Court File No. CV-19-615862-00CL
Court File No. CV-19-616077-00CL
Court File No. CV-19-616779-00CL

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 JTI-MACDONALD CORP.

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF IMPERIAL TOBACCO CANADA LIMITED AND IMPERIAL TOBACCO COMPANY LIMITED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF ROTHMANS, BENSON & HEDGES INC.

Court File No. 500-06-000076-980

PROVINCE DE QUÉBEC
DISTRICT DE MONTRÉAL

COUR SUPÉRIEURE

(Chambre des actions collectives)

CONSEIL QUÉBÉCOIS SUR LE TABAC ET LA SANTÉ et JEAN-YVES BLAIS

Demandeurs

c.

JTI-MACDONALD CORP., IMPERIAL TOBACCO CANADA LIMITÉE et ROTHMANS, BENSON & HEDGES INC.

Défendeurs

- et -

FTI CONSULTING CANADA INC., ERNST & YOUNG INC. et DELOITTE RESTRUCTURING INC.

Intervenants

JOINT NOTICE OF MOTION
(CONFIRMATION ORDER)

The CCAA Plan Administrators[1] will make a motion jointly before Justice Kimmel of the Ontario Superior Court of Justice (Commercial List) (the "**CCAA Court**") and Justice Piché of the Superior Court of Québec (District of Montreal) (the "**Quebec Court**", together, the "**Courts**") on December 3, 2026 at 10:00 a.m. EST, or as soon after that time as the motion can be heard.

PROPOSED METHOD OF HEARING: The motion is to be heard by Zoom video conference. Refer to the Virtual Hearing Protocol attached as **Schedule "A"** for details on attending the motion.

THE MOTION IS FOR:

1. An Order from each of the Courts (collectively, the "**Confirmation Order**"), substantially in the forms included at Tabs 3 and 4 of the Motion Record, respectively, confirming that, throughout the remainder of the Claims Process of the Quebec Administration Plan,

    (a) Quebec Class Counsel are obligated to continue to provide services through Proactio,[2] at the same level and in the same manner, to facilitate the completion, submission, revision and distribution of all Tobacco-Victim Claims and Succession Claims under

[1] This motion is jointly filed by: (i) Ernst & Young Inc. ("**EY**") in its capacity as Court-appointed monitor and CCAA Plan Administrator for Rothmans, Benson & Hedges Inc. ("**RBH**"); (ii) FTI Consulting Canada Inc. ("**FTI**") in its capacity as Court-appointed monitor and CCAA Plan Administrator for Imperial Tobacco Canada Limited ("**ITCAN**") and Imperial Tobacco Company Limited (together with ITCAN, "**Imperial**"); and (iii) Deloitte Restructuring Inc. ("**Deloitte**") in its capacity as Court-appointed monitor and CCAA Plan Administrator for JTI-Macdonald Corp. ("**JTIM**" and, together with RBH and Imperial, the "**Tobacco Companies**" or "**Applicants**"). EY, FTI and Deloitte are hereinafter referred to as the "**Monitors**" and the "**CCAA Plan Administrators**" in the above-captioned coordinated proceedings (the "**CCAA Proceedings**") under the *Companies' Creditors Arrangement Act*, R.S.C., 1985, c. C-36, as amended (the "**CCAA**"). Capitalized terms not defined herein have the meanings given to them in the Fourth Amended and Restated Court-Appointed Mediator's and Monitors' Plans of Compromise or Arrangement in respect of each Applicant dated August 27, 2025 (as may be further amended and restated, the "**CCAA Plans**").

[2] The term "Raymond Chabot" is used in the CCAA Plans and other materials filed in the CCAA Proceedings to refer to Proactio, an entity within the corporate family of Raymond Chabot Administrateur Provisoire Inc. that specializes in class action administration, claims management, member communications and fund distributions.

the Quebec Administration Plan until such Tobacco-Victim Claims and Succession Claims are finally resolved; and

(b) any reduction or modification in such services provided by Proactio may only occur progressively and commensurate with its actual workload rather than projected volumes.

