IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re

The Aldo Group Inc., et al.,¹

Debtors in Foreign Proceedings.

Chapter 15

Case No. 20-11060 (KBO)

Jointly Administered

Re: D.I. 99 & 100

NOTICE OF FILING OF PROPOSED REDACTED VERSION OF MOTION FOR ENTRY OF AN ORDER GIVING EFFECT TO ORDER ENTERED IN THE FOREIGN PROCEEDINGS TO (A) DISMISS FOREIGN PROCEEDING AS TO ALDO 1125 THIRD AVENUE CORPORATION AND ALDO 250 WEST 125 INC., (B) REDUCE INTERIM CREDIT FACILITY, (C) AUTHORIZE KEY EMPLOYEE RETENTION PLAN AND RELATED CHARGE ON ASSETS AND (D) GRANTING RELATED RELIEF

PLEASE TAKE NOTICE that, on July 20, 2021, The Aldo Group Inc., in its capacity as

the Canadian Court-appointed and authorized foreign representative (the "Foreign Representative"), filed under seal the *Motion for Order Giving Effect to Order Entered in the Foreign Proceedings to (A) Dismiss Foreign Proceedings as to Aldo 1125 Third Avenue Corporation and Aldo 250 West 125 Inc., (B) Reduce Interim Credit Facility, (C) Authorize Key Employee Retention Plan and Related Charge on Assets and (D) Granting Related Relief* (D.I. 99) (the "Motion")

(the "<u>Motion</u>").

PLEASE TAKE FURTHER NOTICE that, on July 20, 2021, the Foreign Representative

filed the proposed redacted version of the Motion (D.I. 100) and a related motion to seal (D.I. 101)

¹ The Debtors in these Chapter 15 Cases and the last four digits of their U.S. Federal Employer Identification Numbers or other unique identifier are as follows: The Aldo Group Inc. (2186); Southwest Capital Holdings Inc. (8248); Aldo US Inc. (6704); Aldo Marketing LLC (1748); Aldo Shoes West Forty Second, LLC (2610); Aldo 1125 Third Ave. Corp. (2110); Aldo 5th Ave. Inc. (2112); Aldo 250 West 125 Inc. (2324); and 1230 Avenue of the Americas LLC (6704). The Debtors' principal offices are located at 905 Hodge Street Montreal QC, Canada, H4N 2B3.

pursuant to rule 9018-1 of the Local Rules of Bankruptcy Practice and Procedures of the United

States Bankruptcy Court for the District of Delaware.

Dated: July 28, 2021 Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Paige N. Topper Eric D. Schwartz (No. 3134) Matthew B. Harvey (No. 5186) Paige N. Topper (No. 6470) 1201 North Market Street P.O. Box 1347 Wilmington, DE 19899-1347 Telephone: (302) 658-9200 Facsimile: (302) 658-3989 eschwartz@morrisnichols.com mharvey@morrisnichols.com

-and-

Peter A. Ivanick Lynn Holbert **HOGAN LOVELLS US LLP** 390 Madison Ave. New York, NY 10017 Telephone: (212) 918-3000 Facsimile: (212) 918-3100 peter.ivanick@hoganlovells.com lynn.holbert@hoganlovells.com

Attorneys for the Foreign Representative