

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

THE HONOURABLE MARKUS KOEHNEN)
)
)

FRIDAY,
THE 14th DAY OF AUGUST, 2020



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

AND IN THE MATTER OF CERTAIN PROCEEDINGS TAKEN IN THE UNITED STATES
BANKRUPTCY COURT, SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION WITH
RESPECT TO THE COMPANIES LISTED ON SCHEDULE "A" HERETO

APPLICATION OF MOORES THE SUIT PEOPLE CORP.
UNDER SECTION 46 OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C.
1985, c. C-86, AS AMENDED

AMENDED AND RESTATED SUPPLEMENTAL ORDER
(FOREIGN MAIN PROCEEDING)

THIS APPLICATION made by Moores The Suit People Corp. ("Moores" or the "Foreign Representative") in its capacity as the foreign representative for itself and for the other companies listed at Schedule "A" hereof (the "Chapter 11 Debtors") pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "CCAA"), for an order substantially in the form enclosed in the Application Record was heard on this day by this Court via a teleconference hearing;

ON READING the Notice of Application, the affidavit of Holly Etlin sworn August 4, 2020, the supplemental affidavit of Holly Etlin sworn August 5, 2020 (collectively, the "Etlin Affidavit"), the affidavit of service of Rémi Leprévost sworn August 5, 2020, the pre-filing

report of Grant Thornton Limited as proposed information officer ("**GT**" or the "**Information Officer**") dated August 5, 2020, each filed in the Court record, and upon being provided with copies of the documents required by Section 46 of the CCAA;

AND UPON HEARING the submissions of counsel for the Foreign Representative, counsel for the proposed Information Officer, counsel for JPMorgan Chase Bank N.A., Toronto Branch, as Canadian Administrative Agent to the lender parties under the DIP Financing Agreement (as defined below), and upon being advised that no other persons appearing for any other person on the service list, although duly served with the Application Record, as appears from the Leprévost Affidavit;

SERVICE

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

INITIAL RECOGNITION ORDER

2. **THIS COURT ORDERS** that any capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Initial Recognition Order (Foreign Main Proceedings) dated August 5, 2020 (the "**Initial Recognition Order**").

3. **THIS COURT ORDERS** that the provisions of this Supplemental Order shall be interpreted in a manner complementary and supplementary to the provisions of the Initial Recognition Order, provided that in the event of a conflict between the provisions of this Supplemental Order and the provisions of the Initial Recognition Order, the provisions of the Initial Recognition Order shall govern.

RECOGNITION OF CHAPTER 11 ORDERS

4. **THIS COURT ORDERS** that the following orders, attached to this Order as Schedules "B" to "M" (collectively, the "**Chapter 11 Orders**"), issued by the United States Bankruptcy Court, Southern District of Texas, Houston Division (the "**U.S. Bankruptcy Court**") made in the proceedings commenced before it by the Chapter 11 Debtors under Chapter 11 of Title 11 of the *United States Code* (the "**U.S. Bankruptcy Code**" and the "**U.S. Bankruptcy Proceedings**") are hereby recognized and given full force and effect in all provinces and territories of Canada pursuant to Section 49 of the CCAA:

- (a) the Bar Date Order;
- (b) the Interim Cash Management Order;
- (c) the Interim Critical Vendors Order;
- (d) the Interim Customer Programs Order;
- (e) the Interim DIP Order (the "**U.S. Interim DIP Order**");
- (f) the Insurance Order;
- (g) the Joint Administration Order;
- (h) the Interim Lienholders Order;
- (i) the Corrected Interim NOL Order;
- (j) the Prime Clerk Retention Order;
- (k) the Surety Bond Order;
- (l) the Prepetition Taxes Order; and

(m) the Prepetition Wages Order;

provided, however, that in the event of any conflict between the terms of the Chapter 11 Orders and the Orders of this Court made in the within proceedings, the Orders of this Court shall govern with respect to Property (as defined below) in Canada.

APPOINTMENT OF INFORMATION OFFICER

5. **THIS COURT ORDERS** that GT is hereby appointed as an officer of this Court, with the powers and duties set out herein.

