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CANADA

PROVINCE OF QUÉBEC DISTRICT OF MONTRÉAL LOCALITY OF MONTRÉAL

SUPERIOR COURT (Commercial Division) Bankruptcy and Insolvency Act

N°: 500-11-062022-237

2023-05-12, a Montreal

IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF:

VU la procédure, la preve, l'absence GAVIN INC.

de contestation et les représentations,

Petitioner / Debtor

La présente requite pour paroger les and-

délais de 45 jans, soit jusqu'au 26 juin MNP LTD.

2023, afin de produme une proposition est

Trustee

accordie selon ses conclusions, le tout

Fam frais MOTION FOR THE ISSUANCE OF A SECOND EXTENSION ORDER

(Sections 50.4(9) of the Bankruptcy and Insolvency Act)

ONE OF THE HONOURABLE JUDGES OR REGISTRARS OF THE SUPERIOR COURT, SITTING IN COMMERCIAL DIVISION, IN AND FOR THE JUDICIAL DISTRICT

OF MONTREEL, THE PETITIONER RESPECTFULLY SUBMITS THE FOLLOWING:

Registraire

INTRODUCTION

- 1. On February 27, 2023, the Petitioner filed a Notice of Intention to File a Proposal ("NOI"), and MNP Ltd. was appointed as trustee to the NOI (the "Trustee").
- 2. On March 28, 2023, this Court issued an order extending the NOI to May 12, 2023.
- 3. On March 29, 2023, this Court issued an order (i) approving the creation of a superpriority administrative charge (ii) approving interim financing granted by Crédit Transit Inc. (the "Interim Financing"), and (iii) approving the creation of a superpriority charge to secure the repayment of the Interim Financing.
- 4. For the reasons set out herein, Gavin hereby seeks from this Court the issuance of an order extending the NOI by an additional period of 45 days, i.e. up to and including June 27, 2023.