

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

In re

Pride Group Holdings Inc., *et al.*<sup>1</sup>

Debtors in Foreign Proceedings.

Chapter 15

Case No. 24-10632 (CTG)

(Jointly Administered)

**Ref. Docket No. 410**

**CERTIFICATE OF SERVICE**

I, AMY HENAULT, 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 December 22, 2025, I caused to be served the:
  - a. "Notice of Proposed Sale of Available U.S. Assets," dated December 22, 2025 [Docket No. 410], (the "Full Corrington Agreement"), and
  - b. "Notice of Proposed Sale of Available U.S. Assets," dated December 22, 2025, *related to Docket No. 410*, a copy of which is annexed hereto as Exhibit A, (the "Sale Notice"),

by causing true and correct copies of the:

- i. Sale Notice 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. Full Corrington Agreement to be delivered via electronic mail to those parties listed on the annexed Exhibit C.

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<sup>1</sup>The 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/ Amy Henault  
Amy Henault

**EXHIBIT A**

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re

Pride Group Holdings Inc., *et al.*<sup>1</sup>

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”),<sup>2</sup> 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

<sup>1</sup> The 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.

<sup>2</sup> 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 agreement (as may be amended or supplemented from time to time, the "APA") attached to this Sale Notice as Exhibit A. The material terms of the APA are described below:

- **Available U.S. Assets Being Sold**: all rights, title and interests of Debtor Corrington Missouri Holding Corp. (the "Seller") in and to the real property located at SEC Corner 45th St & Corrington Ave., Kansas City, MO 64117 and all other property described in Section 1.01 of the APA (collectively referred to as the "Property").
- **Purchaser**: American Property LLC (the "Purchaser").
- **Purchase Price**: US\$290,000 subject to any real estate taxes, utility charges, rents and other expenses of the Property, which shall be prorated between the Purchaser and the Seller as of closing (the "Purchase Price").
- **Terms of Payment**: Purchaser made an earnest money deposit in the amount of US\$14,500 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**:
  - The Seller retained CBRE, Inc., an independent broker, to publicly list the Property for sale beginning on February 6, 2024. The Seller received several indications of interest and the Purchaser's offer over the course of the listing in the amount of US\$290,000.
  - The Purchaser's offer in the amount of US\$290,000 was the highest and best offer for the Property 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 APA 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 an offer that is a higher and better offer than the Purchaser's offer 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 Property. There are no other known liens on the Property.
- **Consent by Known Holders of Liens**: Roynat Inc. and the DIP Agent have consented to the Sale of the Property.
- **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 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 29, 2025**.<sup>3</sup>

**PLEASE TAKE FURTHER NOTICE** that if no response or objection is timely filed and served as provided above, the Debtors may consummate the Sale following the expiration of the objection deadline without further order of the Court, notice, or a hearing.

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<sup>3</sup> 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: December 22, 2025  
Wilmington, Delaware

**MORRIS, NICHOLS, ARSHT & TUNNELL LLP**

*/s/ Luke Brzozowski*

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Derek C. Abbott (No. 3376)  
Andrew R. Remming (No. 5120)  
Luke Brzozowski (No. 7377)  
1201 N. Market Street, 16th Floor  
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Facsimile: (302) 658-3989  
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aremming@morrisnichols.com  
lbrzozowski@morrisnichols.com

- and -

**LINKLATERS LLP**

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Christopher J. Hunker, Esq. (admitted *pro hac vice*)  
Clark L. Xue, Esq. (admitted *pro hac vice*)  
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christopher.hunker@linklaters.com  
clark.xue@linklaters.com

*Attorneys for the Foreign Representative*

**Exhibit A**

APA

[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](mailto:TPine@epiqglobal.com).]

