

CANADA
PROVINCE OF QUÉBEC
DISTRICT OF TERREBONNE
No.: 700-11-022385-241

SUPERIOR COURT
Commercial Division

IN THE MATTER OF THE PLAN OF
ARRANGEMENT OR COMPROMISE OF:

THE LION ELECTRIC COMPANY

- and -

LION ELECTRIC FINANCE CANADA INC.

- and -

LION ELECTRIC VEHICLE FINANCE CANADA
INC.

- and -

LION ELECTRIC HOLDING USA INC.

- and -

NORTHERN GENESIS ACQUISITION CORP.

- and -

THE LION ELECTRIC CO. USA INC.

- and -

LION ELECTRIC MANUFACTURING USA INC.

- and -

LION ELECTRIC FINANCE USA INC.

Applicants

- and -

DELOITTE RESTRUCTURING INC.

Monitor

**APPLICATION FOR THE ISSUANCE OF
A SECOND AMENDED AND RESTATED INITIAL ORDER
(Sections 11, 11.02, 11.03, 11.2 and 11.52 of the *Companies' Creditors Arrangement
Act*)**

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TO THE HONOURABLE MICHEL A. PINSONNAULT, J.S.C. OF THE SUPERIOR COURT,
SITTING IN COMMERCIAL DIVISION, IN AND FOR THE JUDICIAL DISTRICT OF
TERREBONNE, THE APPLICANTS RESPECTFULLY SUBMIT THE FOLLOWING:

1. **INTRODUCTION**

1. The applicants, which are comprised of The Lion Electric Company ("**Lion Electric**"), Lion Electric Finance Canada Inc. ("**Lion Finance Canada**"), Lion Electric Vehicle Finance Canada Inc. ("**Lion Vehicle Finance Canada**"), Lion Electric Holding USA Inc. ("**Lion Holding USA**"), Northern Genesis Acquisition Corp. ("**Northern Genesis**"), The Lion Electric Co. USA Inc. ("**Lion Electric USA**"), Lion Electric Manufacturing USA Inc. ("**Lion Manufacturing USA**") and Lion Electric Finance USA Inc. ("**Lion Finance USA**") and, together with Lion Electric, Lion Finance Canada, Lion Vehicle Finance Canada, Lion Holding USA, Northern Genesis, Lion Electric USA and Lion Manufacturing USA, the "**Lion Group**" or the "**Applicants**"), hereby submit to the Superior Court of Québec (Commercial Division) (the "**Court**"), pursuant to the *Companies' Creditors Arrangement Act*, R.S.C., 1985, c. C-36, as amended, (the "**CCAA**"), the present *Application for the Issuance of a Second Amended and Restated Initial Order* (the "**Application**"), by which the Applicants seek the issuance of a second amended and restated initial order (the "**Second ARIO**"), substantially in the form of the draft Second ARIO communicated herewith as **Exhibit R-1**¹, providing for the following relief:
 - (a) Interim Financing. The approval of supplemental interim financing in accordance with the terms and conditions set forth in the Amended and Restated Interim Financing Loan Agreement (the "**A&R Interim Financing Loan Agreement**"), between the Applicants and National Bank of Canada, Fédération des Caisses Desjardins du Québec and Bank of Montreal (collectively, the "**Interim Lenders**"), and the authorization for the Applicants to borrow thereunder an additional amount of up to US\$7,000,000, for an interim facility in the aggregate amount of US\$17,000,000 (the "**Interim Facility**"), to be secured by an increased super-priority interim lenders' charge against the Property in an additional amount of US\$8,400,000, for an interim lenders' charge in the aggregate amount of US\$20,400,000 (the "**Interim Lenders' Charge**"), subject to the ranking set out in the Second ARIO;
 - (b) Stay Extension. An extension of the stay of proceedings against the Applicants, their respective assets, undertakings and properties (collectively, the "**Property**") and their respective directors and officers (collectively, the "**D&Os**"), until April 25, 2025 (the "**Stay Period**"); and
 - (c) Suspension of Continuous Disclosure, Reporting and Related Obligations, and Authorization to Incur no Further Expenses. The authority for Lion Electric to incur no further expenses in relation to the Securities Filings (as defined below) and a declaration that none of the directors, officers, employees and other representatives of the Lion Group, or the Monitor (and its directors, officers, employees and representatives) shall have any personal liability for any failure by Lion Electric to make the Securities Filings.

