

Court File No. CV-22-00691990-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

B E T W E E N:

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 1000156489 ONTARIO INC.

Applicant

**MOTION RECORD OF THE MONITOR
(Representative Counsel Order and Stay Extension Order,
returnable January 28, 2025)**

January 21, 2025

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1000156489 Ontario Inc. (f/k/a DCL
Corporation) and not in its personal or
corporate capacity

Court File No.: CV-22-00691990-00CL

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 1000156489 ONTARIO INC. (the
“Applicant”)

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(as at January 21, 2025)

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Court File No. CV-22-00691990-00CL

ONTARIO
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B E T W E E N:

IN THE MATTER OF THE *COMPANIES' CREDITORS*
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TAB 1

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ONTARIO
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B E T W E E N:

IN THE MATTER OF THE *COMPANIES' CREDITORS*
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AND IN THE MATTER OF A PLAN OF COMPROMISE OR
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Applicant

NOTICE OF MOTION
(Representative Counsel Order and Stay Extension Order)

Alvarez & Marsal Canada Inc. (“**A&M**”), in its capacity as court-appointed monitor of the Applicant (in such capacity, the “**Monitor**”), pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the “**CCAA**”), will make a Motion before a Judge of the Commercial List on Tuesday, January 28, 2025 at 12:00 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;
- By video conference

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at the following location:

<https://ca01web.zoom.us/j/64683302309?pwd=hk4renYSbUXbUn41tPpZqSX8FIZNTI.1#success>

THE MOTION IS FOR

1. An Order, substantially in the form of the draft order included in the Motion Record (the “**Representative Counsel Order**”), among other things:
 - (a) appointing Ursel Phillips Fellows Hopkinson LLP (“**Ursel Phillips**”) as representative counsel (“**Representative Counsel**”) for the Represented Parties (as defined herein);
2. An Order, substantially in the form of the draft order included in the Motion Record (the “**Stay Extension Order**”), among other things:
 - (a) abridging the time for, and validating service of, this Notice of Motion and supporting materials such that the motion is properly returnable on January 28, 2025 and dispensing with further service thereof;
 - (b) extending the Stay Period (defined below) until and including August 29, 2025; and
3. Such further and other Relief as to this Honourable Court may seem just.

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THE GROUNDS FOR THE MOTION ARE¹

1. On December 20, 2022 (the “**Petition Date**”), 1000156489 Ontario Inc. (f/k/a DCL Corporation) (the “**Applicant**”) obtained an initial order (the “**Initial Order**”) from the Ontario Superior Court of Justice (Commercial List) (the “**Court**”) under the CCAA. The proceedings commenced thereby are referred to herein as the “**CCAA Proceedings**”. Among other things, the Initial Order appointed A&M as Monitor in the CCAA Proceedings;
2. On the Petition Date, HIG Colors Holdings and certain of its U.S.-based subsidiaries (collectively, the “**Chapter 11 Debtors**”) each filed voluntary petitions for relief under Chapter 11 of the U.S. Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (such proceedings, the “**Chapter 11 Proceedings**”, and together with the CCAA Proceedings, the “**Restructuring Proceedings**”);
3. On December 29, 2022, the Applicant obtained an amended and restated Initial Order (the “**Amended and Restated Initial Order**”) that, among other things, approved the DIP Facility and the Final DIP Credit Agreement, and extended the Stay Period (each as defined in the Amended and Restated Initial Order);
4. The DCL Group conducted a sales process in the Restructuring Proceedings that culminated in a transaction (the “**Transaction**”) with Pigments Services, Inc. On March 29, 2023, this Court issued an Order, which, among other things, approved the Transaction. The Transaction closed on April 14, 2023;

¹ All capitalized terms not otherwise defined have the meaning given to them in the Ninth Report of the Monitor dated January 21, 2025 (the “**Ninth Report**”).

