

SUPREME COURT OF NOVA SCOTIA

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C., c. C-36,  
AS AMENDED

AND IN THE MATTER OF A PLAN OR ARRANGEMENT OF SALTWIRE NETWORK INC.,  
THE HALIFAX HERALD LIMITED, HEADLINE PROMOTIONAL PRODUCTS LIMITED,  
TITAN SECURITY & INVESTIGATION INC., BRACE CAPITAL LIMITED AND BRACE  
HOLDINGS LIMITED

BETWEEN:

Fiera Private Debt Fund III LP and Fiera Private Debt Fund V LP,  
each by their general partner, Fiera Private Debt GP Inc.

Applicants

-and-

Saltwire Network Inc., The Halifax Herald Limited, Headline Promotional Products Limited,  
Titan Security & Investigation Inc., Brace Capital Limited and Brace Holdings Limited

Respondents

**NOTICE OF MOTION**  
**(returnable June 28, 2024)**

**To:** Saltwire Network Inc., The Halifax Herald Limited, Headline Promotional Products  
Limited, Titan Security & Investigation Inc., Brace Capital Limited and Brace  
Holdings Limited

c/o **STEWART MCKELVEY**  
600-1741 Lower Water St.  
Halifax, NS B3J 0J2

**Maurice Chiasson**  
Tel: 902.420.3300  
Email: mchiasson@stewartmckelvey.com

**Sara Scott**  
Tel: 902.420.3363  
Email: sscott@stewartmckelvey.com

and the Service List attached hereto as **Schedule "A"**.

## **Motion**

Capitalized terms used herein and not otherwise defined have the meaning given to them in the Amended and Restated Initial Order made in this proceeding on March 22, 2024 (the “**Initial Order**”).

KSV Restructuring Inc., in its capacity as Court-appointed Monitor (the “**Monitor**”), moves for orders:

1. If necessary, abridging and validating the time for service and filing of this notice of motion and the Monitor’s motion record;
2. Approving an extension of the Stay Period to August 9, 2024;
3. approving the KERP and granting the KERP Charge, as those terms are defined in the Third Report of the Monitor (the “**Third Report**”), to be filed;
4. Approving an increase to the maximum principal amount Saltwire Network Inc. and The Halifax Herald Limited may borrow under the Second Amended and Restated Interim Financing Term, as recommended in the Third Report; and
5. Such further and other relief as this Honourable Court may deem just.

## **Time and Place**

The motion is to be heard by Justice Keith at 9:30 a.m. (AST) on Friday, June 28, 2024, in the Supreme Court of Nova Scotia, 1815 Upper Water Street, Halifax, Nova Scotia. The moving party has arranged for a half day in chambers. The moving party acknowledges that the motion will not require more time.

## **References**

The moving party relies on the following legislation, Rules, or points of law:

1. *Companies' Creditors Arrangements Act*, ss. ss. 11, 11.02 and 11.2; and
2. The Nova Scotia *Civil Procedures Rules*, and in particular Rules 2.03 and 23.

## **Evidence**

The evidence filed in support of the motion is as follows:

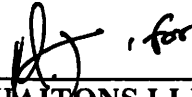
1. The Third Report, to be filed;
2. Such further and other evidence as the moving party may advise and this Honourable Court may permit.

## **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 June 14, 2024



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**CHALPONS LLP**  
5000 Yonge Street, 10<sup>th</sup> Floor  
Toronto, ON M2N 7E9

**George Benchetrit**  
Tel: (416) 218-1141  
Email: [george@chaitons.com](mailto:george@chaitons.com)



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**BURCHELL WICKWIRE BRYSON LLP**  
1800 - 1801 Hollis Street  
Halifax, NS B3J 3N4