¹ A copy of a redline document comparing the proposed Second ARIO to the Amended and Restated Initial Order issued by the Court on January 7, 2025, is communicated herewith as **Exhibit R-1A**.

2. The Applicants understand that, in support of this Application and the relief sought herein, Deloitte Restructuring Inc. ("**Deloitte**"), as the monitor of the Applicants (the "**Monitor**"), has prepared a report in advance of the hearing on the Second ARIO (the "**Third Report**") setting out its observations and recommendations with respect to the Applicants' request for the issuance of the Second ARIO.
3. The Applicants respectfully submit that the issuance of the Second ARIO is necessary and appropriate in the circumstances and is in the best interest of the Lion Group and its stakeholders.
4. Unless indicated otherwise, all references to currency in this Application are in United States dollars.

2. PROCEDURAL BACKGROUND

5. On December 18, 2024, the Honourable Michel A. Pinsonnault, J.S.C. issued, pursuant to the CCAA, the following orders:
 - (a) an Initial Order (the "**Initial Order**"), which provided for, *inter alia*, the following relief:
 - (i) a stay of proceedings against the Applicants, their Property, and their D&Os (the "**Stay of Proceedings**") for an initial period of ten (10) days, followed by a "*deemed extension*" of the initial Stay of Proceedings until the "*comeback hearing*" on January 7, 2025;
 - (ii) the appointment of Deloitte as the Monitor of the Applicants;
 - (iii) the approval of an interim financing loan agreement entered into between the Applicants and the Interim Lenders (the "**Interim Financing Loan Agreement**") in an initial amount thereunder of up to a maximum of US\$6,000,000, which amount was secured by the Interim Lenders' Charge in an initial amount of US\$7,200,000;
 - (iv) the approval of a super-priority charge against the Property in an initial amount of US\$800,000 (the "**Administration Charge**") to secure the Applicants' obligations towards the undersigned counsel and Troutman Pepper Locke LLP, as legal advisors to the Applicants, Deloitte, as Monitor to the Applicants, and Deloitte's legal advisors, National Bank Financial Inc. ("**NBF**") in its role as Financial Advisor (as defined below), and, if required, financial advisors of the Interim Lenders (collectively, the "**Professionals**");
 - (v) the approval of a super-priority charge in an initial amount of US\$2,500,000 (the "**D&O Charge**") to secure the Applicants' indemnification obligations towards their respective directors, *de facto* directors, as well as certain senior officers in connection with potential liabilities that could arise as and from the issuance of the Initial Order;
 - (vi) the approval of a Key Employee Retention Plan, and the establishment of a super-priority charge against the Property in an

amount of US\$1,500,000 to secure the Applicants' obligations thereunder; and

(vii) a declaration that Canada is the "*centre of main interest*" of the Applicants;

(b) a Sale and Investment Solicitation Process Order (the "**SISP Order**"), which provided for, *inter alia*, the following relief:

(i) the authorization for Applicants and the Monitor (collectively, the "**SISP Team**"), in consultation with the Interim Lenders and with the assistance of NBF in its role as Financial Advisor, to conduct and implement a Sale and Investment Solicitation Process (the "**SISP**"); and

(ii) the appointment of NBF as financial advisor to the Lion Group (in such a role, the "**Financial Advisor**") and the establishment of a super-priority charge against the Property in favour of the Financial Advisor in an amount of US\$4,000,000 to secure the Applicants' obligations towards the Financial Advisor.

6. On December 20, 2024, the United States Bankruptcy Court for the Northern District of Illinois (the "**US Court**"), granted a provisional order recognizing, among other things, the proceedings commenced under the CCAA (the "**CCAA Proceedings**") and giving full force and effect, in the United States, to the Initial Order on an interim basis, including, without limitation, the sale procedures and financing provisions, as well as the Stay of Proceedings.

7. On the same day, the US Court also granted an order authorizing the joint administration and consolidation of the foreign recognition proceedings of the Applicants in the United States pursuant to Chapter 15 of the United States Bankruptcy Code, as well as an order scheduling the recognition hearing as to the Initial Order, ARIO and SISP Order in the United States.