THE GROUNDS FOR THE MOTION ARE:

2. Separate but substantially identical plans of compromise or arrangement in respect of each of the Tobacco Companies were sanctioned by the Court on March 6, 2025 (the "**CCAA Plans**").[3]

3. The CCAA Court (i) approved and sanctioned each of the CCAA Plans pursuant to a Sanction Order granted in each of the CCAA Proceedings; (ii) appointed the CCAA Plan Administrators in respect of their respective CCAA Plans; and (iii) appointed Epiq Class Action Services Canada, Inc. ("**Epiq**") as Claims Administrator in respect of the CCAA Plans.

4. On August 25, 2025, the CCAA Court granted an Order in each of the CCAA Proceedings, among other things, approving the Quebec Class Counsel Fee in the aggregate amount of $901,177,915, plus applicable Sales and Excise Taxes, subject to reduction of the QCC Reserve (as defined therein) in the amount of $50,000,000. The related endorsement acknowledges Quebec Class Counsel's representation that, consistent with the CCAA Plans and the Quebec Administration Plan, the Quebec Class Counsel Fee will be used to pay the fees of Proactio, "which

[3] Initial CCAA Plans were developed by the Court-Appointed Mediator and the Monitors and dated October 17, 2024. The CCAA Plans were each amended and restated on December 5, 2024, and then further amended and restated on January 27, 2025, and February 27, 2025 and August 27, 2025.

will support [the QCAP Claimants'] preparation and submission of their claims *without any additional costs to the claimants*" (emphasis added).

5. Also on August 27, 2025, the CCAA Court granted a Claims Administrator Order in each of the CCAA Proceedings, among other things, appointing Epiq as PCC Agent. Epiq's duties and responsibilities as PCC Agent are solely as agent to PCC Representative Counsel and in respect of the PCC Compensation Plan; they do not extend to the Quebec Administration Plan, in respect of which Proactio had already been retained.

6. The CCAA Plans were implemented on August 29, 2025 (the "**Plan Implementation Date**").

Overview of the Quebec Administration Plan and QCAP *Blais* Claims

7. The Quebec Administration Plan is included as a Schedule to each of the CCAA Plans and provides a framework for Eligible *Blais* Class Members to obtain a Compensation Payment from the Quebec Settlement Amount.

8. Pursuant to the Quebec Administration Plan, Tobacco-Victim Claimants and Succession Claimants (each, a "**QCAP Claimant**") were permitted to submit a Proof of Claim to the Claims Administrator during the *Blais* Claims Submission Period in order to assert a Tobacco-Victim Claim or Succession Claim (each, a "**QCAP *Blais* Claim**"). The *Blais* Claims Submission Period commenced on the Plan Implementation Date and expired upon the *Blais* Claims Application Deadline, being August 31, 2026.

9. The Quebec Administration Plan provides that Quebec Class Counsel: (i) have a traditional solicitor-client relationship with the *Blais* Class Members, which includes a duty to act in their

best interests and represent their interests in regard to the Claims Process; and (ii) may assist the QCAP Claimants in completing and submitting their Proofs of Claim to the Claims Administrator.

10. On December 10, 2024 the CCAA Court issued an injunctive order (the "**Injunction**") preventing another law firm from taking steps to solicit and act for individual QCAP Claimants. The CCAA Court endorsement stated: "The interests of the [QCAP Claimants] are represented in this proceeding by the Quebec Class Counsel. If the CCAA plan is approved by the creditors and sanctioned by the Court, the [QCAP Claimants] will require no additional legal representation."[4]

11. In connection with the motion for the Injunction, Quebec Class Counsel stated in their Notice of Motion that Quebec Class Counsel would "continue to represent Quebec Class Members through the duration of the claims process and, more particularly, have mandated [Proactio] to assist *Blais* Class Members through *every step of the claims and distribution process*" **(emphasis added).** Quebec Class Counsel also represented to the Court that it had been appointed the "sole proxy" for all the QCAP Claimants and it has the "exclusive role" to represent them.[5]

12. The Quebec Administration Plan further acknowledges that Quebec Class Counsel had retained Proactio to assist Quebec Class Counsel in performing their duties as class counsel. These services provided by Proactio have focused on assisting QCAP Claimants in preparing their Proofs of Claim, including providing QCAP Claimants with assistance in collecting information and preparing and submitting supplemental documentation in connection with their QCAP *Blais* Claims.

