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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

In re:	§	Chapter 15
	§	
Fossil Creek A2A Limited	§	Case No. 24-44299
Partnership, <i>et al.</i> , <sup>1</sup>	§	
	§	
Debtors in a Foreign Proceeding.	§	

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**NOTICE OF DESIGNATION AS COMPLEX BANKRUPTCY CASES**

On November 20, 2024, Alvarez & Marsal Canada Inc., (the “*Foreign Representative*”), in its capacity as the duly authorized foreign representative of the above-captioned debtors (collectively, the “*Debtors*”), filed voluntary petitions for relief under Chapter 15 of Title 11 of the United States Code on behalf of each of the Debtors and sought joint administration of these cases. The undersigned counsel for the Foreign Representative believes that these chapter 15 cases qualify as complex cases

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<sup>1</sup> The Debtors in these chapter 15 cases, along with the Debtors’ unique identifiers, are: A2A Developments Inc. (Ontario Corp. No. 2274252), Hills of Windridge A2A GP Inc. (Ontario Corp. No. 2360816), Windridge A2A Developments, LLC (Tax I.D. 32047814366), Fossil Creek A2A GP Inc. (Corporate Access No. 2018090577), Fossil Creek A2A Developments, LLC (Tax I.D. 32047814341), Serene Country Homes (Canada) Inc. (Ontario Corp. No. 2216166), A2A Capital Services Canada Inc. (Corp. No. 835144-9), Fossil Creek A2A Limited Partnership (Registration No. LP18090985), Hills of Windridge A2A LP (Business I.D. No. 230156754), Fossil Creek A2A Trust, and Hills of Windridge A2A Trust. Copies of materials filed with the applicable court in the CCAA proceedings and these chapter 15 cases are available on the website of the Monitor: <https://www.alvarezandmarsal.com/A2A>.

pursuant to this Court's *Procedures for Complex Cases in the Northern District of Texas* for the following reasons:

- \_\_\_\_\_ The total liability of the Debtors, along with the total liabilities of the Debtors' non-filing affiliates, exceeds \$25 million;
- \_\_\_\_\_ There are more than 100 parties-in-interest in this case;
- \_\_\_\_\_ Any claims or interests in the Debtors are publicly traded.
- X\_\_\_\_\_ Other: this is a non-consensual chapter 15 involving eleven affiliated entities with various corporate structures.

A copy of the proposed order granting complex bankruptcy case treatment is attached hereto as **Exhibit A**.

*[Remainder of page intentionally left blank]*

Dated: November 20, 2024  
Dallas, Texas

Respectfully submitted,

**REED SMITH LLP**

By: /s/ Michael P. Cooley

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**Certificate of Service**

I certify that on November 20, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

/s/ Michael P. Cooley

Michael P. Cooley

**Exhibit A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

In re:	§	Chapter 15
	§	
Fossil Creek A2A Limited	§	Case No. 24-44299
Partnership, <i>et al.</i> , <sup>2</sup>	§	
	§	
<u>Debtors in a Foreign Proceeding.</u>	§	

**ORDER GRANTING COMPLEX BANKRUPTCY CASE TREATMENT**

On November 20, 2024, Alvarez & Marsal Canada Inc., as Monitor (the “Foreign Representative”) filed voluntary petitions for relief under chapter 15 of title 11 of the United States Code on behalf of each of the above-captioned debtors, commencing these chapter 15 cases (collectively, the “Cases”). Also on November 20, 2024, the Foreign Representative filed the *Notice of Designation as Complex Bankruptcy Cases*. After review of the initial

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<sup>2</sup> The Debtors in these chapter 15 cases, along with the Debtors’ unique identifiers, are: A2A Developments Inc. (Ontario Corp. No. 2274252), Hills of Windridge A2A GP Inc. (Ontario Corp. No. 2360816), Windridge A2A Developments, LLC (Tax I.D. 32047814366), Fossil Creek A2A GP Inc. (Corporate Access No. 2018090577), Fossil Creek A2A Developments, LLC (Tax I.D. 32047814341), Serene Country Homes (Canada) Inc. (Ontario Corp. No. 2216166), A2A Capital Services Canada Inc. (Corp. No. 835144-9), Fossil Creek A2A Limited Partnership (Registration No. LP18090985), Hills of Windridge A2A LP (Business I.D. No. 230156754), Fossil Creek A2A Trust, and Hills of Windridge A2A Trust. Copies of materials filed with the applicable court in the CCAA proceedings and these chapter 15 cases are available on the website of the Monitor: <https://www.alvarezandmarsal.com/A2A>.

pleadings filed in these Cases, the Court finds and concludes that these Cases are complex bankruptcy cases warranting application of the *Procedures for Complex Cases in the Northern District of Texas* (the “Complex Case Procedures”). Accordingly, **IT IS HEREBY ORDERED THAT:**

1. The Complex Case Procedures and the *Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas* (the “Local Rules”) shall apply to and govern these Cases. Compliance with the Complex Case Procedures is required for all hearing, notice, and objection procedures. The Complex Case Procedures can be found on the Court’s website at: <https://www.txnb.uscourts.gov/complex-case-procedures>. If a conflict exists between the Local Rules and the Complex Case Procedures, the Complex Case Procedures shall govern.

2. The Foreign Representative (or its noticing agent) shall give notice of this Order to all parties in interest within seven (7) days of entry of the Order. If any party in interest objects to the provisions of this Order, that party may file an appropriate motion articulating the objection and the relief requested within 14 days of service of the Order. After hearing the objection and any responses, the Court may reconsider any part of this Order and may grant relief, if appropriate.

**### END OF ORDER ###**

Submitted by:

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