

**SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

**IN THE MATTER OF THE *COMPANIES' CREDITORS
ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED**

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR
ARRANGEMENT OF EASTERN MEAT SOLUTIONS INC.,
2298442 ONTARIO LIMITED, COLDTERRA SUPPLY
CHAIN LTD., COLDTERRA REALTY CORPORATION,
RVB HOLDINGS INC., VANDEN BROEK HOLDINGS
(2008) INC., COLDTERRA REALTY CALGARY
CORPORATION AND EASTERN MEAT SOLUTIONS
(USA) CORP.**

Applicants

**MOTION RECORD
(Re: Motion for Stay Extension Order)
(Returnable November 28, 2025)**

November 27, 2025

THORNTON GROUT FINNIGAN LLP
TD West Tower, Toronto-Dominion Centre
100 Wellington Street West, Suite 3200
Toronto, ON M5K 1K7

Rebecca L. Kennedy (LSO# 61146S)
Email: rkennedy@tgf.ca

D.J. Miller (LSO#34393P)
Email: djmiller@tgf.ca

Shurabi Srikaruna (LSO #90908K)
Email: ssrikaruna@tgf.ca

Tel: (416) 304-1616
Fax: (416) 304-1313

Lawyers for the Applicants

TO: THE SERVICE LIST

Court File No.: CV-24-00720622-00CL

**SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

**IN THE MATTER OF THE *COMPANIES' CREDITORS
ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED**

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR
ARRANGEMENT OF EASTERN MEAT SOLUTIONS INC.,
2298442 ONTARIO LIMITED, COLDTERRA SUPPLY
CHAIN LTD., COLDTERRA REALTY CORPORATION,
RVB HOLDINGS INC., VANDEN BROEK HOLDINGS
(2008) INC., COLDTERRA REALTY CALGARY
CORPORATION AND EASTERN MEAT SOLUTIONS
(USA) CORP.**

Applicants

INDEX

Tab	Description
1	Notice of Motion returnable November 28, 2025
2	Affidavit of Robert Vanden Broek sworn November 27, 2025
3	Draft Stay Extension Order

TAB 1

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

**IN THE MATTER OF THE *COMPANIES' CREDITORS
ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED**

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR
ARRANGEMENT OF EASTERN MEAT SOLUTIONS INC.,
2298442 ONTARIO LIMITED, COLDTERRA SUPPLY
CHAIN LTD., COLDTERRA REALTY CORPORATION,
RVB HOLDINGS INC., VANDEN BROEK HOLDINGS (2008)
INC., COLDTERRA REALTY CALGARY CORPORATION
AND EASTERN MEAT SOLUTIONS (USA) CORP.**

Applicants

**NOTICE OF MOTION
(Motion for Stay Extension Order)
(Returnable November 28, 2025 at 10:00 a.m.)**

The Applicants will make a motion before the Honourable Justice Kimmel of the Ontario Superior Court of Justice (Commercial List) (the “**Court**”) on Friday, November 28, 2025, at 10:00 a.m. (ET), or as soon after that time as the motion may be heard by videoconference at Toronto, Ontario. The videoconference details will be provided by the Court.

PROPOSED METHOD OF HEARING: The Motion is to be heard

- ☐ In writing under subrule 37.12.1(1);
- ☐ In writing as an opposed motion under subrule 37.12.1(4);
- ☐ In person;
- ☐ By telephone conference;
- ☒ By video conference.

THE MOTION IS FOR:

1. An Order (the “**Stay Extension Order**”) in the form of the draft order included at Tab 3 of the Applicants’ motion record that, among other things¹, extends the stay of proceedings from November 28, 2025 to December 12, 2025 (the “**Stay Period**”).
2. Such further and other relief as this Court may deem just and equitable.

THE GROUNDS FOR THE MOTION ARE:

Background and Activities Since the Initial Order

3. The Applicants are a group of privately held companies that were in the business of procuring and distributing meat products and food processing services as well as cold storage and supply chain solutions for the food industry.
4. The Applicants had three distinct business lines, each of which was carried out by a separate entity within the corporate group. There was a meat trading and market services business, which was conducted by Eastern Meat and has been wound down. There was a food processing business, which was conducted by Sierra Foods and was sold to 1001000161 Ontario Limited (the “**Foods Purchaser**”), with the transaction closing on October 25, 2024. Lastly, Coldterra Supply Chain Ltd. (formerly Sierra Supply Chain Services Inc., “**Coldterra Services**”) continues to operate a cold storage and transportation business (the “**Cold Storage Business**”).

¹ All capitalized terms not expressly defined herein are defined, and have the meanings set forth, in the Affidavit of Robert Vanden Broek sworn November 27, 2025.

5. The Applicants were granted CCAA protection on May 21, 2024, under an Initial Order followed by an Amended and Restated Initial Order at the Comeback Hearing on May 31, 2024, where the Court approved a sale and investment solicitation process for Sierra Foods' business and assets.
6. On September 25, 2024, the Court issued two orders:
 - (a) The Approval and Vesting Order, approving the sale of Sierra Foods to the Foods Purchaser pursuant to an APA, vesting in the Foods Purchaser all of the right, title, and interest of Sierra Foods in and to the Purchased Assets (as defined in the APA).
 - (b) The Stay Extension Order, which among other things, (i) extended the stay period to January 31, 2025; (ii) approved the KERP; (iii) granted a KERP charge of \$285,600; and (iv) recognized the Applicants' compliance with Wage Earner Protection Program Regulations requirements as prescribed by section 3.2.
7. On January 24, 2025, the Court granted an order, which among other things, (i) extended the Stay Period up to and including May 31, 2025; (ii) approved the Monitor's Third Report and the Monitor's activities, conduct and decisions set out therein; (iii) approved the fees and disbursements of the Monitor and its legal counsel; (iv) authorized and approved the Second DIP Amendment; (v) ratified the Applicants' actions related to the filing of Articles of Amendment for Sierra Custom Foods Inc., Sierra Realty Corporation and Sierra Realty (Calgary) Corporation; and (vi) authorized and directed the Applicants to file the Articles of Amendment in respect to Sierra Supply Chain Services Inc.

