

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN**

In re:

Invotek Group Inc.,<sup>1</sup>

Debtor in a Foreign  
Proceeding.

Chapter 15

Case No.: 26-45536 (MLO)

(Joint Administration Requested)

**MOTION OF THE FOREIGN REPRESENTATIVE FOR  
ENTRY OF AN ORDER (A) SCHEDULING A HEARING  
ON CHAPTER 15 PETITIONS AND RECOGNITION, AND (B)  
SPECIFYING FORM AND MANNER OF SERVICE OF NOTICE**

KSV Restructuring Inc. (“KSV”), the court-appointed receiver and manager (the “Receiver”) and authorized foreign representative (the “Foreign Representative”) of the above-captioned debtor, together with Mara Technologies Inc., Invotek Group USA Inc., and Mara Technologies USA, Inc. (collectively, the “Debtors”), which are the subjects of a receivership proceeding (the “Canadian Proceeding”) under section 243(1) of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as amended (the “BIA”) and section 101 of the *Courts of Justice Act*,

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<sup>1</sup> An order has been requested directing the joint administration of these chapter 15 cases. The chapter 15 debtors incorporated in Canada (the “Canadian Debtors”) are: Invotek Group Inc. (Canadian Corp. No. 1215931-7), Case No. 26-45536 and Mara Technologies Inc. (Ontario Corp. No. 1954003), Case No. 26-45545. The chapter 15 debtors incorporated in the United States (the “U.S. Debtors”), with the last four digits of each U.S. Debtor’s federal tax identification number, are: Invotek Group USA Inc. (4011), Case No. 26-45556 and Mara Technologies USA Inc. (1919), Case No. 26-45562. The Debtors’ executive headquarters are at 5680 14th Avenue, Markham, Ontario L3S 3K8, Canada.

R.S.O. 1990, c. C.43, as amended (the “CJA”) pending before the Ontario Superior Court of Justice (Commercial List) (the “Canadian Court”), submits this motion seeking entry of an order substantially in the form attached as **Exhibit A**, (i) scheduling a hearing on the relief sought in the *Verified Petition of Foreign Representative for (I) Recognition of Canadian Proceeding as Foreign Main Proceeding, (II) Recognition of Foreign Representative, and (III) Related Relief Under Chapter 15 of the Bankruptcy Code* (the “Verified Petition,”<sup>2</sup> and together with the form petitions, the “Petitions”), (ii) setting the date by which all responses and objections to the Verified Petition must be received and (iii) approving the form and manner of service thereof. In support of this motion, the Foreign Representative respectfully states as follows:

### **JURISDICTION AND VENUE**

1. This Court has jurisdiction over this matter under 28 U.S.C. §§ 157 and 1334.
2. These chapter 15 cases were properly commenced for each of the Debtors under sections 1504, 1509(a) and 1515 of title 11 of the United States Code (the “Bankruptcy Code”). This is a core proceeding under 28 U.S.C. § 157(b)(2)(P).
3. Under Rule 7008 of the Federal Rules of Bankruptcy Procedure (the

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<sup>2</sup> Capitalized terms used but not defined in this Motion have the meanings given to them in the Verified Petition.

“Bankruptcy Rules”), the Foreign Representative consents to entry of a final order on this Motion to the extent later determined necessary under Article III of the United States Constitution.

4. Venue is proper in this District under 28 U.S.C. § 1410(1)–(3). The U.S. Debtors are incorporated under the laws of the State of Michigan and each has a registered office in this District; Mara US is a party to litigation in this District; and the Canadian Debtors each have property in the United States, including in this District, and submit that venue in this District is consistent with the interests of justice and convenience of the parties.

5. The statutory bases for the relief requested are sections 105(a), 1514 and 1515 of the Bankruptcy Code and Rules 2002 and 9007 of the Bankruptcy Rules.