**Marc Dunning**  
Tel: (902) 482-7017  
Email: [mdunning@bwblp.ca](mailto:mdunning@bwblp.ca)

**Lawyers for KSV Restructuring Inc., in its  
capacity as Court-Appointed Monitor**

**SCHEDULE "A" - SERVICE LIST**

<p><b>NORTON ROSE FULBRIGHT CANADA LLP</b>                  222 Bay Street, Suite 3000, P.O. Box 53                  Toronto, ON M5K 1E7</p> <p><b>Jennifer Stam</b>                  Tel: 416.202.6707  <a href="mailto:jennifer.stam@nortonrosefulbright.com">jennifer.stam@nortonrosefulbright.com</a></p> <p><b>Katie Parent</b>  <a href="mailto:katie.parent@nortonrosefulbright.com">katie.parent@nortonrosefulbright.com</a></p> <p>-and-</p> <p><b>BOYNECLARKE LLP</b>                  99 Wyse Road, Suite 600                  Dartmouth, Nova Scotia B3A 4S5</p> <p><b>Joshua J. Santimaw</b>                  Tel: 902.460.3451  <a href="mailto:jsantimaw@boyneclarke.com">jsantimaw@boyneclarke.com</a></p> <p><b>Lawyers for the Applicants, Fiera Private Debt Fund III LP and Fiera Private Debt Fund V LP</b></p>	<p><b>KSV RESTRUCTURING INC.</b>                  220 Bay Street, Suite 1300                  Toronto Ontario M5J 2W3</p> <p><b>Bobby Kofman</b>                  Tel: 416.932.6228                  Email: <a href="mailto:bkofman@ksvadvisory.com">bkofman@ksvadvisory.com</a></p> <p><b>Mitch Vininsky</b>                  Tel: 416.932.6013                  Email: <a href="mailto:mvininsky@ksvadvisory.com">mvininsky@ksvadvisory.com</a></p> <p><b>Monitor</b></p>
<p><b>CHAITONS LLP</b>                  5000 Yonge Street                  10<sup>th</sup> Floor                  Toronto, ON M2N 7E9</p> <p><b>George Benchetrit</b>                  416.218.1141  <a href="mailto:george@chaitons.com">george@chaitons.com</a></p> <p><b>Lawyers for the Monitor</b></p>	<p><b>BURCHELL WICKWIRE BRYSON LLP</b>                  1801 Hollis Street, Suite 1800                  Halifax, NS B3J 3N4</p> <p><b>Marc Dunning</b>                  Tel: 902.482.7017                  Email: <a href="mailto:mdunning@bwblp.ca">mdunning@bwblp.ca</a></p> <p><b>Lawyers for the Monitor (Local Counsel)</b></p>

