

Estate No: 33-1884683
33-1884684
33-1884686

**ONTARIO
SUPERIOR COURT OF JUSTICE
IN BANKRUPTCY AND INSOLVENCY**

**IN THE MATTER OF THE PROPOSAL OF K.F.S. LIMITED,
2726556 CANADA INC. AND NATHAR LIMITED**

Applicants

MOTION RECORD

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Applicant

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NOTICE OF MOTION

K.F.S. Limited, 2726556 Canada Inc., and Nathar Limited, insolvent persons, (the "Applicants"), of the City of Cornwall, will make a Motion without notice, to this Court in Bankruptcy, on December 8, 2014, at the Court House, 161 Elgin Street, Ottawa, Ontario.

PROPOSED METHOD OF HEARING: The motion is to be in writing.

THIS MOTION IS FOR:

1. An Order approving the Proposal of K.F.S. Limited, 2726556 Canada Inc., and Nathar Limited.
2. Such further and other relief as counsel may advise and this Honourable Court may permit.

THE GROUNDS FOR THE MOTION ARE:

1. The Applicants filed Notices of Intention to Make a Proposal on June 24, 2014, pursuant to the provisions of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c.B3.
2. Various extensions were obtained from this Honourable Court with regard to the filing of the Proposal and ultimately the within proposal was filed and presented to the creditors at a creditors' meeting on November 21, 2014.
3. On October 27, 2014, an Order was obtained from this Court consolidating the Proposal Files of the Applicants, being 33-1884683, 33-1884684, 33-1884686.
4. The creditors passed the Proposal by the required voting standard at the said meeting.
5. The Applicants now require the approval of this Honourable Court to the said Proposal pursuant to the provisions of the *Bankruptcy and Insolvency Act*.
6. The terms of the Proposal are reasonable and are calculated to benefit the general body of creditors.
7. No offences or facts have been proved to justify the Court withholding its approval.
8. Such further and other grounds as counsel may advise and this Honourable Court may permit.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the Motion:

1. Consolidation Order dated October 27, 2014.

2. The Report of the Trustee on the Proposal.
3. Such further and other material as counsel may advise and this Honourable Court may permit.

Date: November 28, 2014

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Applicants

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SUPERIOR COURT OF JUSTICE
Proceeding commenced at Ottawa

NOTICE OF MOTION

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