

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

SIMEX INC., *et al.*,¹

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 24-10083 (TMH)

(Joint Administration Requested)

Related Docket No. 8

**ORDER SCHEDULING HEARING AND SPECIFYING FORM AND MANNER
OF SERVICE OF NOTICE PURSUANT TO SECTIONS 105(a), 1514, AND 1515
OF THE BANKRUPTCY CODE AND BANKRUPTCY RULES 2002 AND 9007**

Upon the (the “Motion”)² of the Foreign Representative for entry of an order pursuant to sections 105(a), 1514 and 1515 of the Bankruptcy Code and Bankruptcy Rules 2002 and 9007, scheduling a hearing and specifying the form and manner of service of notice, all as more fully described in the Motion; and this Court having jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(P); and the Foreign Representative having consented to the Court’s authority to enter a final order consistent with Article III of the United States Constitution; and venue being proper before this Court pursuant to 28 U.S.C. § 1410; and due and proper notice of the Motion having been provided; and it appearing that no other or further notice need be provided; and a hearing

¹ The chapter 15 debtor incorporated in Canada and/or in the province of Ontario (the “Canadian Debtor”), along with the last four digits of the Canadian Debtor’s Canadian business number, is: SimEx Inc. (“SimEx”) (5222). The chapter 15 debtors incorporated in the United States (the “U.S. Debtors”), along with the last four digits of each U.S. Debtor’s federal tax identification number, are: Iwerks Entertainment, Inc. (“Iwerks”), (9361) and SimEx-Iwerks Myrtle Beach, LLC (“SIMB”) (8416). The Canadian Debtor and the U.S. Debtors are referred to herein, collectively, as the “Debtors” or “SimEx”. The Debtors’ executive headquarters are located at: 210 King St East, 600, Toronto, Ontario, Canada, M5A 1J7.

² Capitalized terms not defined herein are used as defined in the Motion.

having been held to consider the relief requested in the Motion (the “Hearing”); and upon the Jordan Sleeth Declaration, the Verified Petition, the Declaration of Roger Jaipargas in support of the Verified Petition, and other documents filed contemporaneously with the Motion; and upon the record of the Hearing and all of the proceedings had before the Court; and it appearing that the relief requested by the Motion is in the best interest of the Debtors, their creditors, and other parties in interest; and after due deliberation thereon and sufficient cause appearing therefor; it is hereby ORDERED that:

1. The Motion is granted as set forth herein.
2. The Recognition Hearing Notice, substantially in the form attached hereto as **Exhibit 1**, is hereby approved.
3. The Publication Notice, substantially in the form attached hereto as **Exhibit 2**, is hereby approved.
4. Service of the Recognition Hearing Notice in accordance with this Order is hereby approved as adequate and sufficient notice and service on all interested parties.
5. Prior to mailing the Recognition Hearing Notice and publishing the Publication Notice, the Foreign Representative may fill in any missing dates and other information, correct any typographical errors, conform the provisions thereof to the provisions of this Order and make such other and further changes as the Foreign Representative deems necessary or appropriate, provided that such changes do not materially abridge the substance of such notices.
6. All notice requirements specified in section 1514(c) of the Bankruptcy Code and Local Rule 9013-1(m) are hereby waived or otherwise deemed inapplicable to these cases.

7. The Court will hold a hearing on the relief requested by the Chapter 15 Petitions and the Verified Petition, including recognition of the CCAA Proceedings as foreign main proceedings, on **February 22, 2024, at 10:00 a.m. (prevailing Eastern Time)**.

8. The Foreign Representative shall serve, or cause to be served, the Recognition Hearing Notice by electronic mail to the extent email addresses are available and otherwise by United States or Canadian mail, first-class postage-prepaid, on parties on the Master Service List within three (3) business days following entry of this Order and the Provisional Order, or as soon thereafter as practicable. To the extent email addresses are available, the Foreign Representative shall serve copies of the Notice Documents with the Recognition Hearing Notice by electronic mail on parties on the Master Service List.

9. Unless otherwise ordered by the Court, the Foreign Representative shall serve, or cause to be served, the Notice Documents and all other papers filed by the Foreign Representative after the date hereof by the Foreign Representative in these Chapter 15 Cases on the Core Notice Parties, including any party requesting to be a Core Notice Party, by electronic mail to the extent email addresses are available and otherwise by United States or Canadian mail, first-class postage-prepaid.

