



BURCHELLS LLP

Barristers & Solicitors
1801 Hollis Street, Suite 1800
Halifax, Nova Scotia
Canada B3J 3N4
t. 902.423.6361
f. 902.420.9326
www.burchells.ca

D. Bruce Clarke, Q.C.
bclarke@burchells.ca

File: 19176-1082181

June 22, 2021

VIA COURIER

The Honourable Justice Presiding in Chambers
Supreme Court of Nova Scotia
The Law Courts
1815 Upper Water Street
Halifax NS B3J 1S7

My Lord/My Lady:

**Re: Atlantic Crane & Material Handling Limited ("Atlantic Crane"), Labrador Cranes 2005 Limited ("Labrador Cranes"), and LCB Rentals Limited ("LCB") (collectively the "Atlantic Crane Group")
Estate No. 51-2743163 / Court No. 44783
Motion to be heard on June 24, 2021 @ 2:00 p.m.**

We represent TD Bank, the secured working capital lender to the debtor companies.

I have been provided copies of the June 17, 2021 filings from Boyne Clarke in favor of (a) an extension of time for making a Proposal, and (b) leave to sell certain real estate. I acknowledge adequate notice and sufficient service.

TD Bank does not oppose the grant of a first extension order. TD Bank expects that no additional extensions will be required, as continued uncertainty is not beneficial to the companies.

TD Bank does not oppose the sale of real estate in accordance with the draft order. The net funds are a replacement asset of the relevant company, subject to the statutory and consensual security applicable thereto, and held by the Proposal Trustee pending further order of this court.

All of which is respectfully submitted.

BURCHELLS LLP



D. Bruce Clarke, Q.C.

DBC/grm

- c. Tim Hill, Q.C. – via email thill@boyneclarke.ca
- c. A. Meaghan Kells – via email mkells@boyneclarke.ca
- c. Benjamin R. Durnford – via email ben.durnford@mcinnescooper.com
- c. Sara L. Scott – via email sscott@stewartmekelvey.com
- c. Eric Findlay – via email eric.findlay@mnp.ca
- c. client