### **BACKGROUND**

6. This motion is brought in connection with the commencement of these chapter 15 cases and the filing of the following pleadings (together, the “Chapter 15 Pleadings”): (i) the Petitions; (ii) the *Emergency Motion of Foreign Representative for Provisional Relief Under Section 1519 of the Bankruptcy Code* (the “Provisional Relief Motion”); (iii) the *Declaration of Foreign Representative Under 11 U.S.C. § 1515 and Rule 1007(a)(4) of the Federal Rules of Bankruptcy Procedure and in Support of Verified Petition of Foreign Representative for (I)*

*Recognition of Canadian Proceeding as Foreign Main Proceeding, (II) Recognition of Foreign Representative, and (III) Related Relief Under Chapter 15 of the Bankruptcy Code* (the “Foreign Representative Declaration”); and (iv) the *Declaration of Edmond Lamek in Support of Verified Petition of Foreign Representative for (I) Recognition of Canadian Proceeding as Foreign Main Proceeding, (II) Recognition of Foreign Representative, and (III) Related Relief Under Chapter 15 of the Bankruptcy Code* (the “Foreign Law Declaration”). The Chapter 15 Pleadings are accompanied by all certifications, statements, lists and documents in support of the Petitions as required under section 1515 of the Bankruptcy Code and Bankruptcy Rule 1007(a)(4).

7. In the Chapter 15 Pleadings, the Foreign Representative seeks recognition of the Canadian Proceeding as a foreign main proceeding (or, in the alternative, as a foreign nonmain proceeding) and related relief under sections 1520 and 1521 of the Bankruptcy Code. A description of the Debtors’ businesses, corporate and capital structure, and the events leading up to the commencement of the Canadian Proceeding and these chapter 15 cases is included in the Foreign Representative Declaration.

### **RELIEF REQUESTED**

8. The Foreign Representative seeks the entry of an order substantially in the form attached to this motion as **Exhibit A** (the “Proposed Order”): (i)

scheduling the date for the hearing to consider the recognition of the Canadian Proceeding as a foreign main proceeding under chapter 15 of the Bankruptcy Code (the “Recognition Hearing”), (ii) setting the deadline by which all responses and objections to the relief requested in the Verified Petition must be filed (the “Objection Deadline”) and (iii) approving the form of notice of the Recognition Hearing substantially in the form attached to the Proposed Order as **Exhibit 1** (the “Hearing Notice”) and the manner of its service as described in this motion.

### **BASIS FOR RELIEF**

**A. The Proposed Hearing Notice and Procedures Comply with the Bankruptcy Code and Bankruptcy Rules.**

9. Section 1517(a) of the Bankruptcy Code authorizes a bankruptcy court to enter an order recognizing a foreign proceeding after notice and a hearing. 11 U.S.C. § 1517(a).

10. Bankruptcy Rule 2002(q)(1) provides that a hearing on a petition for recognition of a foreign proceeding requires 21 days’ notice to (i) the debtor, (ii) all persons or bodies authorized to administer foreign proceedings of the debtor, (iii) all entities against whom provisional relief is sought, (iv) all parties to litigation pending in the United States in which the debtor is a party, and (v) such other entities as the court may direct. Fed. R. Bankr. P. 2002(q)(1).

11. Bankruptcy Rules 2002(m) and 9007 provide that when notice is

required under the Bankruptcy Rules, the court may enter an order designating the form and manner of that notice. Fed. R. Bankr. P. 2002(m) and 9007.

12. The Foreign Representative respectfully requests that the Court set a date for the Recognition Hearing approximately twenty-one (21) days after service of the Chapter 15 Pleadings in accordance with Bankruptcy Rule 2002(q).

13. The Foreign Representative engaged Stretto, Inc. to act as noticing agent for these chapter 15 cases (the “Noticing Agent”). The Noticing Agent will serve the Hearing Notice and the Petitions (collectively, the “Notice Documents”) by email, where available and practicable, and by courier or domestic mail (or foreign mail, if applicable) first-class postage pre-paid, where email service is impracticable, within three (3) business days of the entry of the Proposed Order, upon the following parties and their counsel, if known (collectively, the “Notice Parties”): (i) counsel to the Foreign Representative; (ii) counsel to the Debtors; (iii) the Office of the United States Trustee for the Eastern District of Michigan; (iv) all other parties that request notice in these chapter 15 cases as of the Court’s entry of the Proposed Order; and (v) all other parties that this Court may direct. The Foreign Representative also requests that the Court’s order regarding the relief requested in the Verified Petition, and all subsequent notices, likewise be served on the Notice Parties in the manner set forth in this paragraph 13.