10. Responses or objections to recognition of the CCAA Proceedings as foreign main proceedings, or the Verified Petition and the relief requested therein must (i) be in writing, (ii) detail the factual and legal basis for the response or objection, (iii) comply with the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and (iv) be filed with the Office of the Clerk of the Court, 824 N. Market Street, Third Floor, Wilmington, Delaware 19801, served upon Deloitte Restructuring, Inc., Attn: Jordan Sleeth, Bay Adelaide East, 8

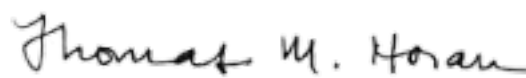
Adelaide Street West, Suite 200, Ontario MSH 0A9, Canada (jsleeth@deloitte.ca) and served upon the following counsel so as to be received at least seven days prior to the Recognition Hearing: (a) counsel for the Foreign Representative: (i) Perkins Coie LLP, Attn: Tina N. Moss, 1155 Avenue of the Americas, 22nd Floor, New York, New York 10046-2711 (TMoss@perkinscoie.com) and Perkins Coie LLP, Attn: Paul Jasper, 505 Howard Street, Suite 1000, San Francisco, California 94105-3204 (PJasper@perkinscoie.com) and (ii) Chipman, Brown, Cicero & Cole, Attn: Mark L. Desgrosseilliers and Kristi J. Doughty, Hercules Plaza, 1313 N. Market Street, Suite 5400, Wilmington, Delaware 19801 (desgross@chipmanbrown.com and doughty@chipmanbrown.com); (b) counsel for the Royal Bank of Canada: Dentons Canada, 77 King St. West, Suite 400, Toronto, ON M5K 0A1, Attention: Ken Kraft, John Salmas, and Sarah Lam (kenneth.kraft@dentons.com, john.salmas@dentons.com, and sarah.lam@dentons.com) and (c) counsel for BDC Capital Inc., Spetter Zeitz Klaiman, 100 Sheppard Ave., East, Suite 850, Toronto, ON M2N 6N5, Attention: Jason Spetter (jspetter@szklaw.ca).

11. Notwithstanding any applicability of any Bankruptcy Rules, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

12. The Foreign Representative is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.

13. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and/or enforcement of this Order.

Dated: January 26th, 2024
Wilmington, Delaware



THOMAS M. HORAN
UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

Notice of Recognition Hearing

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

SIMEX INC., *et al.*,¹

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 24-10083 (TMH)

(Joint Administration Requested)

**NOTICE OF RECOGNITION HEARING AND
NOTICE OF ENTRY OF PROVISIONAL ORDER**

PLEASE TAKE NOTICE OF THE FOLLOWING:

On January 17, 2024, the above-captioned debtors (collectively, the “Debtors”) filed petitions under the *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36 (as amended, the “CCAA”), in the Ontario Superior Court, Court of Justice (Commercial List) (the “Canadian Court”) to commence restructuring proceedings (the “CCAA Proceedings”). That same day, the Canadian Court approved the initial order pursuant to the CCAA (the “Initial Order”), which in part authorized Deloitte Restructuring, Inc. et al. to act as foreign representative of the Debtors (the “Foreign Representative” or “Deloitte”).

On January 25, 2024, Deloitte, in its capacity as the Canadian Court-appointed and authorized Foreign Representative of the Debtors, filed petitions for recognition under chapter 15 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”).

Contemporaneously with filing the petitions for recognition, the Foreign Representative filed (a) *Verified Petition for (I) Recognition of Foreign Main Proceedings, (II) Recognition of Foreign Representative, and (III) Related Relief Under Chapter 15 of the Bankruptcy Code* [D.I. 4] (the “Verified Petition”); (b) *Declaration of Foreign Representative Pursuant to 11 U.S.C. § 1515 and Rule 1007(a)(4) of the Federal Rules of Bankruptcy Procedure and in Support of Verified Petition for (I) Recognition of Foreign Main Proceedings, (II) Recognition of Foreign Representative, and (III) Recognition of Initial Order and Amended Initial Order, and (IV) Related Relief Under Chapter 15 of the Bankruptcy Code* [D.I. [5]] (the “Deloitte Declaration”); and (c) *Declaration of Jaipargas in Support of Verified Petition for (I) Recognition of Foreign Main Proceedings, (II) Recognition of Foreign Representative, and (III) Related Relief Under Chapter 15 of the Bankruptcy Code* [D.I. 7] (the “Jaipargas Declaration”) and the *Motion*