NO PROCEEDINGS AGAINST THE CHAPTER 11 DEBTORS OR THE PROPERTY

6. **THIS COURT ORDERS** that until such date as this Court may order (the "**Stay Period**"), no proceeding or enforcement process in any court or tribunal in Canada (each, a "**Proceeding**") shall be commenced or continued against or in respect of the Chapter 11 Debtors or affecting their business (the "**Business**") or their current and future assets, undertakings and properties of every nature and kind whatsoever, and wherever situate including all proceeds thereof (the "**Property**"), except with written consent of the relevant Chapter 11 Debtor or leave of this Court, and any and all Proceedings currently under way against or in respect of any of the Chapter 11 Debtors or affecting the Business or the Property are hereby stayed and suspended pending further Order of this Court.

7. **THIS COURT ORDERS** that the Chapter 11 Debtors shall pay rent for any leased store in Canada as required by the U.S. Bankruptcy Code until the effective date of the rejection of such applicable lease pursuant to an order of the U.S. Bankruptcy Court, or as otherwise agreed upon with the applicable landlord.

NO EXERCISE OF RIGHTS OR REMEDIES

8. **THIS COURT ORDERS** that during the Stay Period, all rights and remedies of any

individual, firm, corporation, governmental body or agency, or any other entities (all of the foregoing, collectively being "**Persons**" and each being a "**Person**") against or in respect of the Chapter 11 Debtors, or affecting the Business or the Property, are hereby stayed and suspended except with written consent of the relevant Chapter 11 Debtor or leave of this Court, provided that nothing in this Order shall (i) prevent the assertion of or the exercise of rights and remedies outside of Canada, (ii) empower any of the Chapter 11 Debtors to carry on any business in Canada which that Chapter 11 Debtor is not lawfully entitled to carry on, (iii) affect such investigations or Proceedings by a regulatory body as are permitted by section 11.1 of the CCAA, (iv) prevent the filing of any registration to preserve or perfect a security interest, or (v) prevent the registration of a claim for lien.

NO INTERFERENCE WITH RIGHTS

9. **THIS COURT ORDERS** that during the Stay Period, no Person shall discontinue, fail to honour, alter, interfere with, repudiate, terminate or cease to perform any right, renewal right, contract, agreement, licence or permit in favour of or held by any of the Chapter 11 Debtors in respect of or affecting the Business in Canada, except with written consent of the relevant Chapter 11 Debtor or leave of this Court.

ADDITIONAL PROTECTIONS

10. **THIS COURT ORDERS** that during the Stay Period, all Persons having oral or written agreements with the Chapter 11 Debtors (or any of them) or statutory or regulatory mandates for the supply of goods and/or services in Canada, including without limitation all computer software, communication and other data services, centralized banking services, payroll services, insurance, transportation services, utility or other services provided in respect of the Property or Business of the Chapter 11 Debtors, are hereby restrained until further Order of this Court from discontinuing, altering, interfering with or terminating the supply of such goods or services as may be required by the Chapter 11 Debtors, and that the Chapter 11

Debtors shall be entitled to the continued use in Canada of their current premises, telephone numbers, facsimile numbers, internet addresses and domain names.

11. **THIS COURT ORDERS** that during the Stay Period, and except as permitted by subsection 11.03(2) of the CCAA, no Proceeding may be commenced or continued against any of the former, current or future directors or officers of the Chapter 11 Debtors with respect to any claim against the directors or officers that arose before the date hereof and that relates to any obligations of the Chapter 11 Debtors whereby the directors or officers are alleged under any law to be liable in their capacity as directors or officers for the payment or performance of such obligations.

12. **THIS COURT ORDERS** that no Proceeding shall be commenced or continued against or in respect of the Information Officer, except with leave of this Court. In addition to the rights and protections afforded the Information Officer herein, or as an officer of this Court, the Information Officer shall have the benefit of all of the rights and protections afforded to a Monitor under the CCAA, and shall incur no liability or obligation as a result of its appointment or the carrying out of the provisions of this Order, save and except for any gross negligence or wilful misconduct on its part.

OTHER PROVISIONS RELATING TO INFORMATION OFFICER

13. **THIS COURT ORDERS** that the Information Officer:

- (a) is hereby authorized to provide such assistance to the Foreign Representative in the performance of its duties as the Foreign Representative may reasonably request;
- (b) shall report to this Court periodically with respect to the status of these proceedings and the status of the U.S. Bankruptcy Proceedings, which reports

may include information relating to the Property, the Business, or such other matters as may be relevant to the proceedings herein;

- (c) in addition to the periodic reports referred to in paragraph 13(b) above, the Information Officer may report to this Court at such other times and intervals as the Information Officer may deem appropriate with respect to any of the matters referred to in paragraph 13(b) above;
- (d) shall have full and complete access to the Property, including the premises, books, records, data, including data in electronic form, and other financial documents of the Chapter 11 Debtors, to the extent that is necessary to perform its duties arising under this Order; and
- (e) shall be at liberty to engage independent legal counsel or such other persons as the Information Officer deems necessary or advisable respecting the exercise of its powers and performance of its obligations under this Order.