<p><b>STEWART MCKELVEY</b> 600-1741 Lower Water St. Halifax, NS</p> <p><b>Maurice Chiasson</b> Tel: 902.420.3300 Email: <a href="mailto:mchiasson@stewartmckelvey.com">mchiasson@stewartmckelvey.com</a></p> <p><b>Sara Scott</b> Tel: 902.420.3363 Email: <a href="mailto:sscott@stewartmckelvey.com">sscott@stewartmckelvey.com</a></p> <p><b>Lawyers for the Debtors</b></p>	<p><b>RESOLVE ADVISORY SERVICES LTD</b></p> <p><b>David Boyd</b> <a href="mailto:davidboyd.resolve@gmail.com">davidboyd.resolve@gmail.com</a></p> <p><b>Chief Restructuring Officer</b></p>
<p><b>CANADA REVENUE AGENCY</b> Insolvency Division P.O. Box 638, Stn Central 145 Hobsons Lake Drive Halifax, NS B3J 2T5</p> <p><a href="mailto:Devon.Steele@cra-arc.gc.ca">Devon.Steele@cra-arc.gc.ca</a></p> <p><b>SHAWINIGAN-SUD NATIONAL VERIFICATION AND COLLECTION CENTRE</b> Canada Revenue Agency 4695 Shawinigan-Sud Blvd. Shawinigan QC G9P 5H9</p>	<p><b>ATTORNEY GENERAL OF CANADA, DEPARTMENT OF JUSTICE</b> Tax Law Services Atlantic Regional Office Suite 1400, Duke Tower 5251 Duke Street Halifax, NS N3J 1P3</p> <p><a href="mailto:AGC_PGC_ARO-BRA@JUSTICE.GC.CA">AGC_PGC_ARO-BRA@JUSTICE.GC.CA</a></p> <p><b>Deanna M. Frappier, K.C.</b> <a href="mailto:Deanna.frappier@justice.gc.ca">Deanna.frappier@justice.gc.ca</a></p>
<p><b>CAVALLUZZO LLP</b> <b>BARRISTERS AND SOLICITORS</b> 474 Bathurst Street, Suite 300 Toronto, ON M5T 2S6</p> <p><b>Balraj Dosanjh</b> Email: <a href="mailto:bdosanjh@cavalluzzo.com">bdosanjh@cavalluzzo.com</a></p> <p><b>Sean FitzPatrick</b> Email: <a href="mailto:sfitzpatrick@cavalluzzo.com">sfitzpatrick@cavalluzzo.com</a></p> <p><b>Sama Sayegh</b> Email: <a href="mailto:ssayegh@cavalluzzo.com">ssayegh@cavalluzzo.com</a></p> <p><b>Lawyers for the CWA Cape Breton Post, Halifax Typographical Union – Editorial and Halifax Typographical Union – Press</b></p>	<p><b>UNITED FOOD AND COMMERCIAL WORKERS OF CANADA, LOCAL 1252 (UFCW CANADA, LOCAL 1252)</b> 120 Lemarchant Rd St. John's, NFLD A1C 2H2 Tel: 709.753.8830</p> <p><b>Sandra Corbett</b> Email: <a href="mailto:scorbett@ufcw.nf.net">scorbett@ufcw.nf.net</a></p>

<p><b>UNIFOR UNION OF CANADA, LOCAL 441G</b>  115 Gordon Baker Road  Toronto, ON M2H 0A8</p> <p><b>Anthony F. Dale</b>  Tel: 1.800.268.5763 ext. 8475  Email: <a href="mailto:Anthony.Dale@unifor.org">Anthony.Dale@unifor.org</a></p>	<p><b>NOVA SCOTIA DEPARTMENT OF JUSTICE</b>  Legal Services Division  1690 Hollis St., 8<sup>th</sup> Floor  Halifax, NS B3J 1T0</p> <p><b>Andrew Hill, Solicitor – Litigation Services</b>  Tel: 902.220.6623  Email: <a href="mailto:Andrew.Hill@novascotia.ca">Andrew.Hill@novascotia.ca</a></p> <p><b>Lawyers for the Superintendent of Pensions</b></p>
<p><b>MANULIFE</b>  2727 Joseph Howe Drive, PO Box 1030  Halifax, NS B3J 2X5</p> <p><b>Karrie LeDrew</b>  Client Relationship Manager, Group Retirement Solutions</p> <p>Tel: 902.718.9674  Email: <a href="mailto:karrie_ledrew@manulife.ca">karrie_ledrew@manulife.ca</a></p> <p><b>Adminstrator of the defined benefit and defined contribution plan of Saltwire Networks Inc. and The Halifax Herald Limited</b></p>	<p><b>COX &amp; PALMER LLP</b>  Nova Centre – South Tower  1500-1625 Grafton Street  Halifax, NS B3J 0E8</p> <p><b>Kevin Latimer, KC</b>  Tel: 902.491.4212  Email: <a href="mailto:klatimer@coxandpalmer.com">klatimer@coxandpalmer.com</a></p> <p><b>John T.G. Boyle</b>  Tel: 902.491.4137  Email: <a href="mailto:jboyle@coxandpalmer.com">jboyle@coxandpalmer.com</a></p> <p><b>Lawyers for Transcontinental Nova Scotia Media Group Inc.</b></p>
<p><b>OSLER, HOSKIN &amp; HARCOURT LLP</b>  100 King Street West  1 First Canadian Place, Suite 6200  PO Box 50  Toronto, ON M5X 1B8</p> <p><b>Andrea Boctor</b>  Tel: 416.862.4945  Email: <a href="mailto:aboctor@osler.com">aboctor@osler.com</a></p> <p><b>Martino Calvaruso</b>  Tel: 416.862.6665  Email: <a href="mailto:mcalvaruso@osler.com">mcalvaruso@osler.com</a></p> <p><b>Lawyers for Eckler AdminCorp Ltd.</b></p>	<p><b>MCMILLAN LLP</b>  Brookfield Place, 181 Bay Street,  Suite 4400  Toronto, Ontario M5J 2T3</p> <p><b>Brett Harrison</b>  Tel: 416.301.5995  Email: <a href="mailto:Brett.harrison@mcmillan.ca">Brett.harrison@mcmillan.ca</a></p> <p><b>Lawyers for the landlord of the Herald's head office at 2717 Joseph Howe Drive, Manulife Investment Management</b></p>