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5. On May 8, 2023, this Court issued an Order, which, among other things: (i) granted the Monitor the Expanded Powers (as defined and described in the Fifth Report), expanding the powers of the Monitor to, among other things, oversee the wind-down activities of the Applicant; and (ii) changed the style of cause in the CCAA Proceedings to reflect the Applicant's change of name following the closing of the Transaction;

6. On June 20, 2023, this Court issued an Order, which, among other things: (i) granted the claims procedure by which creditors may file claims against the Applicant, or against the Applicant's Directors or Officers, as applicable; and (ii) extended the Stay Period until and including December 31, 2023;

7. On December 6, 2023, this Court issued an Order, which, among other things, extended the Stay Period until and including June 30, 2024;

8. On June 21, 2024, this Court issued an Order, which, among other things, extended the Stay Period until and including January 31, 2025;

Representative Counsel Order

9. The Monitor proposes that this Court grant the Representative Counsel Order, appointing Ursel Phillips as Representative Counsel for all members of both the Hourly DB Plan and the Salaried DB Plan (save and except those that opt-out of such representation) (the "**Represented Parties**") for purposes of representing the Represented Parties' rights in any entitlement to surplus under the Hourly DB Plan and the Salaried DB Plan;

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10. The proposed Representative Counsel Order provides for the appointment of up to three representatives to, among other things, instruct Representative Counsel on behalf of the members of the Salaried DB Plan and one representative, being a representative of the Union to, among other things, instruct Representative Counsel on behalf of the members of the Hourly DB Plan;

11. The appointment of Representative Counsel pursuant to the proposed Representative Counsel Order will facilitate and streamline negotiations with respect to entitlement to the surplus balances in the Hourly DB Plan and Salaried DB Plan;

12. It is intended that Representative Counsel's involvement will assist in simplifying the surplus distribution process for the benefit of the Applicant and the Represented Parties and allow this key outstanding matter in the CCAA Proceedings to progress efficiently and expeditiously to resolution. To the extent that this process undertaken with the involvement of Representative Counsel results in a recovery to the Applicant from the surplus balances, such recovery may potentially increase the recovery available to the Applicant's unsecured creditors in the CCAA Proceedings;

13. Ursel Phillips has extensive experience acting as representative counsel for employees and retirees of major Canadian companies seeking to preserve their pensions, benefits and severance entitlements during CCAA proceedings;

14. If the Representative Counsel Order is granted by this Court and the parties reach agreement regarding surplus entitlement under the Hourly DB Plan and the Salaried DB Plan, the Monitor intends to seek orders and/or declarations from the Court regarding surplus entitlement,

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with the support of Representative Counsel, which will then be submitted to FSRA, in accordance with the *Pension Benefits Act* (Ontario);

15. The proposed Representative Counsel Order provides that Representative Counsel's fees and disbursements will be paid in accordance with the terms of the engagement letter entered into between Ursel Phillips and the Monitor, on behalf of the Applicant;

16. The proposed Representative Counsel Order requires that notice of the Representative Counsel Order, if granted, will be provided to all Represented Parties;

Extension of Stay Period

17. The Stay Period currently expires on January 31, 2025;

18. The Monitor proposes that this Court extend the Stay Period until and including August 29, 2025;

19. As of the Claims Bar Date, the Monitor received 170 Proofs of Claim totalling approximately \$40.2 million of asserted Claims against the Applicant. One Claim is subject to ongoing review and adjudication by the Monitor (the "**Unresolved Claim**");

20. As described above, the Applicant and the Monitor also continue to pursue the surplus balance remaining after the wind-down of the Hourly DB Plan and the Salaried DB Plan;

21. The stay of proceedings should provide the time necessary for the Monitor to reach a settlement of the Unresolved Claim and to administer the CCAA Cash Pool (as described in the

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Ninth Report) and for the Monitor and Applicant to continue to pursue the surplus balance from the Hourly DB Plan and Salaried DB Plan;

22. The stay of proceedings is required to provide the necessary stability and certainty to enable the Monitor to facilitate the wind-down of the CCAA Proceedings;

23. The Remaining Canadian Designated Amount Portion (described in the Ninth Report) and approximately \$50,000 of the CCAA Cash Pool together with any funds received by the Applicant in respect of the Hourly DB Plan and/or Salaried DB Plan surplus funds, are expected to provide sufficient liquidity to fund the remaining costs anticipated to be incurred to complete the wind-down of the CCAA Proceedings (and any related wind-down proceedings such as formal bankruptcies);

24. The Applicant, with the assistance and oversight of the Monitor, continues to act in good faith and with due diligence;

Other Grounds

25. The provisions of the CCAA, and the statutory, inherent and equitable jurisdiction of this Honourable Court;

26. Rules 1.04, 1.05, 2.03, 3.02, 16 and 37 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; and

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

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

1. The Ninth Report of the Monitor dated January 21, 2025; and
2. Such further and other evidence as counsel may advise and this Honourable Court may permit.

