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 Ltd. (the "**Applicant**") for relief under s. 11 of the CCAA

NOTICE OF MOTION

1. The Applicant in this proceeding is applying to a judge for an order pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c.C-36, as amended (the "**CCAA**"), which, *inter alia*:

   (a) abridges the time for service of the motion and the materials filed in support thereof, and dispensing with further service thereof;

   (b) extends the stay of proceedings (the "**Stay Period**") granted under the Amended and Restated Initial Order (the "**ARIO**") to April 24, 2026;

2. On February 27, 2026, by Order of this Honorable Court, the deadline for bids pursuant to the Sale and Investment Solicitation Process (the "**SISP**") passed. The Monitor did not receive any qualified bids.

3. Since that time, the Monitor has gauged interest and is in discussions with parties that have shown some interest in the assets of the Applicant or the Applicant as a going concern.

4. The Applicant has acted in good faith and with due diligence throughout this CCAA proceeding since the granting of the Initial Order and will continue to do so throughout the remainder of the process.

5. The extension of the Stay Period will allow the Applicant to continue to operate in the ordinary course.

References

The moving party relies on the following legislation:

(a) The provisions of the CCAA generally, including s. 11 thereof; and
(b) Such further and other grounds as counsel may advise and this Honourable Court may permit.

Evidence

The evidence in support of the motion is as follows:

(a) March ___, 2026 Affidavit of Travis D. Payne; and
(b) Such further and other evidence as counsel may advise and this Honourable Court may permit.

Signed this 18 day of March, 2026.

Travis D. Payne
Laura F. Murphy
Curtis Dawe
Solicitor for the Applicant
Whose address for service is:
139 Water Street
11th Floor, Fortis Building
P.O. Box 337
St. John's, NL A1C 5J9

To the Service List attached hereto as Schedule "A"

SCHEDULE "A"

SERVICE LIST

SERVICE LIST

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

PARTY	CONTACT
Ocean View Farms Limited Farm Road P.O. Box 108 Bay Bulls, NL, A0A 1C0 **Applicant**	**O'Keefe & Sullivan** 80 Elizabeth Ave., Suite 202 St. John's, NL, A1A 1W7 **Counsel for the Applicant** **Darren O'Keefe** Email: dokeefe@okeefesullivan.com **Megan Taylor** Email: mtaylor@okeefesullivan.com
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