

ORDERED, that the form of notice of the Recognition Hearing annexed to this Order as **Exhibit A** (the “Notice”) is hereby approved; and it is further

ORDERED, that the notice requirements set forth in section 1514(c) of the Bankruptcy Code are inapplicable in the context of this Chapter 15 case or are hereby waived; and it is further

ORDERED, that copies of the Notice Documents shall be served by United States mail, first class postage prepaid, upon the Chapter 15 Notice Parties within three days of entry of this Order; and it is further

ORDERED, that any party in interest wishing to submit a response or objection to the Verified Petition or the relief requested therein must do so in writing, and in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Rules for the Bankruptcy Court for the Southern District of New York, setting forth the basis therefor, which response or objection must be filed electronically with the Court on the Court's electronic case filing system in accordance with General Order M-399 and the Court's Procedures for the Filing, Signing and Verification of Documents by Electronic Means (copies of which may be viewed on the Court's website at www.nysb.uscourts.gov), and by all other parties in interest in searchable Portable Document Format (PDF) or any other Windows-based word processing format. A hard copy of such response or objection shall be sent to (i) the chambers of Judge John P. Mastando III, United States Bankruptcy Judge, (ii) Attn: Shara Cornell, Trial Attorney, Office of the United States Trustee (shara.cornell@usdoj.gov), and (iii) served upon Freshfields US LLP, Attn: Madlyn Gleich Primoff (madlyn.primoff@freshfields.com), Alexander Adams Rich (alexander.rich@freshfields.com) and Sarah R. Margolis (sarah.margolis@freshfields.com), 3 World Trade Center, 175 Greenwich Street, New York, NY 10007, counsel to the Foreign Representative, **so as to be received no later than 5:00 p.m. (New York time), on July 31, 2025**; and it is further

ORDERED, that service pursuant to this Order shall be deemed good and sufficient service and adequate notice of the Recognition Hearing.

Dated: New York, New York
July 11, 2025

/S/ John P. Mastando III

HONORABLE JOHN P. MASTANDO III
UNITED STATES BANKRUPTCY JUDGE

Exhibit A

**Notice of Filing and Hearing on Petition for Recognition
Under Chapter 15 of the Bankruptcy Code and Motion for Related Relief**

Madlyn Gleich Primoff, Esq.
Madlyn.primoff@freshfields.com
Alexander Adams Rich, Esq.
Alexander.rich@freshfields.com
Sarah R. Margolis, Esq.
Sarah.margolis@freshfields.com

FRESHFIELDS US LLP

3 World Trade Center
175 Greenwich Street
New York, New York 10007
Telephone: (212) 277-4000
Facsimile: (212) 277-4001

*Attorneys for William E. Aziz of BlueTree Advisors Inc.
In His Capacity as Foreign Representative*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

JTI-MACDONALD CORP.,

Debtor in a Foreign Proceeding.

)
)
) Chapter 15
)
) Case No. 25-11530 (JPM)
)
)
)
)
)
)

**NOTICE OF FILING OF AND HEARING ON
PETITION FOR RECOGNITION UNDER CHAPTER 15 OF THE
UNITED STATES BANKRUPTCY CODE AND MOTION FOR RELATED RELIEF**

1. **PLEASE TAKE NOTICE** that on July 9, 2025, William E. Aziz of BlueTree Advisors Inc., in his capacity as the duly authorized foreign representative (the “Foreign Representative”) of JTI-Macdonald Corp. (the “Debtor”) in a proceeding (the “Canadian Proceeding”) under Canada’s *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended, pending before the Ontario Superior Court of Justice (Commercial List) in Toronto, commenced a Chapter 15 case ancillary to the Canadian Proceeding, seeking recognition of such

foreign proceeding as a “foreign main proceeding” and relief in aid of the Canadian Proceeding in the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) with respect to the Debtor.

