

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

In re:

SIMEX INC., et al.,<sup>1</sup>

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 24-10083 (TMH)

(Joint Administration Requested)

**NOTICE OF FILING OF BANKRUPTCY PETITIONS AND RELATED PLEADINGS;  
NOTICE AND AGENDA OF HEARING ON FIRST DAY MOTIONS SCHEDULED FOR  
JANUARY 26, 2024, AT 3:00 P.M. (PREVAILING EASTERN TIME)**

**THIS HEARING WILL CONDUCTED ENTIRELY BY ZOOM.**

**To attend a hearing remotely, please register using the eCourtAppearance tool  
([available here](#)) or on the court's website at [www.deb.uscourts.gov](http://www.deb.uscourts.gov)**

**\*The deadline to register for remote attendance is 6 PM (prevailing Eastern Time)  
the business day before the hearing unless otherwise noticed.\***

**This agenda sets forth items in the order they appear in the first day motion binders  
delivered to the Court. The status of each is set forth below.**

1. PETITION PACKAGES
  - a. Iwerks Entertainment, Inc. (Case No. [24-10081](#))
  - b. SimEx-Iwerks Myrtle Beach, LLC (Case No. [24-10082](#))
  - c. SimEx Inc. (Case No. [24-10083](#))
  
2. Declaration of Foreign Representative Pursuant to 11 U.S.C. § 1515 and Rule 1007(a)(4) of the Federal Rules of Bankruptcy Procedure and in Support of 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 [[Docket No. 5](#); filed 1/25/24].

<sup>1</sup> The chapter 15 debtor incorporated in Canada and/or in the province of Ontario (the "Canadian Debtor"), along with the last four digits of the Canadian Debtor's Canadian business number, is: SimEx Inc. ("SimEx") (5222). The chapter 15 debtors incorporated in the United States (the "U.S. Debtors"), along with the last four digits of each U.S. Debtor's federal tax identification number, are: Iwerks Entertainment, Inc. ("Iwerks"), (9361) and SimEx-Iwerks Myrtle Beach, LLC ("SIMB") (8417). The Canadian Debtor and the U.S. Debtors are referred to herein, collectively, as the "Debtors" or "SimEx". The Debtors' executive headquarters are located at: 210 King St East, 600, Toronto, Ontario, Canada, M5A 1J7.

Status: The Declaration will be relied upon as evidentiary support for the first day matters listed below.

3. Declaration of Roger Jaipargas in Support of Verified Petition for (I) Recognition of Canadian Proceedings as Foreign Main Proceedings, (II) Recognition of Foreign Representative, and (III) Related Relief Under Chapter 15 of the Bankruptcy Code [[Docket No. 7](#); filed 1/25/24].

Status: The Declaration will be relied upon as evidentiary support for the first day matters listed below.

### FIRST DAY PLEADINGS

1. Motion of Foreign Representative for Entry of an Order (I) Directing Joint Administration of Cases Under Chapter 15 of the Bankruptcy Code and (II) Authorizing Foreign Representative to File Consolidated Lists of Information Required by Bankruptcy Rule 1007(a)(4) [[Docket No. 3](#), filed 1/25/24].

Status: This matter is going forward.

2. Verified Petition of Foreign Representative for (I) Recognition of Canadian Proceedings as Foreign Main Proceedings, (II) Recognition of Foreign Representative, and (III) Related Relief Under Chapter 15 of the Bankruptcy Code [[Docket No. 4](#), filed 1/25/24].

Status: This matter is going forward.

3. Motion for Provisional Relief Pursuant to Section 1519 of the Bankruptcy Code [[Docket No. 6](#); filed 1/25/24].

Status: This matter is going forward

4. Motion of Foreign Representative for Entry of Order Scheduling Hearing and Specifying Form and Manner of Service of Notice Pursuant to Sections 105, 1514, and 1515 of the Bankruptcy Code and Bankruptcy Rules 2002 and 9007 [[Docket No. 8](#); filed 1/25/24].

Status: This matter is going forward

**PLEASE TAKE FURTHER NOTICE** that a hearing (the “**First Day Hearing**”) with respect to the First Day Motions is scheduled for **January 26, 2024, at 3:00 p.m. (prevailing Eastern Time)** before the Honorable Thomas M. Horan at the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE** that any and all objections to the First Day Motions may be made at the First Day Hearing.

**PLEASE TAKE FURTHER NOTICE** that copies of all petitions, motions and pleadings identified herein are available on the Court's website [www.deb.uscourts.gov](http://www.deb.uscourts.gov).

Dated: January 25, 2024  
Wilmington, Delaware

**CHIPMAN BROWN CICERO & COLE, LLP**

/s/ Mark L. Desgrosseilliers

Mark L. Desgrosseilliers (No. 4083)

Kristi J. Doughty (No. 3826)

Hercules Plaza

1313 North Market Street, Suite 5400

Wilmington, Delaware 19801

Telephone: (302) 295-0191

Facsimile: (302) 295-0199

Email: [desgross@ChipmanBrown.com](mailto:desgross@ChipmanBrown.com)

[doughty@chipmanbrown.com](mailto:doughty@chipmanbrown.com)

-and-

**PERKINS COIE LLP**

Tina N. Moss (*pro hac vice* pending)

1155 Avenue of the Americas

22<sup>nd</sup> Floor

New York, NY 10036

Tel. (212) 262-6900

Fax. (212) 977-1648

TMoss@perkinscoie.com

Paul Jasper (*pro hac vice* pending)

505 Howard Street

Suite 1000

San Francisco, California 94105-3204

Tel. (415) 344-7000

Fax. (415) 344-7050

PJasper@perkinscoie.com

*Attorneys for Foreign Representative*