

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re:

XEBEC HOLDING USA INC., *et al.*,

Debtors in a foreign proceeding.¹

Chapter 15

Case No. 22-10934 (KBO)

Jointly Administered

Hearing Date: April 5, 2023 at 1:00 p.m. (ET)

Objection Deadline: March 29, 2023 at 4:00 p.m. (ET)

**MOTION OF THE FOREIGN REPRESENTATIVE
TO AMEND THE CASE CAPTION**

FormerXBC Inc. (f/k/a Xebec Adsorption Inc.), in its capacity as the authorized foreign representative (the “**Foreign Representative**” or “**Xebec Adsorption**”) for the above-captioned debtors (collectively, the “**Debtors**”) in a proceeding (the “**Canadian Proceeding**”) commenced under Canada’s Companies’ Creditors Arrangement Act, R.S.C. 1985, c. C-36, as amended (the “**CCAA**”), and pending before the Superior Court of Québec, in the Province of Québec, District of Montréal (the “**Canadian Court**”), respectfully submits this Motion (this “**Motion**”) requesting the entry of an order (the “**Proposed Order**”), substantially in the form attached hereto as **Exhibit A**, pursuant to section 105(a) of title 11 of the United States Code (the “**Bankruptcy Code**”), Rules 1005, 2002(m), and 2002(n) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 9004-1(a) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court of the District of Delaware (the “**Local Rules**”), authorizing the amendment of the case caption used in these chapter 15 cases. In support of this Motion, the Foreign Representative respectfully states as follows:

¹ The Debtors in the chapter 15 proceedings and the last four digits of their federal tax identification numbers are: FormerXBC Inc. (f/k/a Xebec Adsorption Inc.) (0228), 11941666 Canada Inc. (f/k/a Xebec RNG Holdings Inc.) (N/A), Applied Compression Systems Ltd. (N/A), 1224933 Ontario Inc. (f/k/a Compressed Air International Inc.) (N/A), Xebec Holding USA Inc. (8495), Enerphase Industrial Solutions Inc. (1979), CDA Systems, LLC (6293), Xebec Adsorption USA, Inc. (0821), The Titus Company (9757), Nortekbelair Corporation (1897), XBC Flow Services – Wisconsin Inc. (7493),
(continued...)

JURISDICTION AND VENUE

1. The Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334, and the Amended Standing Order of Reference from the United States District Court for the District of Delaware dated as of February 29, 2012.

2. The Foreign Representative, in its capacity as authorized foreign representative, has properly commenced these chapter 15 cases pursuant to sections 1504, 1509, and 1515 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”).

3. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Pursuant to Local Rule 9013-1(f), the Foreign Representative consents to the entry of a final order by the Court in connection with this Motion to the extent it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

4. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

5. The statutory predicates for the relief sought by this Motion is section 105(a) of the Bankruptcy Code, Bankruptcy Rules 1005, 2002(m), and 2002(n) and Local Rule 9004-1(a)(2).

BACKGROUND

6. On September 30, 2022 (the “**Petition Date**”), the Foreign Representative commenced these chapter 15 cases by filing, among other things, verified chapter 15 petitions seeking recognition by the Court of the Canadian Proceeding as a foreign main proceeding under chapter 15 of the Bankruptcy Code.

(continued...)

California Compression, LLC (4752), and Xebec Systems USA LLC (4156). The location of the Debtors’ corporate
(continued...)

7. On the Petition Date, the Court entered that certain *Order (A) Directing Joint Administration of Cases Under Chapter 15 of the Bankruptcy Code and (B) Authorizing the Filing of a Consolidated List Under Bankruptcy Rule 1007* [Docket No. 8].

8. On October 27, 2022, the Court entered that certain *Order Granting Recognition of Foreign Main Proceeding and Certain Related Relief* [Docket No. 36] (the “**Recognition Order**”). Pursuant to the Recognition Order, the Court recognized the Canadian Proceeding as a “foreign main proceeding” pursuant to chapter 15 of the Bankruptcy Code, recognized the Foreign Representative as the “foreign representative” in respect of the Canadian Proceeding, and recognized and granted comity to, and gave full force and effect in the United States to the Canadian Proceeding and the orders entered in the Canadian Proceeding, including enforcing the automatic stay in the United States.

