

2021

Hfx. No. 507069
Estate No. 51-2743163
Court No. 44783
District of Nova Scotia
Division No. 01-Halifax

**SUPREME COURT OF NOVA SCOTIA
IN BANKRUPTCY & INSOLVENCY**

**IN THE MATTER OF THE PROPOSAL OF
ATLANTIC CRANE & MATERIAL HANDLING LIMITED, LABRADOR
CRANES 2005 LIMITED and LCB RENTALS LIMITED**

Notice of Motion

To: The Service List attached hereto

Motion

Atlantic Crane & Material Handling Limited, Labrador Cranes 2005 Limited, and LCB Rentals Limited, the Applicants in this proceeding, move for orders:

1. insofar as necessary, abridging the notice periods pursuant to *Civil Procedure Rule 2.03* and the *Bankruptcy and Insolvency General Rules*, Rule 6(4);
2. pursuant to section 34(1) of the *Bankruptcy and Insolvency Act* (“*BIA*”), giving directions as to the sale of the assets of the Applicants; and, if determined to be necessary by the Court;
 - (a) pursuant to section 187(5) of the *BIA*, rescinding the Court’s Sale Approval and Vesting Order granted September 29, 2021; and
 - (b) pursuant to Section 65.13 of the *BIA* approving the sale of the assets of the Applicants to Russell Industries Corp. or its nominee.

Time and place

The motion is to be heard by a judge on October 12th, 2021, at 2 p.m. in The Law Courts, 1815 Upper Water Street, Halifax, Nova Scotia, B3J 1S7. The moving party has arranged this time 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: *Civil Procedure Rule 2.03, Bankruptcy and Insolvency General Rules, Rule 6(4), BIA sections 34, 187(5) and 65.13.*

Evidence

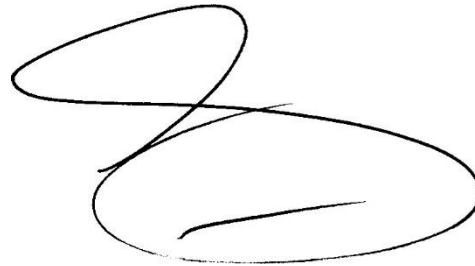
The evidence in support of the motion is as follows: Material Adverse Change Report of MNP Limited, Proposal Trustee, dated October 7, 2021.

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 7, 2021.

A handwritten signature in black ink, consisting of a large, stylized 'S' shape with a horizontal line extending from the bottom right.

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Limited and LCB Rentals Limited

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