8. On January 7, 2025, the Honourable Michel A. Pinsonnault, J.S.C. issued an Amended and Restated Initial Order (the "**ARIO**"), which provided for, *inter alia*, the following relief:

(a) an extension of the Stay of Proceedings until February 14, 2025;

(b) an increase in the interim financing available via the Interim Financing Loan Agreement up to a maximum total amount of US\$10,000,000, and a corresponding increase to the Interim Lenders' Charge to a total amount of US\$12,000,000;

(c) an increase in the Administration Charge to a total amount of US\$1,300,000 for work performed and to be performed by the Professionals in connection with these CCAA Proceedings; and

(d) a D&O Charge in the amount of US\$1,900,000.

9. On January 21, 2025, the US Court granted the final recognition order, which, *inter alia*, recognized the CCAA Proceedings as the foreign main proceedings, and granted

and gave full force and effect in the United States, on a final basis, to the relief sought under the Initial Order, the ARIO and the SISF Order.

3. THE CCAA PROCEEDINGS

3.1 OVERVIEW OF THE APPLICANTS' ACTIVITIES SINCE THE COMEBACK HEARING

10. Since the granting of the ARIO at the "*comeback hearing*," the Applicants, in consultation and with the assistance of the Monitor, have been working in good faith and with due diligence to stabilize their business and operations, and implement the SISF in accordance with the SISF Order.
11. The Applicants have been working closely with the Monitor, as well as US counsel, to address all questions and concerns raised by the Applicants' stakeholders. In doing so, the Monitor and the Applicants, as applicable, have sent letters to, and had communications with, the Applicants' various creditors and other stakeholders, including customers and suppliers, and have held a number of calls in order to explain the situation and address the path moving forward.
12. Furthermore, in an effort to preserve the Applicants' liquidity and limit their cash burn rate during the CCAA Proceedings, the Applicants have worked closely with the Monitor to review and identify unprofitable contracts and agreements to be disclaimed.
13. Accordingly, several unprofitable contracts, including leases, have been disclaimed and resiliated since the "*comeback hearing*," and no objections to these disclaimers have arisen. Some of the disclaimed and resiliated contracts and leases include:
 - (a) the Applicants' lease agreement with Société en Commandite Groupe en Capitaux 4200 Boul. St-Laurent, in the province of Québec;
 - (b) the Applicants' lease agreement with Propriétés Cosmopolites Incorporée, in the province of Québec;
 - (c) the Applicants' lease agreement with Comztar Inc., in the province of New Brunswick;
 - (d) the Applicants' lease agreement with 5 Road Lands Inc., in the province of British Columbia;
 - (e) the Applicants' lease agreement with Malone Milton Properties LLC, in the state of Vermont;
 - (f) the Applicants' lease agreement with DP Clifford LLC, in the state of California;
 - (g) the Applicants' lease agreement with 909 North 17th Street LLC, in the state of Virginia;
 - (h) the Applicants' lease agreement with Terreno Auburn 400 LLC, in the state of Washington;
 - (i) the Applicants' lease agreement with Joliet Industrial CPB2, LLC, in the state of Illinois;

- (j) the Applicants' lease agreement with Larson Development 4000, LLC, in the state of Minnesota;
- (k) the Applicants' lease agreement with Sherman Warehouse GP, in the state of Colorado; and
- (l) the Applicants' lease agreement with Jacksonville Re Holdings LLC, in the state of Florida.

3.2 UPDATE ON THE SISP²

- 14. The Applicants intend to provide a more fulsome description of the conduct of the SISP at a later date when they seek Court approval of any transaction(s) resulting therefrom. However, below is a brief update on the status and conduct of the SISP since the *"comeback hearing."*
- 15. After the SISP Order was granted, the SISP Team and the Financial Advisor initiated the SISP by reaching out and distributing the Solicitation Letter to potentially interested parties. 169 potentially interested parties were contacted by the Financial Advisor. A number of these parties executed NDAs prior to the Phase 1 Bid Deadline and, in accordance with the SISP Procedures, were provided with the CIM and granted access to the VDR.
- 16. Ultimately, non-binding LOIs were submitted by the Phase 1 Bid Deadline on February 5, 2025. Following the careful assessment and review of the Phase 1 Qualified Bids by the SISP Team and their respective counsel, in consultation with the Financial Advisor and the Interim Lenders, and their respective counsel, the SISP Team determined that certain Phase 1 Qualified Bidder(s) should be invited to continue into Phase 2 of the SISP.
- 17. A such, and in accordance with the SISP Procedures, on February 7, 2025, the Financial Advisor sent:
 - (a) notices in writing to the Phase 1 Qualified Bidder(s) that they were selected as Phase 2 Qualified Bidder(s) and were permitted to proceed to Phase 2 of the SISP; and
 - (b) notices in writing to the other Phase 1 Qualified Bidders that they were not determined to be a Phase 2 Qualified Bidders and were not permitted to proceed to Phase 2 of the SISP.
- 18. Any Phase 2 Qualified Bidder who wishes to make a Phase 2 Qualified Bid must do so by the Phase 2 Bid Deadline (March 7, 2025). After the Phase 2 Bid Deadline, and in the event there is no need for an Auction, the Successful Bid(s) shall be selected by no later than March 19, 2025, with the hearing of an Approval Application in respect of Successful Bid(s) being foreseen for the week of March 31, 2025, subject to Court availability.