14. In the Hearing Notice, the Foreign Representative will also direct the Notice Parties to the Chapter 15 Pleadings that are maintained by the Foreign Representative at [www.ksvadvisory.com/experience/case/mara](http://www.ksvadvisory.com/experience/case/mara) (on which website the documents from the Canadian Proceeding as well as the documents filed on the docket in these cases will be made available for download without cost), in addition to the electronic case filing website maintained by the federal judiciary.

15. If any party files a notice of appearance in these chapter 15 cases after the initial service of the Hearing Notice, the Foreign Representative will serve the Hearing Notice (and any subsequent notices) upon that party within three (3) business days of the filing of the notice of appearance, if such documents have not already been served on such party (or its counsel).

16. The Foreign Representative further requests that the Court require that any responses, answers or objections to the Petitions (i) be in writing, (ii) set forth in detail the factual and legal bases therefor, (iii) be filed with the Court electronically in accordance with the Administrative Procedures for Electronic Case Filing and (iv) served upon counsel for the Foreign Representative, DLA Piper LLP (US), 444 West Lake Street, Suite 900, Chicago, Illinois 60606, Attn: Oksana Koltko Rosaluk, [oksana.koltkorosaluk@us.dlapiper.com](mailto:oksana.koltkorosaluk@us.dlapiper.com), so as to be received on or before seven (7) days prior to the Recognition Hearing, consistent with the requirements of Bankruptcy Rule 1012(b).

17. The Foreign Representative respectfully submits that the Hearing Notice constitutes adequate and sufficient notice of these chapter 15 cases. The Hearing Notice will notify the Notice Parties of the commencement of these chapter 15 cases, the relief sought in the Petitions, as well as the Objection Deadline and the procedures for filing a response or objection thereto. The Foreign Representative also submits that the form and manner of service of notice requested in this Motion constitutes adequate and sufficient notice of the commencement of the chapter 15 cases and the additional relief sought in the Verified Petition. Accordingly, the Foreign Representative respectfully requests that this Court approve the proposed manner of Hearing Notice and service under Bankruptcy Rules 2002 and 9007.

18. The Foreign Representative further requests approval of the foregoing service process and form of notice for subsequent notices in these chapter 15 cases, substantially consistent with the process provided for herein.

**B. Section 1514(c) Is Not Applicable to These Cases**

19. The Foreign Representative also seeks waiver of certain notice requirements that are not applicable to these chapter 15 cases. Specifically, section 1514(c) of the Bankruptcy Code provides that “[w]hen a notification of commencement of a case is to be given to foreign creditors, such notification shall (1) indicate the time period for filing proofs of claim and specify the place for

filing such proofs of claim; [and] (2) indicate whether secured creditors need to file proofs of claim . . . .” 11 U.S.C. § 1514(c). Given that this is an ancillary case under chapter 15 and the Foreign Representative does not presently intend to conduct a claims process in these chapter 15 cases, the Foreign Representative respectfully submits that section 1514 is inapplicable here. As explained in Collier on Bankruptcy, that section is the “last in a series of sections dealing with the international aspects of cases under chapters *other than chapter 15* that began with section 1511.” 8 COLLIER ON BANKRUPTCY ¶ 1514.01 (Alan N. Resnick & Henry J. Sommer eds., 16th ed.) (emphasis added). To the extent section 1514(c) applies, the Foreign Representative respectfully requests that its requirements are waived. Therefore, the Foreign Representative respectfully requests the Court find that section 1514(c) of the Bankruptcy Code is inapplicable or otherwise waived.

### **NOTICE**

20. This Motion will be provided to the following parties: (i) counsel to the Debtors; (ii) the Office of the United States Trustee for the Eastern District of Michigan; (iii) all other parties that request notice in these chapter 15 cases as of the Court’s entry of the Proposed Order; and (iv) all other parties that this Court may direct. Given the nature of the relief requested in this Motion, no further notice of this Motion is necessary or required.

