

Form 23.03

District of: Nova Scotia
Division of: 01-Halifax
Court No. 45907
Estate No. 51-3134197

**Supreme Court of Nova Scotia
In Bankruptcy and Insolvency**

**In the matter of the Notice of Intention to make a proposal of Motryx Inc. pursuant to the
Bankruptcy and Insolvency Act, R.S.C. 1985, c. B-3, as amended**

Amended Notice of Motion

To: The Service List attached as Schedule "A"

Motion

Motryx Inc. ("**Company**"), the applicant in this proceeding, moves for an Order

- (i) abridging the time for service of this motion, if necessary;
- ~~(ii) extending the time for the Company to file a proposal pursuant to s. 50.4(9) of the Bankruptcy and Insolvency Act, R.S.C. 1985, c. B-3 as amended (the "BIA") by thirty three (33) days to March 26, 2025; and~~
- ~~(iii)~~(ii) approving an amended debtor-in-possession facility term sheet ("**Amended DIP Agreement**") executed by the Applicant on ~~February 12~~ March 7, 2025, with Aerocom GBMH & Co. (the "**DIP Lender**") pursuant to which this DIP Lender has agreed to advance to the Applicant a total amount of up to ~~\$400,000.00~~ \$525,000.00.

Time and place

The motion is to be heard by the registrar on ~~February 21~~ March 13, 2025, at ~~9:30-10:00~~ 10:00 a.m. in The Law Courts, 1815 Upper Water Street, Halifax, Nova Scotia, B3J 1S7. The moving party has set the motion for hearing in a half-hour or less 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: *Bankruptcy and Insolvency Act*, RSC 1985, c. 8-3, s. 50.4(9); *Bankruptcy and Insolvency Act General Rules*, Can. Reg. 368; and the *Nova Scotia Civil Procedure Rules*.

Evidence

The evidence in support of the motion is as follows:

1. The Fifth Report and Sixth Report of BDO Canada Limited in its capacity as the Proposal Trustee, which will be filed in advance of the motion hearing and the affidavit of Niva Sabeshan sworn and filed with this amended motion.

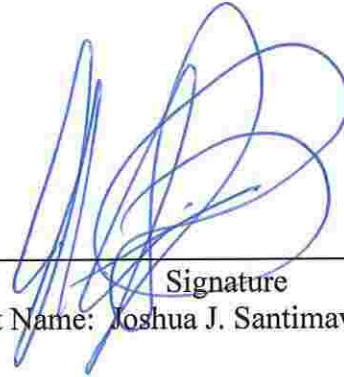
Possible order against you

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 February 14, 2025

Amended March 6, 2025

A handwritten signature in blue ink, consisting of several overlapping loops and a long vertical stroke on the left side, positioned above a horizontal line.

Signature

Print Name: Joshua J. Santimaw

Schedule A – Service List

<p>AEROCOM GMBH & Co Adam-Riesse-Strase 26 D-73529 Schabisch Gmund, Germany Attn: Roland Pfizer roland.pfizer@aerocom.de</p>	<p>ATLANTIC CANADA OPPORTUNITIES AGENCY P.O. Box 2284 Station Central Halifax, NS B3J 3C8 Attn: Julia Pelton Julia.Pelton@ACQA-APECA.GC.CA</p>
<p>BAKERTILLY 130 Eileen Stubbs Ave. Suite 201 Dartmouth, NS B3B 2C4 Attn: Aida Mitchell amitchell@bakertilly.ca</p>	<p>BENNETT GROUP OF COMPANIES INC. 1131 Topsail Road St. John's, NL A1E 0G5 Attn: Cathy Bennett Cathy@sandpiper.vc</p>
<p>BURCOT PARK HOLDINGS INCORPORATED 1131 Studley Avenue Halifax, NS B3H 3R7 Attn: Bruce MacDougall Bruce.MacDougall@rci.rogers.com</p>	<p>CAMERON AND CO. INVESTMENTS LIMITED 5632 Morris Street Halifax, NS B3J 1C2 Attn: James Wilson david@wilsons.ca</p>
<p>CONCRETE VENTURES LIMITED PARTNERSHIP 244-1505 Barrington Street Halifax, NS B3J 1C2 phankinson@concrete.vc</p>	<p>DCW HOLDINGS INC. 2160 Newton Avenue Halifax, NS B3L 3B9 Attn: David C. Wilson david@wilsons.ca</p>
<p>EAST PORT HOLDINGS LIMITED 130 Eileen Stubs Avenue – Suite 25 N Dartmouth, NS B3B 2C4 Attn: John Lindsay John.lindsay@eastportproperties.ca</p>	<p>G2S2 CAPITAL INC. 400-145 Hobsons Lake Drive Halifax, NS B3S 0H9 Attn: Mark Power powerm@geosam.ca</p>
<p>JCOVE HOLDINGS LIMITED 526 Purcell's Cove Road Halifax, NS B3P 2G3 Attn: William Adams bill.adams@eastlink.ca</p>	<p>KILLICK VENTURE FUND LP 95 Water Street, 2nd Floor P.O. Box 5383 Stn. C St. John's, NL A1C 5W2 Attn: Joe MacKenna mailto:jmckenna@killickcapital.com</p>

<p>MCINNES COOPER 1300-1969 Upper Water Street P.O. Box 730 Halifax, NS B3J 3R7 Attn: Robert Cowan robert.cowan@mcinnescooper.com</p>	<p>Chris Huskisson 230 Church Street Halifax, NS B2T 1A2 5h@eastlink.ca</p>
<p>RANDOM HOLDINGS LTD. 6130 Jubilee Road Halifax, NS B3H 2E8 david@wilsons.ca</p>	<p>ROYAL BANK OF CANADA 1801 Hollis Street Halifax, NS B3J 0C3 Attn: Aly Khalaf Aly.khalaf@rbc.com</p>
<p>MOTRYX INC. 1505 Barrington Street – Suite 100 Halifax, NS B3J 3K5 n.sabeshan@motryx.com</p>	<p>BDO CANADA LIMITED 255 Lacewood Drive Halifax, NS B3M 4G2 Attn: Neil Jones nejones@bdo.com</p>
<p>MCINNES COOPER 1300-1969 Upper Water Street P.O. Box 730 Halifax, NS B3J 3R7 Attn: Stephen Kingston Stephen.kingston@mcinnescooper.com</p>	<p>CANADA REVENUE AGENCY Insolvency Division 145 Hobsons Lake Drive Halifax, NS B3S 0H9 Attn: Mike MacLean mike.maclean@cra-arc.gc.ca</p>