PLEASE TAKE FURTHER NOTICE that the Foreign Representative seeks entry of an order (i) recognizing the Canadian Proceeding as a foreign main proceeding; (ii) recognizing the Foreign Representative as a “foreign representative” within the meaning of Bankruptcy Code section 101(24); and (iii) enforcing the Sanction Order and the CCAA Plan, including the Releases of the Released Parties.

PLEASE TAKE FURTHER NOTICE that the Bankruptcy Court has scheduled a hearing to consider the relief requested by the Foreign Representative for August 7, 2025 (the “Recognition Hearing”). Copies of the Foreign Representative’s Verified Petition for Recognition of Foreign Main Proceeding and Related Relief (the “Verified Petition”) and all other accompanying documentation are available to parties-in-interest on the Bankruptcy Court’s Electronic Case Filing System, which can be accessed at the Bankruptcy Court’s web site at <http://nysb.uscourts.gov> (a PACER login and password is required to retrieve a document) or upon written request to the Foreign Representative’s counsel (including facsimile or email) addressed to:

Freshfields US LLP
Attn: Madlyn Gleich Primoff
Alexander Adams Rich
Sarah R. Margolis
3 World Trade Center
175 Greenwich Street
New York, New York 10007
Facsimile: (212) 277-4001
Email:
Madlyn.primoff@freshfields.com
Alexander.rich@freshfields.com
Sarah.margolis@freshfields.com

PLEASE TAKE FURTHER NOTICE that, at the hearing, the Court may order the scheduling of a case management conference to consider the efficient administration of the case.

PLEASE TAKE FURTHER NOTICE that any party in interest wishing to submit a response or objection to the Verified Petition or the relief requested therein must do so in writing, and in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Rules for the Bankruptcy Court for the Southern District of New York, setting forth the basis therefor, which response or objection must be filed electronically with the Court on the Court's electronic case filing system in accordance with General Order M-399 and the Court's Procedures for the Filing, Signing and Verification of Documents by Electronic Means (copies of which may be viewed on the Court's website at www.nysb.uscourts.gov), and by all other parties in searchable Portable Document Format (PDF) or any other Windows-based word processing format. A hard copy of such response or objection shall be sent to (i) the chambers of Judge John P. Mastando III, United States Bankruptcy Judge, (ii) Attn: Shara Cornell, Trial Attorney, Office of the United States Trustee (shara.cornell@usdoj.gov), and (iii) served upon Freshfields US LLP, Attn: Madlyn Gleich Primoff (madlyn.primoff@freshfields.com), Alexander Adams Rich (alexander.rich@freshfields.com) and Sarah R. Margolis (sarah.margolis@freshfields.com), 3 World Trade Center, 175 Greenwich Street, New York, NY 10007, counsel to the Foreign Representative, **so as to be received no later than 5:00 p.m. (New York time), on July 31, 2025.**

PLEASE TAKE FURTHER NOTICE that all parties in interest opposed to the Verified Petition or the relief requested therein must appear at the Recognition Hearing at the time and place set forth above.

PLEASE TAKE FURTHER NOTICE that if no response or objection is timely served as provided herein, the Court may grant the relief requested in the Verified Petition without further notice.

PLEASE TAKE FURTHER NOTICE that the Recognition Hearing may be adjourned from time to time without further notice other than an announcement in open court, or a notice of adjournment filed with the Court, of the adjourned date or dates at the hearing or any other further adjourned hearing.

Dated: July 9, 2025
New York, New York

By: /s/ Madlyn Gleich Primoff
Madlyn Gleich Primoff, Esq.
Alexander Adams Rich, Esq.
Sarah R. Margolis, Esq.
FRESHFIELDS US LLP
3 World Trade Center
175 Greenwich Street
New York, New York 10007
Telephone: (212) 277-4000
Facsimile: (212) 277-4001
Madlyn.primoff@freshfields.com
Alexander.rich@freshfields.com
Sarah.margolis@freshfields.com

*Attorneys for William E. Aziz of BlueTree Advisors Inc.
In His Capacity as Foreign Representative*