

**2025 01G 0491**  
**IN THE SUPREME COURT OF NEWFOUNDLAND AND LABRADOR**  
**IN BANKRUPTCY AND INSOLVENCY**

**IN THE MATTER OF** the *Companies Creditors Arrangement Act* R.S.C., 1985 c. C-36 as Amended (the “**CCAA**”)

**AND IN THE MATTER OF** an application of Karwood Contracting Ltd., Karwood Engineering Inc., Karwood Design Group Ltd., and Karwood Ontario Ltd. (the “**Applicants**”)

**NOTICE OF APPLICATION**

<b>SUMMARY OF CURRENT DOCUMENT</b>	
Court File Number(s):	2025 01G 0491
Date of Filing of Document:	November 7, 2025
Name of Filing Party or Person:	The Monitor, BDO Canada Limited
Application to which Document being filed relates:	Application to approve the fees and disbursements of the Monitor and its counsel and to terminate this proceeding pursuant to the <i>Companies' Creditors Arrangement Act</i> , RSC, 1985, c C-36
Statement of purpose in filing:	To Commence application
Court Sub-File Number, if any:	None

1. The Monitor, BDO Canada Limited (“**Monitor**”), seeks an order for, *inter alia*, to approve the fees and disbursements of the Monitor and its counsel incurred in this proceeding and discharge the Monitor and terminating this CCAA proceeding.

## **Facts**

2. The Monitor relies on the facts set out in:
  - (a) The Proposed Monitor's Pre-Filing Report, dated January 31, 2025
  - (b) The Monitor's First Report, dated February 12, 2025
  - (c) The Monitor's Second Report, dated February 20, 2025
  - (d) The Monitor's Third Report, dated April 9, 2025
  - (e) The Monitor's Fourth Report, dated June 5, 2025
  - (f) The Monitor's Fifth Report, dated June 27, 2025,
  - (g) The Monitor's Sixth Report, dated September 15, 2025,
  - (h) The Monitor's Seventh Report dated September 15, 2025
  - (i) The Monitor's Confidential Supplement to its Seventh Report dated September 15, 2025; and
  - (j) The Monitor's Eight Report to be filed herein.

## **Issues**

3. Should this Court approve the fees and disbursements of the Monitor and its counsel incurred in this proceeding and discharge the Monitor and terminating this CCAA proceeding.

### **Approve the fees and disbursements**

4. The fees and activities of the Monitor and its counsel through the period February 3, 2025, to November 13, 2025, including the estimated fees and disbursements up to the CCAA termination time.

5. The fees and disbursements of the Monitor are set out in the Eight Report of the Monitor. The Monitor submits those fees and disbursements are reasonable considering the complexity of the issues raised in the proceeding and the work involved through the period noted above through termination.

**Terminating CCAA Proceeding**

6. With the completion of the sale of the last property, the Monitor is of the view that the objectives of this CCAA proceeding will be met and a termination order is appropriate.

**DATED** at Dartmouth, Nova Scotia, this 10<sup>th</sup> November 2025



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Joshua J. Santimaw

Solicitors for the Monitor  
BDO Canada Limited  
Whose address for service is:  
**BOYNECLARKE LLP**  
99 Wyse Road – Suite 600  
Dartmouth, NS B2Y 3Z5  
jsantimaw@boyneclarke.ca

To: The Service List attached as Exhibit “A”

**ISSUED** at St. John’s, in the Province of Newfoundland and Labrador the \_\_ day of November 2025.

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*Creditors Arrangement Act* R.S.C., 1985 c.  
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**AND IN THE MATTER OF** an  
application of Karwood Contracting Ltd.,  
Karwood Engineering Inc., Karwood  
Design Group Ltd., and Karwood Ontario  
Ltd. (the “**Applicants**”)

**NOTICE**

You are hereby notified that the foregoing application will be made the judge presiding in Chambers at the Court House at St. John’s, Newfoundland and Labrador on November 13, 2025, at the hour of 10:00 a.m. in the forenoon or so soon thereafter as the application can be heard.

To: the Service List

**2025 01G 0491**  
**IN THE SUPREME COURT OF NEWFOUNDLAND AND LABRADOR**  
**IN BANKRUPTCY AND INSOLVENCY**

**IN THE MATTER OF** the *Companies Creditors Arrangement Act* R.S.C., 1985 c. C-36 as Amended (the "CCAA")

**AND IN THE MATTER OF** an application of Karwood Contracting Ltd., Karwood Engineering Inc., Karwood Design Group Ltd., and Karwood Ontario Ltd. (the "**Applicants**")

I, Neil Jones, CIRP, CA, CPA, LIT, of Halifax, Nova Scotia, MAKE OATH AND SAY THAT:

1. I am the Director of BDO Canada Limited and am the Court-appointed Monitor in this proceeding.
2. That I have read and understand the foregoing application.
3. That the facts contained in the foregoing Application are true to the best of my knowledge, information and belief.

**SWORN** before me at Halifax  
in the Province of Nova Scotia  
the 10 day of November 2025

**JOSHUA J. SANTIMAW**  
A Barrister of the Supreme  
Court of Nova Scotia



Neil Jones

**KARWOOD CONTRACTING LTD. AND KARWOOD ENGINEERING INC. AND KARWOOD  
ONTARIO LTD. AND KARWOOD DESIGN GROUP LTD.**

**SCHEDULE "A"  
MASTER SERVICE  
LIST**

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<p><b>ROYAL BANK OF CANADA</b> 1871 Hollis Street, 7<sup>th</sup> Floor Halifax, NS B3J 1M7</p> <p><b>David Savoie</b> 902-421-4905 David.Savoie@rbc.com</p>	<p><b>AXIOM LEASING INC.</b> 4 Robert Speck Pkwy 15th Floor, Mississauga, ON L4Z 1S1</p>
<p><b>MOSKOWITZ CAPITAL MORTGAGE FUND II INC.</b></p> <p><b>Stewart McKelvey</b> Suite 1100, Cabot Place 100 New Gower St. St. John's, N.L. A1C 6K3 Tel 709.570.8851 Fax 709.722.4565</p> <p><b>Stephen Winter</b> swinter@stewartmckelvey.com</p> <p><b>Joe Thorne</b> joethorne@stewartmckelvey.com</p>	<p><b>BANK OF MONTREAL</b> 31 Water Street St. John's NL A1C 1A9 Canada <b>Raffael Di Genova</b> Raffael.digenova@bmo.com</p> <p><b>Cox &amp; Palmer</b> Scotia Centre, 235 Water St suite 1100, St. John's, NL A1C 1B6</p> <p><b>Josh McElman</b> jmcelman@coxandpalmer.com</p>

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### Email List

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