

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF COLORADO**

In re:)
) Chapter 15
NILEX USA INC.) Case No. 22-14719 MER
)
Debtor in Foreign Proceeding.)

**NOTICE OF PROPOSAL TRUSTEE’S MOTION FOR ENTRY OF AN ORDER
APPROVING INTERIM DISTRIBUTION OF SALE PROCEEDS TO SECURED
CREDITOR AND GRANTING RELATED RELIEF**

OBJECTION DEADLINE: March 9, 2023

YOU ARE HEREBY NOTIFIED that KSV Restructuring Inc. (“KSV”), in its capacity as Proposal Trustee (the “Proposal Trustee”), has filed a Motion for Entry of an Order Approving Interim Distribution of Sale Proceeds to Secured Creditor and Granting Related Relief with the Bankruptcy.

Proposal Trustee seeks recognition of the Alberta Court’s Distribution Order authorizing distributions to Fulcrum. Accordingly, the Proposal Trustee requests this Court’s grant of comity and cooperation in the form of its recognition of the Distribution Order issued by the Alberta Court in the Canadian Proceedings which authorizes an interim distribution, and further distributions, to Fulcrum from the proceeds of Nilex USA’s assets up to the amount of the Assigned Debt.

If you oppose the Motion or object to the requested relief, your objection and request for hearing must be filed on or before the objection deadline stated above, served on the movant at the address indicated below, and must state clearly all objections and any legal basis for the objections. The Court will not consider general objections.

In the absence of a timely, substantiated objection and request for hearing by an interested party, the Court may approve or grant the requested relief without any further notice to creditors or other interested parties.

Dated: February 16, 2023.

Respectfully submitted,

LEWIS ROCA ROTHGERBER CHRISTIE LLP

s/ Brent R. Cohen

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*Attorneys for KSV Restructuring Inc., as
Proposal Trustee and authorized Foreign
Representative of Nilex USA Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 16, 2023, the **PROPOSAL TRUSTEE'S MOTION FOR ENTRY OF AN ORDER APPROVING INTERIM DISTRIBUTION OF SALE PROCEEDS TO SECURED CREDITOR AND GRANTING RELATED RELIEF, NOTICE and PROPOSED ORDER** were electronically filed and served via CM/ECF pursuant to L.B.R. 9036-1 and 2082-1(a) and (b) and was served upon the following:

See Attached

s/ Jennifer Eastin

Of: Lewis Roca Rothgerber Christie LLP

Label Matrix for local noticing
1082-1
Case 22-14719-MER
District of Colorado
Denver
Thu Feb 16 11:09:53 MST 2023

15253 E. Fremont Dr LLC
Attn Dennis E. Brown
16595 East Alamo Place
Centennial CO 80015-4045

15354 E Hinsdale LLC
16595 East Alamo Place
Centennial, CO 80015-4045

Advantage Leasing Associates, LLC
50 Schilling Rd, Ste. 100
Hunt Valley, MD 21031-1105

All Copy Products
PO BOX 660831
Dallas, TX 75266-0831

Applegate Mulch
1000 Highview Dr.
Webberville, MI 48892-9007

Associate Business Tech.
PO Box 660831
Dallas, TX 75266-0831

Bowman Construction
6620 NW Toni Drive
Des Moines, IA 50313-5453

CIBC c/o Norton Rose Fulbright
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Denver, CO 80202-2995

Caldon Commodities, LLC
PO Box 35
Sanford, CO 81151-0035

Caliber Cleaning Services
2732 S 3600 W
West Valley City, UT 84119

Centenary Polytex PVT LTD
241 New Cloth Market
Raipur Ahmedabad India

Cherokee Manufacturing
150 Bridgepoint Drive, Ste. 200 S.
St Paul, MN 55075-2500

Clearwater
23595 CR 62
Greeley, CO 80631-8637

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1601 19th Street
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Colorado Mechanical Systems, LLC
7094 S. Revere Pkwy.
Centennial, CO 80112-4551

Colorado Wattles/PSI
903 Lucas Road
Lodi, CA 95242-9207

Cultec, Inc
878 Federal Road
PO Box 280
Brookfield, CT 06804-0280

DC Landscaping
4495 Crystal Street
Denver, CO 80239-4955

DP Inc.
PO Box 406
Rigby, ID 83442-0406

Declare it Clean
1521 S. Ventura Street
Aurora, CO 80017-5352

Denver Propane Exchange
PO Box 807
Commerce City, CO 80037-0807

Elastec American Marine
1309 W. Main St.
Carni IL 62821-1389

England Logistics Inc.
PO Box 953776
St. Louis, MO 63195-3776

Enviro Straw LLC
PO Box 406
Rigby, ID 83442-0406

Gallex Pallets, LLC
9613 W. Girton Dr.
Lakewood, CO 80227-4425

Hilfiker Retaining Walls
1902 Hilfiker Lane
Eureka, CA 95503-5711

INTEGRITY EXPRESS LOGISTICS, LLC c/o
Weltman, Weinberg, and Reis Co., L.P.A.
965 Keynote Circle
Cleveland, OH 44131-1829

Integrity Express Logistics, LLC
62488 Collections Center Drive
Chicago, IL 60693-0001

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390 N. Supulveda Blvd.
El Sugundo, CA 90245-4475

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Ogden, UT 84402-0445

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Salt Lake City, UT 84123-6737

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655 Stoney Creek Circle
Corona, CA 92879-8585

Pioneer Lumber Company
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Labadie MO 63055-0172

Prime Source
2517 Paysphere Circle
Chicago, IL 60674-0025

Prinsco
NW 6387
PO Box 1450
Minneapolis, MN 55485-6387

R&R Express
PO BOX 72124
Cleveland, OH 44192-0002

Rubberosion Inc.
12311 CR 41
Hudson, CO 80642-9615

Rueser Seam, LLC
7975 E. Harvard Ave. Unit F
Denver, CO 80231-3829

SATT Management LLC
3463 S. 3500 W.
Ogden, UT 84401

SEMOR, LLC
4510 Orleans St.
Denver, CO 80249-8068

Seven Oaks Capital Associates, LLC
PO BOX 669130
Dallas, TX 75266-9130

Solmax International Inc.
2801 Marie Victorin Blvd.
Varennes, QC J3X 0J4

Sonitrol, Pacific West Security, Inc.
1587 Schallenberger Road
San Jose, CA 95131-2434

Staples Advantage
PO Box 660409
Dallas, TX 75266-0409

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7 Technology Circle
Columbia, SC 29203-9591

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Windsor, CO 80550-0596

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Chicago, IL 60680-1741

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12575 Uline Drive
Pleasant Prairie WI 53158-3686

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3499 Rider Trail South
St. Louis, MO 63045-1110

Welch Equipment Company
5025 Nome Street
Denver, CO 80239-2725

Whitmore Pest & Wildlife Control, Inc
PO Box 456
Sedalia, CO 80135-0456

Wire Products Supply Company
PO Box 1568
Sherman, TX 75091-1568

XPO Logistics Freight, Inc.
Attn: Bankruptcy Dept
9151 Boulevard 26 Bldg A
North Richland Hills, TX 76180-5600