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[4] Endorsement of the CCAA Court dated December 10, 2024.
[5] Factum of the Quebec Class Counsel dated December 9, 2024; Affidavit of Andre Lesperance sworn December 8, 2024.

13. Pursuant to Orders issued by the Quebec Court on July 21, 2025 and by the Courts on February 20, 2026, each of RAMQ, MSSS and Santé Québec was authorized to communicate certain medical information in respect of the QCAP Claimants prescribed therein to Proactio alone.

14. Under the Quebec Administration Plan, the Claims Administrator (Epiq) reviews each Proof of Claim and makes a determination as to whether each QCAP *Blais* Claim:

(a) meets all the *Blais* Eligibility Criteria and is accepted;

(b) *prima facie* meets all of the *Blais* Eligibility Criteria other than Diagnosis, in which instance the Claims Administrator may issue a Notice to Provide Alternative Proof to the claimant, and the claimant will then have 120 days to submit a form of Alternative Cancer Proof or Alternative Emphysema/COPD (GOLD Grade III or IV) Proof (each, an "**Alternative Proof**"), as applicable;

(c) is incomplete, in which instance the Claims Administrator will issue a Notice of Incomplete *Blais* Claim to the claimant and the claimant will have 60 days to submit a revised Proof of Claim; or

(d) does not meet all *Blais* Eligibility Criteria and is rejected, in which instance the Claims Administrator will issue a Notice of Rejection of *Blais* Claim to the claimant and the claimant will have 60 days to submit a completed Request for Review and any supporting documentation to the Claims Administrator.

Each of the timelines operate independently of the *Blais* Claims Application Deadline and may extend well beyond the *Blais* Claims Application Deadline.

Update on the Implementation of the Quebec Administration Plan

15. Prior to the Plan Implementation Date, the CCAA Plan Administrators and Claims Administrators were advised by Quebec Class Counsel that a vast number of QCAP *Blais* Claims were fully prepared and should be expected to be filed in the period immediately following the Plan Implementation Date. Accordingly, the Claims Administrator took steps to ensure it was properly staffed as of the Plan Implementation Date to review the QCAP *Blais* Claims anticipated to be filed.

16. The Claims Administrator has reported that, during the *Blais* Claims Submission Period, approximately 80,400 Proofs of Claim were filed with the Claims Administrator, of which: (i) approximately 26,700 were filed prior to August 9, 2026; and (ii) approximately 53,700 were filed in the three-week period prior to the expiry of the *Blais* Claims Application Deadline most of which are incomplete, including approximately 23,800 claims missing estate documentation and approximately 22,900 claims awaiting medical records from Santé Québec.

17. In addition, the Claims Administrator has reported that approximately 26,000 claims were filed directly with it in the week prior to August 31, 2026 which, based on the Claims Administrator's analysis, have a medium or high likelihood of being fraudulent.

18. Given: (i) the significant delay in the filing of the QCAP *Blais* Claims anticipated to be filed in the period immediately following the Plan Implementation Date; and (ii) the high volume of QCAP *Blais* Claims filed in the final three weeks of the *Blais* Claims Submission Period, the Claims Administrator was not yet able to review all of the filed QCAP *Blais* Claims resulting in a large backlog.

19. Many of these claims that are being returned to the Claimant/Proactio will require the assistance of Proactio. The Claims Administrator further expects that a significant number of QCAP Claimants that filed QCAP *Blais* Claims which are disputed or pending will require assistance from Proactio to collect and submit additional information to support their QCAP *Blais* Claim.

20. It is anticipated by the Claims Administrator that the adjudication and resolution of all QCAP *Blais* Claims will not be completed until mid-2027 at the earliest.

A Shifting Description of Proactio Role

21. Over the last two months, Quebec Class Counsel has made varying statements regarding Proactio. Their position has varied from advising first, that Proactio would be discontinued; then later that its activities would be scaled back; and then that the role would be wound down as the activities were substantially complete.

22. The Quebec Class Action Plaintiffs have filed Court materials now which indicate that since the *Blais* Claims Application Deadline has passed and certain services may no longer be required of Proactio, Proactio would continue "in a different role" following December 24, 2026 once the remaining files have been transferred to the Claims Administrator without defining it.