THE NAME CHANGES

9. On February 16, 2023, the Canadian Court entered that certain Approval, Vesting and Assignment Order in Respect of the Assets of Xebec Adsorption Inc. and Compressed Air International Inc. (the “**Ivys Vesting Order**”), pursuant to which the Canadian Court, among other things, authorized the Debtors to enter into that certain Asset Purchase Agreement (the “**Ivys APA**”), dated February 8, 2023, by and between Debtors Xebec Adsorption and 1224933 Ontario Inc. (f/k/a Compressed Air International Inc.) (together, the “**Sellers**”), as sellers, and Ivys Adsorption Inc. and Ivys Inc., on behalf of a corporation to be incorporated, as buyers.

(continued...)

headquarters and the Debtors’ foreign representative is: 730 Industriel Boulevard, Blainville, Quebec, J7C 3V4, Canada.

10. Pursuant to the Ivys APA, the Sellers sold substantially all of their assets related to the Sellers' operations at the Debtors' facility located in Blainville, Québec, Canada (the "**Ivys Transaction**"), including, among other assets, all intellectual property assets used or held for use in or otherwise relating to the business acquired from the Sellers. The Ivys Transaction closed effective on February 24, 2023.

11. To effectuate the terms of Ivys APA relating to the sale of the Sellers' intellectual property, certain of the Debtors are required to change their names. Therefore, on or about March 9, 2023, Canadian Debtors Xebec Adsorption, Xebec RNG Holdings Inc., and Compressed Air International Inc. changed their names, in accordance with Canadian law, to FormerXBC Inc., 11941666 Canada Inc., and 1224933 Ontario Inc., respectively.

12. Thereafter, on March 16, 2023, Xebec Holdings USA Inc., the lead debtor named in the case caption, and three other United States Debtors formally changed their names with the State of Delaware as follows:

Former Debtor Name	New Debtor Name
Xebec Holding USA Inc.	FormerXBC Holding USA Inc.
Xebec Adsorption USA Inc.	FormerXBC Adsorption USA Inc.
Xebec Systems USA, LLC	FormerXBC Systems USA, LLC
XBC Flow Services – Wisconsin Inc.	FormerXBC Flow Services – Wisconsin Inc.

RELIEF REQUESTED

13. Due to the name changes, the Foreign Representative respectfully requests entry of the Proposed Order, pursuant to section 105(a) of the Bankruptcy Code, Bankruptcy Rules 1005, 2002(m), and 2002(n), and Local Rule 9004-1(a)(2), authorizing the amendment of the case caption used in these chapter 15 cases. The Foreign Representative also requests that

the Court authorize the Clerk of the United States Bankruptcy Court for the District of Delaware, the Foreign Representative, and other parties in interest to take all actions necessary to update the ECF filing system and their respective records to reflect the changes to the names of the Debtors.

BASIS FOR RELIEF

14. As noted above, pursuant to the terms of the Ivys APA and the authority granted by Ivys Vesting Order, the Debtors effectuated changes to certain of their corporate names, which requires amending the case caption in these chapter 15 cases. Accordingly, the Foreign Representative respectfully request that this Court approve the following revised case caption used in the chapter 15 cases to reflect the Debtors’ new names:

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re:

FORMERXBC HOLDING USA INC.
(f/k/a XEBEC HOLDING USA INC.), *et al.*,

Debtor in a foreign proceeding.¹

Chapter 15

Case No. 22-10934 (KBO)

Jointly Administered

¹ The Debtors in the chapter 15 proceedings and the last four digits of their federal tax identification numbers are: FormerXBC Inc. (f/k/a Xebec Adsorption Inc.) (0228), 11941666 Canada Inc. (f/k/a Xebec RNG Holdings Inc.) (N/A), Applied Compression Systems Ltd. (N/A), 1224933 Ontario Inc. (f/k/a Compressed Air International Inc.) (N/A), FormerXBC Holding USA Inc. (f/k/a Xebec Holding USA Inc.) (8495), Enerphase Industrial Solutions Inc. (1979), CDA Systems, LLC (6293), FormerXBC Adsorption USA Inc. (f/k/a Xebec Adsorption USA Inc.) (0821), The Titus Company (9757), Nortekbelair Corporation (1897), FormerXBC Flow Services – Wisconsin Inc. (f/k/a XBC Flow Services – Wisconsin Inc.) (7493), California Compression, LLC (4752), and FormerXBC Systems USA, LLC (f/k/a Xebec Systems USA LLC) (4156). The location of the Debtors’ corporate headquarters and the Debtors’ foreign representative is: 730 Industriel Boulevard, Blainville, Quebec, J7C 3V4, Canada.