² Terms not defined but otherwise used in this section shall have the meaning given to them in the SISP Order and the SISP Procedures.

19. The Outside Date for closing any transaction(s) resulting from the SISP is April 23, 2025.
20. In order to allow the Applicants to pursue the SISP onto Phase 2, the Applicants negotiated with the Interim Lenders an increase in the interim financing available for an additional amount of US\$7,000,000, and a corresponding increase to the Interim Lenders' Charge for an additional amount of US\$8,400,000. Should this Court approve the execution of the A&R Interim Financing Loan Agreement, the aggregate maximum amount of the Interim Facility and of the Interim Lenders' Charge shall be US\$17,000,000 and US\$20,400,000, respectively.

4. THE SECOND ARIO

4.1 APPROVAL OF THE AMENDED AND RESTATED INTERIM FINANCING LOAN AGREEMENT

21. The Applicants seek the approval of the A&R Interim Financing Loan Agreement, which is communicated herewith as **Exhibit R-2**, along with the revised cash flow projections (the "**Cash Flow Projections**") as an Appendix thereto, communicated herewith, *under seal*, as **Exhibit R-2A**. A redlined copy highlighting the changes between the Interim Financing Loan Agreement and the A&R Interim Financing Loan Agreement is communicated herewith as **Exhibit R-2B**, for ease of reference.
22. As shown in the cash flow projections for the 7-week period starting from the week ending January 5, 2025, until the week ending February 16, 2025, and which were filed *under seal* as Appendix C to the Monitor's second report in advance of the "*comeback hearing*," the interim financing sought and approved in the ARIO was expected to be insufficient to allow the Applicants to continue operating until February 16, 2025.
23. The Applicants, accordingly, require further funding to continue their restructuring efforts and, in particular, to enable them to proceed with the conduct and implementation of Phase 2 of the SISP.
24. As a result, the Interim Lenders, pursuant to the A&R Interim Financing Loan Agreement, have agreed to advance to the Applicants an additional amount of US\$7,000,000 (US\$17,000,000 in the aggregate), subject to a corresponding increase in the Interim Lenders' Charge for an additional amount of US\$8,400,000 (US\$20,400,000 in the aggregate), as set out in the draft Second ARIO.
25. The additional financing provided under the A&R Interim Financing Loan Agreement is to be provided on identical terms as the initial financing provided for under the Interim Financing Loan Agreement.
26. The Applicants submit that the terms of the A&R Interim Financing Loan Agreement should be approved by this Court, as it is in the best interest of the Applicants and their stakeholders to have access to the requisite interim financing to continue to pursue the SISP and the present restructuring.

