

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.

Applicants

**WRITTEN SUBMISSIONS OF THE PROVINCE OF BRITISH COLUMBIA,
PROVINCE OF SASKATCHEWAN, THE PROVINCE OF MANITOBA, THE
PROVINCE OF NEW BRUNSWICK, THE PROVINCE OF NOVA SCOTIA, THE
PROVINCE OF PRINCE EDWARD ISLAND, THE YUKON TERRITORY, THE
NORTHWEST TERRITORIES, AND NUNAVUT**

MOTION RETURNABLE AUGUST 27, 2025

1. The submissions are filed on behalf of the Provinces of British Columbia, Saskatchewan, Manitoba, New Brunswick, Nova Scotia, and Prince Edward Island, and the Northwest Territories, Yukon Territory and Nunavut (collectively, the "**Consortium**") in response to the motion of Epiq Class Actions Services Canada Inc. ("**Epiq**", and such motion, the "**Epiq Motion**").

2. The Consortium takes no position on the Epiq Motion but provides these submissions solely as a reservation of rights.

3. In light of the fact that the Orders sought in the Epiq Motion provide that the CCAA Court and Quebec Superior Court retain joint jurisdiction to approve Epiq's First Annual Global Claims Administration Costs Budget and all Subsequent Annual Global Claims Administration Costs Budgets on future motions to be brought forward by Epiq in its capacities as Claims Administrator and PCC Agent, the Consortium reserves its rights to make submissions at such motions as Epiq's budgets are presented for consideration and approval.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 26th day of August, 2025.

Bennett Jones LLP
BENNETT JONES LLP

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.**

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

Proceeding Commenced at Toronto

**WRITTEN SUBMISSIONS OF THE PROVINCES OF BRITISH
COLUMBIA, SASKATCHEWEN, MANITOBA, NEW BRUNSWICK,
NOVA SCOTIA AND PRINCE EDWARD ISLAND, AND THE
TERRITORIES OF YUKON, NORTHWEST TERRITORIES AND
NUNAVUT**

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Lawyers for the Provinces of British Columbia, Saskatchewan, Manitoba, New Brunswick, Nova Scotia,
and Prince Edward Island, and the Territories of Yukon, Northwest Territories and Nunavut, in their
capacities as plaintiffs in the HCCR Legislation Claims