23. These shifting descriptions of Proactio's activities, together with the volume of incomplete claims, create confusion and make it important that QCAP Claimants, the Claims Administrator and the Courts have certainty and clarity about the assistance that Proactio will provide for the QCAP Claimants who have outstanding claims.

24. Given the number of currently disputed QCAP *Blais* Claims, as well as, those additional claims which remain outstanding it is apparent that the services of Proactio will be required to

assist QCAP Claimants throughout the entirety of the period. This is necessary to be consistent with representations made to the QCAP Claimants and the Courts.

Alternatives to Proactio would not Adequately Fulfil the Mandate

25. If Proactio is not available to perform these duties, either the duties will not be performed because the QCAP Claimants are not able to do them without assistance or those duties will be directly or indirectly redirected to the Claims Administrator.

26. The Claims Administrator cannot perform these duties. This would require the Claims Administrator to cross the ethical line between Proactio and the Claims Administrator, a distinction which is fundamental to the structure of the Claims Process. Court Orders authorize RAMQ, the MSSS and Santé Québec to communicate the relevant medical information in respect of the Eligible Blais Clas Members to Proactio alone. The Claims Administrator cannot request medical information on a claimant's behalf, correct a deficient claim, or advise claimants without compromising its independence. This is an acute distinction: the Claims Administrator cannot prepare a claim and then assess the claim.

27. Moreover, if the Proactio duties were to be performed by the Claims Administrator, which is not permissible, the net effect would be that the Proactio fee would be paid out of the QCAP Settlement Amount rather than being paid out of the Quebec Class Counsel Fee. This would result in a reduction of the funds available for distribution to Eligible *Blais* Class Members.

28. Proactio has devoted a team of approximately 150 personnel to provide services to the QCAP Claimants. Quebec Class Counsel retained Proactio because they did not have the infrastructure and capacity to handle the number of claims anticipated to be advanced by the QCAP Claimants.

29. As indicated in connection with the Injunction, Quebec Class Counsel are the only legal representatives of the QCAP Claimants and there are no other legal representatives which could assist the QCAP Claimants.

30. Accordingly, Quebec Class Counsel cannot discharge their remaining obligations without Proactio, as evidenced by the fact that they needed Proactio for this purpose.

31. The CCAA Plan Administrators accept, in principle, that Proactio may be downsized, provided that any reduction occurs progressively and is commensurate with the actual workload.

32. Accordingly, the CCAA Plan Administrators seek the Confirmation Order which is necessary to protect the interests of the QCAP Claimants and ensure Proactio continues to provide the necessary assistance in preparing, submitting and remediating the claims as set out in the Quebec Administration Plan.

Additional Grounds

33. Section 11 of the CCAA and the inherent and equitable jurisdiction of the Courts.

34. Rules 1.04, 1.05, 2.03, 3.02, 16, 37 and 59 of the *Rules of Civil Procedure*, R.R.O. 1990, Reg. 194, as amended and the *Courts of Justice Act*, R.S.O. 1990, c. C.43 as amended.

35. Article 49 of the *Code of Civil Procedure*, CQLR c C-25.01.

36. Such further and other grounds as counsel may advise and the Courts may permit.

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

37. The Fourth Report of the Monitor and the CCAA Plan Administrator of RBH to be filed, 2026;

38. The Fifth Report of the Monitor and the CCAA Plan Administrator of JTIM to be filed;

39. The Fourth Report of the Monitor and the CCAA Plan Administrator of Imperial to be filed; and

40. Such further and other evidence as counsel may advise and the Courts may permit.

November 18, 2026

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TO: COMMON SERVICE LIST

Schedule “A”

PROTOCOL FOR MOTION BY ZOOM VIDEO CONFERENCE

Scheduling and Specific Requirements

1. Any person on the Service List that wishes to appear virtually on the motion(s) ("**Participants**") must register by 4:00 p.m. on Friday, November 27th, 2026 for the motion(s) scheduled for Thursday, December 3rd, 2026, by emailing Veritext Litigation Solutions Canada, Inc. (scheduling@neesonsreporting.com) and copying each Monitor's counsel (aperley@dwpv.com, emartin@cassels.com, nancy.thompson@blakes.com). In their email, Participants should provide contact information, including their name, the party they are acting for, their email address and phone number for the counsel slip, along with a statement regarding whether they intend to make submissions.

