

Superior Court  
(Commercial Division)

Canada  
Province of Québec  
District of Montréal  
No: 500-11-058763-208

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**In the matter of the *Companies' Creditors Arrangement Act* of:**

**Groupe Dynamite Inc.  
GRG USA Holdings Inc.  
GRG USA LLC**

Debtors

-and-

**Deloitte Restructuring Inc.**

Monitor

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**Application for a Fourth Extension of the Stay Period  
(Companies' Creditors Arrangement Act, s 11.02(2))**

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**To the Honourable Peter Kalichman, Judge of the Superior Court, sitting in the Commercial Division for the District of Montréal, the Debtors respectfully submit:**

**I. Introduction**

1. By the present application (the "**Application**"), the Debtors request an extension of the Stay Period to July 6, 2021, in accordance with the terms of the proposed extension order (the "**Proposed Extension Order**"), communicated herewith as **Exhibit P-1**.
2. The relief sought in the Application is necessary and appropriate to allow for the Debtors to continue the restructuring process contemplated in the Initial Order dated September 8, 2020, as amended and restated on September 18, 2020 (the "**Initial Order**").
3. The Monitor supports the relief sought.

**II. The Stay Period should be extended**

4. On September 8, 2020, the Debtors served an Application for an Initial Order and an Amended and Restated Initial Order (the "**Initial Application**"), as appears from the Court record.

5. The Initial Application provides a detailed description of the activities of the Debtors, their key stakeholders, the circumstances surrounding the filing of the Initial Application as well as the Restructuring contemplated pursuant to the Initial Order.
6. On September 8, 2020, this Court granted the Initial Application and rendered an Initial Order, commencing proceedings in respect of the Debtors under the CCAA (the "**CCAA Proceedings**").
7. On September 18, 2020, the Court rendered an amended and restated initial order, *inter alia*, confirming the provisions of the Initial Order and extending the Stay Period to October 19, 2020.
8. On October 15, 2020, the Court extended the Stay Period to December 11, 2020.
9. On December 10, 2020, the Court extended the Stay Period to February 26, 2021.
10. On February 25, 2021, the Court extended the Stay Period to April 19, 2021.
11. Since the last extension of the Stay Period on February 25, 2021, the Debtors:
  - (a) have proceeded to continue their review of their lease portfolio. As of April 12, 2021, Groupe Dynamite had verbal agreements with landlords regarding all of its 303 stores, as well as finally documented agreements regarding 160 of them;
  - (b) have elaborated a claims process; and
  - (c) have progressed in the elaboration of one or more plan(s) of compromise or arrangement.
12. The Debtors seek the extension of the Stay Period until July 6, 2021 to complete the review of their lease portfolio, to enter into lease amending agreements, to initiate of a claims process and the elaboration of a plan of compromise or arrangement.
13. It is respectfully submitted that the Debtors have acted and are acting in good faith and with due diligence and that the proposed extension should be granted, in accordance with the Proposed Extension Order.
14. Given the need to advance the restructuring process as quickly as possible, it is respectfully submitted that this Court order the provisional execution of the order sought notwithstanding any appeal.

**FOR THESE REASONS, MAY IT PLEASE THE COURT TO:**

**RENDER** an order substantially in the form of the Proposed Extension Order, Exhibit P-1;

**THE WHOLE** without legal costs, save in case of contestation.

Montreal, April 12, 2021

*McCarthy Tétraut*

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**McCarthy Tétraut LLP**

Lawyers for the Debtors

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**Affidavit**


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I, the undersigned, Guy Vallières, authorized representative of the Debtors, domiciled for the purpose hereof at 5592 Ferrier Street, Mount-Royal, Québec, Canada, solemnly affirm that all the facts alleged in the present *Application for a Fourth Extension of the Stay Period* are true.

AND I HAVE SIGNED,

  
\_\_\_\_\_  
Guy Vallières

SOLEMNLY AFFIRMED TO BEFORE ME AT  
MONTREAL, this 12<sup>th</sup> day of April, 2021

 #222,780

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COMMISSIONER OF OATHS  
FOR THE PROVINCE OF QUÉBEC

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**Notice of Presentation**

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**TO: Service List**

**1. PRESENTATION OF THE PROCEEDING**

**TAKE NOTICE** that the present *Application for a Fourth Extension of the Stay Period* will be presented for adjudication before the Superior Court of Québec, sitting in the commercial division for the district of Montréal, located at 1 Notre Dame Street East, Montréal, QC, H2Y 1B6, **during the virtual roll** on April 19<sup>th</sup>, 2021 at 9:00 am and in room 17.09 or soon thereafter as counsel may be heard.

**2. HOW TO JOIN THE VIRTUAL PRACTICE ROLL CALL**

The coordinates for joining the room 17.09 virtual roll call are the following:

- a) **With Microsoft Teams Tool:** by clicking on the link available on the website [www.tribunaux.qc.ca](http://www.tribunaux.qc.ca);

You need at that time to inscribe your name and click on "Joining now". In order to facilitate the progress and the identification of the participants, we are inviting you to inscribe your name by this manner:

The lawyers: Mtre First name, Last Name (name of the represented party)

The syndics: First name, Last Name (syndic's name)

The superintendent: First name, Last name (superintendent's name)

The parties non-represented by lawyers: First name, Last name (precise: Plaintiff, Defendant, Petitioner, Respondent, Creditor, Opponent or other)

For people who are assisting to a public hearing: the mention may be limited to entering: (public)

b) **By telephone:**

Canada, Québec (paid number): + 1 581-319-2194

Canada (toll-free number): (833) 450-1741

Conference ID: 991 211 186#

c) **By videoconference:** [teams@teams.justice.gouv.qc.ca](mailto:teams@teams.justice.gouv.qc.ca)

Conference VTC ID: 1185631255

d) **In person:** If and only if you do not have access to one of these technological means above-identified. You can then go to room 17.09 of the Courthouse of Montreal, located at:

1 Notre-Dame Street East.

### 3. **DEFAULT OF PARTICIPATING TO THE VIRTUAL ROLL CALL**

**TAKE NOTICE** that if you wish to contest the proceeding you need to advise by written the instigator of the proceeding at the indicated coordinates in this Notice of Presentation at least 48 hours before the presentation date and participate to the virtual roll call. Failing that, a judgment could be rendered during the presentation of the proceeding, without any further notice or delay.

### 4. **OBLIGATIONS**

#### 4.1 The Collaboration

**TAKE NOTICE** that you have the obligation to cooperate with the other party, in particular by informing each other, at all relevant times, of all facts and elements susceptible of promote a loyal debate and making sure you preserve the relevant evidence (*Civil Code of Procedure*, Art. 20).

#### 4.2 Preventing and Resolving Disputes Method

**TAKE NOTICE** that you must, before going to the Tribunal, considerate the recourse of all preventing and resolving disputes methods which are, among others, negotiation, mediation or arbitration, for which the parties appeal a third-party assistance (*Civil Code of Procedure*, Art. 2).

**DO GOVERN YOURSELVES ACCORDINGLY.**

Montreal, April 12, 2021

*McCarthy Tétrault*

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Proposed Monitor

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**List of Exhibits**

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<b>EXHIBITS</b>	<b>DESCRIPTION</b>
Exhibit P-1	Proposed Extension Order

Montreal, April 12, 2021



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**McCarthy Tétrault LLP**  
Lawyers for the Debtors



SUPERIOR COURT  
(COMMERCIAL DIVISION)

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