**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
NATIONAL TRAILER LEASING, INC	AS ADMIN AGENT 1155, RUE METCALFE, 23RD FL-F511 MONTREAL QC H3B 4S9 CANADA
OFFICE OF THE UNITED STATES ATTORNEY	2382 ROUTE 130 DAYTON NJ 08810
OUR COMMUNITY CREDIT UNION	DISTRICT OF DELAWARE HERCULES BUILDING 1313 N. MARKET STREET, SUITE 400 WILMINGTON DE 19801
PACCAR FINANCIAL CORP	PO BOX 1670 SHELTON WA 98584
PACCAR FINANCIAL CORP	240 GIBRALTAR ROAD, SUITE 200 HORSHAM PA 19044
PACCAR FINANCIAL LTD.	PO BOX 1518 BELLEVUE WA 98009
PACCAR FINANCIAL LTD.	240 GIBRALTAR ROAD, SUITE 200 HORSHAM PA 19044
PACCAR FINANCIAL LTD.	PO BOX 1518 BELLEVUE WA 98009
RAY PROPERTIES LLC	3032 E CENTRAL AVENUE FRESNO CA 93725
REGIONS CAPITAL MARKETS	REGIONS SECURITIES LLC ATTN: KYLE SHENTON 250 PARK AVENUE NEW YORK NY 10177
REGIONS CAPITAL MARKETS	REGIONS SECURITIES LLC C/O MAYER BROWN LLP; SEAN SCOTT 71 SOUTH WACKER DRIVE CHICAGO IL 60606

Claim Name	Address Information
REGIONS COMMERCIAL EQUIPMENT FINANCE LLC	1900 5TH AVE N SUITE 2400 BIRMINGHAM AL 35203
REGIONS EQUIPMENT FINANCE CORPORATION	1900 5TH AVE N SUITE 2400 BIRMINGHAM AL 35203
ROYAL BANK OF CANADA	155 WELLINGTON STREET WEST, 8TH FL TORONTO ON M5V 3K7 CANADA
ROYNAT, INC.	1235 N SERVICE RD, STE 200 OAKVILLE ON L6M 2W2 CANADA
ROYNAT, INC.	40 KING ST W, 13TH FL TORONTO ON M5H 1H1 CANADA
TA OPERATING LLC	2510 BURR ST GARY IN 46406
TBK BANK SSB	12700 PARK CENTRAL DR, STE 1700 DALLAS TX 75251
THE BANK OF NOVA SCOTIA	44 KING ST W, 14TH FLOOR TORONTO ON M5H 1H1 CANADA
THE TORONTO-DOMINION BANK	100 WELLINGTON STREET WEST, 26TH FL TORONTO ON M5K 1A2 CANADA
THE TORONTO-DOMINION BANK	AS ADMIN AGENT 77 KING ST W, TD N TWR, 25TH FL TORONTO ON M5K 1A2 CANADA
U.S. DEPARTMENT OF LABOR	S-2521 200 CONSITUTION AVE, NW WASHINGTON DC 20210
UNITED STATES TREASURY	OFFICE OF THE TREASURER 1500 PENNSYLVANIA AVENUE, NW ROOM 2134 WASHINGTON DC 20220
VAL VERDE FAMILY LIMITED PARTNERSHIP	3410 IRVING BLVD DALLAS TX 75247
VAUGHN THOMPSON	3150 IRVING BLVD DALLAS TX 75247
VERSA FINANCE US CORP.	140 FULLARTON STREET, SUITE 2002 LONDON ON N6A 5P2 CANADA
VF US LLC	PO BOX 26131 GREENSBORO NC 27402
VILLAGE OF FRANKLIN PARK	9500 BELMONT FRANKLIN PARK IL 60131
VOLVO FINANCIAL SERVICES	(A DIVISION OF VFS CANADA INC.) 238 WELLINGTON ST. E. 3RD FLOOR AURORA ON L4G 1J5 CANADA
VRP, INC.	15662 VALLEY BLVD FONTANA CA 92335

**Total Creditor count: 61**

Pride Group Holdings Inc., *et al.*, Case No. 24-10632 (CTG)  
First Class Mail Additional Service Party

American Property LLC  
ATTN: Greg Short  
8611 E. 67th Terrace  
Kansas City, MO 64133

**EXHIBIT C**

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BDO CANADA LIMITED	ATTN: JOSIE PARISI & GARY CERRATO	jparisi@bdo.ca; gcerrato@bdo.ca
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BMO CAPITAL MARKETS	ATTN: ESTELLE L. RICHMOND	estelle.richmond@bmo.com
BUSINESS DEVELOPMENT BANK OF CANADA	ATTN: ROBERT PRINCE & ADAM LAIKEN	robert.prince@bdc.ca; adam.laiken@bdc.ca
CAMELINO GALESSIERE LLP	ATTN: GUSTAVO F. CAMELINO	gcamelino@clegal.ca
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