8. On May 28, 2025, the Court granted an order, which among other things, (i) extended the Stay Period up to and including August 29, 2025; (ii) approved the Monitor's Fourth Report and the Monitor's activities set out therein; (iii) approved the fees and disbursements of the Monitor and its legal counsel; (iv) authorized and approved the Third DIP Amendment; and (v) authorized and directed the Monitor and 2298442 Ontario Limited to make future distributions to certain creditors of Sierra Foods holding a valid and enforceable purchase money security interest in the amounts as provided in the Fourth Report.
9. On August 19, 2025, the Court granted an order (the "**August Stay Extension Order**"), which among other things, (i) extended the Stay Period up to and including November 28, 2025; (ii) approved the Monitor's Fifth Report and the Monitor's activities set out therein; (iii) approved the fees and disbursements of the Monitor and its legal counsel; and (iv) authorized and approved the Amended and Restated DIP Agreement (the "**A&R DIP Agreement**"), which extended the maturity date under the A&R DIP Agreement to November 28, 2025.
10. On August 19, 2025, the Court also granted an order which, among other things, approved a sale and investment solicitation process in respect of the business and/or the assets of Coldterra Services (the "**Coldterra SISP**").
11. Since the granting of the August Stay Extension Order, the Applicants have continued to act in good faith and with due diligence.

The Coldterra SISP

12. The Coldterra SISP was approved by Court order on August 19, 2025, and conducted by

the Monitor and the Applicants with the assistance of a sales agent. Despite a robust outreach process, including distribution of a teaser, execution of ten NDAs, and data-room access granted to qualified bidders, site tours and meetings with management, no Letters of Intent were submitted by the Phase 1 deadline of October 28, 2025 (the “**Phase 1 Bid Deadline**”).

13. Following the Phase 1 Bid Deadline, and in consultation with the Monitor and DIP Lender, the Applicants are pursuing an alternative purchaser for Coldterra Services and negotiating a transaction agreement with the prospective purchaser, who is the landlord of the Facility.

Stay Extension

14. The Applicants are seeking the extension to the Stay Period to provide the additional time necessary to finalize a transaction agreement with the prospective purchaser.
15. The Applicants have acted, and continue to act, in good faith and with due diligence during this proceeding. The Applicants have sufficient liquidity to fund their business operations during the proposed extension to the Stay Period.
16. The maturity date under the A&R DIP Agreement is set to expire on November 28, 2025. The DIP Lender has agreed to extend the maturity date to December 12, 2025 to align with the proposed Extended Stay Period.
17. The extension will not prejudice any stakeholder and will facilitate negotiations to finalize a transaction agreement. The Monitor supports the extension.

Other Grounds

18. The provisions of the CCAA, including, without limitation, sections 2(1), 11, 11.02(2) and the inherent and equitable jurisdiction of this Court.
19. Rules 1.04, 2.01, 2.03, 3.02, 16, and 37 of the *Rules of Civil Procedure*, R.R.O. 1990, Reg. 194, as amended, and section 106 of the *Courts of Justice Act*, R.R.O. 1990 c. C.43, as amended.
20. Such further and other grounds as counsel may advise and this Honourable Court may permit.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the Motion:

21. The Affidavit of Robert Vanden Broek sworn November 27, 2025;
22. The Sixth Report of the Monitor, to be filed; and
23. Such further and other evidence as counsel may advise and this Court may permit.

November 27, 2025

Thorton Grout Finnigan LLP
3200-100 Wellington Street West
P.O. Box 329, West Tower, T-D Centre
Toronto, ON M5K 1K7

Rebecca L. Kennedy (LSO #61146S)
Email: rkennedy@tgf.ca

D.J. Miller (LSO #34393P)
Email: djmiller@tgf.ca

Shurabi Srikaruna (LSO #90908K)
Email: ssrikaruna@tgf.ca

Tel: (416) 304-1616
Fax: (416) 304-1313

Lawyers for the Applicants

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

**IN THE MATTER OF THE *COMPANIES' CREDITORS
ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED**

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR
ARRANGEMENT OF EASTERN MEAT SOLUTIONS INC.,
2298442 ONTARIO LIMITED, COLDTERRA SUPPLY
CHAIN LTD., COLDTERRA REALTY CORPORATION,
RVB HOLDINGS INC., VANDEN BROEK HOLDINGS
(2008) INC., COLDTERRA REALTY CALGARY
CORPORATION AND EASTERN MEAT SOLUTIONS
(USA) CORP.**

**Service List
(as at May 23, 2025)**

TO:	<p>THORNTON GROUT FINNIGAN LLP TD West Tower, Toronto-Dominion Centre 100 Wellington Street West, Suite 3200 Toronto, ON M5K 1K7 Fax: (416) 304-1313</p> <p>Rebecca L. Kennedy Tel: (416) 304-0603 Email: rkennedy@tgf.ca</p> <p>D.J. Miller Tel: (416) 304-0559 Email: djmiller@tgf.ca</p> <p>Shurabi Srikaruna Email: ssrikaruna@tgf.ca</p> <p>Lawyers for the Applicants</p>
------------	--

AND TO:	DELOITTE RESTRUCTURING INC. 8 Adelaide Street West, Suite 200 Toronto, ON M5H 0A9 Jorden Sleeth Tel: (416) 775-8858 Email: jsleeth@deloitte.ca Todd Ambachtsheer Tel: (416) 607-0781 Email: tambachtsheer@deloitte.ca Martin Lin Tel: (416) 607-1162 Email: muslin@deloitte.ca Matthew R. Hong Tel: (416) 607-1200 Email: mahong@deloitte.ca Court-appointed Monitor
----------------	--

AND TO:	<p>DENTONS CANADA LLP 77 King Street West, Suite 400 Toronto-Dominion Centre Toronto, ON M5K 0A1</p> <p>Robert Kennedy Tel: (416) 367-6756 Email: robert.kennedy@dentons.com</p> <p>Michael Schafler Tel: (416) 863-4457 Email: michael.schafler@dentons.com</p> <p>Valerie Cross Tel: 1 (604) 648-654 Email: valerie.cross@dentons.com</p> <p>Sarah Lam Tel: (416) 863 4689 Email: sarah.lam@dentons.com</p> <p>Lawyers for the Court-appointed Monitor</p>
AND TO:	<p>BORDEN LADNER GERVAIS LLP Bay Adelaide Centre, East Tower 22 Adelaide Str. West, Suite 3400 Toronto, ON M5H 4E3</p> <p>Alex MacFarlane Tel: (416) 367-6305 Email: AMacFarlane@blg.com</p> <p>Lawyers for Bank of Montreal</p>