¹ The chapter 15 debtor incorporated in Canada and/or in the province of Ontario (the “Canadian Debtor”), along with the last four digits of the Canadian Debtor’s Canadian business number, is: SimEx Inc. (“SimEx”) (5222). The chapter 15 debtors incorporated in the United States (the “U.S. Debtors”), along with the last four digits of each U.S. Debtor’s federal tax identification number, are: Iwerks Entertainment, Inc. (“Iwerks”), (9361) and SimEx-Iwerks Myrtle Beach, LLC (“SIMB”) (8416). The Canadian Debtor and the U.S. Debtors are referred to herein, collectively, as the “Debtors” or “SimEx”). The Debtors’ executive headquarters are located at: 210 King St East, 600, Toronto, Ontario, Canada, M5A 1J7.

for Provisional Relief Pursuant to Section 1519 of the Bankruptcy Code [D.I. 6] (the “Provisional Relief Motion”).

On January 26, 2024, the Bankruptcy Court entered the *Order Granting Provisional Relief* (D.I. [REDACTED]) (the “Provisional Order”), which granted, on a provisional basis:

- a. Recognition and enforcement in the United States, on a provisional basis, of the Initial CCAA Order² providing for, among other things:
 - i. staying all proceedings and remedies taken or that might be taken in respect of the Debtors or any of their property until the Court rules on the Debtors’ Chapter 15 Petitions to the same extent provided in the Initial CCAA Order;
 - ii. authorizing the Debtors’ use of their existing cash management system subject to any limitations imposed by the Canadian Court;
 - iii. approving the DIP Facility with the DIP Lender subject to the terms of the Commitment Letter and, to the extent approved by the Canadian Court, the Definitive Documents; and
 - iv. granting an Administration Charge, DIP Lender’s Charge, and Directors’ Charge to the same extent provided in the Initial CCAA Order.
- b. Recognition of the Foreign Representative as the representative of the Debtors with full authority to administer the Debtors’ assets and affairs in the United States.
- c. Finding Section 361 of the Bankruptcy Code shall apply with respect to each of the Debtors and the property of each of the Debtors that is within the territorial jurisdiction of the United States.
- d. Finding that, until the Court rules on the Debtors’ Chapter 15 Petitions, Section 362 of the Bankruptcy Code shall apply with respect to each of the Debtors and the property of each of the Debtors that is within the territorial jurisdiction of the United States. For the avoidance of doubt and without limiting the generality of the foregoing, the Provisional Relief Order shall impose a stay within the territorial jurisdiction of the United States of:
 - i. The commencement or continuation, including the issuance or employment of process of, any judicial, administrative, or any other action or proceeding involving or against the Debtors or their assets or proceeds thereof, or to recover a claim or enforce any judicial, quasi-

² Capitalized terms used in this section but not otherwise defined herein shall have the meanings ascribed to them in the Initial CCAA Order.

- judicial, regulatory, administrative, or other judgment, assessment, order, lien or arbitration award against the Debtors or their assets or proceeds thereof, or to exercise any control over the Debtors' assets located in the United States except as authorized by the Foreign Representative in writing;
- ii. The creation, perfection, seizure, attachment, enforcement, or execution of liens or judgments against the Debtors' property in the United States or from transferring, encumbering or otherwise disposing of or interfering with the Debtors' assets or agreements in the United States without the express consent of the Foreign Representative;
 - iii. Any act to collect, assess, or recover a claim against any of the Debtors that arose before the commencement of the Debtors' Chapter 15 Cases; and
 - iv. The setoff of any debt owing to any of the Debtors that arose before the commencement of the Debtors' Chapter 15 Cases against any claim against of the Debtors.
- e. Finding Section 364 of the Bankruptcy Code applicable with respect to each of the Debtors and the property of each of the Debtors that is within the territorial jurisdiction of the United States. For the avoidance of doubt and without limiting the generality of the foregoing, the Provisional Relief Order shall, without limitation, grant liens and security interests in the Debtors' assets located within the territorial jurisdiction of the United States pursuant to Section 364(d)(1) of the Bankruptcy Code in respect of, and in accordance with, the Administration Charge, DIP Lender's Charge, and Directors' Charge (collectively, the "CCAA Charges")
- f. Finding that for counterparties to the Debtors' executory contracts and unexpired leases, section 365(e) of the Bankruptcy Code shall apply with respect to each of the Debtors and the property of each of the Debtors that is within the territorial jurisdiction of the United States.
- g. Finding specifically that, until the Court rules on the Debtors' Chapter 15 Petitions, any and all counterparties to executory contracts with the Debtors are hereby prohibited from taking any steps to cancel, terminate, or modify any such contract.