2. Subject to the Court's overriding discretion over all matters, counsel for the Monitors / CCAA Plan Administrators will coordinate with Participants and the Court to develop an agenda for the hearing.

3. All material for use on the motion(s) is to be posted on Case Center, as more fully described in Appendix "B".

4. Participants will appear by video. Veritext will distribute the Zoom link to registered Participants. Participants are not permitted to forward or share the Zoom link. No person should have access to the hearing on Zoom other than Participants. If a Participant is unable to attend by video, they should contact Monitors' counsel. Participants should carefully review the technical requirements below.

5. Counsel are required to gown for the hearing.

6. For access by the general public, a YouTube link will be posted on each of the Monitors' websites by 10:00 a.m. not less than two (2) business days prior to the hearing. The YouTube link will allow the general public to view a livestream of the hearing, but not participate in the hearing. For greater clarity, individuals viewing the livestream via YouTube will not be heard or seen by the Court, Judge or Participants.

7. No recording of any part of the hearing (including audio) may be made unless authorized in advance by the Court.

8. For greater certainty, notice and service requirements are set out in the Rules of Civil Procedure and the various orders and endorsements in the proceedings. For ease of reference, we have included paragraphs 58-63 of the Second Amended and Restated Initial Order dated

March 8, 2019 in the JTIM proceedings, attached as Appendix “A”. It should be noted that similar notice and service requirements have been set out in various orders and endorsements in the parallel proceedings of Imperial and RBH. Nothing in this protocol modifies or amends Orders of the Court related to service requirements, the Rules of Civil Procedure, any Commercial List Practice Direction or other applicable rules.

9. Participants will be placed into a virtual waiting room upon entering the Zoom meeting.

Technical Requirements for Zoom Participants

10. Participants will require a device with a working microphone and camera. The device can be a computer (desktop or laptop), tablet or smartphone. The device must be connected to an internet connection that is sufficient to send and receive video and audio.

11. Each Participant is responsible for ensuring that they have suitable equipment to participate in the hearing and that such equipment works properly. Participants must test such equipment well in advance of the scheduled hearing to ensure:

(a) that they are familiar with how to use such equipment;

(b) the compatibility and functioning of such equipment; and

(c) that the remote location has adequate internet bandwidth to support the use of Zoom without interruption.

12. Each Participant is also responsible for ensuring that they are familiar with the features and operation of Zoom. Participants must ensure that they have downloaded any necessary software, and practiced using Zoom, well in advance of the scheduled hearing.

13. Counsel on Zoom should identify their display name in the following format: [First Name] [Last name], for [Client].

14. Participants should log on using the Zoom link provided approximately 30 minutes before the hearing is scheduled to begin. During this time, Participants should speak to each other to determine if there are any audio/visual/connection issues.

15. It is suggested that Participants use the “gallery view” mode, rather than the “active speaker” mode, available on Zoom.

16. It is suggested that only counsel who are making submissions turn on their cameras during the hearing.

17. Should a Participant become disconnected from Zoom or experience technical difficulties during the hearing, they should immediately inform the Court by sending an email to Veritext Litigation Solutions Canada, Inc. (scheduling-on@veritext.com).

18. Further participant information is included in Appendix “B.”

APPENDIX “A”

58. **THIS COURT ORDERS** that, subject to paragraph 59, all motions in this proceeding are to be brought on not less than seven (7) calendar days' notice to all persons on the Service List. Each Notice of Motion shall specify a date (the **"Return Date"**) and time for the hearing.

59. **THIS COURT ORDERS** that motions for relief on an urgent basis need not comply with the notice protocol described herein.

60. THIS COURT ORDERS that any interested Person wishing to object to the relief sought in a motion must serve responding motion material or, if they do not intend to file material, a notice in all cases stating the objection to the motion and the grounds for such objection in writing (the **"Responding Material"**) to the moving party, the Applicant and the Monitor, with a copy to all Persons on the Service List, no later than 5 p.m. on the date that is four (4) calendar days prior to the Return Date (the **"Objection Deadline"**).