AND TO:	<p>CWB NATIONAL LEASING INC. 1525 Buffalo Place Winnipeg, MB R3T 1L9</p> <p>Emmanuel Tiku <i>Contract Administration Specialist</i> Tel: 1 (877) 211-4061 Fax: 1 (866) 689-8250 Email: debtenforcement@cwbnationalleasing.com</p> <p>PPSA registrant with respect to Eastern Meat Solutions Inc., Sierra Supply Chain Services Inc. and Sierra Custom Foods Inc.</p>
AND TO:	<p>GM FINANCIAL CANADA LEASING LTD. 2001 Sheppard Ave., Suite 600 Toronto, ON M2J 4Z8</p> <p>Email: cservice@gmfinancial.com CommercialLending@gmfinancial.com</p> <p>PPSA registrant with respect to Eastern Meat Solutions Inc.</p>
AND TO:	<p>CROWN CREDIT (CANADA) CORPORATION 210 Annagem Blvd. Mississauga, ON L5T 2V5</p> <p>Dan Fatigati <i>Director</i> Fax: (905) 795-9311 Email: dan.fatigati@crown.com</p> <p>PPSA registrant with respect to Eastern Meat Solutions Inc.</p>
AND TO:	<p>GARFINKLE BIDERMAN LLP 1 Adelaide Street East, Suite 801 Toronto, Ontario M5C 2V9</p> <p>Wendy Greenspoon-Soer Tel: (416) 869-1234 Email: wgreenspoon@garfinkle.com</p> <p>Lawyer for PNC Vendor Finance Corporation Canada</p>

AND TO:	<p>PNC VENDOR FINANCE CORPORATION CANADA 2-4145 North Service Road Burlington, ON L7L 6A3</p> <p>Nicola Luskey <i>Territory Manager</i> Email: nluskey@leaserv.com</p> <p>PPSA registrant with respect to Sierra Custom Foods Inc. and Sierra Supply Chain Services Inc.</p>
AND TO:	<p>DE LAGE LANDEN FINANCIAL SERVICES CANADA INC. 5046 Mainway, Unit 1 Burlington, ON L7L 5Z1</p> <p>3450 Superior Court, Unit 1 Oakville, ON L6L 0C4</p> <p>Jesse Thornton Email: jthornton@leasedirect.com Tel: (905-901-6373)</p> <p>PPSA registrant with respect to Sierra Custom Foods Inc. and Sierra Supply Chain Services Inc.</p>
AND TO:	<p>LINDE CANADA INC. 1 City Centre Drive Mississauga, ON L5B 1M2</p> <p>500-5015 Spectrum Way Mississauga, ON L4W 0W4</p> <p>Sophie Traub <i>Associate Director - Legal</i> Tel: (905) 803 1715 Fax: (905) 803 1716 Email: sophie.traub@linde.com</p> <p>PPSA registrant with respect to Sierra Custom Foods Inc.</p>

AND TO:	TIP FLEET SERVICES CANADA LTD. 1880 Britannia Road East Mississauga, ON L4W 1J3 Accounts Receivable Tel: (905) 670-7077 Email: ca-ar@tip-group.com PPSA registrant with respect to Sierra Custom Foods Inc.
AND TO:	YALE INDUSTRIAL TRUCKS INC. 340 Hanlan Road Woodbridge, ON L4L 3P6 Tel: (905) 851-6620 Fax: (905) 851-6866 Email: info@yaleforklifts.com PPSA registrant with respect to Sierra Custom Foods Inc.
AND TO:	RCAP LEASING INC. 5575 North Service Rd., Suite 300 Burlington, ON L7L 6M1 Email: rcap.collections@rcapleasing.com csc@rcapleasing.com Fax: (905) 639-1363 PPSA registrant with respect to Sierra Supply Chain Services Inc.
AND TO:	FOOD BANKS CANADA 22 High Street Hamilton, ON L8T 3Z3 2680 Matheson Blvd. East Suite 102 Mississauga, ON L4W 0A5 Fax: (905) 602-5614 Email: info@foodbankscanada.ca PPSA registrant with respect to Sierra Supply Chain Services Inc.

AND TO:	<p>STEIN MONAST L.L.P. ATTORNEYS Édifice Stein Monast 70, rue Dalhousie, bureau 300 Québec, QC G1K 4B2</p> <p>Caroline Tardif Tel: 1 (418) 640-4458 Fax: 1 (418) 523-5391 Email: Caroline.Tardif@steinmonast.ca</p> <p>Marianne Lamontagne Email: marianne.lamontagne@steinmonast.ca</p> <p>Lawyers for Exceldor Cooperative West and Exceldor Cooperative</p>
AND TO:	<p>MINISTER OF FINANCE INSOLVENCY UNIT 6th Floor, 33 King Street West Oshawa, ON L1H 8H5</p> <p>Insolvency Unit Email: insolvency.unit@ontario.ca</p>
AND TO:	<p>DEPARTMENT OF JUSTICE Ontario Regional Office 120 Adelaide Street West, Suite 400 Toronto, ON M5H 1T1 Tel.: 613-795-9021</p> <p>Fozia Chaudary Email: Fozia.Chaudary@justice.gc.ca</p> <p>Edward Park Email: Edward.Park@justice.gc.ca</p> <p>Meggie Johnson Email: Meggie.Johnson@justice.gc.ca</p> <p>Email: AGC-PGC.Toronto-Tax-Fiscal@justice.gc.ca</p>

AND TO:	CANADA REVENUE AGENCY 1 Front Street West Toronto, ON M5J 2X6 Email: AGC-PGC.Toronto-Tax-Fiscal@justice.gc.ca
AND TO:	OLYMEL S.E.C/L.P. 1580 rue Eifel Boucherville, QC J4B 5Y1 Franck Rarivoson Email: FranckRarivoson@OLYMEL.com
AND TO:	ALLIANZ TRADE CANADA 1155 boul. René-Lévesque Ouest, Suite 2810 Montreal, QC H3B 2L2 Sophie Normandin Email: Sophie.normandin@amer.allianz-trade.com
AND TO:	WHOLESTONE FARMS 900 S Platte Ave. Fremont, NE 68025 Danny Connerly Email: Dlconnerly@wholestonefarms.com
AND TO:	SEABOARD FOODS 9000 W. 67th Street Suite 200 Merriam, KS 66202 Clay Williams Email: Clay.Williams@seaboardfoods.com
AND TO:	KOCH FOODS OF GAINESVILLE, LLC 329 Oak St. Ste 001 Gainesville, GA 30501 Chelsea Kuhl Email: Chelsea.Kuhl@kochfoods.com

AND TO:	MCMILLAN LLP Brookfield Place 181 Bay Street, Suite 4400 Toronto, ON M5J 2T3 Mitch Koczerzinski Email: Mitch.Koczerzinski@mcmillan.ca
AND TO:	DEPARTMENT OF JUSTICE CANADA Ontario Regional Office 120 Adelaide Street West, Suite 400 Toronto, ON M5H 1T1 Fozia Chaudary Email: Fozia.Chaudary@justice.gc.ca Edward Park Email: Edward.Park@justice.gc.ca
AND TO:	TYSON FOODS, INC. 220 W. Don Tyson Parkway Springdale, AR 72762 KATHERINE CLEMENTS Email: Katherine.clements@tyson.com
AND TO:	WITTEN LLP Suite 2500, Canadian Western Bank Place 10303 Jasper Avenue Edmonton, AB T5J 2N6 Bren Cargill Email: bcargill@wittenlaw.com Tel: 1 (780) 701-3776 Ada Tang Email: atang@wittenlaw.com Lawyers for Sierra Winds Business Park Inc.