- h. Finding that, until the Court rules on the Debtors' Chapter 15 Petitions, any and all licensors or licensees are hereby prohibited from taking any steps to cancel, terminate, or modify any license to which one or more of the Debtors is a party for any reason, including non-payment of royalties and/or due to any ipso facto clause described by Section 365(e)(1) of the Bankruptcy Code.
- i. Finding that, until the Court rules on the Debtors' Chapter 15 Petitions, any and all landlords or other parties with a lease of premises to the Debtors located within the US are hereby prohibited from: taking any steps to cancel, terminate, or modify any lease for any reason, including non-payment of rent and/or due to any ipso facto clause described by Section 365(e)(1) of the Bankruptcy Code; enforcing any "landlord lien", possessory lien or similar lien against any property of the Debtor; changing the locks or codes on any of the Debtors' premises; or commencing or continuing any eviction or similar proceedings; and
- j. Finding that the Foreign Representative shall have the rights and protections to which the Foreign Representative is entitled under chapter 15 of the Bankruptcy Code, including, but not limited to, the protections limiting the jurisdiction of United States Courts over the Foreign Representative in accordance with section 1510 of the Bankruptcy Code and the granting of additional relief in accordance with sections 1519(a)(3) and 1521 of the Bankruptcy Code.
- k. Finding that notwithstanding any provision in the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") to the contrary, (i) the Provisional Relief Order shall be effective immediately and enforceable upon entry, (ii) the Foreign Representative is not subject to any stay in the implementation, enforcement, or realization of the relief granted in the Provisional Relief Order, and (iii) the Foreign Representative is authorized and empowered, and may, in its discretion and without further delay, take any action and perform any act necessary to implement and effectuate the terms of the Provisional Relief Order.

The Provisional Order also conditionally recognized, subject to the Canadian Court's approval on a provision basis, the anticipated amended and restated initial order (the "Amended and Restated Initial Order") that will supplement the Initial Order by, among other things:

- Extends the automatic stay from January 29, 2024 through May 3, 2024; and
- Increases the amounts of the charges granted to the Debtors' lenders.

Responses or objections to recognition of the CCAA Proceedings as foreign main proceedings or foreign nonmain proceedings, or the Verified Petition and the relief requested therein must (i) be in writing, (ii) detail the factual and legal basis for the response or objection, (iii) comply with the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), and (iv) be filed with the Office of the Clerk of the Court, 824 N. Market Street, Third Floor, Wilmington, Delaware 19801, served upon Deloitte Restructuring, Inc., Attn: Jordan Sleeth, Bay Adelaide East, 8 Adelaide Street West, Suite 200, Ontario MSH 0A9, Canada

(jsleeth@deloitte.ca) and served upon the following **so as to be received at least seven days prior to the Recognition Hearing, i.e., February 15, 2024, at 4:00 p.m. (prevailing Eastern time):** (a) counsel for the Foreign Representative: (i) Perkins Coie LLP, Attn: Tina N. Moss, 1155 Avenue of the Americas, 22nd Floor, New York, New York 10046-2711 (TMoss@perkinscoie.com) and Perkins Coie LLP, Attn: Paul Jasper, 505 Howard Street, Suite 1000, San Francisco, California 94105-3204 (PJasper@perkinscoie.com) and (ii) Chipman, Brown, Cicero & Cole, Attn: Mark L. Desgrosseilliers and Kristi J. Doughty, Hercules Plaza, 1313 N. Market Street, Suite 5400, Wilmington, Delaware 19801 (desgross@chipmanbrown.com and doughty@chipmanbrown.com); (b) counsel for the Royal Bank of Canada: (i) Dentons Canada, 77 King St. West, Suite 400, Toronto, ON M5K 0A1, Attention: Ken Kraft, John Salmas, and Sarah Lam (kenneth.kraft@dentons.com, john.salmas@dentons.com, and sarah.lam@dentons.com) and (c) counsel for BDC Capital Inc., Spetter Zeitz Klaiman, 100 Sheppard Ave., East, Suite 850, Toronto, ON M2N 6N5, Attention: Jason Spetter (jspetter@szklaw.ca).