61. **THIS COURT ORDERS** that, if no Responding Materials are served by the Objection Deadline, the judge having carriage of the motion (the **"Presiding Judge"**) may determine:

(a) whether a hearing is necessary;

(b) whether such hearing will be in person, by telephone or by written submissions only; and

(c) the parties from whom submissions are required

(collectively, the **"Hearing Details"**). In the absence of any such determination, a hearing will be held in the ordinary course.

62. **THIS COURT ORDERS** that, if no Responding Materials are served by the Objection Deadline, the Monitor shall communicate with the Presiding Judge regarding whether a determination has been made by the Presiding Judge concerning the Hearing Details. The Monitor shall thereafter advise the Service List of the Hearing Details and the Monitor shall report upon its dissemination of the Hearing Details to the Court in a timely manner, which may be contained in the Monitor's next report in the proceeding.

63. **THIS COURT ORDERS** that if any party objects to the motion proceeding on the Return Date or believes that the Objection Deadline does not provide sufficient time to respond to the motion, such objecting party shall, promptly upon receipt of the Notice of Motion and in any event prior to the Objection Deadline, contact the moving party and the Monitor (together with the objecting party and any other party who has served Responding Materials, the "**Interested Parties**") to advise of such objection and the reasons therefor. If the Interested Parties are unable to resolve the objection to the timing and schedule for the motion following good faith consultations, the Interested Parties may seek a scheduling appointment before the Presiding Judge to be held prior to the Return Date or on such other date as may be mutually agreed by the Interested Parties or as directed by the Presiding Judge to establish a schedule for the motion. At the scheduling appointment, the Presiding Judge may provide directions including a schedule for the delivery of any further materials and the hearing of the contested motion, and may address such other matters, including interim relief, as the Court may see fit. Notwithstanding the foregoing, the Presiding Judge may require the Interested Parties to proceed with the contested motion on the Return Date or on any other date as may be directed by the Presiding Judge or as may be mutually agreed by the Interested Parties, if otherwise satisfactory to the Presiding Judge.

APPENDIX "B"

1. All Participants will have their microphones muted and may only unmute their own microphones when they are addressing the Court. When parties are not muted, they must avoid making extraneous noise (including for example, typing and shuffling papers) as these noises may interfere with the hearing.

2. Participants must ensure that they participate in the Zoom hearing from a well-lit room so that they are easily visible. Participants must also ensure that no filters are active that may distort or otherwise conceal their appearance.

3. Participants must ensure that they participate in the Zoom hearing from a quiet location where they (and the Court) will not be interrupted or disturbed during the hearing.

4. All mobile devices must be turned off or put on silent mode during the hearing.

5. Participants must refrain from speaking over other Participants.

6. Participants should make submissions in accordance with the order set out in the agenda. If there is a need to make submissions out of sequence, Participants should make a request in a manner directed by the Court. The Court may ask Participants to signal when they intend to address the Court by raising their hand (either by physically raising their hand or by using the virtual "raise hand" feature in Zoom).

7. Participants must state their name and who they represent before addressing the Court.

8. Upon entry into the virtual waiting room, each Participant joining by video should identify themselves, including any person off camera that may be viewing the video feed. This also allows any audio or visual issues to be identified. Each Participant is obligated to immediately notify the presiding judge if any additional person joins them in viewing the video feed.

9. If a Participant intends to rely on any documents, the materials you intend to rely on must be served and shared on the relevant Case Center bundle and all references during the hearing should reference the Case Center page numbering associated with such Case Center bundle.

10. If a party wishes to share certain documents during the hearing, the documents should be provided to the Monitors in advance so that it can be added to the agenda and a method for sharing can be set up.

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 **JTI-MACDONALD CORP.**
AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF **IMPERIAL TOBACCO CANADA LIMITED** AND **IMPERIAL TOBACCO COMPANY LIMITED**
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ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

PROCEEDING COMMENCED AT
TORONTO

JOINT NOTICE OF MOTION OF THE CCAA PLAN ADMINISTRATORS (CONFIRMATION ORDER)

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