Court File No.: CL-26-00000261-0000

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF PAYSTONE HOLDINGS INC., PAYSTONE INC., ATOM GROWTH INC., and ATOM GROWTH (USA), INC.

MOTION RECORD

(Returnable June 30, 2026)

June 29, 2026

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Court File No.: CL-26-00000261-0000

ONTARIO
SUPERIOR COURT OF JUSTICE
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IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF PAYSTONE HOLDINGS INC., PAYSTONE INC., ATOM GROWTH INC. and ATOM GROWTH (USA), INC.

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Court File No.: CL-26-00000261-0000

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF PAYSTONE HOLDINGS INC., PAYSTONE INC., ATOM GROWTH INC. and ATOM GROWTH (USA), INC.

Applicants

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TAB 1

Court File No.: CL-26-00000261-0000

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF PAYSTONE HOLDINGS INC., PAYSTONE INC., ATOM GROWTH INC., AND ATOM GROWTH (USA), INC.

Applicants

NOTICE OF MOTION
(Returnable June 30, 2026)

Paystone Holdings Inc., Paystone Inc. ("**Paystone**"), Atom Growth Inc., and Atom Growth (USA), Inc. (collectively, the "**Applicants**" or the "**Company**") will make a motion before the Honourable Justice Myers of the Ontario Superior Court of Justice (Commercial List) (the "**Court**") on June 30, 2026 at 2:00 p.m. or as soon after that time as the motion can be heard.

PROPOSED METHOD OF HEARING: The motion is to be heard:

[ ] In writing under subrule 37.12.1(1).
[ ] In writing as an opposed motion under subrule 37.12.1(4).
[ ] In person.
[ ] By telephone conference.
[X] By video conference.

At a Zoom link to be provided by the Court in advance of the motion.

THE MOTION IS FOR:

1. An order (the "**Stay Extension Order**") pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "**CCAA**"), among other things, granting an extension of the Stay Period (as defined below) to and including July 6, 2026 (the "**Stay Extension**").

2. Such other relief as this Honourable Court deems just.

THE GROUNDS FOR THE MOTION ARE:

Background

3. On June 5, 2026, the Applicants sought and obtained an initial order (the "**Initial Order**") from the Court granting certain limited relief under the CCAA, including approving a ten-day stay of proceedings, and appointing AlixPartners Restructuring, Inc. as monitor of the Applicants (in such capacity, the "**Monitor**"). The Applicants have twice since returned to Court – first, on June 15, 2026, when they sought and obtained an Amended and Restated Initial Order that extended the stay of proceedings to June 25, 2026 (the "**Stay Period**"); and second, on June 22, 2026, when they sought an Approval and Vesting Order approving a pre-packaged asset sale transaction, along with an Ancillary Order granting related relief.

4. The relief sought on June 22 was opposed by BDC Capital Inc. ("**BDC**"), which instead sought approval of a sale process in respect of the Applicants. As set out in an endorsement dated June 24, 2026, the Court: (i) declined to grant the relief sought by the Applicants on June 22, 2026; (ii) declined to grant the relief sought by BDC; and (iii) extended the Stay Period to 11:59 p.m. on June 30, 2026.

5. The Applicants, together with Reflect Advisors, LLC, the Chief Restructuring Officer of Paystone and counsel, have engaged in discussions with key stakeholders regarding the path forward in these CCAA proceedings, which have principally focused on ensuring continued stability for the Applicants while a further, Court-supervised sale and investment solicitation process (a "**SISP**") is conducted.

6. The Monitor, in consultation with Sandton Investments X (Luxembourg) S.à r.l. ("**Sandton**"), BDC, and the Applicants, is in the process of designing a SISP for the Applicants' business and property. The Applicants expect that the SISP will be Monitor-led and Court-supervised, which the Applicants support. The Applicants understand that the Monitor intends to bring a motion seeking approval of same in the near term.

7. In parallel, the Applicants and the Monitor are working to secure debtor-in-possession ("**DIP**") financing sufficient to fund the Applicants' continued operations during the SISP and the increased costs associated with same. Sandton has advised that it is not prepared to be primed, and that it would oppose any motion seeking to prime it – neither the Applicants nor the Monitor has received a proposal for junior DIP financing. The Applicants are therefore in advanced discussions with Sandton regarding the terms of a potential Sandton-sponsored DIP facility, which they expect to seek approval of concurrently with the Monitor's SISP motion.