**NO PRIOR REQUEST**

21. No prior request for the relief requested in this Motion has been made.

**WHEREFORE**, the Foreign Representative respectfully requests that this Court (i) grant this Motion and the relief requested herein; (ii) enter the Proposed Order, scheduling the Recognition Hearing and approving the form and manner of service of the Hearing Notice; and (iii) grant such other and further relief as is appropriate under the circumstances.

Dated: May 15, 2026

Respectfully submitted,

By: /s/Danielle Rushing Behrends

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**Exhibit A**  
(Proposed Order)

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN**

In re:

Invotek Group Inc.,

Debtors in a Foreign  
Proceeding.

Chapter 15

Case No.: 26-45536

(Joint Administration Requested)

**ORDER (A) SCHEDULING A HEARING  
ON CHAPTER 15 PETITIONS AND RECOGNITION,  
AND (B) SPECIFYING FORM AND MANNER OF SERVICE OF NOTICE**

Upon consideration of the *Motion of the Foreign Representative for Entry of an Order (A) Scheduling a Hearing on Chapter 15 Petition and Recognition, and (B) Specifying Form and Manner of Service of Notice* [ECF No. •] (the “Motion”)<sup>1</sup>, requesting the entry of an order under sections 105(a), 1514 and 1515 of title 11 of the United States Code (the “Bankruptcy Code”) and Rules 2002 and 9007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), (a) scheduling a hearing to consider the recognition of the Canadian Proceeding as a foreign main proceeding (or, in the alternative, as a foreign nonmain proceeding) under chapter 15 of the Bankruptcy Code (the “Recognition Hearing”), (b) setting the deadline by which all responses and objections must be filed (the “Objection Deadline”), and (c) approving the form and manner of service of notice, substantially in the form

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<sup>1</sup> Capitalized terms used but not defined in this Order shall have the meanings given to them in the Motion.

annexed to this Order as **Exhibit 1** (the “Hearing Notice”), all as more fully described in the Motion; and the Court having found that (i) it has jurisdiction over this matter under 28 U.S.C. §§ 157 and 1334, (ii) venue is proper in this District under 28 U.S.C. § 1410, (iii) these chapter 15 cases have been properly commenced by the duly appointed Foreign Representative (iv) this is core proceeding under section 157(b)(2)(P) of title 28 of the United States Code and (v) the Foreign Representative’s notice of the Motion was adequate and appropriate under the circumstances and no other or further notice need be provided; and it appearing that the relief requested in the Motion is in the best interest of the Debtors and other parties in interest in these chapter 15 cases; and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED:**

1. The Motion is GRANTED as set forth in this Order.
2. The Recognition Hearing shall be held before this Court on \_\_\_\_\_, 2026 at \_\_:00 \_\_.m. (prevailing Eastern Time) before the Honorable Maria L. Oxholm of the United States Bankruptcy Court for the Eastern District of Michigan, 211 West Fort Street Detroit, Michigan 48226.
3. The date and time of the Recognition Hearing may be adjourned or continued to a subsequent date without further notice except for an in-court announcement on the record at the Recognition Hearing or a filing by the Foreign

Representative on the docket of the chapter 15 case of the date and time to which the Recognition Hearing has been adjourned or continued.

4. The Hearing Notice in substantially the form attached to this Order as **Exhibit 1** is approved. Prior to serving the Hearing Notice, the Foreign Representative may fill in any missing dates and other information, correct any typographical errors, conform the provisions of the Hearing Notice to the provision of this Order and make such other and further non-material, non-substantive changes as the Foreign Representative deems necessary or appropriate.

