

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Pride Group Holdings Inc., *et al.*¹

Debtors in Foreign Proceedings.

Chapter 15

Case No. 24-10632 (CTG)

(Jointly Administered)

Ref. Docket No. 404

CERTIFICATE OF SERVICE

I, ANGELA CHACHOFF, hereby certify that:

1. I am employed as a Case Manager by Epiq Corporate Restructuring, LLC, with their principal office located at 777 Third Avenue, New York, New York 10017. I am over the age of eighteen years and am not a party to the above-captioned action.
2. On November 26, 2025, I caused to be served the:
 - a. "Notice of Proposed Sale of Available U.S. Assets," dated November 26, 2025 [Docket No. 404], (the "Notice"), and
 - b. "Notice of Proposed Sale of Available U.S. Assets," dated November 26, 2025, *related to Docket No. 404*, a copy of which is annexed hereto as Exhibit A, (the "Notice Revised for Mailing"),

by causing true and correct copies of the:

- i. Notice Revised for Mailing to be enclosed securely in separate postage pre-paid envelopes and delivered via first class mail to those parties listed on the annexed Exhibit B, and
- ii. Notice to be delivered via electronic mail to those parties listed on the annexed Exhibit C.

¹The last four digits of Debtor Pride Group Holdings Inc.'s Canadian business number are 6399. Due to the large number of debtors in these chapter 15 cases, a complete list of the debtor entities and the last four digits of their unique identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' noticing agent at <https://dm.epiq11.com/pridegroup>. The Debtors' service address for the purposes of these chapter 15 cases is 1450 Meyerside, Suite 600, Mississauga, Ontario, L5T 2N5, Canada.

3. All envelopes utilized in the service of the foregoing contained the following legend:
“LEGAL DOCUMENTS ENCLOSED. PLEASE DIRECT TO THE ATTENTION OF ADDRESSEE, PRESIDENT OR LEGAL DEPARTMENT.”

/s/ Angela Chachoff
Angela Chachoff

EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re

Pride Group Holdings Inc., *et al.*¹

Debtors in Foreign Proceedings.

Chapter 15

Case No. 24-10632 (CTG)

Jointly Administered

NOTICE OF PROPOSED SALE OF AVAILABLE U.S. ASSETS

PLEASE TAKE NOTICE that on March 27, 2024, Randall Benson, solely in his capacity as the duly authorized foreign representative (the “Foreign Representative”) of the above-captioned debtors (collectively, the “Debtors”) in the Canadian proceedings (the “CCAA Proceedings”) commenced under the Companies’ Creditors Arrangement Act, R.S.C. 1985 c C-36, pending before the Ontario Superior Court of Justice (Commercial List) in Ontario, Canada, Court File No. CV-24-00717340-00CL (the “Canadian Court”), and that on April 1, 2024 filed the *Verified Petition for (I) Recognition of Foreign Main Proceedings, (II) Recognition of Foreign Representative, and (III) Related Relief Under Chapter 15 of the Bankruptcy Code* [D.I. 2] (as amended on April 23, 2024 [D.I. 120], the “Amended Verified Petition”) and the form chapter 15 petitions for the Initial Debtors (together with the form chapter 15 petitions for the Additional Debtors filed on April 15, 2024 and the Amended Verified Petition, the “Chapter 15 Petitions”) pursuant to chapter 15 of title 11 of the United States Code (the “Bankruptcy Code”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that on May 2, 2024, the Court entered an order granting recognition of the CCAA Proceedings and related relief sought in the Chapter 15 Petitions [D.I. 152] (the “Recognition Order”).

PLEASE TAKE FURTHER NOTICE that on June 7, 2024, the Court entered the *Order (I) Approving the Sale Procedures and Sale Notice, (II) Authorizing the Sale of the Debtors’ U.S. Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, and (III) Granting Related Relief* [D.I. 197] (the “Sale Procedures Order”),² which authorizes the sale of the Debtors’ assets located within the territorial jurisdiction of the United States pursuant to the procedures set forth in the Sale Procedures Order.