AND TO:	TOTAL QUALITY LOGISTICS, LLC 4289 Ivy Pointe Blvd Cincinnati, OH 45245 Joseph B. Wells Email: JWells@tql.com Tel: 513-495-6193
AND TO:	INDUSTRIAL REFRIGERATION LTD. 139 Roncesvalles Ave, Unit 2 Toronto, ON M6R 2L2 Stephen Baker Email: Stephen@gaenns.com Tel: 647-643-4110
AND TO:	NIAGARA PALLET 2906 South Grimsby Road 8 Smithville, ON L0R 2A0 Fred Vrugteveen Email: Fred@niagarapallet.ca Tel: 905-386-7543 ext. 222
AND TO	RAAB LOGISTICS INC. 1108 – 250 Consumers Road #823 North York, ON M2J 4V6 Anthony Esew Email: Anthonye@raablogistics.com Tel: 905-565-0026 ext. 221
AND TO	CONVERSION TALENT 1275 Finch Avenue West, suite 513 North York, ON, M3J 0L5 Renny Camargo Email: Admin@conversiontalent.ca Tel: 416-238-1653 ext. 210

AND TO	<p>RANTOUL FOODS 205 Turner Dr, Rantoul, IL, 61866</p> <p>Alle Ashalintubbi Email: AlleA@rantoulfoods.com Tel: 847-649-3400 ext. 145</p> <p>Dave Bulgarelli Email: davidb@trim-rite.com Tel: 847-649-3400 ext. 105</p> <p>Susan Anzelone Email: suea@trim-rite.com Tel: 847-649-3400 ext. 115</p> <p>Dave Piotrowski Email: DaveP@trim-rite.com Tel: 847-649-3400 ext. 101</p>
AND TO:	<p>DLA PIPER (CANADA) LLP 1 First Canadian Place, Suite 6000 100 King Street West Toronto, ON M5X 1E2</p> <p>Bruce Darlington Email: bruce.darlington@ca.dlapiper.com Tel: 416-365-3529</p> <p>Counsel to the Purchaser Sierra Custom Foods Inc.</p>
AND TO:	<p>SERVICE CANADA/ GOVERNMENT OF CANADA</p> <p>Amanda Dion Email: amanda.dion@servicecanada.gc.ca Tel: 343-541-8564</p>

AND TO:	DIXON COMMERCIAL INVESTIGATORS 91 Geneva St St Catherines, ON L2R 6W8 Erika Mokren Email: collections@dixoncommercial.com Tel: 1-800-387-8929 ext. 4094
AND TO:	DIXON COMMERCIAL INVESTIGATORS 91 Geneva St St Catherines, ON L2R 6W8 Erika Mokren Email: collections@dixoncommercial.com Tel: 1-800-387-8929 ext. 4094
AND TO:	SOUTHERN HENS INC. P. O. Box 8000 Moselle, MS, USA 39459 Brian Izor Email: bizor@southernhens.com Phone: 1+ (601) 584-4731
AND TO:	BRUNINI, GRANTHAM, GROWER & HEWES, PLLC P.O. Drawer 119 Jackson, MS, USA 39205 James A. McCullough, II Email: jmccullough@brunini.com Phone: 1+ 601-960-6898

AND TO:	<p>PALIARE ROLAND ROSENBERG ROTHSTEIN LLP 155 Wellington Street west, 35th floor Toronto, ON M5V 3H1</p> <p>Jeffrey Larry Email: jeff.larry@paliareroland.com Phone: 416-646-4330</p> <p>Douglas Montgomery Email: Douglas.montgomery@paliareroland.com Phone: 416-646-6313</p> <p>Counsel to Sierra Winds Business Park Inc.</p>
AND TO:	<p>DEPARTMENT JUSTICE OF CANADA 120 Adelaide Street West, Suite 400 Toronto, ON M5H 1T1</p> <p>Vaughan Thatcher Email: vaughan.thatcher@justice.gc.ca Phone: 416-518-0089</p> <p>Edward Park Email: Edward.Park@justice.gc.ca</p> <p>Fozia Chaudary Email: Fozia.Chaudary@justice.gc.ca</p> <p>Department of Justice Canada: general intake email Email: AGC-PGC.Toronto-Tax-Fiscal@justice.gc.ca</p>
AND TO	<p>LOBLAWS INC. 1 President's Choice Circle Brampton, ON, L6Y 5S5</p> <p>Ben Goodis Email: Ben.Goodis@loblaw.ca Tel: 416-303-3970</p>

AND TO:	LINEAGE 46500 Humboldt Dr. Novi, MI 48377 Michael Chiano Email: mchiano@onelineage.com
AND TO:	GOWLING WLG LLP Suite 1600, 1 First Canadian Place 100 King Street West Toronto, ON M5X 1G5 Virginie Gauthier Email: virginie.gauthier@gowlingwlg.com Tel: 416-369-7256 Nicholas Kluge Email: nicholas.kluge@gowlingwlg.com Tel: 416-369-4610 Kate Yurkovich Email: kate.yurkovich@gowlingwlg.com Tel: 416-862-4342 Counsel to GoCold Solutions Inc. and Premium Brands Holdings Corporation