5. The Foreign Representative will serve, or cause to be served, the Hearing Notice and the Petitions (collectively, the “Notice Documents”) by email, where available and practicable, and by courier or domestic mail (or foreign mail, if applicable) first-class postage pre-paid, where email service is impracticable, within three (3) business days of the entry of the Order, upon the following parties and their counsel, if known (collectively, the “Notice Parties”): (i) counsel to the Foreign Representative; (ii) counsel to the Debtors; (iii) the Office of the United States Trustee for the Eastern District of Michigan; (iv) all other parties that request notice in these chapter 15 cases as of the Court’s entry of the Proposed Order; and (v) all other parties that this Court may direct. The Foreign Representative will also serve the Court’s order regarding the relief requested in the Verified Petition, as well as all subsequent notices, on the Notice Parties in the

manner set forth in this paragraph 5.

6. If any party files a notice of appearance in these chapter 15 cases after the initial service of the Hearing Notice, the Foreign Representative will serve the Hearing Notice (and any subsequent notices) upon that party within three (3) business days of the filing of the notice of appearance, if such documents have not already been served on such party (or its counsel).

7. Subsequent notices shall be served in the form and manner set forth in this Order or as otherwise required by the Bankruptcy Code and Bankruptcy Rules.

8. Service of the Hearing Notice and any related document in accordance with this Order is approved as adequate, due and sufficient on all interested parties under the Bankruptcy Code and Bankruptcy Rules.

9. Any responses, answers or objections to the Chapter 15 Petition must comply with the Bankruptcy Code, the Bankruptcy Rules and the Local Bankruptcy Rules for the United States Bankruptcy Court for the Eastern District of Michigan and must (i) be in writing, (ii) set forth in detail the factual and legal bases therefor, (iii) be filed with the Court electronically in accordance with the Administrative Procedures for Electronic Case Filing and (iv) served upon counsel for the Foreign Representative, DLA Piper LLP (US), 444 West Lake Street, Suite 900, Chicago, Illinois 60606, Attn: Oksana Koltko Rosaluk, oksana.koltkorosaluk@us.dlapiper.com, so as to be received on or before 5:00

P.M. (ET) on the day that is seven (7) days prior to the Recognition Hearing. The Foreign Representative may file a reply, if any, on or before 5:00 P.M. (ET) on the day that is three (3) days before the Recognition Hearing.

10. The requirements of section 1514(c) of the Bankruptcy Code are deemed inapplicable to these chapter 15 cases or otherwise waived.

11. All other subsequent notices and process of service in these chapter 15 cases will substantially follow the process provided for herein.

12. Notwithstanding any applicability of any Bankruptcy Rules, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

13. The Foreign Representative is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

14. This Court shall retain jurisdiction with respect to any and all matters arising from or related to the interpretation or implementation of this Order.

**Exhibit 1**  
(Hearing Notice)

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN**

In re:

Invotek Group Inc.,

Debtors in a Foreign Proceeding.

Chapter 15

Case No.: 26-45536

(Joint Administration Requested)

**NOTICE OF PETITIONS FOR RECOGNITION OF  
CANADIAN PROCEEDING AND MOTION FOR AN ORDER GRANTING  
RECOGNITION OF CANADIAN PROCEEDING AND RELATED RELIEF**

**PLEASE TAKE NOTICE** that on May 14, 2026, KSV Restructuring Inc., in its capacity as the authorized foreign representative (the “Foreign Representative”) of Mara Technologies USA Inc., Invotek Group USA Inc., Mara Technologies Inc., and Invotek Group Inc., (each, a “Debtor,” and collectively, the “Debtors”), each of which is subject to a Canadian Proceeding in Canada (collectively, the “Canadian Proceeding”) under section 243(1) of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as amended, and section 101 of the *Courts of Justice Act*, R.S.O. 1990, c. C.43, as amended, before the Ontario Superior Court of Justice (Commercial List) (the “Canadian Court”), filed, among other things, voluntary petitions for relief under chapter 15 of title 11 of the United States Code (the “Bankruptcy Code”) for the Debtors and the *Verified Petition of Foreign Representative for (I) Recognition of Canadian Proceeding as Foreign Main Proceeding, (II) Recognition of Foreign Representative, and (III) Related Relief Under Chapter 15 of the Bankruptcy Code*. [ECF No. \_\_] (the “Verified Petition”)¹ with the United States Bankruptcy Court for the Eastern District of Michigan (the “Court”).