15. Courts in this district have routinely granted the same or similar relief as requested in this Motion to chapter 11 debtors. *See, e.g., In re Phaserx, Inc.*, Case No. 17-12890 (CSS) (Bankr. D. Del. Mar. 2, 2018) (authorizing amendment to case caption); *In re Katy Indus.*,

Inc., Case No. 17-11101 (KJC) (Bankr. D. Del. Sept. 29, 2017) (same); *In re Garden Fresh Rest. Intermediate Holding, LLC*, Case No. 16-12174 (CSS) (Bankr. D. Del. Feb. 13, 2017) (same); *In re The Standard Register Co.*, Case No. 15-10541 (BLS) (Bankr. D. Del. Aug. 14, 2015) (same).

NOTICE

16. Notice of this Motion will be provided to the following parties or their counsel: (a) the Office of the United States Trustee for the District of Delaware; (b) all parties to litigation in which any Debtor is a party and that is pending in the United States as of the date that the Chapter 15 Petitions were filed; (c) the Debtors' DIP Lenders and prepetition secured lenders; (d) the 20 largest unsecured creditors of the Debtors in these cases; (e) the Debtors' counsel in the Canadian Proceeding; (f) the Monitor; and (g) all other parties that have requested notice in these cases. In light of the relief requested herein, the Foreign Representative respectfully submits that no other or further notice of this Motion is necessary under the circumstances.

[Remainder of Page Intentionally Left Blank]

WHEREFORE, the Foreign Representative respectfully request entry of an order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested by this Motion and such other and further relief as may be just and proper.

Dated: March 22, 2023
Wilmington, Delaware

BIELLI & KLAUDER, LLC

/s/ David M. Klauder

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Counsel for the Foreign Representative

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re:

XEBEC HOLDING USA INC., *et al.*,

Debtors in a foreign proceeding.¹

Chapter 15

Case No. 22-10934 (KBO)

Jointly Administered

Re: D.I. No.

ORDER AMENDING CASE CAPTION

Upon consideration of the *Motion of the Foreign Representative to Amend the Case Caption*, and the Court having found that (i) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated as of February 29, 2012, (ii) venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409, (iii) this is a core proceeding pursuant to 28 U.S.C. § 157(b); and the Court having found that good and sufficient cause appearing therefor, it is HERBY ORDERED THAT:

1. The Motion is GRANTED, as set forth herein.
2. The case caption used in these jointly administered chapter 15 cases shall read as

follows:

¹ The Debtors in the chapter 15 proceedings and the last four digits of their federal tax identification numbers are: FormerXBC Inc. (f/k/a Xebec Adsorption Inc.) (0228), 11941666 Canada Inc. (f/k/a Xebec RNG Holdings Inc.) (N/A), Applied Compression Systems Ltd. (N/A), 1224933 Ontario Inc. (f/k/a Compressed Air International Inc.) (N/A), Xebec Holding USA Inc. (8495), Enerphase Industrial Solutions Inc. (1979), CDA Systems, LLC (6293), Xebec Adsorption USA, Inc. (0821), The Titus Company (9757), Nortekbelair Corporation (1897), XBC Flow Services – Wisconsin Inc. (7493), California Compression, LLC (4752), and Xebec Systems USA LLC (4156). The location of the Debtors' corporate headquarters and the Debtors' foreign representative is: 730 Industriel Boulevard, Blainville, Quebec, J7C 3V4, Canada.

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re:

FORMERXBC HOLDING USA INC.
(f/k/a XEBEC HOLDING USA INC.), *et al.*,

Debtor in a foreign proceeding.¹

Chapter 15

Case No. 22-10934 (KBO)

Jointly Administered

¹ The Debtors in the chapter 15 proceedings and the last four digits of their federal tax identification numbers are: FormerXBC Inc. (f/k/a Xebec Adsorption Inc.) (0228), 11941666 Canada Inc. (f/k/a Xebec RNG Holdings Inc.) (N/A), Applied Compression Systems Ltd. (N/A), 1224933 Ontario Inc. (f/k/a Compressed Air International Inc.) (N/A), FormerXBC Holding USA Inc. (f/k/a Xebec Holding USA Inc.) (8495), Enerphase Industrial Solutions Inc. (1979), CDA Systems, LLC (6293), FormerXBC Adsorption USA Inc. (f/k/a Xebec Adsorption USA Inc.) (0821), The Titus Company (9757), Nortekbelair Corporation (1897), FormerXBC Flow Services – Wisconsin Inc. (f/k/a XBC Flow Services – Wisconsin Inc.) (7493), California Compression, LLC (4752), and FormerXBC Systems USA, LLC (f/k/a Xebec Systems USA LLC) (4156). The location of the Debtors’ corporate headquarters and the Debtors’ foreign representative is: 730 Industriel Boulevard, Blainville, Quebec, J7C 3V4, Canada.