14. **THIS COURT ORDERS** that the Chapter 11 Debtors and the Foreign Representative shall, (i) advise the Information Officer of material steps and events in the present CCAA proceedings or in the U.S. Bankruptcy Proceedings, (ii) co-operate fully with the Information Officer in the exercise of its powers and discharge of its obligations, and (iii) provide the Information Officer with the assistance that is necessary to enable the Information Officer to adequately carry out its functions.

15. **THIS COURT ORDERS** that the Information Officer shall not take possession of the Property and shall take no part whatsoever in the management or supervision of the management of the Business and shall not, by fulfilling its obligations hereunder, be deemed to have taken or maintained possession or control of the Business or Property, or any part

thereof.

16. **THIS COURT ORDERS** that the Information Officer (i) shall post on its website all Orders of this Court made in these proceedings, all reports of the Information Officer filed herein, and such other materials as this Court may order from time to time, and (ii) may post on its website any other materials that the Information Officer deems appropriate.

17. **THIS COURT ORDERS** that the Information Officer may provide any creditor of a Chapter 11 Debtor with information provided by the Chapter 11 Debtors in response to reasonable requests for information made in writing by such creditor addressed to the Information Officer. The Information Officer shall not have any responsibility or liability with respect to the information disseminated by it pursuant to this paragraph. In the case of information that the Information Officer has been advised by the Chapter 11 Debtors is privileged or confidential, the Information Officer shall not provide such information to creditors unless otherwise directed by this Court or on such terms as the Information Officer, the Foreign Representative and the relevant Chapter 11 Debtors may agree.

18. **THIS COURT ORDERS** that Canadian counsel to the Chapter 11 Debtors, the Information Officer and counsel to the Information Officer shall be paid by the Chapter 11 Debtors their reasonable fees and disbursements incurred in respect of these proceedings, both before and after the making of this Order, in each case at their standard rates and charges unless otherwise ordered by the Court on the passing of accounts. The Chapter 11 Debtors are hereby authorized and directed to pay the accounts of Canadian counsel to the Chapter 11 Debtors, the Information Officer and counsel for the Information Officer forthwith upon receipt.

19. **THIS COURT ORDERS** that, if requested by the Foreign Representative, this Court or any interested party, the Information Officer and its legal counsel shall pass their accounts from time to time, and for this purpose the accounts of the Information Officer and its legal counsel are hereby referred to a judge of the Commercial List of the Ontario Superior Court of Justice, and the accounts of the Information Officer and its counsel shall not be subject to approval in the Foreign Proceeding.

20. **THIS COURT ORDERS** that the Information Officer and counsel to the Information Officer shall be entitled to the benefit of and are hereby granted a charge on the Property in Canada in the aggregate amount of \$600,000 (the "**Administration Charge**"), as security for their professional fees and disbursements incurred in respect of these proceedings, both before and after the making of this Order. The Administration Charge shall have the priority set out in paragraphs 23 and 24 hereof.

INTERIM FINANCING

21. **THIS COURT ORDERS** that the Agents (as such term is defined in the DIP Financing Agreement filed Exhibit "H" to the Etlin Affidavit (the "**DIP Financing Agreement**")), for and on behalf of themselves and the other Lenders (as such term is defined in the DIP Financing Agreement) shall be entitled to the benefit of and are hereby granted a charge on the Property in Canada (the "**DIP Lenders' Charge**"), as security for the Obligations (as such term is defined in the DIP Credit Agreement), which DIP Lenders' Charge shall be consistent with the liens and charges created by the Interim DIP Order, provided however that the DIP Lenders' Charge, with respect to the Property in Canada, shall have the priority set out in paragraphs 23 and 25 hereof, and further provided that the DIP Lenders' Charge shall not be enforced except with leave of this Court.