PLEASE TAKE FURTHER NOTICE that pursuant to the Sale Procedures Order, the Foreign Representative seeks authority from the Court for the Debtors to consummate the sale of

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² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Sale Procedures Order.

the Debtors' assets located within the territorial jurisdiction of the United States (the "Sale") pursuant to the asset purchase agreements (as may be amended or supplemented from time to time, the "APAs") attached to this Sale Notice as Exhibit A. The material terms of the APAs are described below:

- **Available U.S. Assets Being Sold**: all rights, title and interests of Debtor Eastgate Missouri Holding Corp. (the "Seller") in and to the adjacent real properties located at (i) 2726 N. Eastgate Avenue, Springfield, MO 65803 (the "2726 Lot") and (ii) 2827 and 2929 N. Eastgate Avenue, Springfield, MO 65803 (the "2827/2929 Lot"), and all other property described in Section 1.01 of the APAs (collectively referred to as the "Properties").
- **Purchaser**: Samuel Industrial, LLC (the "Purchaser").
- **Purchase Price**: Aggregate amount of US\$2,575,000 subject to any real estate taxes, utility charges, rents and other expenses of the Properties, which shall be prorated between the Purchaser and the Seller as of closing (the "Purchase Price").
- **Terms of Payment**: Purchaser made earnest money deposits in the aggregate amount of US\$128,750 to First American Title Insurance Company, as Escrow Agent, to be held in trust. The Purchaser will pay the balance of the Purchase Price in cash at closing (subject to adjustments).
- **Marketing Efforts**:
 - As set forth in the Foreign Representative Declaration, the Seller retained SVN Rankin Company, LLC, an independent broker, beginning in March 2024 to publicly list each of the 2726 Lot and 2827/2929 Lot for sale. The Seller received several indications of interest and offers from two potential purchasers over the course of the listings, including (i) an offer from Bosovik Group, LLC for the 2827/2929 Lot in the amount of US\$2,100,000 and (ii) the Purchaser's offers for (a) the 2827/2929 Lot in the amount of US\$2,125,000 and (b) the 2726 Lot in the amount of US\$450,000. The Purchaser submitted the highest and best offer for the 2827/2929 Lot and the only offer for the 2726 Lot.
 - After reviewing all offers submitted on the Properties, the Seller determined that the Purchaser's offers in the aggregate amount of US\$2,575,000 were the best offers for the Properties based on (i) total value offered, (ii) the terms and conditions of the offers and (iii) Purchaser's assurances that the Sale would close, which culminated in the APAs between the Seller and Purchaser. The Seller, in consultation with the CRO and the Monitor, determined that additional marketing efforts would be unlikely to yield offers that are higher and better offers than the Purchaser's offers under the circumstances.

- **Known Liens**: As of the date hereof, Roynat Inc., as the mortgagee, and the DIP Agent (as defined in the Recognition Order) have liens on the Properties. There are no other known liens on the Properties.
- **Consent by Known Holders of Liens**: Roynat Inc. and the DIP Agent have consented to the Sale of the Properties.
- **Other Material Terms**: The Purchase Price shall be increased or decreased as may be required by prorations or adjustments to be made by closing.

PLEASE TAKE FURTHER NOTICE that the Foreign Representative requests entry of the proposed order attached to this notice as **Exhibit B** (the "Proposed Order") authorizing the consummation of the Sale and granting relief pursuant to sections 363(f) and 363(m) of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that in support of the relief requested in the Proposed Order, the Foreign Representative submits the *Declaration of Foreign Representative* attached to this Sale Notice as **Exhibit C** (the "Foreign Representative Declaration").

PLEASE TAKE FURTHER NOTICE that consistent with the Sale Procedures Order and the Foreign Representative Declaration, if the Court enters an order granting relief under section 363(f) of the Bankruptcy Code, upon closing of the Sale, the Available U.S. Assets shall be transferred free and clear of all liens, claims, encumbrances and other interests, with such liens, claims, encumbrances and other interests attaching to the sale proceeds with the same validity, priority, force, and effect such liens, claims, encumbrances and other interests had on the properties immediately prior to the Sale.