3. The Clerk of the Court is directed to make a docket entry in each chapter 15 bankruptcy case as follows:

- a. In case number 22-10934 (KBO): “An order has been entered in this case directing that the caption of this case be changed, in accordance with the name change of Xebec Holding USA Inc. to FormerXBC Holding USA Inc.”
- b. In case number 22-10941 (KBO): “An order has been entered in this case directing that the caption of this case be changed, in accordance with the name change of Xebec Adsorption USA Inc. to FormerXBC Adsorption USA Inc.”
- c. Xebec In case number 22-10944 (KBO): “An order has been entered in this case directing that the caption of this case be changed, in accordance with the name change of XBC Flow Services – Wisconsin Inc. to FormerXBC Flow Services – Wisconsin Inc.”
- d. In case number 22-10946 (KBO): “An order has been entered in this case directing that the caption of this case be changed, in accordance with the name change of Xebec Systems USA, LLC to FormerXBC Systems USA LLC.”

4. The terms and conditions of this Order are immediately effective and enforceable upon its entry.

5. The Debtors are authorized and empowered to take all actions necessary or appropriate to implement the relief granted in this Order.

6. This Court retains jurisdiction over all matters arising from or related to the implementation or interpretation of this Order.

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re:

XEBEC HOLDING USA INC., *et al.*,

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Hearing Date: April 5, 2023 at 1:00 p.m. (ET)

Objection Deadline: March 29, 2023 at 4:00 p.m. (ET)

**NOTICE OF THE MOTION OF THE FOREIGN REPRESENTATIVE
TO AMEND THE CASE CAPTION**

PLEASE TAKE NOTICE THAT FormerXBC Inc. (f/k/a Xebec Adsorption Inc.), (the “**Foreign Representative**” or “**Xebec Adsorption**”) has filed the *Motion of the Foreign Representative to Amend the Case Caption* (the “**Motion**”) in the above-captioned chapter 15 cases.

You are required to file a response to the Motion on or before **March 29, 2023 at 4:00 p.m. (ET)**

At the same time, you must also serve a copy of the response upon the Foreign Representative’s attorney:

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BIELLI & KLAUDER, LLC
1204 N. King Street
Wilmington, DE 19801
Phone: (302) 803-4600
Facsimile: (302) 397-2557
Email: dklauder@bk-legal.com

HEARING ON THE MOTION IS **April 5, 2023 at 1:00 p.m. (ET)** before the Honorable Karen B. Owens at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 6th Floor, Wilmington, DE 19801 in Courtroom Number 3.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

¹ The Debtors in the chapter 15 proceedings and the last four digits of their federal tax identification numbers are: FormerXBC Inc. (f/k/a Xebec Adsorption Inc.) (0228), 11941666 Canada Inc. (f/k/a Xebec RNG Holdings Inc.) (N/A), Applied Compression Systems Ltd. (N/A), 1224933 Ontario Inc. (f/k/a Compressed Air International Inc.) (N/A), Xebec Holding USA Inc. (8495), Enerphase Industrial Solutions Inc. (1979), CDA Systems, LLC (6293), Xebec Adsorption USA, Inc. (0821), The Titus Company (9757), Nortekbelair Corporation (1897), XBC Flow Services – Wisconsin Inc. (7493), California Compression, LLC (4752), and Xebec Systems USA LLC (4156). The location of the Debtors’ corporate headquarters and the Debtors’ foreign representative is: 730 Industriel Boulevard, Blainville, Quebec, J7C 3V4, Canada.

Dated: March 22, 2023
Wilmington, Delaware

BIELLI & KLAUDER, LLC

/s/ David M. Klauder

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**UNITED STATES BANKRUPTCY COURT
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CERTIFICATE OF SERVICE

I, David M. Klauder, Esquire, certify that on March 22, 2023, the *Motion of the Foreign Representative to Amend the Case Caption* was served on the parties on the attached Service List in the manner indicated.

Dated: March 22, 2023
Wilmington, Delaware

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