

## Ambachtsheer, Todd

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**From:** Ariyana Botejue <ABotejue@blaney.com>  
**Sent:** March 25, 2020 5:33 PM  
**To:** 'kmahar@millerthomson.com'; 'aiqbal@millerthomson.com'; Reynolds, Phil; Sleeth, Jordan; Ambachtsheer, Todd; 'LWilliams@tgf.ca'; 'pfesharaki@tgf.ca'; 'chris.burr@blakes.com'; 'aryo.shalviri@blakes.com'; 'milly.chow@blakes.com'; 'katherineforbes@kpmg.ca'; 'nbrearton@kpmg.ca'; 'dmcintosh@alvarezandmarsal.com'; 'gkarpel@alvarezandmarsal.com'; 'sbabe@airdberlis.com'; 'amiakichev@foglers.com'; 'diane.winters@justice.gc.ca'; 'kevin.ohara@ontario.ca'; 'ahatnay@kmlaw.ca'; 'dyiokaris@kmlaw.ca'; 'zweigs@bennettjones.com'; 'jmcelman@coxandpalmer.com'; 'tdunn@mindengross.com'; 'vince@deangelislaw.ca'; 'ro'brien@couttskrane.com'; 'maryanne.shaw@sympatico.ca'; 'frank.spizzirri@audaxlaw.com'; 'vince@deangelislaw.ca'; 'info@petkerlaw.com'; 'mfleming@foglers.com'; 'Harp Khukh'; 'blinickj@bennettjones.com'  
**Cc:** David T. Ullmann  
**Subject:** [EXT] In the Matter of North American Fur Producers Inc. (CV-19-00630241-00CL)  
**Attachments:** 2020-03-25 - Motion Record of the Applicants.pdf

To the Service List:

Please find attached a motion record in the above-referenced matter seeking: (I) an extension of the stay of proceedings to and including May 4, 2020; (II) an increase in the Administration Charge to USD\$1.5 million (\$700k in first priority; \$800K in fourth priority); and (iii) authorizing the Applicants to complete a settlement.

The Monitor has communicated with the Court, and Justice McEwen has advised that His Honour will hear the motion on April 1, 2020.

Depending on whether there is opposition, as set out below, the intention is for the motion to proceed in writing or by teleconference or videoconference, as the Court may direct.

In light of COVID 19 and the Notice to the Profession issued by the Court and the Commercial List Users Committee, the following procedure will be applied to this hearing:

1. Parties on the Service List who intend to oppose the Company's requested stay extension shall provide written notice to counsel for the Company ([dullmann@blaney.com](mailto:dullmann@blaney.com)), the Monitor ([jsleeth@deloitte.ca](mailto:jsleeth@deloitte.ca); [kmahar@millerthomson.com](mailto:kmahar@millerthomson.com)) and the Commercial List Office ([Toronto.commercialist@jus.gov.on.ca](mailto:Toronto.commercialist@jus.gov.on.ca)) by no later than 5:00 p.m. on March 30, 2020 (an "**Objection Notice**").
2. If no party delivers an Objection Notice in accordance with the procedure and deadlines set out above, the Monitor shall advise the Court accordingly and request the motion be heard in writing on the materials filed.
3. If a party delivers an Objection Notice, the Monitor shall advise the Court, and the Court will direct the parties with respect to the scheduling and conduct of a hearing.

To the extent the hearing cannot be heard on April 1, 2020 as a result of an Objection Notice, the Company will request the Court issue a short stay extension to maintain the status quo pending a final determination of the Company's stay extension request

Thank you,



Ariyana Botejue

Legal Assistant to Stephen Gaudreau and David Ullmann

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