IN THE MATTER OF TEKNOSCAN SYSTEMS INC., and H. SAMUEL HYAMS

MOTION OF H. SAMUEL HYAMS UNDER RULE 29 OF THE CAPITAL MARKETS TRIBUNAL RULES

For Adjournment of the Merits Hearing November 1, 2023 at 10:00 am

A. ORDER SOUGHT

The Moving Party, H. Samuel (Sam) Hyams, requests with notice, that the Tribunal make the following order:

1. To adjourn the Merits Hearing of November 1, 2023 to allow time to prepare for self-representation.

B. GROUNDS

The grounds for the motion are:

- 2. Due to last minute unforeseen circumstances, that is the withdrawal of legal representative DLA Piper, and the Company not being in a position to engage another attorney to represent me.
- 3. Don't have the personal financial resources to engage new attorneys.
- 4. The other parties, Mr. Kung and Mr. Tam have or are able to acquire the funds to have representation.
- 5. The result of these parties' very poor corporate decisions, the Company has been brought to financial ruin and close to, if not to bankruptcy.
- he employees have not received compensation for at least two months and I have not received any for five months plus. Not certain when the Tnext pay cheque will be received.
- 7. For these reasons forced to self-represent.

C. EVIDENCE

- 8. Oral evidence will be provided.
- 9. It required documentary evidence will be provided.

DATED this 30th day of October, 2023

H. Samuel Hyams 160 Brickstone Circle Thornhill, Ontario L4J 7Y2