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HONORABLE TIMOTHY W. DORE
Chapter 15
Hearing Date: November 26, 2024
Time: 10:00 a.m.
Location: Courtroom 8106
Responses Due: November 19, 2024

10
11 UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

12 In re
13 VICINITY MOTOR CORP., *et al.*,¹
14 Debtors in a Foreign Proceeding.
15

Lead Case No. 24-12675-TWD

Jointly Administered with:
Case No. 24-12677;
Case No. 24-12678; and
Case No. 24-12679

16 **NOTICE OF CHAPTER 15 PETITION**
17 **AND RECOGNITION HEARING**

18 **PLEASE TAKE NOTICE** that on October 24, 2024, FTI Consulting Canada Inc., in its
19 capacity as the receiver (the “Receiver”) appointed in the Canadian insolvency proceeding of
20 Vicinity Motor Corp., Vicinity Motor (Bus) Corp., Vicinity Motor (Bus) USA Corp., and Vicinity
21 Motor Property, LLC (collectively, the “Debtors”), *In the Matter of the Receivership of Vicinity*
22 *Motor (Bus) Corp., et al.*, Supreme Court of British Columbia Case Number No. S-247082 (the
23 “Canadian Proceeding”), and as authorized foreign representative of the Debtors, filed the Official
24 Form 401 *Chapter 15 Petition for Recognition of a Foreign Proceeding* (ECF No. 1) and *Verified*
25 *Petition for Recognition of Foreign Main Proceeding and Related Relief* (ECF No. 3) (together,
the “Petition”) with the United States Bankruptcy Court for the Western District of Washington
(the “Bankruptcy Court”) under Chapter 15 of Title 11 of the United States Code (the “Bankruptcy
Code”) seeking recognition of the Canadian Proceeding as a foreign main proceeding and related
relief.

26 ¹ The Debtors are Vicinity Motor Corp., Bankruptcy Case No. 24-12675, Vicinity Motor (Bus) Corp.,
27 Bankruptcy Case No. 24-12677, Vicinity Motor (Bus) USA Corp., Bankruptcy Case No. 24-12678, and
Vicinity Motor Property, LLC, Bankruptcy Case No. 24-12679.

NOTICE OF CHAPTER 15 PETITION AND
RECOGNITION HEARING - 1

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1 **PLEASE TAKE FURTHER NOTICE** that a hearing has been scheduled on **November**
2 **26, 2024, at 10:00 a.m.** (prevailing Pacific Time), at Courtroom 8106 (the “Recognition
3 Hearing”).

4 **PLEASE TAKE FURTHER NOTICE** that responses, if any, to the Petition must be
5 made in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and
6 the Local Rules of Bankruptcy Procedure of the United States Bankruptcy Court for the Western
7 District of Washington, in writing describing the basis therefor, filed with the Office of the Clerk
8 of the Court, 700 Stewart Street, Suite 6301, Seattle, WA 98101, **not later than November 19,**
9 **2024,** and served upon the following:

10 (A) U.S. counsel for the Receiver, Lane Powell PC, 1420 Fifth Avenue, Suite 4200, Seattle,
11 WA 98101, Attention: Gregory R. Fox (foxg@lanepowell.com); and James B. Zack
12 (zackj@lanepowell.com);

13 (B) Canadian counsel for the Receiver, Fasken Martineau DuMoulin LLC, 550 Burrard
14 Street, Suite 2900, Vancouver, British Columbia V6C 0A3, Canada, Attention: Lisa
15 Hiebert (lhiebert@fasken.com); and Kibben Jackson (kjackson@fasken.com); and

16 (C) the Receiver, FTI Consulting Canada Inc., 701 West Georgia Street, Suite 1450, PO
17 Box 10089, Vancouver, British Columbia V7Y 1B6, Canada, Attention: Tom Powell
18 (tom.powell@fticonsulting.com).

19 **PLEASE TAKE FURTHER NOTICE** that if no response is timely filed and served as
20 provided above, the Bankruptcy Court may grant the recognition and relief requested in the
21 Petition without further notice or hearing.

22 **PLEASE TAKE FURTHER NOTICE** that the Recognition Hearing may be adjourned
23 from time to time without further notice other than an announcement in open court at such hearings
24 of the adjourned date or dates or any adjourned hearing.

25 **PLEASE TAKE FURTHER NOTICE** that no time period or place for the filing of proofs
26 of claim in these Chapter 15 cases has been established and creditors need not file proofs of claim
27 with the Bankruptcy Court at this time.

28 **PLEASE TAKE FURTHER NOTICE** that copies of the Petition and other filings in this
29 case are presently available (1) via Public Access to Court Electronic Records (PACER), which
30 can be accessed from the Bankruptcy Court’s website at <https://ecf.wawb.uscourts.gov/> (a PACER
31 login and a password are required to retrieve a document), and/or (2) upon written request to the
32 Receiver’s counsel addressed to:

33 Lane Powell PC
34 Attn: James B. Zack
35 zackj@lanepowell.com
36 1420 Fifth Avenue, Suite 4200
37 Seattle, Washington 98101

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DATED: October 29, 2024

LANE POWELL PC

By: /s/ James B. Zack
Gregory R. Fox, WSBA No. 30559
James B. Zack, WSBA No. 48122
Attorneys for FTI Consulting Canada Inc.,
Foreign Representative