

CANADA
PROVINCE OF QUÉBEC
DISTRICT OF MONTREAL

SUPERIOR COURT
(Commercial Division)

NO.: 500-11-035190-095

In the matter of the proposal of:

Sur les allégures, les pièces
l'affidant et les représen-
tations des procureurs
des parties et du liquidateur
à la proposition de la
débiteur. Accord de la
présente requête présentée
ses conclusions. Reçu
contre la masse MTL. Ce 15 mai 2009.
[Signature]

POLYCHEM PRODUCTS CANADA INC.; a duly
constituted company, having its head office at
1501, rue des Futailles, Montréal, Québec, H1N
3P1,

DEBTOR/RESPONDENT

-and-

CANADIAN IMPERIAL BANK OF COMMERCE, a
Canadian Chartered Bank, governed by the
provisions of the *Bank Act*, having a place of
business at 1155, René-Lévesque Blvd. West,
Suite 300, Montréal Québec, H3B 4P9,

PETITIONER

MOTION FOR THE APPOINTMENT OF AN INTERIM RECEIVER
(Subsection 47.1 of the *Bankruptcy and Insolvency Act*)

**TO ONE OF THE HONORABLE JUDGES OF THE SUPERIOR COURT,
COMMERCIAL DIVISION, SITTING IN AND FOR THE DISTRICT OF MONTREAL, OR
TO THE REGISTRAR OF THIS COURT, PETITIONER RESPECTFULLY SUBMITS
THE FOLLOWING:**

THE ORDERS SOUGHT BY THE PETITIONER

1. The Petitioner, Canadian Imperial Bank of Commerce (hereinafter referred to as the "**Petitioner**" or the "**Bank**"), is a lender and secured creditor of Respondent (hereinafter referred to as "**Polychem**") holding security *inter alia* over Polychem's immovable and movable property, corporeal and incorporeal, present and future, wherever situate, hereby requests that this Honorable Court issue an Order appointing RSM Richter Inc. as interim receiver of the assets, property and undertaking of Solplast, pursuant to subsection 47.1 of the *Bankruptcy and Insolvency Act* (the "**BIA**");

COPIE CONFORME

[Signature: Elaine C-Nova]
Greffier adjoint