

17 Decembre 2014

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CANADA
PROVINCE OF QUEBEC
DISTRICT OF MONTREAL

SUPERIOR COURT
(Commercial Division)

NO.: 500-11-047518-143

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

NOVEKO INTERNATIONAL INC.

Debtor/Petitioner

-and-

RICHTER ADVISORY GROUP INC.

Trustee

17 decembre 2014
Vu la requête des alligés
et les représentations
Vu les dispositions de l'art 50.4(a)

Des ces parties

MOTION TO EXTEND THE DELAY TO MAKE A PROPOSAL
(Section 50.4(9) Bankruptcy and Insolvency Act, Canada)

IN SUPPORT OF THE PRESENT MOTION, DEBTOR/PETITIONER SUBMITS AS
FOLLOWS:

1. On October 7, 2014, the Debtor, Noveko International Inc. (the "Debtor"), filed a Notice of Intention to Make a Proposal (the "NOI") under the relevant provisions of the *Bankruptcy and Insolvency Act*, Canada (the "BIA") naming Richter Advisory Group Inc. ("Richter") as trustee thereto, the whole as appears of record herein.
2. The Debtor, in conjunction with its subsidiaries (collectively, the "Noveko Group"), specializes in the air filtration industry by providing its clientele with innovative and eco-energetic filtration solutions, including the design, development, manufacture and marketing of products incorporating patented air filtration technologies, including air filters, antimicrobial masks and respirators, and other antimicrobial products, including hand sanitizers (the "Business").
3. The Noveko Group presently employs approximately 15 persons and has continued operating the Business throughout the NOI period.
4. Third Eye Capital Corporation ("TEC"), as secured party and as agent and *fondé de pouvoir*, is the Noveko Group's operating lender and principal secured creditor.
5. In order to ensure that the Noveko Group has sufficient funding to continue its operations during the restructuring process, on October 16, 2014, this Honourable Court issued Interim Financing Orders, authorizing a \$2,000,000 interim credit facility secured by a first-ranking charge in favour of TEC, as appears of record herein.
6. On November 5, 2014, the Court extended the delay under the NOI for the Debtor to make its proposal until December 19, 2014.

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DROITS DE GREFFE
Gouvernement du Québec
Palais Justice MONTREAL

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E. Luperas
Creditor Adjoint, C.S.M.