

October 8, 2021

VIA COURIER

The Honourable Justice John Bodurtha
Supreme Court of Nova Scotia
The Law Courts
1815 Upper Water Street
Halifax NS B3J 1S7

My Lord:

**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 October 12, 2021 at 2:00 p.m.**

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

I have been provided with the filings of the Companies seeking revocation of the prior sale approval order, and the issuance of an amended sale approval order.

It is difficult to be pleased by this evolving process. Nevertheless, a sale of the assets of these companies, on an immediate basis, is far preferable to any other available option.

TD Bank supports the issuance of the relief applied for.

All of which is respectfully submitted.

BURCHELLS LLP



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