8. The Applicants have also engaged in discussions with the Bank of Nova Scotia ("**BNS**"), their primary billing provider, regarding BNS's stated concern about potential customer chargeback exposure during the CCAA proceedings – as previously noted by the Monitor, BNS has requested additional cash collateral or other protections beginning July 2, 2026. Discussions between the parties regarding a comprehensive solution remain ongoing.

9. Throughout this period, the Applicants and their management have continued to make significant efforts to preserve ordinary course operations and maintain constructive engagement with employees, customers, partners and other stakeholders.

Extending the Stay of Proceedings

10. The Stay Period is set to expire at the end of day on June 30, 2026. Pursuant to the Stay Extension Order, the Applicants are seeking to extend the Stay Period to and including July 6, 2026.

11. Since the June 24 endorsement, the Applicants have acted, and continue to act, in good faith and with due diligence while engaging in discussions with key stakeholders regarding the path forward in these CCAA proceedings.

12. The Company submits that the relief sought on the within motion is in the best interests of the Applicants and their stakeholders. The proposed Stay Extension will allow, among other things, (i) the Monitor to prepare an appropriate SISP; (ii) the Applicants to negotiate and finalize a DIP agreement while working toward a constructive solution with BNS; and (iii) each to return to Court to seek approval of same.

13. The cash flow forecast previously appended to the Second Report of the Monitor dated June 19, 2026 demonstrates that the Applicants will have sufficient liquidity to fund their obligations and the costs of these CCAA proceedings throughout the Stay Extension.

14. The Applicants are not aware of any party that is expected to suffer material prejudice as a result of the proposed extension of the Stay Period. The Monitor and Sandton are supportive of the Stay Extension.

Other Grounds

15. The provisions of the CCAA and the inherent and equitable jurisdiction of the Court.

16. Rules 1.04, 1.05, 2.01, 2.03, 3.02, 16, 37 and 39 of the *Rules of Civil Procedure* R.R.O. 1990, Reg. 194, as amended and section 106 of the *Courts of Justice Act*, R.S.O. 1990, c. C. 43, as amended.

17. Such further and other grounds as counsel may advise and this Court may permit.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the Motion:

18. The Affidavit of Adam Zalev sworn June 29, 2026, and the exhibits attached thereto.

19. Such further and other material as counsel may advise and this Honourable Court may permit.

June 29, 2026

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TO: THE SERVICE LIST

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT,* R.S.C. 1985, c. C-36*,* AS AMENDED

Court File No.: CL-26-00000261-0000

AND IN THE MATTER OF PAYSTONE HOLDINGS INC., PAYSTONE INC., ATOM GROWTH INC., and ATOM GROWTH (USA), INC.

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)
Proceedings Commenced in Toronto

NOTICE OF MOTION
(Returnable June 30, 2026)

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TAB 2

Court File No.: CL-26-00000261-0000

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF PAYSTONE HOLDINGS INC., PAYSTONE INC., ATOM GROWTH INC., AND ATOM GROWTH (USA), INC.

Applicants

AFFIDAVIT OF ADAM ZALEV
(Sworn June 29, 2026)

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ONTARIO
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IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF PAYSTONE HOLDINGS INC., PAYSTONE INC., ATOM GROWTH INC., AND ATOM GROWTH (USA), INC.

Applicants

AFFIDAVIT OF ADAM ZALEV
(Sworn June 29, 2026)

I, Adam Zalev, of the City of Nashville, in the State of Tennessee in the United States of America, **MAKE OATH AND SAY**:

1. I am the Founder and Managing Director of Reflect Advisors, LLC ("**Reflect**"), which, as discussed further below, is the Chief Restructuring Officer (in such capacity, the "**CRO**") of Paystone Inc. ("**Paystone**").

2. On June 5, 2026, Paystone Holdings Inc., Paystone, Atom Growth Inc., and Atom Growth (USA), Inc. (collectively, the "**Applicants**") sought and obtained protection under the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "**CCAA**", and these proceedings, the "**CCAA Proceedings**") pursuant to an initial Order (the "**Initial Order**") granted by the Ontario Superior Court of Justice (Commercial List) (the "**Court**"). As discussed in greater detail below, those proceedings remain ongoing.

