



ONTARIO SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

COUNSEL/ENDORSEMENT SLIP

COURT FILE NO.: BK-26-03364251-0032

DATE: September 14, 2026

NO. ON LIST: 2

TITLE OF PROCEEDING: IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF NATIONAL TRAFFIC SAFETY MANAGEMENT INC.

BEFORE: JUSTICE STEELE

PARTICIPANT INFORMATION

For Plaintiff, Applicant, Moving Party:

Name of Person Appearing	Name of Party	Contact Info
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For Defendant, Respondent, Responding Party:

Name of Person Appearing	Name of Party	Contact Info

For Other, Self-Represented:

Name of Person Appearing	Name of Party	Contact Info
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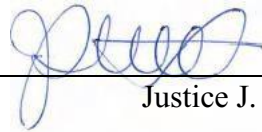
ENDORSEMENT OF JUSTICE STEELE:

- [1] National Traffic Safety Management (“National” or the “Company”) brings a motion for an order extending the time required for the Company to file its proposal. National originally sought an extension to October 26, 2026. However, today counsel for the Company indicated that they were instead seeking a three-week extension.
- [2] Capitalized terms used in this endorsement that are not defined herein have the meaning set out in the Company’s factum.
- [3] LIUNA Local 837 (“Local 837”) filed materials opposing the extension to October 26, 2026. Local 837’s materials indicated that they would be prepared to support a one-week extension in order to enable it to have further discussions with the Company to resolve its concerns.
- [4] LIUNA Locals 183 and 506 (“Locals 183 and 506”) did not file materials. However, their counsel made brief oral submissions supporting Local 837’s position.
- [5] After hearing submissions from the parties, I indicated that the three-week stay extension would be granted. The parties are scheduled to return on **October 5, 2026, at 11 am (one hour)**.
- [6] The only issue before me was whether to grant an extension of the time to file a proposal to and including October 5, 2026.
- [7] Counsel advised that the parties had arranged to have a meeting today, but that meeting was postponed because the parties want counsel to attend. Counsel for the Company is unavailable this week.
- [8] Section 50.4(9) of the BIA provides that the Court may grant an extension or further extension of up to 45 days for any individual extension or five months in total following the expiry of the initial 30-day period. In determining whether to grant an extension, the Court must consider:
- (a) Whether the debtor has acted in good faith and with due diligence;
 - (b) Whether the debtor would likely be able to make a viable proposal if the extension being applied for were granted; and
 - (c) Whether any creditor will be materially prejudiced by the extension.
- [9] Antonio Bruno, the sole officer and director of the Company since April 13, 2026, filed affidavit evidence. Mr. Bruno’s company, A2 Environmental Group (the “A2”) entered into a Letter Intent dated April 12, 2026 pursuant to which A2 agreed to purchase the shares of certain shareholders of the Company. The original share transaction fell apart. Mr. Bruno seeks to acquire the business and assets of the Company and has obtained a Commitment Letter for financing to do so. At the return the Company expects to bring a motion for an order approving a sale process for the sale of its business, which will likely include a stalking horse bid from a company owned by Mr. Bruno. Mr. Bruno seeks to enter into a going concern transaction

that will preserve the Company's operations and employment. Based on the record before me, I am satisfied that the Company is acting in good faith and with due diligence. I am also satisfied that it is likely that the Company will be in a position to move forward with the sale process if the short extension is granted.

- [10] The unions are concerned because the Company has not been paying some of their post-filing employee obligations, including certain dues owing to the unions for, among other things, employee pensions and benefits. For Local 837, the Company had entered into an MOS pursuant to which it had agreed to continue to make certain post-filing payments. However, the Company failed to make the required remittance of approximately \$97,000 on or about August 15, 2026 in respect of the month of July. The next required remittance in respect of the month of August is due tomorrow (anticipated to be about the same amount). While there will be additional accruals in the two additional weeks sought by the Company (the next payment due date after tomorrow is October 15, 2026), I am not satisfied that this arises to material prejudice in all the circumstances, particularly because the additional time will hopefully result in the approval of a stalking horse bid and sales process, to the benefit of the stakeholders including the employees.
- [11] Local 837 raised the concern that the Commitment Letter does not allocate any funds to address their debt. However, counsel for the Company advised that the "working capital" entry of \$438,316 was intended to cover, among other things, the obligations to the unions.
- [12] As noted by counsel, any viable proposal will need to address these employee obligations (BIA, s. 60(1.3(a)) as well as the unpaid tax remittances, among other things.
- [13] Order to go in the form attached with immediate effect.

Date: Sep 14, 2026



Justice J. Steele