

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

In re:

Invotek Group USA Inc.,

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 26-45556

**MOTION OF FOREIGN REPRESENTATIVE FOR
ORDER DIRECTING JOINT ADMINISTRATION
OF CHAPTER 15 CASES AND RELATED RELIEF**

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 Invotek Group Inc., Mara Technologies 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*, 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**, that (i) directs the joint administration of the Debtors’ chapter 15 cases for procedural purposes only under section 105(a) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 1015(b) of the Federal Rules of Bankruptcy Procedure

(the “Bankruptcy Rules”), and Rule 1015-1 of the Local Rules of the Bankruptcy Court for the Eastern District of Michigan (the “Local Rules”), and (ii) grants related relief.

In support of this motion, the Foreign Representative relies upon 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 *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”) and respectfully states as follows:¹

RELIEF REQUESTED

1. The Foreign Representative seeks entry of an order directing the joint administration of these chapter 15 cases for procedural purposes only.

¹ Capitalized terms used but not defined in this motion have the meaning given 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”).

2. The Foreign Representative also asks the Court to modify the caption of these chapter 15 cases to reflect joint administration (including the accompanying footnote), substantially as follows:

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

In re:

Invotek Group Inc., *et al.*,¹

Debtors in a Foreign
Proceeding.

¹ An order has been entered 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.

3. The Foreign Representative also asks the Court to direct that the following notation be entered on the docket of each Debtor’s chapter 15 case, except in the case of Invotek Group Inc., to reflect joint administration:

An order has been entered in this case directing the joint administration of the chapter 15 cases of: Invotek Group Inc. 26-45536; Mara Technologies Inc. 26-45545; Invotek Group USA Inc. 26-45556; and Mara Technologies USA Inc. 26-45562. All further pleadings and other papers shall be filed, and all

further docket entries shall be made, in Case No. 26-45536 (MLO), and such docket should be consulted for all matters affecting these chapter 15 cases.

4. Finally, the Foreign Representative seeks authority to send combined notices to the Debtors' creditors and other parties in interest where appropriate.

JURISDICTION AND VENUE

5. This Court has jurisdiction over this matter under 28 U.S.C. §§ 157 and 1334.

6. This is a core proceeding under 28 U.S.C. § 157(b)(2)(P).

7. Venue is proper in this District under 28 U.S.C. §§ 1410.

8. The Foreign Representative consents to the entry of final orders or judgments by this Court if it is determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

9. The Foreign Representative has properly commenced these chapter 15 cases in accordance with sections 1504 and 1515 of the Bankruptcy Code, by the filing of voluntary petitions for recognition of the Canadian Proceeding under section 1515 of the Bankruptcy Code.

10. The statutory bases for the relief requested in this motion are section 105(a) of the Bankruptcy Code, Bankruptcy Rules 1015(b) and 1007(a)(4), and Local Rule 1015-1.

BACKGROUND

11. On May 5, 2026, Frontwell Capital Partners Inc. (“Frontwell”), the Debtors’ senior secured lender, commenced the Canadian Proceeding before the Ontario Superior Court of Justice (Commercial List) (the “Canadian Court”). That same day, the Canadian Court entered an order (the “Appointment Order”) appointing KSV as Receiver of all of the Debtors’ assets, properties, and undertakings (collectively, the “Property”).

12. The Foreign Representative filed the Verified Petition and accompanying form petitions (collectively, the “Petitions”) commencing these chapter 15 cases as ancillary to the Canadian Proceeding and seeking, among other things, recognition of the Foreign Representative and recognition of the Canadian Proceeding as a “foreign main proceeding” or, in the alternative, a “foreign nonmain proceeding” under section 1517 of the Bankruptcy Code.

BASIS FOR RELIEF REQUESTED

13. Bankruptcy Rule 1015(b) permits the Court to order joint administration when two or more petitions are pending in the same court by or against a debtor and an affiliate. The Debtors are “affiliates” as defined in section 101(2) of the Bankruptcy Code: Invotek Group Inc. has 100% direct or indirect common ownership and control of every other Debtor.

14. Under Local Rule 1015-1, the Debtors make the following disclosures:

- a. **Fed. R. Bankr. P. 1007(a)(3) Disclosure.** Invotek Group Inc. (“Invotek Canada”) owns 100% of the equity interests in Mara Technologies Inc. (“Mara Canada”) and Invotek Group USA Inc. (“Invotek US”). Invotek US owns 100% of the equity interests in Mara Technologies USA Inc. (“Mara US”).
- b. **Inter-Debtor Claims.** Mara US owes Mara Canada \$5,915,778.11. Mara Canada owes Mara US \$3,148,393.92. These claims are undisputed.
- c. **Guaranties/Co-obligations.** Invotek US and Invotek Canada are guarantors on Mara Canada and Mara US’s obligations to Frontwell. Mara Canada and Invotek Canada are guarantors on Mara US’s obligations to EDC.
- d. **Publicly Traded.** None of the Debtors are publicly traded.
- e. **Intercompany transfers within 1 year of the Petition Date.** Due to the Debtors’ cash management system and the integrated operations of the business, there are daily transfers of cash between Mara US and Mara Canada.

