

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

In re:

ROKSTAD HOLDINGS CORPORATION, et al.,¹

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 24-12645 (MFW)

(Jointly Administered)

**NOTICE OF RECOGNITION HEARING
ON FOREIGN RECOGNITION PROCEEDINGS**

PLEASE TAKE NOTICE that on November 21, 2024, FTI Consulting Canada Inc. (“FTI”), in its capacity as the court-appointed receiver (in such capacity, the “Receiver”) of the above-captioned debtors (collectively, the “Rokstad Group” or the “Debtors”) and in its capacity as the authorized foreign representative (the “Foreign Representative”) of the Debtors, which are the subject of a receivership proceeding (the “Canadian Receivership”) pursuant to section 243(1) of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as amended (the “BIA”) and section 39 of the *Law and Equity Act*, R.S.B.C. 1996 c. 253, as amended (the “LEA”) pending before the Supreme Court of British Columbia in Bankruptcy and Insolvency (the “Canadian Court”), filed a *Verified Petition for (I) Recognition of Foreign Main Proceeding, (II) Recognition of Foreign Representative, and (III) Related Relief Under Chapter 15 of the Bankruptcy Code* [Docket No. 4] (the “Verified Petition”) pursuant to sections 1504, 1515, and 1517 of title 11 of the United States Code (the “Bankruptcy Code”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that, among other things, the Debtors seek entry of an order recognizing the Canadian Receivership as a foreign main proceeding (or, in the alternative, as a foreign nonmain proceeding) pursuant to section 1517 of title 11 of the Bankruptcy Code and granting certain additional relief pursuant to sections 105(a), 1507, 1510, 1515, and 1521 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that the Court has scheduled a hearing with respect to the Verified Petition (the “Recognition Hearing”) for **2:00 p.m. (prevailing Eastern Time) on December 16, 2024**.

PLEASE TAKE FURTHER NOTICE that contemporaneously with filing the petitions for recognition, the Foreign Representative filed the *Motion for Provisional Relief Pursuant to Section 1519 of the Bankruptcy Code* [Docket No. 7] (the “Provisional Relief Motion”).

PLEASE TAKE FURTHER NOTICE that on November 22, 2024, the Bankruptcy Court entered the *Order Granting Provisional Relief Pursuant to Section 1519 of the Bankruptcy Code* [Docket No. 28] (the “Provisional Order”), which granted, on a provisional basis, recognition of the Canadian Receivership and gives effect in the United States to the order entered by the Canadian Court in the Canadian Receivership (the “Receivership Order”), which, among other things:

¹ The Debtors in these chapter 15 cases (the “Chapter 15 Cases”), along with the last four digits of each Debtor’s unique identifier, are Rokstad Holdings Corporation (7932); Rokstad Power (2018) Ltd. (8273); Golden Ears Painting & Sandblasting (2018) Ltd. (8286); Plowe Power Systems (2018) Ltd. (8882); Rokstad Power (Prairies) Ltd. (9305); Rokstad Power Transmission Services Ltd. (9301); Rokstad Power Construction Services Ltd. (9295); Rokstad Power (East), Inc. (4090); Rokstad Power Inc. (4394); and Rok Air, LLC (6825).

- authorizes the Foreign Representative to operate the Debtors' businesses and administer the Debtors' assets;
- prohibits contract and lease counterparties from terminating their contracts or agreements with the Debtors solely because of the Debtors' bankruptcy; and
- prevents parties from taking actions against the Debtors and their assets.

PLEASE TAKE FURTHER NOTICE that responses or objections to recognition of the Canadian Receivership as a 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, and served upon the following **so as to be received on or before December 9, 2024**: (a) the Foreign Representative, FTI Consulting Canada Inc., 701 West Georgia Street, Suite 1450, PO Box 10089, Vancouver, BC V7Y 1B6, Attn: Tom Powell (rokstad@fticonsulting.com); (b) counsel to the Foreign Representative, Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, Wilmington, Delaware 19801, Attn: Debra Grassgreen (dgrassgreen@pszjlaw.com), Steven Golden (sgolden@pszjlaw.com), and Colin Robinson (crobinson@pszjlaw.com); (c) counsel for the Receiver, Osler, Hoskin & Harcourt LLP, Suite 3000, Bentall Four, 1055 Dunsmuir Street, Vancouver, BC V7X 1K8 Attn: Mary Buttery, KC (mbuttery@osler.com) and Emily Paplawski (epaplawski@osler.com); and (d) counsel for Stellex, (i) Blake, Cassels, & Graydon LLP, 1133 Melville Street, Suite 3500, The Stack, Vancouver, BC V6E 4E5, Attn: Peter Bychawski (peter.bychawski@blakes.com) and Kelly Bourassa (kelly.bourassa@blakes.com); and (ii) Greenberg Traurig LLP, One Vanderbilt Avenue, New York, NY 10017, Attn: Oscar Pinkas (pinkaso@gtlaw.com) and Nathan Haynes (haynesn@gtlaw.com).

PLEASE TAKE FURTHER NOTICE that copies of the Verified Petition, the Provisional Relief Motion, the Provisional Relief Order, and other documents filed by the Foreign Representative may be obtained by visiting the Court's website at <http://www.ecf.deb.uscourts.gov> (a PACER login and password are required to retrieve a document) or free of charge at <http://cases.stretto.com/Rokstad>.

PLEASE TAKE FURTHER NOTICE that hearings in this matter, including the Recognition Hearing, shall take place at the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 5th Floor, Courtroom No. 4 Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Verified Petition carefully and discuss it with your attorney, if you have one in connection with these Chapter 15 Cases. If you do not have an attorney, you may wish to consult one.

PLEASE TAKE FURTHER NOTICE that if you do not want the Court to grant the relief requested by the Foreign Representative, or if you want the Court to consider your views on any matter requested at the Recognition Hearing, then you or your attorney must attend such hearing. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought by the Foreign Representative and may enter an order granting the relief requested.

PLEASE TAKE FURTHER NOTICE that 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 Canadian Receivership, parties are directed to the Canadian Receivership. Accordingly, there is no need to file proofs of claim in these Chapter 15 Cases. Parties are directed to <http://cfcanada.fticonsulting.com/rokstad/> for information on filing proofs of claim and the Canadian Receivership.

Dated: November 22, 2024

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Steven W. Golden

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Steven W. Golden (DE Bar No. 6807)

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