20 avrit 2018 16.10 8 h 45

CANADA PROVINCE OF QUEBEC DISTRICT OF MONTREAL

NO.: 500-11-054804-188 **ESTATE NO.:** 41-2388971

Me Julie Bégin, registraire

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:

GREATEX MILLS INC./LES MOULINS GREATEX INC.:

Debtor/Petitioner

-and-

RICHTER ADVISORY GROUP INC./ R GROUPE CONSEIL INC.;

AU DOCUMENT DÉTENU PAR LA COUR

Trustee

MOTION TO EXTEND THE DELAY TO MAKE A PROPOSAL OF ACT, R.S.C. 1985, c. B-3)

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

I. INTRODUCTION

- On June 13, 2018, Greatex Mills Inc. (the "Debtor") filed a Notice of Intention to 1. Make a Proposal (the "NOI") pursuant to the relevant provisions of the Bankruptcy and Insolvency Act, Canada (the "BIA"), and named Richter Advisory Group Inc. (the "Trustee" or "Richter") as trustee thereto.
- 2. On July 4, 2018, the Debtor sought and this Honourable Court issued an order (the "SSP Order") authorizing a sale and solicitation process to market and sell the Debtor's assets (the "SSP") and extending the delay under the NOI for the Debtor to make a proposal until August 20, 2018 (the "NOI Delay"), the whole as appears of record herein.
- 3. Since the issuance of the SSP Order, other than the SSP efforts more fully described below, the Debtor has continued its operations and has consistently sold its inventory in order to maximize recovery during the fall selling season which is the Debtor's peak selling season.

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DECEMBER OF CREFFE