3. Given Reflect's role as CRO, I have personal knowledge of the Applicants and the matters to which I depose in this affidavit. Where I have relied on other sources for information, I have so stated and I believe them to be true.

4. I swear this affidavit in support of a motion brought by the Applicants for an Order (the "**Stay Extension Order**"), among other things, extending the Stay Period (as defined below) to and including July 6, 2026.

I. BACKGROUND

5. The Applicants commenced these proceedings on June 5, 2026, at which time they sought and obtained an Initial Order granting customary relief immediately necessary to create stability and maintain operations for the next ten days (including approving an initial stay of proceedings to June 15, 2026 (the "**Initial Stay Period**"), and appointing AlixPartners Restructuring, Inc. (formerly, and at the time, KSV Restructuring Inc.) as monitor (the "**Monitor**")).

6. As described in the application materials filed in connection therewith, at the comeback hearing scheduled for June 15, 2026 (the "**Comeback Hearing**"), the Applicants intended to seek an Approval and Vesting Order (the "**AVO**"), among other things, approving an asset purchase agreement dated effective June 5, 2026 and the transactions contemplated therein (the "**Sale Transaction**") with 1001632600 Ontario Inc., an entity controlled by the principals of the Applicants. Those materials also provided that the Applicants intended to seek an Amended and Restated Initial Order (the "**ARIO**"), in a nearly identical form to the Initial Order, and an Order (the "**Ancillary Order**"), granting certain related relief necessary to facilitate the closing of the Sale Transaction and the subsequent wind-up of the CCAA Proceedings.

7. Following discussions between the Applicants, the Monitor, and the Applicants' subordinate secured creditor, BDC Capital Inc. ("**BDC**"), along with certain other stakeholders, the Applicants agreed to adjourn seeking the AVO and Ancillary Order at the Comeback Hearing. The Applicants instead sought only the ARIO, which did not grant any new material relief in favour of the Applicants beyond an extension of the Initial Stay Period to June 25, 2026 (the "**Stay Period**"). At the Comeback Hearing, the Court granted the ARIO, and scheduled the hearing for the AVO and the Ancillary Order for June 22, 2026.

8. The relief sought was opposed by BDC, which sought approval of a sale process in respect of the Applicants.

9. Following the hearing on June 22, 2026, the Court issued an endorsement dated June 24, 2026. In that endorsement, the Court: (i) declined to grant the relief sought by the Applicants, finding that the Applicants had not yet met the burden for the Court to approve the Sale Transaction, and (ii) declined to grant the sale process sought by BDC. The Court extended the Stay Period to 11:59 p.m. on June 30, 2026, and indicated it would hear a further motion on June 30 regarding the extension of the Stay Period, if necessary.

10. The purpose of this affidavit is to provide an update to the Court on certain developments following the June 24 endorsement, and to provide the basis for the proposed Stay Extension Order.

II. DEVELOPMENTS FOLLOWING JUNE 24 ENDORSEMENT

11. The Applicants, together with the CRO and counsel, have since engaged in discussions with Sandton Investments X (Luxembourg) S.à r.l. ("**Sandton**"), the Applicants' senior secured creditor, BDC, the Monitor, and the Bank of Nova Scotia ("**BNS**") in respect of various issues.

12. I understand that the Monitor is in the process of designing, in consultation with Sandton, BDC and the Applicants, a sale and investment solicitation process (a "**SISP**") that contemplates a Court-supervised marketing of the Applicants' business and property to be led by the Monitor. I also understand that the Monitor intends to bring a motion before this Court in the near term to seek approval of same. The Applicants are supportive of the concept of a Monitor-led, Monitor-designed SISP.

13. Concurrently, the Applicants and the Monitor are working to identify acceptable debtor-in-possession ("**DIP**") financing to allow operations to continue during the SISP, and to otherwise fund the increased costs that will be associated therewith. Sandton, which is currently not entitled to receive interest payments during these CCAA Proceedings, has continued to indicate that it is not prepared to be primed and would oppose any motion seeking to prime it; neither the Applicants nor the Monitor has received a DIP offer that contemplates financing being provided on a junior basis. The Applicants and the Monitor are therefore in advanced discussions with Sandton regarding the terms of a potential Sandton-sponsored DIP facility. The Applicants expect that they will return to Court to bring a motion to seek approval of a DIP financing agreement with Sandton concurrently with the Monitor's motion for approval of a sale process.

