

CANADA  
PROVINCE OF QUÉBEC  
DISTRICT OF MONTRÉAL

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9100

S U P E R I O R C O U R T  
(Commercial Division)  
(Sitting as a court designated pursuant to the  
*Bankruptcy and Insolvency Act*,  
R.S.C. 1985, c. B-3)

No.: 500-11-028119-069  
Estate No.: 41-336505

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

D. & F. FURNITURE LTD.,  
Debtor-Petitioner  
- and -

RSM RICHTER INC., acting in its capacity as  
Trustee to the Notice of Intent and Interim Receiver  
of the Debtor,

Trustee

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**MOTION TO EXTEND THE DELAY TO FILE A PROPOSAL**  
(Subsection 50.4(9) of the *Bankruptcy and Insolvency Act* ("BIA"))

TO ONE OF THE HONOURABLE JUDGES OF THE SUPERIOR COURT, SITTING IN  
COMMERCIAL DIVISION, IN AND FOR THE JUDICIAL DISTRICT OF MONTRÉAL, OR  
TO ONE OF THE REGISTRARS THEREOF, PETITIONER RESPECTFULLY SUBMITS  
THE FOLLOWING:

1. D. & F. Furniture Ltd. (the "Debtor") is a high end baby and junior furniture manufacturer, in business for over thirty (30) years;
2. The Debtor has encountered operational losses and its financial situation subsequently gradually deteriorated, in the context, *inter alia*, of a globalized manufacturing market place and the variation of the Canada/U.S. currency exchange rates, the whole despite efforts made by the Debtor to counter the situation;
3. As a result, on May 17, 2006, the Debtor filed a Notice of Intention to Make a Proposal pursuant to Section 50.4 of the *Bankruptcy and Insolvency Act* and RSM Richter Inc. ("Richter") was named Trustee thereunder, the whole as appears from the Court record;
4. In view of its current financial difficulties, the Debtor has explored its business and financial alternatives, with a view to finding the best possible solution to the benefit of its stakeholders, including first and foremost its creditors;