.ca</p> <p>Lawyer for the Bankruptcy Trustee</p>	<p>MSI SPERGEL INC. 21 King Street West, Suite 1602 Hamilton, ON L8P 4W7</p> <p>Trevor Pringle Tel: 905.527.2227 tpringle@spergel.ca</p> <p>The Trustee</p>
<p>LAWSON CREAMER 133 Prince William Street – Suite 801 Saint John, NB E2L 2B5</p> <p>Chris Isnor cisnor@lawsoncreamer.com</p> <p>Lawyer for Atlantic Golden Age Holdings Inc.</p>	<p>OFFICE OF THE SUPERINTENDENT OF BANKRUPTCY Maritime Centre 1505 Barrington Street, 16th floor Halifax, NS B3J 3K5</p> <p>ic.osbccaa-laccbsf.ic@canada.ca</p>