

CANADA

S U P E R I O R C O U R T  
(Commercial Division)

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PROVINCE OF QUEBEC  
DISTRICT OF MONTREAL

N°: 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

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

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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 ("**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 hands sanitizers (the "**Business**").
3. The Noveko Group presently employs approximately 15 persons and intends to continue operating the Business during the NOI period.

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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. In addition to the appointment of Richter as trustee under the NOI, the Debtor has mandated Richter to oversee a solicitation process to seek purchasers, strategic partners and/or investors to acquire, on a going concern basis, the Debtor's assets including the shares or assets of its subsidiaries and/or to invest in the Debtor and/or its subsidiaries.
7. In this regard, the Debtor has been working with Richter to set up a virtual data room and to commence preparing the documentation for the solicitation process, including a solicitation letter, teaser and non-disclosure agreement.
8. Pursuant to the solicitation process, the Debtor anticipates that offers will be received in early December 2014 and that court approval for a proposed transaction will occur before the end of the year.
9. Accordingly, the Debtor requires a further period of time in order to complete the solicitation process and move forward with its restructuring plan.
10. No creditor of the Debtor will be materially prejudiced if the extension requested herein is granted.
11. The Debtor has acted, is acting and will continue to act in good faith and with due diligence.
12. The Trustee's report on the state of the Debtor's business and financial affairs is produced in support of the present Motion as Exhibit P-1.
13. The Debtor has served the present Motion on all the parties who have requested service thereof.
14. Given all of the foregoing, the Debtor is entitled to seek the extension of the delay to make its proposal until December 19, 2014.
15. The present Motion is well founded in fact and in law.

**WHEREFORE, THE DEBTOR/PETITIONER PRAYS FOR JUDGMENT OF THIS HONOURABLE COURT:**

- (A) **SHORTENING** the delay to serve and present the present Motion;
- (B) **GRANTING** the present Motion;
- (C) **EXTENDING** the delay for Debtor/Petitioner Noveko International Inc. to make its

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proposal until December 19, 2014.

**THE WHOLE WITHOUT COSTS.**

Montreal, November 3, 2014

Kugler Kandestin, LLP  
KUGLER KANDESTIN, L.L.P.  
Attorneys for the Debtor

Kugler Kandestin, LLP  
TRUE COPY  
COPIE CONFORME

CANADA  
PROVINCE OF QUEBEC  
DISTRICT OF MONTREAL

SUPERIOR COURT  
(Commercial Division)

NO.: 500-11-047518-143

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OF:  
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Debtor/Petitioner

-and-

RICHTER ADVISORY GROUP INC.

Trustee

ATTESTATION OF AUTHENTICITY  
(Article 82.1 C.C.P.)

The undersigned, JEREMY CUTTLER, attorney of the Firm Kugler Kandestin, L.L.P., carrying on business at 1 Place Ville Marie, Suite 2101, in the City and District of Montreal, Province of Quebec, under my oath of office, declare that:

1. On November 3, 2014, Kugler Kandestin, L.L.P. received by e-mail the Solemn Declaration of Mr. André Leroux signed on November 3, 2014 and received by Kugler Kandestin, L.L.P. at 2:17 p.m. on the same date;
2. The copy of the Solemn Declaration attached hereto is a true copy and such Solemn Declaration was received by Kugler Kandestin, L.L.P. as set forth in paragraph 1 above.

AND I HAVE SIGNED

JEREMY CUTTLER

Solemnly declared before me at Montreal  
this 3<sup>rd</sup> day of November, 2014.