The Bankruptcy Court has scheduled a hearing on **February 22, 2024, at 10:00 a.m. (prevailing Eastern time)** to consider recognition of the CCAA Proceedings as foreign main proceedings, or, in the alternative, foreign nonmain proceedings, on a final basis and certain related relief (the “Recognition Hearing”). This proceeding will be conducted in-person. All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom. Please refer to Judge Horan’s Chambers Procedures and the Court’s website (<http://www.deb.uscourts.gov/ecourt-appearances>) for information on the method of allowed participation (video or audio), Judge Horan’s expectations of remote participants, and the advance registration requirements. Registration, if applicable, is required by 4:00 p.m. (ET) the business day before the hearing, unless otherwise noticed, using the *eCourtAppearances* tool available on the Court’s website. At the same time, you must notify the counsel listed above of your intent to appear by Zoom or telephone at the Recognition Hearing.

The Recognition Hearing may be adjourned from time to time without further notice other than a notice on the docket in these cases or an announcement in open court of the adjourned date or dates of any adjourned hearing.

PLEASE TAKE FURTHER NOTICE THAT IF NO RESPONSE OR OBJECTION IS TIMELY FILED OR SERVED AS PROVIDED ABOVE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED BY THE FOREIGN REPRESENTATIVE WITHOUT FURTHER NOTICE OR HEARING.

The Foreign Representative does not currently intend to conduct a claims process in these Chapter 15 cases. To the extent there is a claims process established in the CCAA Proceedings, parties are directed to the CCAA Proceedings, Court File No. CV-24-00713128-0000. **Accordingly, there is no need to file proofs of claim in these chapter 15 cases. Parties are directed to the CCAA Proceedings at www.insolvencies.deloitte.ca/en-ca/pages/SimExInc.aspx for information on filing proofs of claim.**

Copies of the Verified Petition, the Provisional Relief Motion, the Provisional Order, the Initial Order and Amended Initial Order, and other documents filed in these chapter 15 cases are

available and may be examined by interested parties: (i) free of charge at the webpage maintained by the Foreign Representative in connection with the CCAA Proceedings at <https://www.insolvencies.deloitte.ca/en-ca/pages/SimExInc.aspx> or (ii) downloaded from the Court's electronic docket at www.deb.uscourts.gov and (d) provide a telephone number, address, and email address by which parties on the Master Service List may obtain documents filed in these Chapter 15 Cases, including the Notice Documents, from undersigned counsel.

Please note that prior registration with the PACER service center and payment of a fee may be required to access such documents. Parties-in-interest may sign up for a PACER account by visiting the PACER website at pacer.psc.uscourts.gov or by calling (800) 676-6856.

Dated: January 26, 2024
Wilmington, Delaware

CHIPMAN BROWN CICERO & COLE, LLP

/s/ Mark L. Desgrosseilliers

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-and-

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Attorneys for Foreign Representative

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Exhibit 2

Publication Notice

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

SIMEX INC., *et al.*,¹

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 24-10083 (TMH)

(Joint Administration Requested)

**NOTICE OF FILING AND HEARING ON PETITIONS
UNDER CHAPTER 15 OF THE BANKRUPTCY CODE AND RELATED RELIEF**

PLEASE TAKE NOTICE that on January 17, 2024, Deloitte Restructuring, Inc., as Foreign Representative (the “Foreign Representative”) for the above-captioned debtors (collectively, the “Debtors”), commenced proceedings under the *Companies’ Creditors Arrangement Act* (the “CCAA”), in the Superior Court, Commercial Division, in and for the Judicial District of Ontario, Canada (the “CCAA Proceedings”), and on January 25, 2024, filed petitions for relief (the “Petitions”) under chapter 15 of the United States Bankruptcy Code. **Parties can obtain a copy of all documents filed electronically** in the chapter 15 cases and the CCAA Proceedings and find important dates and deadlines free of charge by visiting the webpage maintained by the Foreign Representative in connection with the CCAA Proceedings at <https://www.insolvencies.deloitte.ca/en-ca/pages/SimExInc.aspx> or (ii) downloaded for a fee from the Court’s electronic docket at www.deb.uscourts.gov; and (d) provide a telephone number, address, and email address by which parties on the Master Service List may obtain documents filed in these Chapter 15 Cases, including the Notice Documents, from undersigned counsel.