22. **THIS COURT ORDERS** that, notwithstanding anything to the contrary in the US Interim DIP Order, but subject in all respects to the priorities set out in paragraphs 23 and 25 hereof, the DIP Obligations (as defined in the U.S. Interim DIP Order) secured by the DIP Lenders' Charge shall be satisfied, first from the proceeds of the DIP Collateral (as defined in the U.S. Interim DIP Order) which constitutes Property of the Chapter 11 Debtors (other than the Property of the Canadian Borrower and the Canadian Guarantors, as such terms are defined in the U.S. Interim DIP Order) and second from the proceeds of DIP Collateral which constitutes Property of the Canadian Borrower and the Canadian Guarantors; provided, however, that the foregoing shall not apply to the repayment of any DIP Obligations incurred directly by the Canadian Borrower under the DIP Financing Agreement.

VALIDITY AND PRIORITY OF CHARGES CREATED BY THIS ORDER

23. **THIS COURT ORDERS** that the priorities of the Administration Charge and the DIP Lenders' Charge (collectively, the "**Charges**"), as among them, shall be as follows:

- (a) First, the Administration Charge (up to the maximum amount of \$600,000);
and
- (b) Second, the DIP Lenders' Charge.

24. **THIS COURT ORDERS** that the filing, registration or perfection of the Charges shall not be required, and that the Charges shall be valid and enforceable for all purposes, including as against any right, title or interest filed, registered, recorded or perfected subsequent to the Charges coming into existence, notwithstanding any such failure to file, register, record or perfect the Charges.

25. **THIS COURT ORDERS** that the Charges (all as constituted and defined herein) shall constitute a charge on the Property in Canada and such Charges shall rank in priority to all other security interests, trusts, liens, charges, encumbrances and claims of secured

creditors, statutory or otherwise (collectively, "**Encumbrances**") in favour of any Person.

26. **THIS COURT ORDERS** that except as otherwise expressly provided for herein, or as may be approved by this Court, the Chapter 11 Debtors shall not grant any Encumbrances over any Property in Canada that rank in priority to, or *pari passu* with, the Charges, unless the Chapter 11 Debtors also obtain the prior written consent of the Information Officer and the beneficiaries of the Charges.

27. **THIS COURT ORDERS** that the Charges shall not be rendered invalid or unenforceable and the rights and remedies of the chargees entitled to the benefit of the Charges (collectively, the "**Chargees**") shall not otherwise be limited or impaired in any way by (i) the pendency of these proceedings and the declarations of insolvency made herein; (ii) any application(s) for bankruptcy or receivership order(s) issued pursuant to the BIA or otherwise, or any bankruptcy or receivership order made pursuant to such applications; (iii) the filing of any assignment for the general benefit of creditors made pursuant to the BIA; (iv) the provisions of any federal or provincial statutes; or (v) any negative covenants, prohibitions or other similar provisions with respect to borrowings, incurring debt or the creation of Encumbrances, contained in any existing loan documents, lease, sublease, offer to lease or other agreement (collectively, an "**Agreement**") which binds any Chapter 11 Debtor, and notwithstanding any provision to the contrary in any Agreement:

- (a) the creation of the Charges shall not create or be deemed to constitute a breach by a Chapter 11 Debtor of any Agreement to which it is a party;
- (b) none of the Chargees shall have any liability to any Person whatsoever as a result of any breach of any Agreement caused by or resulting from the creation of the Charges; and
- (c) the payments made by the Chapter 11 Debtors to the Chargees pursuant to

this Order and the DIP Documents, and the granting of the Charges, do not and will not constitute a preference, fraudulent conveyance, transfer at undervalue, oppressive conduct, or other challengeable or voidable transaction under any applicable law.

28. **THIS COURT ORDERS** that any Charge created by this Order over leases of real property in Canada shall only be a Charge in the applicable Chapter 11 Debtor's interest in such real property leases.

SERVICE AND NOTICE

29. **THIS COURT ORDERS** that the Information Officer shall: i) without delay, publish in the Globe and Mail, National Edition, a notice containing the information prescribed under the CCAA; and ii) within five days after the date of this Order, (A) make this Order publicly available in the manner prescribed under the CCAA, (B) send, in the prescribed manner, a notice to every known Canadian creditor who has a claim against the Canadian Chapter 11 Debtors of more than \$1000 (other than employees of the Canadian Chapter 11 Debtors), and (C) prepare a list showing the names and addresses of those creditors and the estimated amounts of those claims, and make it publicly available in the prescribed manner, all in accordance with Section 23(1)(a) of the CCAA and the regulations made thereunder.

