2025 01G 4683
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 by Ocean View Farms Limited (the "**Applicant**") for relief under s. 11 of the CCAA.

NOTICE OF MOTION

TAKE NOTICE THAT that O'Keefe & Sullivan, counsel of record for Ocean View Farms Limited ("**OVFL**"), will apply to a Judge of the Supreme Court of Newfoundland & Labrador, General Division (In Bankruptcy), at St. John's, Newfoundland and Labrador, on a date to be set by the Court, for an Order:

1. Pursuant to Rule 23.06(1) of the *Rules of the Supreme Court,* 1986, declaring that O'Keefe & Sullivan has ceased to act for OVFL and removing them as solicitors of record;

2. Pursuant to ss. 11, 11.02, and 11.03 of the CCAA, directing OVFL to retain new counsel within ten (10) days of the date of the Order;

3. Directing that O'Keefe & Sullivan remain solicitors of record for a transition period of ten (10) days for the sole purpose of transferring the file to new counsel;

4. Direction the Company to pay all outstanding invoices from O'Keefe & Sullivan, as reviewed and approved by the Monitor, within ten (10) days of granting the Order; and

5. such further and other relief as this Court may deem just.

The grounds for the motion include:

6. A breakdown in the solicitor–client relationship such that O'Keefe & Sullivan cannot continue to act;

7. Professional obligations under the Rules of Court and *Law Society Code of Conduct*;

8. The Court's broad jurisdiction under the CCAA to ensure an orderly restructuring process; and

9. The interests of justice and need for continuity in an active CCAA proceeding.

A. NATURE OF APPLICATION:

10. This is an Application for an Order:

    a. pursuant to Rule 23.06(1) of the *Rules of the Supreme Court*, 1986 declaring that O'Keefe & Sullivan has ceased to act for OVFL and removing them as solicitors of record;

    b. pursuant to ss. 11, 11.02, and 11.03 of the CCAA directing OVFL to retain new counsel within ten (10) days; and

    c. directing that O'Keefe & Sullivan remain solicitors of record for ten (10) days solely to enable the orderly transfer of the file.

B. PROCEDURAL HISTORY:

11. On 11 September 2025, OVFL obtained an Initial Order under s. 11 of the CCAA.

12. O'Keefe & Sullivan have acted as counsel for OVFL throughout the CCAA proceedings.

13. On 19 November 2025 OVFL advised they no longer wish to use the law firm of O'Keefe & Sullivan for their legal services.

14. The matter remains active and ongoing.

C. FACTS:

15. A breakdown in the solicitor–client relationship has occurred.

16. As a result, O'Keefe & Sullivan cannot continue to act consistent with professional obligations.

17. Rule 23.06(1) provides for removal of solicitors where counsel has ceased to act.

18. The CCAA provides supervisory authority enabling the Court to ensure orderly continuation of the restructuring.

19. A transition period is necessary to avoid prejudice to OVFL.

D. RELIEF SOUGHT:

20. The Applicant seeks an Order:

a. removing O'Keefe & Sullivan as solicitors of record for OVFL;
b. directing OVFL to retain new counsel within ten (10) days;
c. directing that O'Keefe & Sullivan remain solicitors of record for ten (10) days solely for transition; and
d. a direction that the Company pay all outstanding invoices from O'Keefe & Sullivan, as reviewed and approved by the Monitor, within ten (10) days of granting the Order;
e. such further relief as this Honourable Court may allow.

DATED at St. John's, Newfoundland and Labrador, this 19 day of November, 2025.

O'KEEFE & SULLIVAN

DARREN D. O'KEEFE
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To the Service List attached hereto as Schedule "A"

And to: Ocean View Farms Ltd.
Attn: Richard Walsh
Farm Road
P.O. Box 108
Bay Bulls, NL, Canada
A0A 1C0

SERVICE LIST

Ocean View Farms Limited (the "**Applicant**" or "**OVFL**")

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