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 June 9, 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 has been in discussions with parties that have shown some interest in the assets of the Applicant or the Applicant as a going concern. There have been multiple negotiations that have had varied levels of progress.

4. The parties are currently reviewing a term sheet from an interested party.

5. 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.

6. 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) May 27, 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 27 day of May, 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
S.R. Stack & Company (2023) Ltd. Suite 101, Regatta Plaza II 84-86 Elizabeth Ave. St. John's, NL, A1A 1W7 **Monitor**	**Sean Stack** Email: sean@srstack.ca
Resolve Advisory Services Ltd. **Chief Restructuring Officer for the Applicants**	**David Boyd** Email: davidboyd@resolveadvisory.ca **Chris Brown** Email: chrisbrown@resolveadvisory.ca
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The Bank of Nova Scotia 10 Wright Boulevard Stratford, ON, N5A 7X9 **Bank of Nova Scotia** Pejavar, Anuradha Lending Services Commercial Banking 4715 Tahoe Boulevard Mississauga, ON, L4W 0B4	**Cox & Palmer** 235 Water Street, Suite 1100 St. John's, NL, A1C 1BC **Counsel for Bank of Nova Scotia** **Mark Russell** Email: MRussell@coxandpalmer.com **Michael Hrabowsky** Email: MHrabowsky@coxandpalmer.com
Canada Revenue Agency Insolvency Intake Centre	**Maeve Baird** Email: Maeve.Baird@justice.gc.ca

Shawinigan – Sud National Verification and Collections Centre 4695 Shawinigan-Sud Boulevard Shawinigan, QC G9P 5H9	**Caitlin Ward** Email: caitlin.ward@justice.gc.ca **Deanna Frappier** Email: deanna.frappier@justice.gc.ca
Town of Bay Bulls 2 Southside Road P.O. Box 70 Bay Bulls, NL, A0A 1C0	info@townofbaybulls.com
Workplace NL PO Box 9000 St. John's, NL, A1A 3B8	**Jennifer Langdon** Email: jennifer.langdon@workplacenl.ca
Office of the Superintendent of Bankruptcy Canada Maritime Centre 1505 Barrington Street, 16th Floor Halifax, NS, B3J 3K5	Email: osbccaa-laccbsf@ised-isde.gc.ca
Truro Agromart Limited 547 Onslow Road Upper Onslow, NS, B6L 5L3	Email: office@truroagromart.ca
Atlantic Provinces Department of Justice Legal Services Division Atlantic Regional Office Suite 1400, Duke Tower 5251 Duke Street Halifax, Nova Scotia, B3J 1P3	**Atlantic Canada** Email: AGC_PGC_ARO-BRA@JUSTICE.GC.CA

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AFFIDAVIT

I, Travis D. Payne, Solicitor in the Province of Newfoundland and Labrador, MAKE OATH AND SAY:

1. I am the solicitor for the Applicant.
2. I file the within affidavit for the purpose of having the within application scheduled. To the best of my knowledge, information and belief, based on direct discussion with my client and/or the Monitor, the facts contained herein are true.
3. I make this affidavit for the purpose of supporting the relief requested therein and for no improper purpose.

SWORN TO at the City of St. John's, in the Province of Newfoundland and Labrador, this 27 day of May, 2026.

Olivia Pendergast
Notary Public, NL

TRAVIS D. PAYNE