



**SUPREME COURT OF NOVA SCOTIA
IN BANKRUPTCY AND INSOLVENCY**

District of: Nova Scotia
Division No.: 01-Halifax
Estate No.: 51-2807835
Court No.: 45130

IN THE MATTER OF: A Notice of Intention to Make a Proposal
filed by CL DEVELOPMENT LTD. pursuant to
Section 50.4 of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3

District of: Nova Scotia
Division No.: 01-Halifax
Estate No.: 51-2808321
Court No.: 45130

IN THE MATTER OF: A Notice of Intention to Make a Proposal
filed by COCHRAN LANDING LIMITED PARTNERSHIP pursuant to
Section 50.4 of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3

District of: Nova Scotia
Division No.: 01-Halifax
Estate No.: 51-2808320
Court No.: 45130

IN THE MATTER OF: A Notice of Intention to Make a Proposal
filed by COCHRAN LANDING GP INC. pursuant to
Section 50.4 of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3

NOTICE OF APPLICATION IN CHAMBERS

TO: The parties listed in Schedule "A", via electronic mail;

AND TO: BDO Canada Limited, Proposal Trustee
Attention: Neil Jones (nejones@bdo.ca);

AND TO: The Office of the Superintendent of Bankruptcy Canada
Attention: Brendan Smith (brendan.smith@canada.ca).



The applicants request an order against you

The applicants are applying to a judge in General Chambers in Halifax on Friday, March 25, 2022 at 9:30 am for an Order:

- (a) abridging notice periods and service requirements pursuant to s. 6 of the *Bankruptcy and Insolvency General Rules*; and
- (b) extending the time for the Applicants to make a Proposal in these proceedings by 45 days, commencing from and including the 25th day of March 2022, to and including the 9th day of May 2022 pursuant to s. 50.4(9) of the *Bankruptcy and Insolvency Act*.

The applicants started this application by filing this notice on the date certified by the prothonotary.

Grounds for order

The applicants are applying for the order on the following grounds:

See **Schedule “B”** attached.

Evidence supporting application

The applicants offer the following affidavits in support of the application: Affidavit of Ralph Viereck, sworn on March 18, 2022 and filed with this notice.

A copy of each affidavit is to be delivered to you with this notice, and further affidavits may be delivered before the deadlines provided in Civil Procedure Rule 5 – Application.

You may participate

You may file with the court a notice of contest, and any affidavits upon which you rely, no more than 5 days after this notice is delivered to you or you are otherwise notified of the application. Filing the notice of contest entitles you to notice of further steps in the application, including notice of further affidavits.

Time, date, and place

The application is to be heard by a judge in Chambers on March 25, 2022 at 9:30 a.m. in the Law Courts, 1815 Upper Water Street, Halifax, Nova Scotia. The moving parties have set the application for a half hour or less. The moving parties say that the application will not require more time.

You have the right to be present and to be represented by counsel or to act on your own. If you are not present, the judge may proceed without you.

Possible order against you

The judge may grant a final order on the application without further notice to you if you fail to deliver your notice of contest on time, or if you or your counsel fail to appear in chambers at the above time, date, and place.

Filing and delivering documents

Any documents you file with the court must be filed at the office of the prothonotary, 1815 Upper Water Street, Halifax, Nova Scotia Nova Scotia (telephone #424-4900).

When you file a document you must immediately deliver a copy of it to the applicant and each other party entitled to notice, unless the document is part of an *ex parte* motion, the parties agree delivery is not required, or a judge orders it is not required.

Contact information

The applicants designate the following address:


C/O Stephen Kingston
McInnes Cooper
300-1969 Upper Water Street
Purdy's Wharf Tower II,
Halifax, Nova Scotia B3J 2V1

Documents delivered to this address are considered received by the applicants.

Further contact information is available from the prothonotary.

Signature

Signed March 21, 2022



Stephen Kingston
Counsel to the Applicants

Prothonotary's certificate

I certify that this notice of application was filed with the court on March 21, 2022.