15. Joint administration of the chapter 15 cases is warranted because: (i) the Debtors are affiliates under section 101(2) of the Bankruptcy Code, (ii) the Debtors’ financial affairs and business operations are closely related and their operations are highly integrated, and (iii) it will ease the administrative burden of these cases on the Court and parties in interest.

16. The Foreign Representative anticipates that most notices, motions, hearings, orders, and other pleadings filed in these chapter 15 cases will affect all of the Debtors. Without joint administration, each Debtor would maintain its own docket, and substantially identical pleadings would have to be filed and served for

each issue. That duplication would be wasteful, expensive, and burdensome on the Clerk.

17. Joint administration will allow the Clerk to use a single docket for all of the Debtors' chapter 15 cases and to combine notices to creditors and other parties in interest. It will also help parties in interest stay apprised of the various matters before the Court in all of these cases. Use of the simplified caption set forth above will eliminate cumbersome procedures and ensure uniformity of pleading identification.

18. Joint administration will not adversely affect the rights of the Debtors' respective creditors. The relief sought is purely procedural and does not affect substantive rights. Each creditor and party in interest will retain whatever rights and claims it has against any particular Debtor. The Court and the Clerk will be relieved of the burden of entering duplicative orders and keeping duplicative files, and the Office of the United States Trustee's administrative supervision of these cases will be simplified.

19. The proposed caption satisfies Bankruptcy Rule 1005, and Local Rule 1015-1.

NOTICE

20. Under Local Rule 1015-1(c), the Foreign Representative will serve this Motion on (i) counsel for the Debtors, (ii) the United States Trustee for the Eastern

District of Michigan, (iii) all parties against whom provisional relief is sought,² (iv) counsel to the Debtor's secured creditors, (a) Frontwell Capital Partners Inc., (b) Export Development Canada, and (c) XOBPGC Holdings Inc., (v) the Internal Revenue Service, (vi) Michigan Department of Treasury, and (vii) any other persons the Court directs, by email or mail to the extent possible.

WHEREFORE, the Foreign Representative respectfully requests that the Court enter an order, substantially in the form attached as **Exhibit A**, (i) directing the joint administration of these chapter 15 cases, and (ii) granting such other and further relief as is just and proper.

² Local Rule 1015-1(c) requires that the Joint Administration Motion be served on "the list of creditors filed by the debtors under F. R. Bankr. P. 1007(d)." Because these chapter 15 cases do not involve this list, the Joint Administration Motion will be served instead on the list of provisional relief parties filed under F. R. Bankr. P. 1007(a)(4)(B)(ii).

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 USA Inc.,

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 26-45556

**ORDER GRANTING MOTION OF FOREIGN REPRESENTATIVE
FOR ORDER DIRECTING JOINT ADMINISTRATION OF
CHAPTER 15 CASES AND GRANTING RELATED RELIEF**

Upon the motion (the “Motion”) of 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 Invotek Group Inc., Mara Technologies Inc., and Mara Technologies USA Inc. (collectively, the “Debtors”), for entry of an order (this “Order”) (i) directing the joint administration of the Debtors’ chapter 15 cases under section 105(a) of the Bankruptcy Code, Bankruptcy Rule 1015(b), and Local Rule 1015-1; and (ii) granting related relief; and the requested relief being a core proceeding under 28 U.S.C. § 157(b)(2)(P); and venue being proper before this Court under 28 U.S.C. § 1410; and the Court having jurisdiction to consider the Motion under 28 U.S.C. §§ 157 and 1334; and due and proper notice of the Motion appearing adequate and appropriate under the circumstances; and this Court having found that no further notice need be provided; and the legal and factual bases set forth in the Motion

establishing just and sufficient cause to grant the requested relief; and the relief granted being in the best interests of the Debtors, their creditors, and all parties in interest; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. Under Bankruptcy Rule 1015(b), the above captioned debtors will be jointly administered under the lead case of Invotek Group Inc., Case No. 26-45536 (MLO).
3. All pleadings and other papers filed in these chapter 15 cases shall bear a consolidated caption, including the accompanying footnote, in the following form:

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

In re:

Invotek Group Inc., *et al.*,¹

Debtors in a Foreign
Proceeding.

¹ An order has been entered 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.

4. The foregoing caption satisfies the requirements of Bankruptcy Rule 1005, and Local Rule 1015-1 in all respects.

5. In addition, the Foreign Representative requests that this Court authorize and direct that the following notation be entered on the docket for each of the Debtor's chapter 15 cases, except in the case of Invotek Group Inc., to reflect the joint administration of these chapter 15 cases:

An order has been entered in this case directing the joint administration of the chapter 15 cases of: Invotek Group Inc. 26-45536; Mara Technologies Inc. 26-45545; Invotek Group USA Inc. 26-45556; and Mara Technologies USA Inc. 26-45562. All further pleadings and other papers shall be filed, and all further docket entries shall be made, in Case No. 26-45536 (MLO), and such docket should be consulted for all matters affecting these chapter 15 cases.

6. Nothing contained in this Order shall be deemed or construed as directing or otherwise effecting a substantive consolidation of the chapter 15 cases.

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

8. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry, and the Clerk is hereby directed to enter this Order on the docket in the chapter 15 case of each of the Debtors.

9. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and/or enforcement of this Order.