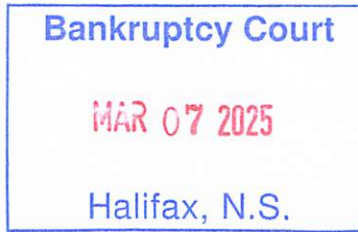


Form 23.03

District of: Nova Scotia
Division of:
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**

NOTICE OF MOTION

To: The Service List attached as Schedule "A"

Motion

BDO Canada Limited (the "**Proposal Trustee**"), in its capacity as the Proposal Trustee for Motryx Inc. herein, seeks:

1. An Order abridging time (if required) pursuant to Rule 6 of the *Bankruptcy and Insolvency General Rules*, R.S.C. 1978, c. 368, as am; and
2. An Order pursuant to s. 65.13 of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as am. (the "**BIA**") approving the sale by Motryx Inc. of all of its property, assets and undertakings of every kind and description and wheresoever situate, other than excluded assets (collectively, the "**Purchased Assets**"), on the terms and conditions set out in the Stalking Horse Asset Purchase Agreement (the "**Stalking Horse Agreement**") appended to the Sale and Investment Solicitation Process Order issued herein on December 20, 2024, and also providing that:
 - (i) the Purchased Assets shall vest in the Purchaser free and clear of all liens, claims, or encumbrances; and
 - (ii) that the monies payable to Motryx pursuant to the sale of the Purchased Assets shall stand in the place and stead of the Purchased Assets for the purpose of determining the nature and priority of any claims thereto.

Time and place

The motion is to be heard by the Registrar on **Thursday, March 13, 2025 at 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, R.S.C. 1985, c. 8-3, s. 50.4(9);

Bankruptcy and Insolvency General Rules, Can. Reg. 368; and

Nova Scotia Civil Procedure Rules.

Evidence

The evidence in support of the motion is as follows:

Affidavit of Stephen Kingston sworn on March 6, 2025 and filed with this motion


Sixth Report of BDO Canada Limited, in its capacity as Proposal Trustee.

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 March 6, 2025



Stephen Kingston

Counsel to BDO Canada Limited,
in its capacity as Proposal Trustee of Motryx Inc.

Schedule A — Service List

<p>AEROCOM GMBH & Co Adam-Riese-Strase 26 D-73529 Sehabisch Gmund, Germany Attn: Roland Pfizer Rolan.pfizer@aerocern.de</p>	<p>ATLANTIC CANADA OPPORTUNITIES AGENCY P.O. Box 2284 Station Central Halifax, NS B3J 3C8 Attn: Julia Pelton Julia.Pelton@ACOA-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.ve</p>
<p>BURCOT PARK HOLDINGS INCORPORATED 1131 Studley Avenue Halifax, NS B3H 312.7 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.ve</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 Stubbs 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 Strn. 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</p>	<p>Chris Huskilson 230 Church Street Halifax, NS B2T 1A2 5h@eastlink.ca</p>

Attn: Robert Cowan robert.cowan@mcinnescooper.com	
RANDOM HOLDINGS LTD. 6130 Jubilee Road Halifax, NS B3H 2E8 david@wilsons.ca	ROYAL BANK OF CANADA 1801 Hollis Street Halifax, NS B3J 0C3 Attn: Aly Khalaf Aly.khalaf@rbc.com
MOTRYX INC. 1505 Barrington Street - Suite 100 Halifax, NS B3J 3K5 n.sabeshan@motryx.com	BDO CANADA LIMITED 255 Lacewood Drive Halifax, NS B3M 402 Attn: Neil Jones nejones@bdo.com
MCINNES COOPER 1300-1969 Upper Water Street P.O. Box 730 Halifax, NS B3J 3R7 Attn: Stephen Kingston Stephen.kingston@mcinnescooper.com	CANADA REVENUE AGENCY Insolvency Division 145 Hobsons Lake Drive Halifax, NS B3S 0H9 Attn: Mike MacLean Mike.maclean@cra-arc.gc.ca