PLEASE TAKE FURTHER NOTICE that any party in interest wishing to submit a response, answer, or objection to the Sale must do so pursuant to the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, 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 United States Bankruptcy Court for the District of Delaware, Office of the Clerk of the Court, 824 Market Street, Wilmington, Delaware 19801, and (iv) served upon counsel for the Foreign Representative, Linklaters LLP, 1290 Avenue of the Americas, New York, New York 10104 (Attention: Penelope J. Jensen, Esq. and Christopher J. Hunker, Esq.) and Morris, Nichols, Arsht & Tunnell LLP, 1201 N. Market St., 16th Floor, P.O. Box 1347, Wilmington, Delaware 19801 (Attention: Derek C. Abbott, Esq. and Andrew R. Remming, Esq.), so as to be actually received on or before **December 3, 2025**.³

PLEASE TAKE FURTHER NOTICE that if no response or objection is timely filed and served as provided above, the Proposed Order may be entered by the Court without further notice or a hearing.

³ In accordance with the Sale Procedures Order, the Foreign Representative must provide: (i) seven (7) days' notice with respect to any Sale with an aggregate sale price less than US\$7,000,000 and (ii) twenty-one (21) days' notice with respect to any Sale with an aggregate sale price greater than or equal to US\$7,000,000.

Dated: November 26, 2025
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Luke Brzozowski

Derek C. Abbott (No. 3376)
Andrew R. Remming (No. 5120)
Luke Brzozowski (No. 7377)
1201 N. Market Street, 16th Floor
P.O. Box 1347
Wilmington, Delaware 19899-1347
Telephone: (302) 658-9200
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- and -

LINKLATERS LLP

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Christopher J. Hunker, Esq. (admitted *pro hac vice*)
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Attorneys for the Foreign Representative

Exhibit A

APAs

[This exhibit has been omitted from this service copy of the Notice due to its length. Copies of this Notice with this exhibit included may be obtained free of charge on the docket report maintained on the website of the Debtors' noticing agent at <https://dm.epiq11.com/case/pridegroup/dockets>. A copy of the Notice with this exhibit included may also be requested by emailing the Debtors' noticing agent at TPine@epiqglobal.com.]

Exhibit B

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re

Pride Group Holdings Inc., et al.¹

Debtors in Foreign Proceedings.

Chapter 15

Case No. 24-10632 (CTG)

(Jointly Administered)

**ORDER AUTHORIZING AND APPROVING SALE OF AVAILABLE
U.S. ASSETS FREE AND CLEAR OF LIENS, CLAIMS, ENCUMBRANCES AND
OTHER INTERESTS IN ACCORDANCE WITH THE SALE PROCEDURES ORDER**

Upon the *Notice of Proposed Sale of Available U.S. Assets* (the “Sale Notice”) and the *Declaration of Foreign Representative* attached to the Sale Notice as Exhibit C (the “Foreign Representative Declaration”) in support of entry of an order (this “Order”) authorizing the sale of the Available U.S. Assets (the “Sale”) under the asset purchase agreements each dated October 17, 2025 (as may be amended or supplemented from time to time, the “APAs”) by and between Eastgate Missouri Holding Corp., as seller, and Samuel Industrial, LLC, as purchaser (the “Purchaser”), pursuant to the *Order (I) Approving the Sale Procedures and Sale Notice, (II) Authorizing the Sale of the Debtors’ U.S. Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, and (III) Granting Related Relief* [D.I. 197] (the “Sale Procedures Order”);² and upon this Court’s review and consideration of the Foreign Representative Declaration; and, if necessary, this Court having held a hearing to consider the relief requested in this Order (the “Hearing”); and due and proper notice of the Sale Notice having been provided and no other or

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² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Sale Procedures Order.

further notice being necessary or required; and no objections or other responses having been filed that have not been overruled, withdrawn, or otherwise resolved; and all interested parties having had an opportunity to be heard at the Hearing, if any; and after due deliberation and sufficient cause appearing therefor,

THIS COURT HEREBY FINDS AND DETERMINES THAT:

A. The findings and conclusions set forth herein constitute this Court's findings of fact and conclusions of law pursuant to Bankruptcy Rule 7052 and made applicable to this proceeding pursuant to Bankruptcy Rule 9014. To the extent any of the following findings of fact constitute conclusions of law, they are adopted as such. To the extent any of the following conclusions of law constitute findings of fact, they are adopted as such.

B. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012.

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

D. Venue is proper in this district pursuant to 28 U.S.C. § 1410.

E. Good and sufficient notice of the relief granted by this Order has been given in accordance with the Sale Procedures Order. Notice of the Sale was good, sufficient and appropriate under the circumstances and provided a reasonable opportunity to object or be heard regarding the relief granted by this Order to parties entitled to notice pursuant to the Bankruptcy Rules and the Local Rules. No further notice of the Sale is required.

F. The Foreign Representative has demonstrated that the Sale is a reasonable exercise of the Foreign Representative's business judgment and is in the best interests of the Debtors, their creditors and other parties in interest. Sound business reasons exist for the Sale.

G. The transfer of the Available U.S. Assets to the Purchaser pursuant to the APAs shall be legal, valid and effective and shall vest the Purchaser with all right, title and interest of the Debtors to the Available U.S. Assets free and clear of all liens, claims, encumbrances and other interests. One or more of the standards set forth in sections 363(f)(1)-(5) of the Bankruptcy Code have been satisfied.

H. The Purchaser is a good faith purchaser for value, is entitled to all of the protections afforded under section 363(m) of the Bankruptcy Code and has otherwise acted in good faith in connection with the Sale. Specifically, (a) the Purchaser is not an “insider” of the Debtors, as that term is defined in the Bankruptcy Code; (b) the Sale was negotiated at arm’s-length and in good faith; (c) the Purchaser did not in any way induce or cause the filing of these Chapter 15 Cases; (d) the consideration provided by the Purchaser under the Sale is fair and reasonable; and (e) the Sale is not the result of fraud or collusion. Neither the Foreign Representative nor the Purchaser has engaged in any conduct that would cause or permit the Sale to be avoided or result in the imposition of any costs or damages under section 363(n) of the Bankruptcy Code.

I. The entry of this Order is in the best interests of the Debtors, their creditors and all other parties in interest in these Chapter 15 Cases;

NOW THEREFORE, IT IS HEREBY ORDERED THAT:

1. The Sale is approved as set forth herein.
2. Pursuant to sections 363(b) and 363(f) of the Bankruptcy Code, the Foreign Representative is authorized to transfer the Available U.S. Assets to the Purchaser pursuant to the terms of the APAs with all right, title and interest in the Available U.S. Assets free and clear of all liens, claims, encumbrances and other interests. Any liens, claims, encumbrances and other interests in the Available U.S. Assets shall attach to the proceeds of the Sale in the order of priority and with the same validity, force and effect that they have as against the Available U.S. Assets

immediately prior to the Sale. The APAs are hereby approved, and the Foreign Representative is authorized to take all actions necessary to consummate the Sale.

3. The Purchaser is a good faith buyer within the meaning of section 363(m) of the Bankruptcy Code and is entitled to the full protections of section 363(m) of the Bankruptcy Code. The reversal or modification on appeal of the authorization provided herein to consummate the Sale shall not affect the validity of the Sale, unless such authorization and consummation of the Sale is duly and properly stayed pending such appeal.

4. The proceeds of the Sale will be distributed in accordance with a further order of the Canadian Court.

5. Notwithstanding Bankruptcy Rule 6004(h) or any other provision in the Bankruptcy Rules or Local Rules to the contrary: (i) the terms of this Order shall be immediately effective and enforceable upon its entry; (ii) the Foreign Representative is not subject to any stay in the implementation, enforcement or realization of the relief granted in this Order and (iii) the Foreign Representative may, in its discretion and without further delay, take any action and perform any act authorized under this Order, the Canadian Orders, or other order of the Canadian Court, including, without limitation, taking any actions or executing any documents the Foreign Representative (acting on behalf of the Debtors) believes appropriate in furtherance of, or in connection with, the consummation of the Sale or the implementation of this Order.

6. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the implementation of this Order.

Exhibit C

Foreign Representative Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Pride Group Holdings Inc., *et al.*¹

Debtors in Foreign Proceedings.

Chapter 15

Case No. 24-10632 (CTG)

Jointly Administered

**DECLARATION OF FOREIGN REPRESENTATIVE
IN SUPPORT OF THE SALE OF AVAILABLE U.S. ASSETS FREE AND
CLEAR OF ANY LIENS, CLAIMS, ENCUMBRANCES AND OTHER INTERESTS**

I, Randall Benson, pursuant to 28 U.S.C. § 1746, hereby declare (this “Declaration”) under penalty of perjury under the laws of the United States, as follows:

1. I am the founder of RC Benson Consulting Inc, which was engaged on February 26, 2024 as the Chief Restructuring Officer (in such capacity, the “CRO”) of the Pride Group. The Debtors and certain of their affiliates are the subject of proceedings (the “CCAA Proceedings”) under the Companies’ Creditors Arrangement Act, pending before the Ontario Superior Court of Justice (Commercial List) in Ontario, Canada, Court File No. CV-24-00717340-00CL (the “Canadian Court”). I was appointed as the foreign representative of the Debtors (the “Foreign Representative”) by the Canadian Court pursuant to the preliminary initial order dated March 27, 2024.

2. I am an individual over the age of 18 and, if called upon, could and would testify to the facts set forth in this Declaration. Except as otherwise indicated, all facts set forth in this Declaration are based upon my personal knowledge, information supplied to me by members of

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the Pride Group's management and professionals or learned from my review of relevant documents, or my opinion based upon my experience and knowledge of the Pride Group's industry, operations, and financial condition that I have acquired since my engagement.

3. I am authorized to make this Declaration on behalf of the Debtors in support of an order approving the sale (the "Sale") of the Debtors' assets free and clear of any liens, claims, encumbrances and other interests (collectively, the "Liens"), pursuant to the asset purchase agreements each dated October 17, 2025 (as may be amended or supplemented from time to time, the "APAs") by and between Eastgate Missouri Holding Corp., as seller (the "Seller"), and Samuel Industrial, LLC, as purchaser (the "Purchaser"), in compliance with Paragraph 2(e) of the Sale Procedures Order (as defined below).²

THE SALE PROCEDURES

4. On May 21, 2024, the Foreign Representative filed a motion [D.I. 178] (the "Sale Procedures Motion") seeking, among other things, this Court's approval of the Sale Procedures governing the sale of any Available U.S. Assets being sold in the United States.

5. On June 7, 2024, this Court entered an Order granting the relief requested in the Sale Procedures Motion [D.I. 197] (the "Sale Procedures Order").

6. Paragraph 2(e) of the Sale Procedures Order provides that the Foreign Representative shall attach to the applicable Sale Notice "a declaration in support of the Sale containing statements sufficient for the Court to find that: (i) the Sale constitutes a prudent exercise of the applicable Debtor's business judgment; (ii) the Sale may be consummated free and clear of

² Capitalized terms used in this Declaration but not otherwise defined shall have the meanings ascribed to them in the Sale Procedures Order.

all Liens under section 363(f) of the Bankruptcy Code; and (iii) the purchaser is a good faith purchaser entitled to the protections of section 363(m) of the Bankruptcy Code.”

**STATEMENTS PURSUANT TO
PARAGRAPH 2(e) OF THE SALE PROCEDURES ORDER**

I. The Sale Constitutes a Prudent Exercise of the Seller’s Business Judgement

7. I believe that the Sale is in the best interests of the Debtors’ estates and constitutes a prudent exercise of the Seller’s business judgment.