**PLEASE TAKE FURTHER NOTICE** that, among other things, the Verified Petition requests entry of an order recognizing the Canadian Proceeding as a foreign main proceeding (or, in the alternative, as a foreign nonmain proceeding), granting related relief under section 1520 of the Bankruptcy Code, and granting certain additional relief under sections 1507 and 1521 of the Bankruptcy Code.

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Verified Petition.

**PLEASE TAKE FURTHER NOTICE** that the Court has scheduled a hearing to consider the relief requested in the Verified Petition (the “Recognition Hearing”) at \_\_:00 \_\_.m. (prevailing Eastern Time) on \_\_\_\_\_, 2026. The Recognition Hearing will be held before the Honorable Maria L. Oxholm of the United States Bankruptcy Court for the Eastern District of Michigan, 211 West Fort Street Detroit, Michigan 48226.

**PLEASE TAKE FURTHER NOTICE** that copies of the Petitions and other related filings in these cases are also available (i) on the Court’s Electronic Case Filing System, which can be accessed from the Court’s website at <https://mieb.uscourts.gov> (a PACER login and password are required), (ii) on the web page maintained by the Foreign Representative at [www.ksvadvisory.com/experience/case/mara](http://www.ksvadvisory.com/experience/case/mara) or (iii) upon written request (including by e-mail) to counsel to the Foreign Representative: DLA Piper LLP (US), 1201 N. Market Street, Suite 2100 Wilmington, DE 19801, Attn: R. Craig Martin, [craig.martin@us.dlapiper.com](mailto:craig.martin@us.dlapiper.com), and DLA Piper LLP (US), 444 West Lake Street, Suite 900, Chicago, Illinois 60606, Attn: Oksana Koltko Rosaluk, [oksana.koltkorosaluk@us.dlapiper.com](mailto:oksana.koltkorosaluk@us.dlapiper.com). All documents in the Canadian Proceeding are also available at [www.ksvadvisory.com/experience/case/mara](http://www.ksvadvisory.com/experience/case/mara).

**PLEASE TAKE FURTHER NOTICE** that any party in interest wishing to submit a response, answer or objection to the Petitions must do so under the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court for the Eastern District of Michigan, and such response, answer or objection must (i) be in writing, (ii) set forth in detail the factual and legal bases therefor, (iii) be filed with the Court electronically in accordance with the Administrative Procedures for Electronic Case Filing and (iv) served upon counsel for the Foreign Representative, DLA Piper LLP (US), 444 West Lake Street, Suite 900, Chicago, Illinois 60606, Attn: Oksana Koltko Rosaluk, [oksana.koltkorosaluk@us.dlapiper.com](mailto:oksana.koltkorosaluk@us.dlapiper.com), so as to be received on or before **5:00 P.M. (ET) on \_\_, 2026**, that is seven (7) days prior to the Recognition Hearing. A courtesy copy of any objection or response shall also be served upon the Chambers of the Honorable Maria L. Oxholm, United States Bankruptcy Judge, United States Bankruptcy Court for the Eastern District of Michigan, 211 West Fort Street Detroit, Michigan 48226.

**PLEASE TAKE FURTHER NOTICE** that all parties in interest opposed to the Petitions or the Foreign Representative’s request for relief must appear telephonically at the Hearing, which may be adjourned from time to time without

further notice except for an in-court announcement at the Hearing or a filing on the docket of this case of the date and time to which the Hearing has been adjourned.

**PLEASE TAKE FURTHER NOTICE** that it is anticipated that the Court may communicate directly with, or request information or assistance directly from, the Canadian Court and/or the Foreign Representative under section 1525 of the Bankruptcy Code.

**PLEASE TAKE FURTHER NOTICE THAT IF NO RESPONSES OR OBJECTIONS ARE RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE FOREIGN REPRESENTATIVE WITHOUT FURTHER NOTICE OR HEARING.**

Dated: May \_\_, 2026

Respectfully submitted,

By: /s/ Danielle Rushing Behrends

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