14. The Applicants have also engaged in discussion with BNS. As noted in the Second Report of the Monitor dated June 19, 2026 (the "**Second Report**"), the Applicants maintain certain bank

and deposit accounts with BNS, which is also the Applicants' primary billing provider. The Applicants have $250,000 of restricted cash with BNS that is used as collateral for chargebacks on the Applicants' billings. As described in the Second Report, on June 18, 2026, BNS advised the Monitor that, due to concerns regarding its exposure to potential customer chargebacks during the CCAA Proceedings, BNS would require additional cash collateral and potentially other protections starting on July 2, 2026. BNS estimated that its exposure would be approximately $5 million per month, but that exposure could be as high as $15 million. BNS continues to request additional protections from the Applicants starting on July 2, 2026. The Applicants and BNS are continuing to discuss a comprehensive go-forward solution to this issue, and I understand that the Monitor intends to speak with BNS in the near term and will assist in facilitating such a solution.

15. The Applicants and their management have otherwise made significant efforts to continue operating in the ordinary course, correspond with key stakeholders, and engage collaboratively with their employees, customers, and partners.

III. STAY EXTENSION

16. The Stay Period is set to expire at the end of the day on June 30, 2026. Pursuant to the Stay Extension Order, the Applicants seek to extend the Stay Period to and including July 6, 2026 (the "**Stay Extension**").

17. The Applicants have acted in good faith and with due diligence throughout these CCAA Proceedings, including, as described above, since the June 24 endorsement was issued. It is necessary and in the best interests of the Applicants and their stakeholders that the Stay Period be extended to allow the Applicants to continue to operate without disruption until a DIP agreement and SISP can be finalized and approved by this Court.

18. As described in the Second Report, the Applicants, with the assistance of the CRO, prepared a cash flow forecast for the five-week period from June 13, 2026 to July 17, 2026 (the "**Cash Flow Forecast**"), which the Monitor reviewed and discussed with the CRO. A copy of the Cash Flow Forecast, which was appended as Appendix "F" to the Second Report, is reattached hereto as **Exhibit "A"**.

19. The Cash Flow Forecast provides that the Applicants are expected to have sufficient liquidity to continue operations during the Stay Extension. As noted above, BNS and the Applicants are working to resolve the issue identified by BNS, and relief may be sought from this Court at a future motion.

20. I understand that the Monitor and Sandton support the Stay Extension and believe that the relief sought is appropriate in the circumstances. I do not believe any party will be materially prejudiced by the granting of the Stay Extension.

IV. CONCLUSION

21. I believe that the relief sought on the within motion and described above is in the best interests of the Applicants and their stakeholders. The Applicants have acted with good faith and due diligence. The extension of the Stay Period will allow: (i) the Monitor to prepare an appropriate SISP; (ii) the Applicants and the Monitor to negotiate and finalize a DIP agreement while working toward a constructive solution with BNS; and (iii) the Monitor and the Applicants to return to Court to seek approval of same. The Stay Extension Order is supported by the Monitor and Sandton.

22. I swear this affidavit in support of the Applicants' motion for the Stay Extension Order and for no other or improper purpose.

SWORN REMOTELY by Adam Zalev, stated as being located in the City of Nashville, in the State of Tennessee, in the United States of America, before me at the City of Toronto, in the Province of Ontario, on June 29, 2026, remotely via videoconference in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.	)	
Thomas Gray A Commissioner for Taking Affidavits in and for the Province of Ontario	)	DocuSigned by: D89351A6922C47B... Adam Zalev

THIS IS **EXHIBIT "A"** REFERRED TO IN THE AFFIDAVIT
OF ADAM ZALEV, SWORN BEFORE ME
THIS 29TH DAY OF JUNE, 2026.

