

**E-MAILED**  
14 Apr 26

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O'KEEFE & SULLIVAN

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**BY EMAIL AND COURIER**

Supreme Court of Newfoundland and Labrador  
General Division, Court Registry  
233 Duckworth St.,  
St. John's, NL

With a copy to:

The Honourable Justice A. MacDonald  
c/o Anette Power, Judicial Assistant  
AnettePower@supreme.court.nl.ca

14 April 2026

To the Registry and Honourable Mr. Justice MacDonald:

**Re: Court File No. 2026 01G 0099  
Receivership of 15132738 Canada Inc. – Hearing of April 15, 2026**

We are solicitors for Janes & Noseworthy Limited (“JNL” or the “Receiver”), court-appointed receiver of 15132738 Canada Inc., pursuant to the Order of this Court dated March 9, 2026. We write to advise the Court, in advance of tomorrow’s hearing, of a change in the Receiver’s position regarding the relief to be sought.

Upon completing a further review of the file in preparation for tomorrow’s hearing, the Receiver has identified a number of loose ends and housekeeping matters it would like to resolve before moving for an Approval and Vesting Order (the “AVO”).

These matters include, among others: the Receiver’s receipt and review of additional materials relevant to the sale transaction; certain outstanding items in the Asset Purchase Agreement schedules and ancillary documentation; and the receipt of a security opinion concerning the BTG Capital Inc. security, which the Receiver wishes to have fully addressed on the record before the AVO is granted.

In the circumstances, the Receiver respectfully requests that the Court treat tomorrow’s hearing as a check-in to canvass the status of the file and provide directions, rather than proceeding with the AVO motion at this time. The Receiver proposes that a return date for the AVO motion be fixed on

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or before **April 30, 2026**, which will allow the Receiver sufficient time to address the outstanding matters and file any necessary supplementary materials.

Counsel for BTG Capital Inc. (Cox & Palmer) has been copied on this letter, and have consented to this matter being set over. We would ask that the Court's clerk confirm whether a brief attendance by counsel by telephone or videoconference would be acceptable for the check-in hearing tomorrow, or alternatively whether the Court's schedule permits a short in-person attendance.

We apologize for any inconvenience caused by this adjournment request and thank the Court for its consideration.

Yours very truly,



**DARREN D. O'KEEFE**  
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cc. The Service List