SUPERIOR COURT (COMMERCIAL DIVISION)

Canada

Province of Québec District of Montréal

No: 500-11-058763-208

Date: November 12, 2020

Presiding:

The Honourable Peter Kalichman, J.S.C.

In the matter of the Companies' Creditors Arrangement Act, RSC 1985, c C-36 of:

Groupe Dynamite Inc.

GRG USA Holdings Inc.

GRG USA LLC

Debtors

and

Deloitte Restructuring Inc.

Monitor

and

Loomis Armored U.S., LLC

Respondent

SAFEGUARD ORDER

- [1] **CONSIDERING** the Application for a Safeguard Order against Loomis dated November 12, 2020 (the "Application") of Groupe Dynamite Inc., GRG USA Holdings Inc. and GRG USA LLC (collectively, the "Debtors") pursuant to the Companies' Creditors Arrangement Act (the "CCAA") and the Code of Civil Procedure (the "CCP"), the affidavit, and the exhibits;
- [2] **CONSIDERING** the notification of the Application;
- [3] CONSIDERING the Amended and Restated Initial Order dated September 18, 2020 (the "Initial Order");
- [4] **CONSIDERING** the representations of the lawyers present;
- [5] **CONSIDERING** the provisions of the CCAA and of the CCP;

THE COURT:

[6] **GRANTS** the Application.

Service

- [7] ORDERS that any prior delay for the presentation of the Application is hereby abridged and validated so that the Application is properly returnable today and hereby dispenses with further service thereof.
- [8] **DECLARES** that sufficient prior notice of the presentation of this Application has been given by the Debtors to interested parties.

Safeguard Measures

- [9] ORDERS Loomis Armored U.S., LLC ("Loomis") to immediately resume all services provided to the Debtors with respect to the cash management of the Debtors' stores in the United States (the "Services"), including collecting cash from the Debtors' Dynamite and Garage stores in the United States and delivering thereto small denominations of currency and coin.
- [10] **ORDERS** Loomis to refrain from suspending or terminating the Services.
- [11] **DECLARES** that the present order shall remain in force until November 23, 2020, at 17h00, subject to the Debtors' right to seek renewal.

General

[12] **REQUESTS** the aid and recognition of any Court, tribunal, regulatory or administrative body in the United States, to give effect to this Order and to assist the Debtors, 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 Debtors, and the Monitor as may be necessary or desirable to give effect to this Order, to grant representative status to the Monitor or the authorized representative of the Debtors in any foreign proceeding, to assist the Debtors, and the Monitor, and to act in aid of and to be complementary to this Court, in carrying out the terms of this Order.

COPIE CERTIFIÉE CONFORME AU DOCUMENT DÉTENU PAR LA COUR

Personne désignée par le-greffier

The Honourable Peter Kalichman, J.S.C.