THOMAS GRAY
A Commissioner for taking Affidavits
(or as may be)

Paystone Holdings Inc., Paystone Inc., Atom Growth Inc. and Atom Growth (USA), Inc. (collectively, the "**Applicants**")

Forecasted Statement of Cash Flow

For the Period Ending July 31, 2026

(Unaudited, $000's)

Forecast Week	Notes	Week 1	Week 2	Week 3	Week 4	Week 5	Week 6	Week 7	Total
Week ending	**[1]**	**19-Jun-26**	**26-Jun-26**	**3-Jul-26**	**10-Jul-26**	**17-Jul-26**	**24-Jul-26**	**31-Jul-26**	**7 Weeks**
Receipts									
Payment Processing Receipts	[2]	420	370	4,370	80	400	350	70	6,060
Other Receipts	[3]	550	415	390	390	520	390	390	3,045
Total Receipts		**970**	**785**	**4,760**	**470**	**920**	**740**	**460**	**9,105**
Disbursements									
Payroll & Benefits	[4]	-	610	-	-	680	-	510	1,800
Contractors	[5]	-	500	-	-	-	-	500	1,000
Commissions	[6]	43	40	40	240	40	40	40	483
Other Operating Expenses	[7]	49	90	197	145	412	145	142	1,179
Rent	[8]	4	-	4	-	4	-	4	14
Interest	[9]	-	-	-	-	-	-	-	-
Interchange Fees		-	-	3,540	-	-	-	-	3,540
Restructuring Professional Fees	[10]	445	54	744	329	329	329	329	2,558
Total Disbursements		**541**	**1,294**	**4,524**	**714**	**1,464**	**514**	**1,524**	**10,573**
Net Cash Flows		**429**	**(509)**	**236**	**(244)**	**(544)**	**226**	**(1,064)**	**(1,468)**
Cash									
Beginning Balance		693	1,121	613	849	605	61	288	693
Net Cash Flow		429	(509)	236	(244)	(544)	226	(1,064)	(1,468)
Ending Cash Balance		**1,121**	**613**	**849**	**605**	**61**	**288**	**(776)**	**(776)**
Less: Restricted Cash	[11]	(600)	(600)	(600)	(600)	(600)	(600)	(600)	(600)
Less: Cash Collateral	[12]	-	-	[TBD]	[TBD]	[TBD]	[TBD]	[TBD]	[TBD]
Unrestricted Cash Balance		**521**	**13**	**249**	**5**	**(539)**	**(312)**	**(1,376)**	**(1,376)**

Notes to the Consolidated Cash Flow Forecast:

Note 1: The purpose of the projection is to present a cash flow forecast of the Applicants for the period June 15, 2026 to July 31, 2026 (the "**Period**") in respect of their proceedings under the Companies' Creditors Arrangement Act ("**CCAA**").

Note 2: Includes receipts from merchant settlers relating to payment processing.

Note 3: Includes receipts related to the Company's gift card and reputation marketing services.

Note 4: Payroll & benefits include salaries, wages, remittances and employee benefits for salaried and part-time employees, paid bi-monthly.

Note 5: Contractors represent payments to third-party service providers and computer engineers engaged by the Company to support operations.

Note 6: Commissions represent payments to sales agents and partners for securing client contracts and generating new business.

Note 7: Disbursements related to software and other operating costs.

Note 8: Rent includes disbursements for the Company's sublease in London.

Note 9: Excludes payments of Sandton's scheduled monthly interest and principal of $825,000 for the weeks ending July 3 and July 31, 2026. Pursuant to the Amended and Restated Initial Order, the payment of principal and interest is currently prohibited, pending further order of the Court

Note 10: Professional fees include fees paid to the Applicants' legal counsel, the CRO, the Monitor, the Monitor's legal counsel, and the Lender's legal counsel.

Note 11: $250,000 of these funds are held as a reserve in connection with the Applicants' billing and payment processing activities and are intended to support potential customer chargebacks, refunds and related adjustments. As a result, the funds are not available for general operating purposes. The remaining $350,000 relates to the wind-up reserve and priority payable amounts funded by the the principals of the Applicants.

Note 12: Scotiabank, Paystone's primary billing processor, has advised that effective July 2, 2026, it may cease providing billing services unless a cash collateral deposit is made. The bank considers billing processing to be a credit product and that it is under no obligation to extend credit while Paystone is under CCAA protection. The requested collateral is intended to cover potential chargeback exposure during the 90 day client refund period. Although discussions remain ongoing, the Company and Scotiabank have been discussing a cash collateral deposit in the amount of $5 million, which approximately represents one month of billings.