Email Service List

robert.kennedy@dentons.com; michael.schafner@dentons.com; valerie.cross@dentons.com;
sarah.lam@dentons.com; rkennedy@tgf.ca; djmiller@tgf.ca; ssrikaruna@tgf.ca;
jsleeth@deloitte.ca; tambachtsheer@deloitte.ca; muslin@deloitte.ca; mahong@deloitte.ca;
AMacFarlane@blg.com; debtenforcement@cwbnationalleasing.com;
cservice@gmfinancial.com; dan.fatigati@crown.com; CommercialLending@gmfinancial.com;
nluskey@leaserv.com; jthornton@leasedirect.com; sophie.traub@linde.com; ca-ar@tip-group.com; info@yaleforklifts.com; rcap.collections@rcapleasing.com; csc@rcapleasing.com;
info@foodbankscanada.ca; FranckRarivison@OLYMEL.com; insolvency.unit@ontario.ca;
Caroline.Tardif@steinmonast.ca; marianne.lamontagne@steinmonast.ca;
wgreenspoon@garfinkle.com; Sophie.normandin@amer.allianz-trade.com;
Dlconnerly@wholestonefarms.com; Clay.Williams@seaboardfoods.com;
Chelsea.Kuhl@kochfoods.com; Mitch.Koczerginski@mcmillan.ca;
Fozia.Chaudary@justice.gc.ca; Edward.Park@justice.gc.ca; Katherine.clements@tyson.com;
bcargill@wittenlaw.com; atang@wittenlaw.com; JWells@tql.com; Stephen@gaenns.com;
Fred@niagarapallet.ca; Anthonye@raablogistics.com; admin@conversiontalent.ca;
AlleA@rantoulfoods.com; davidb@trim-rite.com; suea@trim-rite.com; DaveP@trim-rite.com;
bruce.darlington@ca.dlapiper.com; amanda.dion@servicecanada.gc.ca;
collections@dixoncommercial.com; bizor@southernhens.com; jmccullough@brunini.com;
jeff.larry@paliareroland.com; douglas.montgomery@paliareroland.com;
vaughan.thatcher@justice.gc.ca; Edward.Park@justice.gc.ca; Fozia.Chaudary@justice.gc.ca;
AGC-PGC.Toronto-Tax-Fiscal@justice.gc.ca; Ben.Goodis@loblaw.ca;
mchiano@onlineage.com; virginie.gauthier@gowlingwlg.com;
nicholas.kluge@gowlingwlg.com; kate.yurkovich@gowlingwlg.com;

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF EASTERN MEAT SOLUTIONS INC., 2298442 ONTARIO LIMITED, COLDTERRA SUPPLY CHAIN LTD., COLDTERRA REALTY CORPORATION, RVB HOLDINGS INC., VANDEN BROEK HOLDINGS (2008) INC., COLDTERRA REALTY CALGARY CORPORATION AND EASTERN MEAT SOLUTIONS (USA) CORP.

Court File No. CV-24-00720622-00CL

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

Proceedings commenced at Toronto

NOTICE OF MOTION
(Motion for Stay Extension Order)
(Returnable November 28, 2025)

Thornton Grout Finnigan LLP
3200 – 100 Wellington Street West
TD West Tower, Toronto-Dominion Centre
Toronto, ON M5K 1K7

Rebecca L. Kennedy (LSO #61146S)

Email: rkennedy@tgf.ca

D.J. Miller (LSO #34393P)

Email: djmiller@tgf.ca

Shurabi Srikaruna (LSO #90908K)

Email: ssrikaruna@tgf.ca

Tel: (416) 304-1616

Fax: (416) 304-1313

Lawyers for the Applicants

TAB 2

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

**IN THE MATTER OF THE *COMPANIES' CREDITORS
ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED**

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR
ARRANGEMENT OF EASTERN MEAT SOLUTIONS INC.,
2298442 ONTARIO LIMITED, COLDTERRA SUPPLY CHAIN
LTD., COLDTERRA REALTY CORPORATION,
RVB HOLDINGS INC., VANDEN BROEK HOLDINGS (2008)
INC., COLDTERRA REALTY CALGARY CORPORATION AND
EASTERN MEAT SOLUTIONS (USA) CORP.**

Applicants

AFFIDAVIT OF ROBERT VANDEN BROEK

Table of Contents

A. Background and Activities Since the Initial Order 3

B. The Coldterra SISP..... 8

C. Stay Period Extension 11

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

**IN THE MATTER OF THE COMPANIES' CREDITORS
ARRANGEMENT ACT, R.S.C. 1985, c. C-36, AS AMENDED**

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR
ARRANGEMENT OF EASTERN MEAT SOLUTIONS INC.,
2298442 ONTARIO LIMITED, COLDTERRA SUPPLY CHAIN
LTD., COLDTERRA REALTY CORPORATION,
RVB HOLDINGS INC., VANDEN BROEK HOLDINGS (2008)
INC., COLDTERRA REALTY CALGARY CORPORATION AND
EASTERN MEAT SOLUTIONS (USA) CORP.**

Applicants

**AFFIDAVIT OF ROBERT VANDEN BROEK
(sworn November 27, 2025)**

I, **ROBERT VANDEN BROEK**, of the City of Etobicoke, in the Province of Ontario,
MAKE OATH AND SAY AS FOLLOWS:

1. I am a director of Eastern Meat Solutions Inc. ("**Eastern Meat**"), 2298442 Ontario Limited, formerly known as Sierra Custom Foods Inc. ("**Sierra Foods**"), Coldterra Supply Chain Ltd., formerly known as Sierra Supply Chain Services Inc. ("**Coldterra Services**"), Coldterra Realty Corporation, formerly known as Sierra Realty Corporation ("**Coldterra Realty**"), RVB Holdings Inc., Vanden Broek Holdings (2008) Inc., Eastern Meat Solutions (USA) Corp., and Coldterra Realty Calgary Corporation, formerly known as Sierra Realty Calgary Corporation (collectively, the "**Applicants**").
2. I hold the title of Chief Executive Officer or President for each Applicant (other than Sierra Foods, which is now bankrupt). I am actively involved in the day-to-day management and supervision of the Applicants' remaining businesses. As such, I have personal knowledge

of the matters deposed to herein, including the overall business and financial affairs of the Applicants. Where I have relied on other sources for information, including the books and records of the Applicants, I have stated the source of my information and I believe such information to be true. In preparing this affidavit, I have consulted with other members of senior management and the Applicants' legal and financial advisors. The Applicants do not waive, or intend to waive, any applicable privilege by any statement herein.

3. This is my eleventh affidavit sworn and filed in this proceeding. All capitalized terms not expressly defined herein are defined, and have the meanings set forth, in my affidavits sworn and filed in these CCAA proceedings, as applicable. All references to monetary amounts in this affidavit are in Canadian dollars unless otherwise stated.
4. This affidavit is sworn in support of the Applicants' motion returnable before the Ontario Superior Court of Justice (Commercial List) (the "**Court**") on November 28, 2025, in which the Applicants seek:
 - (a) an order (the "**Stay Extension Order**") in the form of the draft order included at Tab 3 of the Applicants' motion record for, among other things, an extension to the stay of proceedings from November 28, 2025 to December 12, 2025 (the "**Stay Period**"); and
 - (b) such further and other relief as this Court deems just.
- A. **Background and Activities Since the Initial Order**
5. The Applicants are a group of privately held companies that were in the business of procuring and distributing meat products and food processing services and remain in the business of cold storage and supply chain solutions for the food industry.