30. **THIS COURT ORDERS** that the E-Service Guide of the Commercial List (the "Protocol") is approved and adopted by reference herein and, in this proceeding, the service of documents made in accordance with the Guide (which can be found on the Commercial List website at <https://www.ontariocourts.ca/scj/practice/practice-directions/toronto/eservice-commercial/>) shall be valid and effective service. Subject to Rule 17.05 this Order shall constitute an order for substituted service pursuant to Rule 16.04 of the Rules of Civil Procedure. Subject to Rule 3.01(d) of the Rules of Civil Procedure and paragraph 13 of the

Guide, service of documents in accordance with the Protocol will be effective on transmission. This Court further orders that a Case Website shall be established by the Information Officer in accordance with the Guide with the following URL: www.grantthornton.ca/moores.

31. **THIS COURT ORDERS** that if the service or distribution of documents in accordance with the Guide is not practicable, the Chapter 11 Debtors, the Foreign Representative and the Information Officer are at liberty to serve or distribute this Order, any other materials and orders in these proceedings and any notices or other correspondence, by forwarding true copies thereof by prepaid ordinary mail, courier, personal delivery, facsimile, electronic message or other electronic transmission to the Chapter 11 Debtors' creditors or other interested parties and their advisors at their respective addresses as last shown on the records of the applicable Chapter 11 Debtor and that any such service or notice by courier, personal delivery, facsimile, electronic message or other electronic transmission shall be deemed to be received on the date of forwarding thereof, or if sent by ordinary mail, on the third business day after mailing. For greater certainty, any such distribution or service shall be deemed to be in satisfaction of a legal or juridical obligation, and notice requirements within the meaning of clause 3(c) of the *Electronic Commerce Protection Regulations* (SOR/2013-221);

GENERAL

32. **THIS COURT ORDERS** that the Information Officer may from time to time apply to this Court for advice and directions in the discharge of its powers and duties hereunder.

33. **THIS COURT ORDERS** that nothing in this Order shall prevent the Information Officer from acting as an interim receiver, a receiver, a receiver and manager, a monitor, a proposal trustee, or a trustee in bankruptcy of any of the Chapter 11 Debtors, the Business

or the Property.

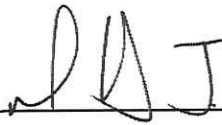
34. **THIS COURT HEREBY REQUESTS** the aid and recognition of any court, tribunal, regulatory, governmental or administrative body having jurisdiction in Canada, the United States or elsewhere, to give effect to this Order and to assist the Chapter 11 Debtors, the Foreign Representative, the Information Officer and their respective counsel and agents in carrying out the terms of this Order. All Courts, tribunals, regulatory, governmental and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to the Chapter 11 Debtors, the proposed Information Officer and their respective counsel and agents, as may be necessary or desirable to give effect to this Order, or to assist the Chapter 11 Debtors, the proposed Information Officer and their respective counsel and agents in carrying out the terms of this Order.

35. **THIS COURT ORDERS** that each of the Chapter 11 Debtors, the Foreign Representative and the Information Officer be at liberty and is hereby authorized and empowered to apply to any court, tribunal, regulatory or administrative body, wherever located, for the recognition of this Order and for assistance in carrying out the terms of this Order.

36. **THIS COURT ORDERS** that the Guidelines for Communication and Cooperation between Courts in Cross-Border Insolvency Matters Issued by the Judicial Insolvency Network and adopted by this Court and the United States Bankruptcy Court and attached as Schedule "N" hereto), are hereby adopted by this Court for the purposes of these recognition proceedings.

37. **THIS COURT ORDERS** that the granting of this order is without prejudice to all rights, if any, of the landlords regarding the process for the rejection of leases, liquidation sales and the notice to be provided prior to such rejections notwithstanding that landlords have not filed an objection in the U.S. to any proceeding filed in the U.S., it being understood however that nothing in this order should be considered or interpreted as a determination by this Court as to whether U.S. law or Canadian law applies to the aforementioned issues.

38. **THIS COURT ORDERS AND DECLARES** that this Order shall be effective as of 12:01 a.m. (Toronto time) on the date of this Order.



ENTERED AT / INSCRIT À TORONTO
ON / BOOK NO:
LE / DANS LE REGISTRE NO:

AUG 17 2020

PER / PAR: 

SCHEDULE "A"
LIST OF CHAPTER 11 DEBTORS

Tailored Brands, Inc.

JA Apparel Corp.

Jos. A. Bank Clothiers, Inc.

Joseph Abboud Manufacturing Corp.

K&G Men's Company Inc.

MWDC Holding Inc.

Nashawena Mills Corp.

Renwick Technologies, Inc.

