

IN THE MATTER OF THE SECURITIES ACT,
S.N.B. 2004, c. S-5.5, as amended

AND

IN THE MATTER OF

**LOCATE TECHNOLOGIES INC., TUBTRON CONTROLS CORP.,
BRADLEY CORPORATE SERVICES LTD., 706166 ALBERTA LTD.,
LORNE DREVER, HARRY NILES, MICHAEL CODY AND
DONALD NASON**

NOTICE OF MOTION

A motion will be made to the New Brunswick Securities Commission ("the Commission") by Staff of the Commission ("staff"), **on 10 April 2008 at 10:00 a.m.** at the offices of the Commission, Suite 300, 85 Charlotte Street, Saint John, New Brunswick, for an order as set out below.

1. **The following relief is being sought by staff:**

- a. That a date be set for a hearing in this matter further to the filing of the Statement of Allegations by Staff; and
- b. That the orders issued by the Commission in this matter on 15 October 2007 be continued and remain in force until the conclusion of this matter.

2. **The grounds for this motion are:**

- a. Staff has now substantially completed its investigation and has issued a Statement of Allegations in this matter;
- b. This matter will not be ready to proceed to a hearing on or before 15 April 2008. Staff is required to provide disclosure in this matter, which is voluminous, and the respondents and/or their counsel will require time to review same; and
- c. The allegations in the Statement of Allegations are serious and consistent with the basis upon which the order of 15 October 2007 was granted. It is in the public interest that the orders remain in force.

3. **Evidence being relied on:**

Staff will rely on:

- a. The affidavit of Ed LeBlanc, Investigator, sworn the 12th day of September 2007 and previously entered in this matter;

- b. The affidavit of Ed LeBlanc, Investigator, sworn the 19th day of March 2007; and
- c. Such further and other evidence as Staff may adduce and the Commission permit, in support of this motion for a Temporary Order.

DATED at the City of Saint John this 19th day of March, 2008.

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