4.2 THE STAY EXTENSION

27. The Applicants request an extension of the Stay Period until April 25, 2025, so as to allow them to pursue their restructuring efforts, including the SISP in accordance with the timelines previously approved by this Court.
28. As was previously noted, the Applicants have acted in good faith and with due diligence since the issuance of the ARIO, having, among other things:
 - (a) engaged with their stakeholders and creditors and responded to inquiries;
 - (b) implemented Phase 1 of the SISP and began implementation of Phase 2 of the SISP;
 - (c) advanced recognition of the CCAA Proceedings in the United States;
 - (d) collaborated with the Monitor to optimize their financial stability and liquidity, and prepare the Cash Flow Projections; and
 - (e) negotiated the A&R Interim Financing Loan Agreement.
29. It is respectfully submitted that the requested extension of the Stay Period is necessary to provide the Applicants with sufficient time and the requisite continued stability in order to, *inter alia*:
 - (a) continue to conduct and implement Phase 2 of the SISP for the purpose of identifying value-maximizing transaction(s) beneficial to the Applicants and their stakeholders;
 - (b) eventually conclude the SISP and prepare the Approval Application, as necessary, in respect of one or more potential Successful Bid(s);
 - (c) implement additional restructuring measures and steps, as necessary, to improve the financial position of the Applicants; and
 - (d) continue their monetization efforts and maximize the value of their assets and business, the whole in the interest of all stakeholders.
30. The Applicants, with the collaboration and under the oversight of the Monitor, will continue to act with good faith and due diligence as they advance into Phase 2 of the SISP.
31. Based on the Cash Flow Projections, and subject to the Court's approval of the A&R Interim Financing Loan Agreement, the Applicants expect to have sufficient funding and liquidity to cover anticipated costs and expenses relating to the present restructuring process and the SISP during the extended Stay Period.
32. As such, the Monitor is of the view that the requested extension of the Stay Period is necessary and reasonable in the circumstances.
33. Furthermore, the Interim Lenders, being the senior secured creditors of the Applicants, support the requested extension to the Stay Period.

34. The desired extension of the Stay Period will not negatively impact the Applicants' creditors, as the Applicants continue to satisfy their post-filing obligations in the normal course and conduct the SISP in the best interest of their creditors and other stakeholders.

4.3 AUTHORIZATION TO INCUR NO FURTHER EXPENSES IN RELATION WITH SECURITIES FILINGS

35. As was previously outlined by the Applicants in their initial application before this Court filed in support of the Initial Order, the SISP Order and the ARIO (the "**Initial Application**"), Lion Electric is a public corporation that is subject to continuous disclosure, reporting and filing obligations under applicable securities laws, rules, regulations, policy statements and other applicable requirements, as well as applicable stock exchange rules and regulations.
36. On December 18, 2024, trading in the common shares and other listed securities of Lion Electric on the Toronto Stock Exchange ("**TSX**") and the New York Stock Exchange (the "**NYSE**") were suspended. The TSX has put the Company under delisting review under its expedited review process and the NYSE has commenced delisting proceedings against the Company. It is anticipated that trading in the Company's listed securities will continue to be suspended until completion of the review and proceedings undertaken by the TSX and the NYSE.
37. As such, the Applicants seek authorization to incur no further expenses in relation to filings (including financial statements), disclosures, core or non-core documents, restatements, amendments to existing filings, press releases or any other actions (collectively, the "**Securities Filings**") that may be required by any federal, state, provincial or other law respecting securities or capital markets in Canada or in the United States, or by the rules and regulations of a stock exchange, including, without limitation, the *Securities Act* (Québec) and comparable statutes enacted by other provinces of Canada, *Securities Act of 1933* (United States) and the *Securities Exchange Act of 1934* (United States) and comparable statutes enacted by individual states of the United States, the rules and regulations of the *Autorité des marchés financiers* (Québec) and other Canadian securities regulatory authorities, and the U.S. Securities and Exchange Commission, the TSX Company Manual, the NYSE Listed Company Manual and any other rules, regulations and policies of the Toronto Stock Exchange (TSX) and the New York Stock Exchange (NYSE) (collectively, the "**Securities Provisions**"), provided that nothing shall prohibit any securities regulator or stock exchange from taking any action or exercising any discretion that it may have of a nature described in section 11.1(2) of the CCAA as a consequence of the Applicants failing to make any Securities Filings required by the Securities Provisions.
38. The Applicants also seek, from this Court, relief that none of the directors, officers, employees, and other representatives of the Applicants, nor the Monitor (and their respective directors, officers, employees or representatives), shall have any personal liability for any failure by the Applicants to make any Securities Filings required by the Securities Provisions during the Stay Period, provided that nothing shall prohibit any securities regulator or stock exchange from taking any action or exercising any discretion that it may have against the directors, officers, employees and other representatives of the Applicants of a nature described in section 11.1 (2) of the CCAA as a consequence of such failure by the Applicants.

