CANADA PROVINCE OF QUÉBEC DISTRICT OF QUÉBEC Division: 01-Montréal

SUPERIOR COURT (Commercial Division) (Bankruptcy and Insolvency Act)

Court No.:

500-11-047554-148

File No.:

41-1920403

IN THE MATTER OF THE NOTICE OF INTENTION TO FILE A PROPOSAL OF:

161617 CANADA INC., 5850 Vanden Abeele Street, Saint-Laurent (Québec) H4S 1R9

Debtor/Petitioner

le 26 janner 2015 Vu les allegations de la régulte la preure et les preces; Vu l'absence de con hestation

RICHTER ADVISORY GROUP INC., 1981 McGill College Avenue, Montréal (Québec) H3A 0G6

Trustee

MOTION FOR THE APPROVAL OF A PROPOSAL (Sections 58 and following of the *Bankruptcy and Insolvency Act*, L.R.C. 1985, c. B-3)

TO ONE OF THE HONOURABLE JUDGES OR THE REGISTRAR OF THE SUPERIOR COURT, SITTING IN COMMERCIAL DIVISION, IN AND FOR THE DISTRICT OF MONTRÉAL, THE DEBTOR/PETITIONER SUBMITS THE FOLLOWING:

- By the present motion, the Debtor/Petitioner 161617 Canada Inc. ("161617") is seeking 1. the approval of a proposal filed on December 22, 2014 (the "Proposal");
- 2. 161617 is a corporation constituted under the Canada Business Corporations Act having its principal place of business in Saint-Laurent (Québec);
- 161617 specializes in the distribution of horticultural products in Québec and Eastern 3. Ontario related to, inter alia, the irrigation and drainage of various types of properties, including sports fields (i.e. golf courses);
- 4. On October 10, 2014, due to general economic downturn and more specifically the current unfavourable economic conditions facing the golf industry, being an important industry in which 161617 operates, 161617 filed a Notice of intention to file a proposal with the Official Receiver and Richter Advisory Group Inc. (Mr. Philip Manel, CPA, CA, CIRP) (the "Trustee") was appointed trustee, the whole as appears from the Court record;
- 5. 161617 was initially required to file a proposal no later than November 10, 2014; however, on November 7, 2014, 161617 obtained an extension of its delay to file a proposal, which extension expired on December 22, 2014, the whole as appears from the Court record;

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DE GRANDPRÉ CHAIT S.E.N.C.R.L./LLP

avocats · lawyers