Prothonotary

MARIE-FRANCE GANNON
Deputy Prothonotary

Schedule "A"

Service List	
Andreas & Gertrud Renate Schaffrath 13/1 Goethestrasse Korntal – Munchingen 70825 schaffrath_a@yahoo.de	Carsten Ape 14 Oberer Reisberg Bad Homburg vor der Hoehe 61350 carsten.ape@cbre.com
Dirk Ruwisch 7 Voigtländer-Weg Sehnde 31319 Germany ruwisch@aol.com	Dr. Christoph Fleig 12 Forchenweg Deilingen 78586 Germany christoph.fleig@web.de
Dr. Christoph Kruse 55 Duererstrasse Krefeld 47799 drkruse.christoph@gmail.com	Dr. Gert Thomas Wohlfahrt 32 Hindenburgstrasse Bietigheim-Bissingen 74321 Germany gert.wohlfahrt@freenet.de
Hauke & Ute Jebesen 38 Drechslerweg Muenster 48161 Germany hauke.jebesen@cthywissenoel.de	Iris and Andre Bovenkamp 44 Wittelbacherstrasse Wuppertal 42287 Germany a.bovenkamp@huehoco.de
Kai – Uwe Witterstein 37 Cambridge Park Twickenham TW1 2JU United Kingdom kuw.positiv@mac.com	Klaus Eberhard Bange 28 In der Esmecke Sundern 59846 Germany klaus.bange@gmx.net
Knut Albin Karl Brinkmann 11 Am Schaulmeistersoll Muhl Rosin 18276 Germany kb@autobrinnmann.de	Manfred Gass 19 Staigstrasse Tuningen 78609 Germany magatu9@aol.com
Michael Link 4 Waldstrasse Bad Duerrheim 78073 Germany michael.link@trumpf.com	Peter Cieplik 49 Am Pfingstanger Goettingen 37075 Germany drctieplik@aol.com
Peter Lang 42 Zugspitzstrasse Neuried 82061 Germany Plang65@gmail.com	Peter Peters 36B Munkmarschner Chausse Keitum/Sylt 25980 Germany peters@peters-sylt.de

<p>Prof. Dr. Peter Herbert Maier 51 Reinhold – Schneider – Strasse Freiburg 79117 Germany peter.maier@ph-karlsruhe.de</p>	<p>Reichenbach Investment GmbH 1 Reichenbachstrasse Ismaning 85737 Germany gottfried.zmeck@mainstream-media.ag</p>
<p>Silvia and Christoph Maigler 18 St. Moritzstr Ehingen 89584 Germany silvia.maigler@gmx.de</p>	<p>Thomas Fenstermacher 25 Mohnwegg Cologne 50858 Germany tf@fenstermacher.de</p>
<p>Ute & Egon Welte 36 Baumgartenstrasse Neu-Ulm 89231 Germany weltefamily@gmx.de</p>	<p>Valentin Blazej 3 Miesstalerstrasse Bleiburg 9150 Austria office@blazej.at</p>

Schedule "B"

1. The Applicants CL Development Ltd., Cochran Landing Limited Partnership, and Cochran Landing GP Inc. (collectively, the "Companies") are bodies corporate and are registered to carry on business in the Province of Nova Scotia.
2. On February 25, 2022 the Companies each filed Notices of Intention to Make a Proposal (the "Notices") pursuant to s. 50.4(1) of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as am. (the "BIA").
3. Pursuant to BIA s. 69, a debtor filing an NOI is automatically given the benefit of an initial 30 day stay of proceedings, which may be extended in increments of 45 days on sufficient cause (to BIA s. 50.4(9)).
4. Since the filing the Notices, the Companies have worked diligently toward the goal of presenting viable Proposals to their creditors. This task, however, cannot be achieved during the initial Stay period, which is currently scheduled to expire at the close of business on March 25, 2022.
5. The Companies accordingly seek an Order extending the Stay for a further 45 days pursuant to BIA s. 50.4(9). The Companies believe that if such extension is granted, they will be able to file Proposals during this period.
6. The Companies also seek to abridge the time requirements for bringing this Application, pursuant to s. 6 of the Bankruptcy and Insolvency General Rules.
7. The Companies shall rely upon the following legislation, rules or points of law in respect of the Application:
 - (i) *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, s. 50.4(9)
 - (ii) Bankruptcy and Insolvency General Rules (Can Reg. 368), ss. 6, 11 and 13
 - (iii) Civil Procedure Rules 22.01 and 23.