COURT FILE NO.: CL-26-00000261-0000

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c.C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF PAYSTONE HOLDINGS INC., PAYSTONE INC., ATOM GROWTH INC. AND ATOM GROWTH (USA), INC.

MANAGEMENT'S REPORT ON CASH FLOW STATEMENT
(paragraph 10(2)(b) of the CCAA

The management of Paystone Holdings Inc., Paystone Inc., Atom Growth Inc. and Atom Growth (USA), Inc. (collectively, the "Applicants"), in consultation with Reflect Advisors, the Applicants' Chief Restructuring Officer, have developed the assumptions and prepared the attached statement of projected cash flow as of the 19th day June, 2026 for the period June 15, 2026 to July 31, 2026 ("Cash Flow"). All such assumptions are disclosed in the notes to the Cash Flow.

The hypothetical assumptions are suitably supported and consistent with the purpose of the Cash Flow, and the probable assumptions are suitably supported and consistent with the plans of the Applicants and provide a reasonable basis for the Cash Flow.

Since the Cash Flow is based on assumptions regarding future events, actual results will vary from the information presented and the variations may be material.

The Cash Flow has been prepared using a set of probable assumptions set out therein. Consequently, readers are cautioned that the Cash Flow may not be appropriate for other purposes.

Dated at Toronto, Ontario this 19th day of June, 2026.

PAYSTONE HOLDINGS INC., PAYSTONE INC., ATOM GROWTH INC. AND ATOM GROWTH (USA), INC.

Signed by:
3CEC77701 1E6469

Per: Abdullah Saab, Chief Financial Officer

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT,* R.S.C. 1985, c. C-36, AS AMENDED

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ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)
Proceedings Commenced in Toronto

AFFIDAVIT OF ADAM ZALEV
(Sworn June 29, 2026)

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TAB 3

Court File No. CL-26-00000261-0000

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

THE HONOURABLE	)	TUESDAY, THE 30TH
	)	
JUSTICE MYERS	)	DAY OF JUNE, 2026

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF PAYSTONE HOLDINGS INC., PAYSTONE INC., ATOM GROWTH INC., and ATOM GROWTH (USA), INC.

Applicants

STAY EXTENSION ORDER

THIS MOTION made by the Applicants, pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "**CCAA**"), for an order, among other things, extending the Stay Period, was heard this day by judicial videoconference via Zoom.

ON READING the Affidavit of Adam Zalev sworn June 29, 2026 and the Exhibit thereto (the "**Zalev Affidavit**"), and on hearing the submissions of counsel for the Applicants, counsel for AlixPartners Restructuring, Inc., in its capacity as the Court-appointed Monitor, and counsel for those other parties appearing as indicated on the counsel slip, and no one else appearing for any other person on the service list, although duly served as appears from the lawyer's certificate of service, filed:

SERVICE AND DEFINITIONS

1. **THIS COURT ORDERS** that the time for service of the Motion Record, including the Notice of Motion, is hereby abridged and validated so that this Motion is properly returnable today and hereby dispenses with further service thereof.

2. **THIS COURT ORDERS** that capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Amended and Restated Initial Order granted by this Court in these proceedings on June 15, 2026.

STAY EXTENSION

3. **THIS COURT ORDERS** that the Stay Period is hereby extended to and including July 6, 2026.

MISCELLANEOUS

4. **THIS COURT HEREBY REQUESTS** the aid and recognition of any court, tribunal, regulatory or administrative body having jurisdiction in Canada or in the United States to give effect to this Order and to assist the Monitor and its agents in carrying out the terms of this Order. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to the Monitor, as an officer of this Court, as may be necessary or desirable to give effect to this Order or to assist the Monitor and its agents in carrying out the terms of this Order.

5. **THIS COURT ORDERS** that this Order and all of its provisions are effective as of 12:01 a.m. (EDT) on the date of this Order without the need for entry or filing.

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IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT,* R.S.C. 1985, c. C-36*,* AS AMENDED

Court File No.: CL-26-00000261-0000

AND IN THE MATTER OF PAYSTONE HOLDINGS INC., PAYSTONE INC., ATOM GROWTH INC., and ATOM GROWTH (USA), INC.

ONTARIO
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STAY EXTENSION ORDER

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IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED

Court File No.: CL-26-00000261-0000_

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ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)
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MOTION RECORD
(Returnable June 30, 2026)

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