39. Since the commencement of the CCAA Proceedings, the Applicants have, in consultation and with the assistance of the Monitor, continued to provide detailed financial information and other information regarding the Applicants' activities via the Monitor's reports and other documentation made publicly available, and which documentation does not constitute Securities Filings. Consequently, the Applicants submit that they are able to provide accurate and detailed information regarding their situation and activities.
40. Thus, in light of the foregoing, and the time and costs associated with preparing the Securities Filings, the Applicants believe that continuing to incur expenses in relation to the Securities Filings would detract from their restructuring efforts. Furthermore, the Applicants submit that the costs incurred in preparing the Securities Filings are prejudicial to the Lion Group's stakeholders, given that these costs reduce the Lion Group's available cash on hand to pay other obligations and expenses, without providing any benefit to stakeholders. In fact, there is no prejudice to stakeholders in granting this relief, given that the detailed information regarding the Lion Group, including financial information, normally made available through the Securities Filings is still made publicly available through the materials filed in these CCAA Proceedings, which materials are published on the Monitor's website.

5. CONCLUSIONS

41. In light of the foregoing, the Applicants respectfully submit that the Second ARIO should be issued in accordance with its conclusions.
42. The Applicants understand that the Monitor supports the relief sought in the present Application as will be more fully detailed in the Third Report that will be filed in support of this Application.
43. The present Application is well-founded in fact and in law.

FOR THESE REASONS, MAY IT PLEASE THIS COURT TO:

GRANT the Application for the Issuance of a Second Amended and Restated Initial Order (the "**Application**").

ISSUE an order substantially in the form of the draft Second ARIO communicated in support of the Application as Exhibit R-1.

WITHOUT COSTS, save and except in case of contestation.

MONTREAL, February 12, 2025

A handwritten signature in cursive script that reads "Stikeman Elliott LLP". The signature is written in black ink and is positioned above a horizontal line.

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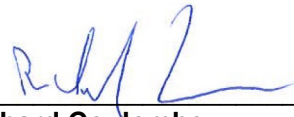
Montreal (Quebec) H3B 3V2

SWORN STATEMENT

I, the undersigned, Richard Coulombe, having my principal place of business at 921 chemin de la Rivière-du-Nord, in the city of Saint-Jérôme, Province of Quebec, solemnly declare the following:

1. I am the Chief Financial Officer of The Lion Electric Company;
2. All the facts alleged in the *Application for the Issuance of a Second Amended and Restated Initial Order* are, to the best of my knowledge, true.

AND I HAVE SIGNED



Richard Coulombe

Solemnly declared before me at Montreal,
on the 12th day of February, 2025



Commissioner for the taking of Oaths for
the Province of Québec

NOTICE OF PRESENTATION

TO: Service List

TAKE NOTICE that the *Application for the Issuance of a Second Amended and Restated Initial Order* will be presented virtually for adjudication to the Honourable Michel A. Pinsonnault, J.C.S., of the Superior Court of Quebec, Commercial Division, District of Terrebonne, **on February 14, 2025 at 9:30 AM in virtual room 6.61.**

The link to connect to the virtual courtroom can be found below.

DO GOVERN YOURSELVES ACCORDINGLY.

<u>ROOM 6.61</u>	<u>Join the Microsoft Teams meeting</u> +1 581-319-2194 Canada, Quebec (Paid number) (833) 450-1741 Canada (Toll-free number) ID de conférence : 234 968 896# <u>Local numbers</u> <u>Reset PIN</u> <u>Learn more about Teams</u> <u>Meeting options</u> Join using a video conferencing device <u>teams@teams.justice.gouv.qc.ca</u> VTC conference ID: 1166172534 <u>Other VTC dialing instructions</u>
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MONTREAL, February 12, 2025



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**SUPERIOR COURT
(Commercial Division)**

Nº. 700-11-022385-241

**CANADA
PROVINCE OF QUÉBEC
DISTRICT OF TERREBONNE**

**IN THE MATTER OF THE PLAN OF ARRANGEMENT OR
COMPROMISE OF:**

THE LION ELECTRIC COMPANY AND AL.

Applicants

-and-

DELOITTE RESTRUCTURING INC.

Monitor

BS0350

Our file : 147366-1035

**APPLICATION FOR THE ISSUANCE OF A SECOND AMENDED AND
RESTATED INITIAL ORDER AND AN ORDER PURSUANT TO THE
WAGE EARNER PROTECTION PROGRAM ACT**

**(Sections 11, 11.02, 11.03, 11.2 and 11.52 of the *Companies'*
Creditors Arrangement Act, Section 5 of the *Wage Earner*
Protection Program Act, and Section 3.2 of the *Wage Earner*
Protection Program Regulations)**

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