

Superior Court
(Commercial Division)

Canada
Province of Québec
District of Montréal
No: 500-11-058763-208

In the matter of the *Companies' Creditors Arrangement Act* of:

**Groupe Dynamite Inc.
GRG USA Holdings Inc.
GRG USA LLC**

Debtors

-and-

Deloitte Restructuring Inc.

Monitor

Application for an Extension of the Stay Period

(Companies' Creditors Arrangement Act, s 11.02(2))

To the Honourable Peter Kalichman, Judge of the Superior Court, sitting in the Commercial Division for the District of Montréal, the Debtors respectfully submit:

I. Introduction

1. By the present application (the "**Application**"), the Debtors request an extension of the Stay Period to December 11, 2020, in accordance with the terms of the proposed extension order (the "**Proposed Extension Order**"), communicated herewith as **Exhibit P-1**.
2. The relief sought in the Application is necessary and appropriate to allow for the Debtors to continue the restructuring process contemplated in the Initial Order dated September 8, 2020, as amended and restated on September 18, 2020 (the "**Initial Order**").
3. The Monitor supports the relief sought.

II. The Stay Period should be extended

4. On September 8, 2020, the Debtors served an Application for an Initial Order and an Amended and Restated Initial Order (the "**Initial Application**"), as appears from the Court record.

5. The Initial Application provides a detailed description of the activities of the Debtors, their key stakeholders, the circumstances surrounding the filing of the Initial Application as well as the Restructuring contemplated pursuant to the Initial Order.
6. On September 8, 2020, this Court granted the Initial Application and rendered an Initial Order, commencing proceedings in respect of the Debtors under the CCAA (the “**CCAA Proceedings**”).
7. On September 8, 2020, the Debtors disclaimed leases in respect of 78 stores, effective as of October 8, 2020.
8. On September 18, 2020, the Court rendered an amended and restated initial order, *inter alia*, confirming the provisions of the Initial Order and extending the Stay Period to October 19, 2020.
9. Since the last extension of the Stay Period on September 18, 2020, the Debtors have proceeded to continue their review of their lease portfolio. In that context, the Debtors have sent additional notices of disclaimer in respect of 18 stores with the consent of the Monitor.
10. As of October 6, 2020, Groupe Dynamite had agreements in principle with landlords regarding 200 stores out of 323 stores. The Debtors seek the extension of the Stay Period until December 11, 2020 to complete the review of their lease portfolio and initiate a claims process.
11. It is respectfully submitted that the Debtors have acted and are acting in good faith and with due diligence and that the proposed extension should be granted, in accordance with the Proposed Extension Order.
12. Given the need to advance the restructuring process as quickly as possible, it is respectfully submitted that this Court order the provisional execution of the order sought notwithstanding any appeal.

FOR THESE REASONS, MAY IT PLEASE THE COURT TO:

RENDER an order substantially in the form of the Proposed Extension Order, Exhibit P-1;

THE WHOLE without legal costs, save in case of contestation.

Montreal, October 7, 2020

McCarthy Tétrault

McCarthy Tétrault LLP

Lawyers for the Debtors

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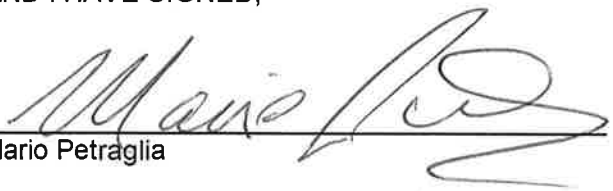
Deloitte Restructuring Inc.

Monitor

Affidavit

I, the undersigned, Mario Petraglia, authorized representative of the Debtors, domiciled for the purpose hereof at 5592 Ferrier Street, Mount-Royal, Québec, Canada, solemnly affirm that all the facts alleged in the present *Application for an Extension of the Stay Period* are true.

AND I HAVE SIGNED,


Mario Petraglia

SOLEMNLY AFFIRMED TO BEFORE ME AT
MONTREAL, this 7th day of October, 2020

Anya Desjardins #226361

COMMISSIONER OF OATHS
FOR THE PROVINCE OF QUÉBEC

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Notice of Presentation

TO: Service List

TAKE NOTICE that the present *Application for an Extension of the Stay Period* will be presented for adjudication before the Superior Court of Québec, sitting in the commercial division for the district of Montréal, on October 15, 2020 at 9:00 am in a room to be determined or by videoconference.

Montreal, October 7, 2020



McCarthy Tétrault LLP
Lawyers for the Debtors

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Proposed Monitor

List of Exhibits

EXHIBITS	DESCRIPTION
Exhibit P-1	Proposed Extension Order

Montreal, October 7, 2020



McCarthy Tétraut LLP
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