January 21, 2025

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solely in its capacity as Monitor of
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corporate capacity

TO: SERVICE LIST

**IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,
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Court File No.: CV-22-00691990-00CL

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF
1000156489 ONTARIO INC.**

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**
Proceeding commenced at Toronto

**NOTICE OF MOTION
(Representative Counsel Order and
Stay Extension Order)**

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TAB 2

Court File No. CV-22-00691990-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

THE HONOURABLE)	TUESDAY, THE 28 TH
)	
JUSTICE DIETRICH)	DAY OF JANUARY, 2025

B E T W E E N:

(Court Seal)

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 1000156489 ONTARIO INC.

Applicant

REPRESENTATIVE COUNSEL ORDER

THIS MOTION made by Alvarez & Marsal Canada Inc. (“**A&M**”), in its capacity as monitor (in such capacity, the “**Monitor**”) of 1000156489 Ontario Inc. (f/k/a DCL Corporation) (the “**Company**”), pursuant to the *Companies' Creditors Arrangement Act*, R.S.C., 1985, c. C-36, as amended (the “**CCAA**”) was heard this day by judicial video conference via Zoom in Toronto, Ontario.

ON READING the the Notice of Motion, the Ninth Report of the Monitor dated January 21, 2025 (the “**Ninth Report**”), and on hearing the submissions of counsel for the Monitor and Representative Counsel (as defined below), and those other parties present:

DEFINITIONS

1. **THIS COURT ORDERS** that capitalized terms used herein that are not otherwise defined have the meanings ascribed to them in the Ninth Report.

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APPOINTMENT OF REPRESENTATIVE COUNSEL

2. **THIS COURT ORDERS** that Ursel Phillips Fellows Hopkinson LLP (the “**Representative Counsel**”) is hereby appointed as representative counsel to represent the interests of all members of the Salaried DB Plan and all members of the Hourly DB Plan (collectively, the “**Represented Parties**”) in these CCAA proceedings, solely with respect to pension surplus entitlements of the Represented Parties under the Salaried DB Plan and the Hourly DB Plan, as applicable (the “**Purpose**”). As used herein, “Represented Parties” shall include any person claiming an interest under or on behalf of a Represented Party.

3. **THIS COURT ORDERS** that Representative Counsel shall be entitled to commence the process of identifying no more than three (3) members of the Salaried DB Plan to be nominated as Court-appointed representative of the Salaried DB Plan and no more than one (1) representative of the Union to be nominated as Court-appointed representative of the Hourly DB Plan (collectively, the “**Representatives**”) as soon as practicable following the date hereof. The Representatives shall, upon appointment, represent the members of the Salaried DB Plan and members of the Hourly DB Plan, as applicable (excluding the Opt-Out Individuals (as defined below), if any), in these CCAA proceedings, to act in the overall best interests of the Represented Parties from each such pension plan, and to advise and where appropriate instruct the Representative Counsel with respect to their respective pension plan, in every case, solely for the Purpose. The Representative Counsel may rely upon the advice, information and instructions received from the Representatives in carrying out the mandate of the Representative Counsel without further communications with or instructions from the Represented Parties, except as may be recommended by the Representative Counsel or ordered by this Court.

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4. **THIS COURT ORDERS** that, with the exception of Opt-Out Individuals, (a) the Representative Counsel shall represent all Represented Parties in these CCAA proceedings; (b) the Representatives of the Salaried DB Plan and the Representatives of the Hourly DB Plan shall each represent the Represented Parties of the Salaried DB Plan and Hourly DB Plan, respectively; (c) the Represented Parties shall be bound by the actions of the Representatives and the Representative Counsel in these CCAA proceedings; and (d) the Representatives shall be entitled, on the advice of the Representative Counsel, to reach any settlement agreements, advocate on behalf of the Represented Parties for the Purpose and compromise any rights, entitlements or claims of the Represented Parties, subject to approval of this Court.

5. **THIS COURT ORDERS** that Representative Counsel shall be permitted to obtain from the Company or the appointed administrator of the Hourly DB Plan and Salaried DB Plan (the “**Administrator**”), to the extent reasonably and readily available to the Company and the Administrator, as applicable, and subject to confidentiality arrangements satisfactory to the Company and the Monitor, without charge to the Company or Monitor, the following information, documents and data (the “**Information**”) to only be used for the Purpose in the context of these CCAA proceedings:

- (a) the names, last known addresses and last known telephone numbers and e-mail addresses (if any) of the Represented Parties (excluding Opt-Out Individuals, if any, who have opted out prior to delivery of the Information); and
- (b) upon request of the Representative Counsel, such documents and data as may be reasonably relevant to matters relating to the issues affecting the Represented

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Parties in these CCAA proceedings provided that such Information is to be only used for the Purpose;

and that, in so doing, the Company or the Administrator is not required to obtain express consent from such Represented Parties authorizing disclosure of the Information to the Representative Counsel for the Purpose and, further, in accordance with section 7(3) of the *Personal Information Protection and Electronic Documents Act*, this Order shall be sufficient to authorize the disclosure of the Information for the Purpose without the knowledge or consent of the individual Represented Parties.