8. The Seller retained SVN Rankin Company, LLC, an independent broker, beginning in March 2024 to publicly list for sale each of the adjacent real properties, including all right, title, and interest therein, located at (i) 2726 N. Eastgate Avenue, Springfield, MO 65803 (the “2726 Lot”) and (ii) 2827 and 2929 N. Eastgate Avenue, Springfield, MO 65803 (the “2827/2929 Lot”, and together with the 2726 Lot, the “Properties”). The Seller received several indications of interest and offers from two potential purchasers over the course of the listings, including (i) an offer from Bosovik Group, LLC for the 2827/2929 Lot in the amount of US\$2,100,000 and (ii) the Purchaser’s offers for (a) the 2827/2929 Lot in the amount of US\$2,125,000 and (b) the 2726 Lot in the amount of US\$450,000. The Purchaser submitted the highest and best offer for the 2827/2929 Lot and the only offer for the 2726 Lot.

9. After reviewing all offers submitted on the Properties, the Seller determined that the Purchaser’s offers in the aggregate amount of US\$2,575,000 were the best offers for the Properties based on (i) total value offered, (ii) the terms and conditions of the offers and (iii) Purchaser’s assurances that the Sale would close, which culminated in the APAs between the Seller and Purchaser. The Seller, in consultation with the CRO and the Monitor, determined that additional marketing efforts would be unlikely to yield offers that are higher and better offers than the Purchaser’s offers under the circumstances. As required under the APAs, the Purchaser has

paid deposits in the aggregate amount of US\$128,750, which will be held in escrow pending closing of the Sale.

10. I believe that the Properties were marketed publicly in a manner designed to maximize the purchase price obtained for those assets in accordance with the Sale Procedures Order. The Purchaser's offers for the Properties are the highest or otherwise best offers received to date, are in line with the market for similar assets, and constitute reasonably equivalent value for the Properties.

11. For these reasons, I believe that selling the Properties to the Purchaser pursuant to the terms set forth in the APAs constitutes a prudent exercise of the Seller's business judgment.

II. The Available Assets Should be Transferred Free and Clear of All Liens, Claims, Encumbrances, and Other Interests Pursuant to Section 363(f) of the Bankruptcy Code

12. I believe consummation of the Sale free and clear of all Liens is appropriate pursuant to section 363(f) of the Bankruptcy Code.

13. As of the date hereof, the only parties known to have any Liens on the Properties are Roynat Inc., as the mortgagee, and the DIP Agent (as defined in the Recognition Order). Roynat Inc. and the DIP Agent have consented to the Sale of the Properties. I am further advised that all Liens on the Properties will attach to the proceeds of the sale under the APAs with the same force, validity, priority, and effect as they currently exist.

14. Accordingly, I believe that the sale of the Properties free and clear of all Liens satisfies the statutory requirements of section 363(f) of the Bankruptcy Code.

III. The Purchaser Should be Entitled to the Protections of Section 363(m) of the Bankruptcy Code

15. I believe the Purchaser is a good faith purchaser for value and has otherwise acted in good faith in connection with the Sale. Specifically: (i) the Purchaser is not an "insider" of the

Debtors, as that term is defined in the Bankruptcy Code; (ii) the Sale was negotiated at arm's length and in good faith, and at all times each of the Purchaser and the Seller were represented by competent counsel of their choosing; (iii) the Purchaser did not in any way induce or cause the filing of the CCAA Proceedings or these Chapter 15 Cases; (iv) the consideration provided by the Purchaser pursuant to the Sale is fair and reasonable; and (v) the Sale is not the result of fraud or collusion.

16. Based on the foregoing, I believe the Purchaser was acting in good faith within the meaning of section 363(m) of the Bankruptcy Code with respect to the Sale and is entitled to the protections thereof.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: November 26, 2025
Toronto, Canada

