

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 of Atlantic Sea Cucumber Ltd., moves for, *inter alia*, an order pursuant to s. 38(4) of the *Bankruptcy and Insolvency Act* to determine the validity and enforceability of the security have the loan(s) Atlantic Golden Age Holding Inc. extended to Atlantic Sea Cucumber Ltd. declared valid, enforceable and secured against the real property and assets of it.

**Time and place**

The motion is to be heard by the registrar on November 22, 2024, at 9:30 a.m. in The Law Courts, 1815 Upper Water Street, Halifax, Nova Scotia, B3J 1S7. The moving party has arranged one full 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*; *Personal Property Security Act* (Nova Scotia); *Land Registration Act* (Nova Scotia); and the *Bill of Exchange Act*.

**Evidence**

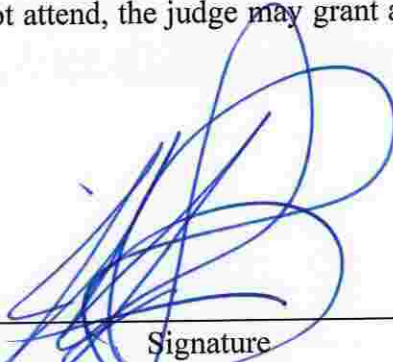
The evidence in support of the motion is as follows: affidavit(s) of a representative of Atlantic Sea Cucumber Ltd.; reports of msi Spergel Inc.

**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 August 16, 2024~~  
November 6, 2024



Signature

Print Name: Joshua J. Santimaw

## Schedule "A"

**Service List – Schedule “A”**

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<p><b>BOYNECLARKE LLP</b> 99 Wyse Road, Suite 600 Dartmouth, NS B3A 4S5</p> <p><b>Joshua J. Santimaw</b> Tel: 902.460.3451 <a href="mailto:jsantimaw@boyneclarke.ca">jsantimaw@boyneclarke.ca</a></p> <p><b>Lawyer for the Trustee</b></p>	<p><b>COX &amp; PALMER</b> Nova Centre – South Tower 1500-1625 Grafton Street Halifax, NS B3J 0E8</p> <p><b>Gavin MacDonald</b> Tel: 902.429.4464 <a href="mailto:gmacdonald@coxandpalmer.com">gmacdonald@coxandpalmer.com</a></p> <p><b>Meaghan Kells</b> Tel: 902.429.6829 <a href="mailto:mkells@coxandpalmer.com">mkells@coxandpalmer.com</a></p> <p><b>Lawyers for Weihai Taiwei Haiyang Aquatic Food Co. Ltd.</b></p>
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	<p><b>CANADA REVENUE AGENCY</b> Shawinigan-Sud Boulevard Shawinigan-Sud, QC G9P 5H9</p> <p><b>Fax: 866.229.0839</b></p>

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