6. **THIS COURT ORDERS** that notice of the granting of this Order shall be provided by the Administrator, with the assistance of the Monitor, delivering a letter from the Representative Counsel explaining the terms of this Order, which shall include the Monitor's website address where a full copy of this Order can be reviewed, to be delivered forthwith to the Represented Parties by ordinary mail to the physical address of each Represented Party as last shown in the books and records of the Administrator, or by such other electronic means as is maintained by the Administrator for the purposes of communicating directly with the Represented Parties, and further that a copy of this Order be posted on the Monitor's website.

7. **THIS COURT ORDERS** that any individual Represented Party who does not wish to be represented by the Representatives and the Representative Counsel in these CCAA proceedings shall, within 30 days of the date of the letter pursuant to paragraph 6 above, notify the Monitor, in writing, that he or she is opting out of representation by the Representatives and the Representative Counsel by delivering to the Monitor an opt-out notice in the form attached as Schedule "A" hereto (each an "**Opt-Out Notice**"), and shall thereafter not be bound by the actions of the

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Representatives or the Representative Counsel and shall represent themselves or be represented by any counsel that such Represented Party may retain exclusively at their own expense in these CCAA proceedings (any such persons who deliver an Opt-Out Notice in compliance with the terms of this paragraph, “**Opt-Out Individuals**”). The Monitor shall deliver copies of all Opt-Out Notices received to the Company and the Representative Counsel as soon as reasonably practicable.

8. **THIS COURT ORDERS** that the Representative Counsel shall be given notice of all motions to which the Represented Parties are entitled to receive notice in these CCAA proceedings and that it shall be entitled to represent those on whose behalf it is hereby appointed in all such proceedings.

9. **THIS COURT ORDERS** that Representative Counsel may retain such actuarial, financial and other advisors and assistants (collectively, the “**Advisors**”) as may be reasonably necessary in connection with its duties as Representative Counsel in relation to the Purpose.

10. **THIS COURT ORDERS** that Representative Counsel’s fees and disbursements shall be paid in accordance with the terms of the Representative Counsel Letter solely from the distributions of the surplus amounts in the Salaried DB Plan and the Hourly DB Plan, and shall be subject to the Global Fee Cap, as further described in the Ninth Report. In the event of any disagreement with respect to the Representative Counsel’s fees and disbursements, such disagreement may be remitted to this Court for determination. The Company and the Monitor shall have no liability whatsoever for the fees and disbursements incurred by Representative Counsel.

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11. **THIS COURT ORDERS** that any payments made to Representative Counsel pursuant to this Order do not and will not constitute preferences, fraudulent conveyances, transfers of undervalue, oppressive conduct or other challengeable or voidable transactions under any applicable laws.

12. **THIS COURT ORDERS** that the Representative Counsel is hereby authorized to take all steps and do all acts necessary or desirable to carry out the terms of this Order.

13. **THIS COURT ORDERS** that the Representative Counsel shall be at liberty, and is hereby authorized, at any time, to apply to this Court for advice and directions in respect of its appointment or the fulfilment of its duties in carrying out the provisions of this Order or any variation of the powers and duties of the Representative Counsel, which shall be brought on notice to the Company, the Monitor and other interested parties, unless this Court orders otherwise.

14. **THIS COURT ORDERS** that the Representative Counsel and the Representatives shall have no personal liability or obligations as a result of the performance of their duties in carrying out the provisions of this Order or any subsequent Orders in these CCAA proceedings, save and except for liability arising out of gross negligence or wilful misconduct.

15. **THIS COURT ORDERS** that no action or other proceeding may be commenced against the Representative Counsel or the Representatives in respect of the performance of their duties under this Order without leave of this Court on seven (7) days' notice to the Representative Counsel or the Representatives, as the case may be.