/s/ Randall Benson
Randall Benson

EXHIBIT B

Claim Name	Address Information
400 SPECTRUM HOLDINGS LLC	400 SPECTRUM CENTER DRIVE IRVINE CA 92618
ADVANCE BUSINESS CAPITAL LLC	DBA TRIUMPH BUSINESS CAPITAL ATTN: DANNY MOURNING, ASST GEN COUNSEL 615 CANYON DR, STE 105 COPPELL TX 75019
AVIATOR FINANCIAL INC	1100 BURLOAK DRIVE, SUITE 301 BURLINGTON ON M5X 1A1 CANADA
AVIATOR FINANCIAL INC	14 WALL ST, 20TH FL NEW YORK NY 10005
BANK OF MONTREAL	100 KING ST W, 18TH FL FIRST CANADIAN PLACE TORONTO ON M5X 1A1 CANADA
BMO HARRIS BANK N.A.	CHARLES R. SMITH & DAN LUNDBERG 300 E. JOHN CARPENTER FREEWAY SUITE 400 IRVING TX 75062
BORDEN LADNER GERVAIS LLP	ALEX MACFARLANE & NICK HOLLARD BAY ADELAIDE CENTRE, EAST TOWER 22 ADELAIDE ST W, STE 3400 TORONTO ON M5H 4E3
CASTELLON PLUMBING CORP.	9841 NW 130 ST HIALEAH GARDENS FL 33018
CHUBB GROUP OF INSURANCE COMPANIES CORPORATION SERVICE COMPANY	202B HALL'S MILL ROAD WHITEHOUSE STATION NJ 08889
DAGM WUBSHET, MARTA A TIBEBU, AND DMH	AS REPRESENTATIVE PO BOX 2576 SPRINGFIELD IL 62708
DAIMLER TRUST	EXPRESS TRUCKING, LLC; LAW OFFICES OF EUGENE N BOLIN, JR, PS; ATTN E BOLIN, JR 144 RAILROAD AVE, STE 308 EDMONDS WA 98020
DELAWARE STATE TREASURY	13650 HERITAGE PKWY FT WORTH TX 76177
DORMAKABA CANADA INC.	820 SILVER LAKE BLVD., SUITE 100 DOVER DE 19904
ENGS COMMERCIAL FINANCE CO	RELIN, GOLDSTEIN & CRANE LLP ATTN: JOSEPH M SHUR 28 E MAIN STREET, STE 1800 ROCHESTER NY 14614
ENGS COMMERCIAL FINANCE CO.	PO BOX 128 ITASCA IL 60143-0128
FEDERAL INSURANCE COMPANY	ONE PIERCE PLACE, SUITE 1100 WEST ITASCA IL 60143
FIRST AMERICAN COMMERCIAL BANCORP, INC.	CAPITAL CENTER 251 NORTH ILLINOIS SUITE 1100 INDIANAPOLIS IN 46204-1927
G3 DEVELOPMENT COMPANY	211 HIGH POINT DR VICTOR NY 14564-1061
GAELECO LEASING	3369 S.CHESTNUT AVENUE FRESNO CA 93725
GM FINANCIAL CANADA LEASING LTD.	2800 FRENCH CAMP TURNPIKE STOCKTON CA 95206
GREAT AMERICA FINANCIAL SERVICES CORP	2001 SHEPPARD AVENUE, SUITE 600 TORONTO ON M2J 4Z8 CANADA
GV TRANS	625 FIRST ST CEDAR RAPIDS IA 52401-2030
HEIDI BERG AND SUSAN BERG FLORES	15666 SLOVER AVE FONTANA CA 92337
HITACHI CAPITAL AMERICA CORP	3275 E CENTRAL AVE FRESNO CA 93725
HOLLAND & KNIGHT LLP	800 CONNECTICUT AVE, 4TH FL N NORWALK CT 06854
INTERNAL REVENUE SERVICE	98 SAN JACINTO BLVD STE 1900 AUSTIN TX 78701-4238
MCCARTY PROPERTY INVESTMENTS, LLC.	P.O. BOX 7346 PHILADELPHIA PA 19101-7346
MERCEDES-BENZ FINANCIAL SERVICES USA LLC	8022 WEST FWY HOUSTON TX 77029
MICHAEL E COLVIN DBA C & C HOLDINGS	13650 HERITAGE PKWY FT WORTH TX 76177
MTCK LLC	7200 NE 45TH STREET KANSAS CITY MO 64117
NATIONAL BANK FINANCIAL INC	345 GRAND ISLAND TONAWANDA NY 14150
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