C A N A D A PROVINCE OF QUEBEC DISTRICT OF MONTREAL

NO.: 500-11-053292-179 **ESTATE NO.:** 41- 2297864

SUPERIOR COURT (Commercial Division)

(*Bankruptcy and Insolvency Act,* R.S.C. 1985, c. B-3)

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

175413 CANADA INC. (operating under the trade name M0851);

Debtor/Petitioner

-and-

KPMG INC.;

Trustee

Délai prery au 25 janvier 2018 147 ce 6-12-17 Une Chantal Flamand, registraire

MOTION TO EXTEND THE DELAY TO MAKE A PROPOSAL

(Section 50.4(9) of the Bankruptcy and Insolvency Act, R.S.C. 1985, c. B-3)

TO ONE OF THE HONOURABLE JUSTICES OF THE SUPERIOR COURT, SITTING IN THE COMMERCIAL DIVISION IN AND FOR THE DISTRICT OF MONTREAL, OR TO ONE OF ITS REGISTRARS, PETITIONER RESPECTFULLY SUBMITS:

INTRODUCTION

- 1. On September 27, 2017, 175413 Canada Inc. (operating under the trade name M0851) (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*") and named KPMG Inc. (the "**Trustee**") as trustee thereto, the whole as appears of record herein.
- 2. On October 6, 2017, the Debtor sought, and this Honourable Court issued, an order (the "Charge Order"):
 - (i) authorizing and ratifying a commitment letter whereby Continental Capital Investments Inc. ("Continental") agreed to provide interim financing to the Debtor pursuant to the terms and conditions set out therein (the "Interim Financing");