PLEASE TAKE FURTHER NOTICE THAT contemporaneously with filing the Petitions, the Foreign Representative filed a verified petition seeking recognition of the CCAA Proceedings as foreign main proceedings, or, in the alternative, foreign nonmain proceedings (D.I.4) (the “Verified Petition”).

PLEASE TAKE FURTHER NOTICE that on January 26, 2024, the Bankruptcy Court entered the *Order Granting Provisional Relief* (D.I.), granting provisional, injunctive, and related relief, including, but not limited to, granting recognition and giving effect in the United States to the Initial Order entered in the CCAA Proceedings. The court in the CCAA proceedings will schedule a hearing to consider recognition of the Amended and Restated Initial Order.

PLEASE TAKE FURTHER NOTICE that the Bankruptcy Court has scheduled a hearing for **10:00 a.m. on February 22, 2024**, to consider approval of the Verified Petition and related relief on a final basis (the “Recognition Hearing”).

PLEASE TAKE FURTHER NOTICE that any party in interest wishing to submit a response or objection to the Verified Petition must do so in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, and such response or objection must be in writing and set forth the basis therefor, which response or objection must be filed with the Office of the Clerk of the Bankruptcy Court, 824 North Market Street, 3rd Floor,

¹ The chapter 15 debtor incorporated in Canada and/or in the province of Ontario (the “Canadian Debtor”), along with the last four digits of the Canadian Debtor’s Canadian business number, is: SimEx Inc. (“SimEx”) (5222). The chapter 15 debtors incorporated in the United States (the “U.S. Debtors”), along with the last four digits of each U.S. Debtor’s federal tax identification number, are: Iwerks Entertainment, Inc. (“Iwerks”), (9361) and SimEx-Iwerks Myrtle Beach, LLC (“SIMB”) (8416). The Canadian Debtor and the U.S. Debtors are referred to herein, collectively, as the “Debtors” or “SimEx”. The Debtors’ executive headquarters are located at: 210 King St East, 600, Toronto, Ontario, Canada, M5A 1J7.

Wilmington, Delaware 19801, with a copy sent to the Monitor/Foreign Representative by email (jsleeth@deloitte.ca) and shall be served upon the following counsel **so as to be actually received on or before 4:00 p.m. (prevailing Eastern Time) on February 15, 2024**: (a) U.S. counsel for the Foreign Representative: (i) Perkins Coie LLP, Attn: Tina N. Moss, 1155 Avenue of the Americas, 22nd Floor, New York, New York 10046-2711 (TMoss@perkinscoie.com) and Perkins Coie LLP, Attn: Paul Jasper, 505 Howard Street, Suite 1000, San Francisco, California 94105-3204 (PJasper@perkinscoie.com) and (ii) Chipman, Brown, Cicero & Cole, Attn: Mark L. Desgrosseilliers and Kristi J. Doughty, Hercules Plaza, 1313 N. Market Street, Suite 5400, Wilmington, Delaware 19801 (desgross@chipmanbrown.com and doughty@chipmanbrown.com); (b) counsel for the Royal Bank of Canada: (i) Dentons Canada, 77 King St. West, Suite 400, Toronto, ON M5K 0A1, Attention: Ken Kraft, John Salmas, and Sarah Lam (kenneth.kraft@dentons.com, john.salmas@dentons.com, and sarah.lam@dentons.com) and (c) counsel for BDC Capital Inc., Spetter Zeitz Klaiman, 100 Sheppard Ave., East, Suite 850, Toronto, ON M2N 6N5, Attention: Jason Spetter (jspetter@szklaw.ca).

Single Order Upload

[24-10083-TMH Deloitte Restructuring Inc. and SimEx Inc.](#)

The new document **SimEx - Order Scheduling Hearing, Service of Notice.pdf** was uploaded successfully on **1/26/2024 at 6:07 PM**

The new document **C:\fakepath\SimEx - Ex 1-2 to Order Scheduling Hearing, Service of Notice.pdf** was uploaded successfully on **1/26/2024 at 6:07 PM**

Order type: Ex Parte (No Hearing Required)

[24-10083-TMH Deloitte Restructuring Inc. and SimEx Inc.](#)

Related document number: 8

Related document description: Motion to Approve (B)

Order ID: [85916](#)

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