6. The Applicants had three distinct business lines, each of which was carried out by a separate entity within the corporate group. There was a meat trading and market services business, which was conducted by Eastern Meat and has been wound down. There was a food processing business, which was conducted by Sierra Foods and was sold to 1001000161 Ontario Limited (the “**Foods Purchaser**”), with the transaction closing on October 25, 2024. Lastly, Coldterra Services continues to operate a cold storage and transportation business (the “**Cold Storage Business**”).
7. On May 21, 2024, the Applicants were granted protection under the CCAA pursuant to the Initial Order of the Honourable Justice Penny.
8. On May 31, 2024, at the Comeback Hearing, the Court granted an Amended and Restated Initial Order.
9. On May 31, 2024, the Court also granted an order which, among other things, approved the sale and investment solicitation process in respect of the business and/or the assets of Sierra Foods.
10. On September 25, 2024, the Court granted an Approval and Vesting Order approving the sale transaction (contemplated by the asset purchase agreement between Sierra Foods and the Foods Purchaser dated September 19, 2024, as amended (the “**Sierra Foods APA**”) and vesting in the Foods Purchaser all of the right, title, and interest of Sierra Foods in and to the Purchased Assets (as defined in the Sierra Foods APA).
11. On September 25, 2024, the Court granted a second order which, among other things, (i) extended the Stay Period until and including January 31, 2025; (ii) approved a key

employee retention plan for certain employees of the Applicants (the “**KERP**”); (iii) granted a related KERP charge on the Property in the maximum aggregate amount of \$285,600; and (iv) declared that the Applicants met the criteria prescribed by section 3.2 of the Wage Earner Protection Program Regulations, SOR/2008-222 and the Applicants’ former employees are individuals to whom the *Wage Earner Protection Program Act* (Canada), SC 2005, c 47, section 1 applies.

12. On January 24, 2025, the Court granted an order which, among other things, (i) extended the Stay Period up to and including May 31, 2025; (ii) approved the Monitor’s Third Report, and the Monitor’s activities set out therein; (iii) approved the fees and disbursements of the Monitor and its legal counsel; (iv) authorized and approved the Second DIP Amendment; (v) ratified the Applicants’ actions related to the filing of Articles of Amendment for Sierra Custom Foods Inc., Sierra Realty Corporation and Sierra Realty (Calgary) Corporation; and (vi) authorized and directed the Applicants to file the Articles of Amendment in respect to Sierra Supply Chain Services Inc.
13. On May 28, 2025, the Court granted an order which, among other things, (i) extended the Stay Period up to and including August 29, 2025; (ii) approved the Monitor’s Fourth Report and the Monitor’s activities set out therein; (iii) approved the fees and disbursements of the Monitor and its legal counsel; (iv) authorized and approved the Third DIP Amendment; and (v) authorized the Monitor and 2298442 Ontario Limited to make future distributions in respect of certain purchase money security interests in the amounts as provided in the Fourth Report of the Monitor.

14. On June 12, 2025, Justice Kimmel endorsed the termination of the Cold Storage Management Agreement dated as of December 17, 2021 (the “**Cold Storage Agreement**”) among Eastern Meat, Coldterra Services, GoCold Solutions Inc. (the “**Manager**”, formerly Confederation Freezers Inc.) and Premium Brands Holding Corporation (“**Premium Brands**”). The Court made no determination regarding how, when, or by whom the agreement was terminated. Any rights, entitlements, or liabilities are as of June 5, 2025, subject to the CCAA rules for pre-filing claims.
15. On August 19, 2025, the Court granted an order (the “**August Stay Extension Order**”), which among other things, (i) extended the Stay Period up to and including November 28, 2025; (ii) approved the Monitor’s Fifth Report and the Monitor’s activities set out therein; (iii) approved the fees and disbursements of the Monitor and its legal counsel; and (iv) authorized and approved the Amended and Restated DIP Agreement (the “**A&R DIP Agreement**”), which extended the maturity date under the A&R DIP Agreement to November 28, 2025.
16. On August 19, 2025, the Court also granted an order (the “**Coldterra SISP Approval Order**”) which, among other things, approved a sale and investment solicitation process in respect of the business and/or the assets of Coldterra Services (the “**Coldterra SISP**”).
17. Since the granting of the August Stay Extension Order and the Coldterra SISP Approval Order, the Applicants have continued to act in good faith and with due diligence to, among other things:
 - (a) continue to operate the Cold Storage Business, subject to the oversight of the Monitor;

- (b) with the assistance of the Monitor, communicate with employees, customers, suppliers, and other key stakeholders;
- (c) communicate with the Bank of Montreal (“**BMO**”) in its capacity as DIP Lender and senior secured creditor of the Applicants and provide BMO with updates on the Applicants’ restructuring efforts; and
- (d) assist the Monitor in carrying out the Coldterra SISP in accordance with the terms of the Coldterra SISP Approval Order and in consultation with the DIP Lender.

Cold Storage Business

- 18. Pursuant to the Cold Storage Agreement, Coldterra Services engaged the Manager to manage all aspects of the Cold Storage Business at a 275,000-square-foot portion of the leased facility located at 90 Glover Road, Hamilton, Ontario (the “**Facility**”). The scope of services included warehousing, food storage, freight transportation, supply chain management and general corporate management, particularly, budgeting and financial reporting. Premium Brands guaranteed the performance of certain obligations under the Cold Storage Agreement.
- 19. The Manager failed to meet its obligations under the Cold Storage Agreement, which led to termination of the Cold Storage Agreement on June 12, 2025.
- 20. In March 2025, the Applicants were running an informal restructuring process for the Cold Storage Business, of which our key stakeholders were kept informed. In August 2025, the Applicants sought a court approved SISP.

B. The Coldterra SISP

21. The Coldterra SISP is described in detail in my ninth affidavit sworn August 13, 2025, in support of the Coldterra SISP Approval Order. Since the last update provided in my ninth affidavit, the Monitor and the Applicants have carried out the Coldterra SISP in accordance with the Coldterra SISP Approval Order and in consultation with the DIP Lender.
22. The Coldterra SISP has now concluded, and no bids were received by the Phase 1 Bid Deadline. Consequently, the Applicants are pursuing an alternative purchaser for Coldterra Services, as described in further detail below. The Applicants require a brief extension to the Stay Period to permit the Applicants to conclude negotiations with the prospective purchaser.