16. **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

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effect to this Order and to assist the Applicant, the Monitor and their respective 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 Applicant and to the Monitor, as an officer of this Court, as may be necessary or desirable to give effect to this Order, to grant representative status to the Monitor in any foreign proceeding, or to assist the Applicant and the Monitor and their respective agents in carrying out the terms of this Order and in case, any which motion to be served within three (3) weeks of the date this order.

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SCHEDULE "A"

FORM OF OPT-OUT NOTICE

TO: **ALVAREZ & MARSAL CANADA INC.**

Royal Bank Plaza, South Tower

200 Bay Street, Suite 2900

P.O. Box 22

Toronto, ON M5J 2J1

Attention: Josh Nevsky

I hereby provide written notice that I do not wish to be represented by Ursel Phillips Fellows Hopkinson LLP, representative counsel (the "**Representative Counsel**") for the members of the Salaried DB Plan and for members of the Hourly DB Plan of 1000156489 Ontario Inc. (f/k/a DCL Corporation) (the "**Company**") in their proceedings under the *Companies' Creditors Arrangement Act* (Court File No. CV-22-00691990-00CL) (the "**CCAA Proceedings**"). I understand that by opting out of representation if I wish to take part in the CCAA Proceedings I would need to do so as an independent party. I am responsible for retaining my own legal counsel should I choose to do so, and that I would be personally liable for the costs of my own legal representation. I understand that a copy of this Opt-Out Form will be provided to the Representative Counsel and to the Company.

 Witness

 Signature

Name [please print]:

Address:

Telephone:

Email address:

Note: To opt out, this form must be completed and received at the above address on or before ●.

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

Court File No.: CV-22-00691990-00CL

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF
1000156489 ONTARIO INC.

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

Proceeding commenced at Toronto

REPRESENTATIVE COUNSEL ORDER

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Counsel for Alvarez & Marsal Canada Inc., solely in its capacity as Monitor of 1000156489 Ontario Inc. (f/k/a DCL Corporation) and not in its personal or corporate capacity

TAB 3

Court File No. CV-22-00691990-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

THE HONOURABLE)	TUESDAY, THE 28 TH
)	
JUSTICE DIETRICH)	DAY OF JANUARY, 2025

B E T W E E N:

(Court Seal)

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 1000156489 ONTARIO INC.

Applicant

**ORDER
(Stay Extension)**

THIS MOTION made by Alvarez & Marsal Canada Inc. (“**A&M**”), in its capacity as monitor (in such capacity, the “**Monitor**”) of 1000156489 Ontario Inc. (f/k/a DCL Corporation) (the “**Company**”), pursuant to the *Companies' Creditors Arrangement Act*, R.S.C., 1985, c. C-36, as amended (the “**CCAA**”) for an order seeking the extension of the Stay Period to August 29, 2025, was heard this day by judicial video conference via Zoom in Toronto, Ontario.

ON READING the Notice of Motion, the Ninth Report of the Monitor dated January 21, 2025 (the “**Ninth Report**”), and on hearing the submissions of counsel for the Monitor and those other parties present, no one else appearing although duly served as appears from the affidavit of service of Marleigh Dick sworn January ●, 2025:

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SERVICE

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

DEFINITIONS

2. **THIS COURT ORDERS** that capitalized terms used herein that are not otherwise defined have the meanings ascribed to them in the Ninth Report.

STAY EXTENSION

3. **THIS COURT ORDERS** that the Stay Period is hereby extended until and including August 29, 2025.

AID AND RECOGNITION

4. **THIS COURT HEREBY REQUESTS** the aid and recognition of any court, tribunal, regulatory or administrative body having jurisdiction in Canada or outside Canada to give effect to this Order and to assist the Monitor, the Company and their respective 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, and the Company, as may be necessary or desirable to give effect to this Order, or to assist the Monitor and the Company and their respective 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. (Toronto time) on the date of this Order.

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

Court File No.: CV-22-00691990-00CL

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF
1000156489 ONTARIO INC.**

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**
Proceeding commenced at Toronto

**ORDER
(Stay Extension)**

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Counsel for Alvarez & Marsal Canada Inc., solely in its capacity as Monitor of 1000156489 Ontario Inc. (f/k/a DCL Corporation) and not in its personal or corporate capacity

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

Court File No.: CV-22-00691990-00CL

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF
1000156489 ONTARIO INC.**

ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST

PROCEEDING COMMENCED AT TORONTO

MOTION RECORD OF THE MONITOR
(Representative Counsel Order and Stay Extension Order)

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