Commissioner of Oaths for Quebec



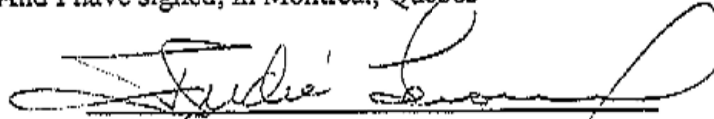
Kugler Kandestin, LLP  
TRUE COPY  
COPIE CONFORME

## A F F I D A V I T

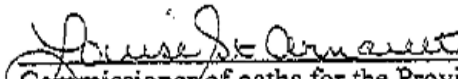
I, the undersigned André LEROUX, businessman, residing and domiciled for the purposes hereof at 149 J.A. Bombardier, unit 2, Boucherville, Quebec, affirm solemnly the following:

1. I am one of the directors of the Debtor, Noveko International Inc.;
2. I have knowledge of all the facts alleged in the annexed "Motion to Extend the Delay to Make a Proposal" and all the facts alleged therein are true.

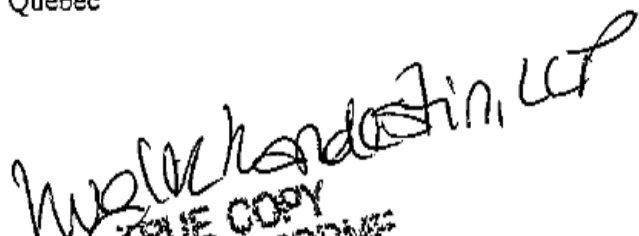
And I have signed, in Montreal, Quebec

  
André LEROUX

Solemnly affirmed before me, in Montreal, Quebec  
this 3 day of November 2014.

  
Commissioner of oaths for the Province of Québec



  
TRUE COPY  
COPIE CONFORME

**NOTICE OF PRESENTATION**

**TO: FISHMAN FLANZ MELAND PAQUIN**  
4100 -1250 René-Lévesque, West  
Montreal, Qc

Attorneys for Third Eye Capital Corporation;

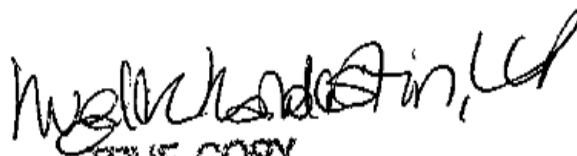
**TO: RICHTER ADVISORY GROUP INC.**  
C/o Mr. Raymond Massi  
1981 McGill College  
Montreal, QC

**TO: THE SUPERINTENDENT OF BANKRUPTCY**  
Sun Life Building  
1155 Metcalfe Street  
Suite 950  
Montreal, Qc

**SIRS**, take notice that the "Motion to Extend the Delay to Make a Proposal" will be presented for adjudication to a Judge of the Superior Court, Commercial Division, of the Province of Québec, of the District of Montreal, or to the Registrar thereof, on November 5, 2014 at 9:00 a.m. in room 16.10 of the Court House in Montreal, 1 Notre-Dame Street, East, or so soon thereafter as counsel may be heard.

Montreal, November 3, 2014

  
KUGLER KANDESTIN, L.L.P.  
Attorneys for the Debtor

  
TRUE COPY  
COPIE CONFORME

CANADA

SUPERIOR COURT  
(Commercial Division)PROVINCE OF QUEBEC  
DISTRICT OF MONTREAL

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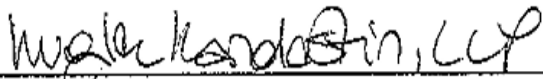
Trustee

## LIST OF EXHIBITS

EXHIBIT P-1:

Trustee's Report

Montreal, November 3, 2014

  
KUGLER KANDESTIN, L.L.P.  
Attorneys for the Debtor  
TRUE COPY  
COPIE CONFORME

**NO.: 500-11-047518-143**

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COUR SUPERIOR COURT  
(Commercial Division)  
DISTRICT OF MONTREAL

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Trustee

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

---

**COPY FOR:**

RICHTER ADVISORY GROUP INC.  
c/o Mr. Raymond Massi

----- Jeremy Cuttler  
O/File No.: 5757-1/JC

**KUGLER KANDESTIN**

AVOCATS • ATTORNEYS

S.E.N.C.R.L. • LLP

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