(i) Summary of the SISP

23. The following table contains a summary of the completed stages of the Coldterra SISP:¹

Stage	Description	Deadline
Preparation	The due diligence process began with identifying and retaining Colliers Macaulay Nicolls Inc., Brokerage to act as the sales agent in accordance with the Coldterra SISP Order and the Coldterra SISP (“ Sales Agent ”). The due diligence process consisted of the collection of all relevant information related to the Cold Storage Business. The setup of a virtual due diligence data room, referred to as the “Data Room,” followed. Known Potential Bidders were identified, and a non-confidential	The initial preparation stage of the Coldterra SISP was completed in accordance with the Coldterra SISP Approval Order by September 3, 2025

¹ All capitalized terms not expressly defined in this section are defined, and have the meanings set forth, in the Coldterra SISP Approval Order, a copy of which is publicly available on the Monitor’s Website [here](#).

Stage	Description	Deadline
	teaser letter (the “ Teaser ”) and a template non-disclosure agreement (“ NDA ”) were prepared and distributed to Known Potential Bidders.	
Phase 1	<p>Phase 1 Qualified Bidders were granted access to the Data Room. Non-binding Letters of Intent (each, an “LOI”) were required by the Phase 1 Bid Deadline. Each LOI needed to specify whether it was a Sale Proposal, Investment Proposal, or Hybrid Proposal and must have included the information required by the Coldterra SISP.</p> <p>No offers were received and as a result, the Monitor and the Applicants, in consultation with the DIP Lender, determined that the Coldterra SISP could not advance to Phase 2.</p>	The Phase 1 Bid Deadline was 5:00 p.m. (ET) on October 28, 2025.

24. In accordance with the Coldterra SISP, the following efforts were made to solicit interest in the Opportunity:

- (a) Known Potential Bidders were identified by preparing a list of potential bidders, including, among others:
 - (i) parties that approached Coldterra Services, the Monitor and/or the Sales Agent indicating an interest in the Opportunity;

- (ii) leaders in the cold storage food business and manufacturers of frozen food products across North America;
 - (iii) strategic parties whom Coldterra Services, the Monitor or the Sales Agent believed may be interested in purchasing all or part of the Business and Assets, or investing in Coldterra Services, pursuant to the Coldterra SISP; and
 - (iv) any party suggested by a stakeholder of the Applicants that the Monitor, the Sales Agent or the Applicants reasonably determined may be interested in the Opportunity;
 - (b) the Monitor and the Sales Agent, with the assistance of the Applicants and in consultation with the DIP Lender, prepared:
 - (i) the Teaser Letter, which described the Opportunity, outlined the terms of the Coldterra SISP and invited recipients to participate in the Coldterra SISP;
 - (ii) the NDA; and
 - (iii) a form of LOI for the Opportunity.
25. The Monitor and the Sales Agent undertook a thorough identification process for potential bidders, leveraging the Sales Agent's extensive database of prospective parties, which includes a broad spectrum of financial and strategic entities. According to reporting that I received from the Sales Agent, over 70 Known Potential Bidders were identified through this process. A Teaser Letter and NDA were sent to each party on this list. Following this initial outreach, 10 parties executed an NDA and were granted access to the Data Room

(the “**Phase 1 Qualified Bidders**”). This process ensured that the opportunity was communicated widely and effectively, drawing interest from a diverse range of potential investors and stakeholders.

26. The Monitor and the Applicants received no LOIs prior to the Phase 1 Bid Deadline and the DIP Lender was notified of this fact on the same day.
27. As the Coldterra SISP did not yield any LOIs prior to the Phase 1 Bid Deadline, the Applicants proceeded to negotiate a transaction with an alternative purchaser, the landlord of the Facility (the “**Purchaser**”).
28. Negotiations are continuing with the Purchaser to finalize a share purchase agreement (the “**Transaction Agreement**”) for the acquisition by the Purchaser of all of the issued and outstanding shares of Coldterra Services. The Applicants are also consulting with the DIP Lender and the Monitor regarding the potential transaction.

C. Stay Period Extension

29. The Applicants seek to extend the Stay Period from November 28, 2025, up to and including December 12, 2025. This extension is necessary and appropriate in the circumstances to provide the Applicants with the time necessary to finalize a Transaction Agreement with the Purchaser.
30. The Applicants have acted, and continue to act, in good faith and with due diligence during this proceeding. The Cash Flow Forecast that will be appended to the Sixth Report of the Monitor demonstrates that the Applicants are forecasted to have sufficient liquidity to fund their business operations during the proposed extension to the Stay Period. The Applicants are of the view that no party will be materially prejudiced by the stay extension.

31. The maturity date under the A&R DIP Agreement is set to expire on November 28, 2025.
The DIP Lender has agreed to extend the maturity date to December 12, 2025 to align with the proposed Extended Stay Period.
32. This affidavit is sworn in support of the Applicants' motion for the Stay Extension Order described herein and for no other or improper purpose.

SWORN by ROBERT VANDEN BROEK, in the City of Etobicoke, in the Province of Ontario, before me at the City of Toronto, in the Province of Ontario, this 27th day of November, 2025 in accordance with *O. Reg. 431/20, Administering Oath or Declaration Remotely*.



Commissioner for Taking Affidavits
(or as may be)

DEREK HARLAND
(LSO # 79504N)



ROBERT VANDEN BROEK

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF EASTERN MEAT SOLUTIONS INC., 2298442 ONTARIO LIMITED, COLDTERRA SUPPLY CHAIN LTD., COLDTERRA REALTY CORPORATION, RVB HOLDINGS INC., VANDEN BROEK HOLDINGS (2008) INC., COLDTERRA REALTY CALGARY CORPORATION AND EASTERN MEAT SOLUTIONS (USA) CORP.