**MAXIMUS CANADA SERVICES INC.**

**Thang Trinh**

Email: [Thang.trinh@maximuscanada.ca](mailto:Thang.trinh@maximuscanada.ca)

**Charles Sweeney**

Email: [charlesksweeney@maximus.com](mailto:charlesksweeney@maximus.com)



Email Service List

[jennifer.stam@nortonrosefulbright.com](mailto:jennifer.stam@nortonrosefulbright.com); [katie.parent@nortonrosefulbright.com](mailto:katie.parent@nortonrosefulbright.com);  
[isantimaw@boyneclarke.com](mailto:isantimaw@boyneclarke.com); [bkofman@ksvadvisory.com](mailto:bkofman@ksvadvisory.com) ; [mvininsky@ksvadvisory.com](mailto:mvininsky@ksvadvisory.com);  
[george@chaitons.com](mailto:george@chaitons.com); [davidboyd.resolve@gmail.com](mailto:davidboyd.resolve@gmail.com); [mchiasson@stewartmckelvey.com](mailto:mchiasson@stewartmckelvey.com);  
[sscott@stewartmckelvey.com](mailto:sscott@stewartmckelvey.com) ; [Devon.Steele@cra-arc.gc.ca](mailto:Devon.Steele@cra-arc.gc.ca) ; [AGC\\_PGC\\_ARO-BRA@JUSTICE.GC.CA](mailto:AGC_PGC_ARO-BRA@JUSTICE.GC.CA); [Deanna.frappier@justice.gc.ca](mailto:Deanna.frappier@justice.gc.ca); [mdunning@bwbllp.ca](mailto:mdunning@bwbllp.ca);  
[bdosanih@cavalluzzo.com](mailto:bdosanih@cavalluzzo.com); [sfitzpatrick@cavalluzzo.com](mailto:sfitzpatrick@cavalluzzo.com); [ssavegh@cavalluzzo.com](mailto:ssavegh@cavalluzzo.com);  
[scorbett@ufcw.nf.net](mailto:scorbett@ufcw.nf.net); [Anthony.Dale@unifor.org](mailto:Anthony.Dale@unifor.org); [Andrew.Hill@novascotia.ca](mailto:Andrew.Hill@novascotia.ca);  
[klatimer@coxandpalmer.com](mailto:klatimer@coxandpalmer.com); [jboyle@coxandpalmer.com](mailto:jboyle@coxandpalmer.com); [karrie\\_ledrew@manulife.ca](mailto:karrie_ledrew@manulife.ca);  
[abocor@osler.com](mailto:abocor@osler.com); [mcalvaruso@osler.com](mailto:mcalvaruso@osler.com); [brett.harrison@mcmillan.ca](mailto:brett.harrison@mcmillan.ca);  
[Thang.trinh@maximuscanada.ca](mailto:Thang.trinh@maximuscanada.ca); [charlesksweeney@maximus.com](mailto:charlesksweeney@maximus.com)