Tailored Brands Gift Card Co LLC

Tailored Brands Purchasing LLC

Tailored Brands Worldwide Purchasing Co.

Tailored Shared Services, LLC

TB UK Holdings Limited

The Joseph A. Bank Mfg. Co., Inc.

The Men's Wearhouse, Inc.

TMW Merchants LLC

Moore's the Suit People Corp.

Moore's Retail Group Corp.

SCHEDULE "B"

ORDER (I) SETTING BAR DATES FOR FILING PROOFS OF CLAIM, INCLUDING REQUESTS FOR PAYMENT UNDER SECTION 503(B)(9), (II) ESTABLISHING AMENDED SCHEDULES BAR DATE AND REJECTION DAMAGES BAR DATE, (III) APPROVING THE FORM OF AND MANNER FOR FILING PROOFS OF CLAIM, INCLUDING SECTION 503(B)(9) REQUESTS, AND (IV) APPROVING NOTICE OF BAR DATES

SCHEDULE "C"

***INTERIM ORDER AUTHORIZING THE DEBTORS TO (I) CONTINUE TO OPERATE THEIR
CASH MANAGEMENT SYSTEMS, (II) HONOR CERTAIN PREPETITION OBLIGATIONS
RELATED THERETO, (III) MAINTAIN EXISTING BUSINESS FORMS, AND (IV)
CONTINUE TO PERFORM INTERCOMPANY TRANSACTIONS***

SCHEDULE "D"
INTERIM ORDER AUTHORIZING THE DEBTORS TO PAY PREPETITION CLAIMS OF (I)
NON-MERCHANDISE CRITICAL VENDORS AND (II) FOREIGN VENDORS

SCHEDULE "E"
***FINAL ORDER AUTHORIZING THE DEBTORS TO MAINTAIN AND ADMINISTER THEIR
EXISTING CUSTOMER PROGRAMS AND HONOR CERTAIN PREPETITION
OBLIGATIONS RELATED THERETO***

SCHEDULE "F"

INTERIM ORDER (I) AUTHORIZING THE DEBTORS TO OBTAIN POSTPETITION FINANCING, (II) AUTHORIZING THE DEBTORS TO USE CASH COLLATERAL, (III) GRANTING LIENS AND PROVIDING SUPERPRIORITY ADMINISTRATIVE EXPENSE STATUS, (IV) GRANTING ADEQUATE PROTECTION TO THE PREPETITION SECURED PARTIES, (V) MODIFYING THE AUTOMATIC STAY, (VI) SCHEDULING A FINAL HEARING, AND (VII) GRANTING RELATED RELIEF

SCHEDULE "G"

***ORDER AUTHORIZING THE DEBTORS TO (I) PAY THEIR OBLIGATIONS UNDER
INSURANCE POLICIES ENTERED INTO PREPETITION, (II) CONTINUE TO PAY
BROKERAGE COMMISSIONS, (III) RENEW, SUPPLEMENT, MODIFY, OR PURCHASE
INSURANCE COVERAGE, AND (IV) CONTINUE TO PAY WORKERS' COMPENSATION
COVERAGE FEES***

SCHEDULE "H"
ORDER DIRECTING JOINT ADMINISTRATION OF THEIR RELATED CHAPTER 11
CASES

SCHEDULE "I"
INTERIM ORDER AUTHORIZING THE DEBTORS TO PAY PREPETITION CLAIMS OF (I)
LIEN CLAIMANTS AND (II) IMPORT CLAIMANTS

SCHEDULE "J"
***CORRECTED INTERIM ORDER APPROVING NOTIFICATION AND HEARING
PROCEDURES FOR CERTAIN TRANSFERS OF AND DECLARATIONS OF
WORTHLESSNESS WITH RESPECT TO COMMON STOCK***

SCHEDULE "K"
ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF PRIME CLERK LLC
AS CLAIMS, NOTICING, AND SOLICITATION AGENT

SCHEDULE "L"
***INTERIM ORDER (I) AUTHORIZING THE DEBTORS TO MAINTAIN THE SURETY BOND
PROGRAM AND (II) GRANTING RELATED RELIEF***

SCHEDULE "M"
ORDER AUTHORIZING THE PAYMENT OF CERTAIN PREPETITION TAXES AND FEES

SCHEDULE "N"
GUIDELINES FOR COMMUNICATION AND COOPERATION BETWEEN COURTS IN
CROSS-BORDER INSOLVENCY MATTERS

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

Proceeding commenced at Toronto

ORDER

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