

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)**

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,  
R.S.C., 1985 c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT  
OF NELSON FINANCIAL GROUP LTD.

Applicant

**NOTICE OF MOTION  
(returnable December 1, 2010)**

**A. John Page & Associates Inc.**, in its capacity as the Court-appointed Monitor of the Applicant (the "**Monitor**"), will make a motion before a judge of the Ontario Superior Court of Justice (Commercial List) on December 1, 2010 at 10:00 a.m. or as soon after that time as the motion can be heard at 330 University Avenue, in the City of Toronto.

**PROPOSED METHOD OF HEARING:** The motion is to be heard orally.

**THE MOTION IS FOR:**

- (a) an Order that this motion is properly returnable at that time and dispensing with further service thereof;
- (b) an Order extending the Stay Period (as defined in the Initial Order of the Honourable Madam Justice Pepall dated March 23, 2010 (the "**Initial Order**")) from December 3, 2010 to and including February 28, 2011; and

- (c) an Order approving the Supplement to Ninth Report dated November 18, 2010 (the “**Supplement to Ninth Report**”) and the Tenth Report of the Monitor (to be filed) (the “**Tenth Report**”) and the conduct and activities of the Monitor described therein.

**THE GROUNDS FOR THE MOTION ARE:**

1. Pursuant to the Initial Order, the Applicant obtained protection from its creditors pursuant to the *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended, and all proceedings were stayed against the Applicant until April 22, 2010 or such later date as this Honourable Court may Order.
2. From time to time, this Honourable Court has extended the stay of proceedings.
3. Pursuant to the Order of the Honourable Madam Justice Pepall dated November 12, 2010, the stay of proceedings was extended to and including December 3, 2010.
4. The Monitor is requesting that this Honourable Court extend the stay of proceedings from December 3, 2010 to and including February 28, 2011 to allow the Applicant an opportunity to develop a plan of compromise or arrangement for its creditors.
5. The Applicant is operating in the normal course and has sufficient cash with which to continue operations until February 28, 2011. Details of this will be set out in the Tenth report (to be filed).

**THE FOLLOWING DOCUMENTARY EVIDENCE** will be used at the hearing of the motion:

- (a) the Supplement to Ninth Report;
- (b) the Tenth Report (to be filed); and

(c) such further and other material as counsel may advise and this Honourable Court may permit.

November 24, 2010

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TO: THIS HONOURABLE COURT

AND TO: THE ATTACHED SERVICE LIST

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ACT, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT  
OF NELSON FINANCIAL GROUP LTD.

APPLICANT  
Court File No. 10-8630-00CL

**ONTARIO**  
**SUPERIOR COURT OF JUSTICE**  
**(COMMERCIAL LIST)**

Proceedings commenced at Toronto

**NOTICE OF MOTION**  
**(returnable December 1, 2010)**

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