Court File No.: CV-24-00720622-00CL

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

Proceedings commenced at Toronto, Ontario

AFFIDAVIT OF ROBERT VANDEN BROEK
(Sworn November 27, 2025)

THORNTON GROUT FINNIGAN LLP
TD West Tower, Toronto-Dominion Centre
100 Wellington Street West, Suite 3200
Toronto, ON M5K 1K7

Rebecca L. Kennedy (LSO #61146S)
Email: rkennedy@tgf.ca

D.J. Miller (LSO #34393P)
Email: djmiller@tgf.ca

Shurabi Srikaruna (LSO #90908K)
Email: ssrikaruna@tgf.ca

Tel: (416) 304-1616
Fax: (416) 304-1313

Lawyers for the Applicants

TAB 3

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

THE HONOURABLE)	FRIDAY, THE 28TH
)	
JUSTICE KIMMEL)	DAY OF NOVEMBER, 2025

**IN THE MATTER OF THE *COMPANIES' CREDITORS
ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED**

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR
ARRANGEMENT OF EASTERN MEAT SOLUTIONS INC.,
2298442 ONTARIO LIMITED, COLDTERRA SUPPLY
CHAIN LTD., COLDTERRA REALTY CORPORATION,
RVB HOLDINGS INC., VANDEN BROEK HOLDINGS (2008)
INC., COLDTERRA REALTY CALGARY CORPORATION
AND EASTERN MEAT SOLUTIONS (USA) CORP.**

Applicants

ORDER

(Stay Extension Order)

THIS MOTION, made by the Applicants pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "CCAA") for an order, among other things, extending the stay of proceedings in favour of the Applicants from November 28, 2025 to December 12, 2025, was heard this day by judicial videoconference, in accordance with the *Guidelines to Determine Mode of Proceeding in Civil Proceedings*, effective February 1, 2024.

ON READING the Affidavit of Robert Vanden Broek sworn November 27, 2025 (the "**Eleventh Vanden Broek Affidavit**"), the Sixth Report of Deloitte Restructuring Inc., solely in its capacity as the Court-appointed monitor of the Applicants (in such capacity, the "**Monitor**") (the "**Sixth Report**"), filed, and on hearing the submissions of counsel for the Applicants, counsel for the Monitor, and such other counsel that were present, no one else appearing for any other parties, although duly served as it appears from the certificate of service of Derek Harland, filed,

SERVICE

1. **THIS COURT ORDERS** that the time for service of the Notice of Motion and the Motion Record is hereby abridged and validated so that this Motion is properly returnable today and hereby dispenses with further service thereof.

DEFINED TERMS

2. **THIS COURT ORDERS** that all capitalized terms not expressly defined herein are defined, and have the meanings set forth, in the Amended and Restated Initial Order of the Honourable Justice Penny dated May 31, 2024 (the “**ARIO**”), and the Stay Extension Order dated August 19, 2025 (the “**August Stay Extension Order**”), as applicable.

STAY EXTENSION

3. **THIS COURT ORDERS** that the Stay Period, as ordered in paragraph 3 of the August Stay Extension Order, is hereby extended from November 28, 2025, until and including December 12, 2025.

GENERAL

4. **THIS COURT ORDERS** that the Applicants and the Monitor may from time to time apply to this Court for advice and directions in the discharge of their respective powers and duties hereunder.

5. **THIS COURT HEREBY REQUESTS** the aid and recognition of any court, tribunal, regulatory or administrative body having jurisdiction in Canada or outside of Canada to give effect to this Order and to assist the Applicants and the Monitor and their 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 Applicants and to the Monitor, as an officer of this Court, as may be necessary or desirable to give effect to this Order or to assist the Applicants and the Monitor and their agents in carrying out the terms of this Order.

6. **THIS COURT ORDERS** that the Applicants and the Monitor be at liberty and are hereby authorized and empowered to apply to any court, tribunal, regulatory or administrative body, wherever located, for the recognition of this Order and for assistance in carrying out the terms of

this Order, and that the Monitor is authorized and empowered to act as a representative in respect of the within proceedings for the purpose of having these proceedings recognized in a jurisdiction outside Canada.

7. **THIS COURT ORDERS** that the Applicants and the Monitor, and their respective counsel, may serve or distribute this Order, or any other materials and orders as may be reasonably required in these proceedings, including any notices, or other correspondence, by forwarding true copies thereof by electronic message to stakeholders or other interested parties and their advisors (if any). For greater certainty, any such distribution or service shall be deemed to be in satisfaction of a legal or juridical obligation, and notice requirements within the meaning of clause 3(c) of the *Electronic Commerce Protection Regulations*, Reg. 81000-2-175 (SOR/DORS).

8. **THIS COURT ORDERS** that this Order and all of its provisions are effective as of 12:01 a.m. Eastern Standard Time on the date of this Order without the need for entry or filing.

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF EASTERN MEAT SOLUTIONS INC., 2298442 ONTARIO LIMITED, COLDTERRA SUPPLY CHAIN LTD., COLDTERRA REALTY CORPORATION, RVB HOLDINGS INC., VANDEN BROEK HOLDINGS (2008) INC., COLDTERRA REALTY CALGARY CORPORATION AND EASTERN MEAT SOLUTIONS (USA) CORP.

Court File No. CV-24-00720622-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

Proceedings commenced at Toronto, Ontario

STAY EXTENSION ORDER

Thornton Grout Finnigan LLP

TD West Tower, Toronto-Dominion Centre
100 Wellington Street West, Suite 3200
Toronto, ON M5K 1K7

Rebecca L. Kennedy (LSO# 61146S)

Email: rkennedy@tgf.ca

D.J. Miller (LSO# 34393P)

Email: djmiller@tgf.ca

Shurabi Srikaruna (LSO# 90908K)

Email: ssrikaruna@tgf.ca

Tel: (416) 304-1616

Fax: (416) 304-1313

Lawyers for the Applicants

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF EASTERN MEAT SOLUTIONS INC., 2298442 ONTARIO LIMITED, COLDTERRA SUPPLY CHAIN LTD., COLDTERRA REALTY CORPORATION, RVB HOLDINGS INC., VANDEN BROEK HOLDINGS (2008) INC., COLDTERRA REALTY CALGARY CORPORATION AND EASTERN MEAT SOLUTIONS (USA) CORP.

Court File No.: CV-24-00720622-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

Proceedings commenced at Toronto, Ontario

**MOTION RECORD
(Re: Motion for Stay Extension Order)
(Returnable November 28, 2025)**

THORNTON GROUT FINNIGAN LLP
TD West Tower, Toronto-Dominion Centre
100 Wellington Street West, Suite 3200
Toronto, ON M5K 1K7

Rebecca L. Kennedy (LSO# 61146S)
Email: rkennedy@tgf.ca

D.J. Miller (LSO#34393P)
Email: djmiller@tgf.ca

Shurabi Srikaruna (LSO #90908K)
Email: ssrikaruna@tgf.ca
Tel: (416) 304-1616
Fax: (416) 304-1313

Lawyers for the Applicants