

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

In re:

Pelican International Inc., *et al.*,

Debtors in a Foreign Proceeding.¹

Chapter 15

Case No. 25-01030

(Joint Administration Requested)

**MOTION FOR ENTRY OF AN ORDER (A) SCHEDULING HEARING ON
RECOGNITION OF CHAPTER 15 PETITIONS AND (B) SPECIFYING FORM AND
MANNER OF SERVICE OF NOTICES**

FTI Consulting Canada Inc. in its capacity as the duly-appointed foreign representative (“FTI” or the “Foreign Representative”) for the above-captioned debtors (collectively, the “Debtors”), which are the subject of a proceeding (collectively, the “Canadian Proceeding”) pending before the Superior Court of Québec (Commercial Division) (the “Canadian Court”), initiated pursuant to the *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36 (as amended, the “CCAA”), has commenced the above-captioned chapter 15 cases and moves (this “Motion”) for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”): (a) scheduling a hearing (the “Recognition Hearing”) to consider recognition of the Canadian Proceeding as a foreign main proceeding under chapter 15 of Title 11 of the United States Code (the “Bankruptcy Code”), as requested in the *Verified Petition for (I) Recognition of Foreign Main Proceedings, (II) Recognition of Foreign Representative, (III) Recognition of Initial Order, Amended and Restated Initial Order, and SISP Order, and (IV) Related Relief* (the “Verified

¹ The Debtors in these chapter 15 proceedings, together with the last four digits of their employment identification number, are: Pelican International Inc. (“Pelican”) (6357); Pelican US Topco LLC (“US Topco”) (8910); and Confluence Outdoor Inc. (“Confluence”) (7554). The location of the Debtors’ headquarters is 21 avenue Peronne, Montréal, Québec, Canada, H3S 1X7. The address of the Foreign Representative is 1000 Sherbrooke West, Suite 915, Montréal, Québec, Canada, H3A 3G4.

Petition”), filed contemporaneously herewith, (b) establishing the deadline (the “Recognition Objection Deadline”) to object to the Chapter 15 Petitions (as defined herein) and the Court’s entry of an order granting the relief requested in the Verified Petition (the “Recognition Order”), (c) approving the form of notice, attached to the Proposed Order as Exhibit 1 (the “Recognition Hearing Notice”), and (d) specifying the manner of service of the Recognition Hearing Notice and any subsequent papers that the Foreign Representative files and is required to serve in accordance with sections 105(a), 1514, and 1515 of 11 U.S.C. §§101-1532 (the “Bankruptcy Code”), and Rules 2002 and 9007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

JURISDICTION AND VENUE

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. Recognition of a foreign proceeding and other matters under chapter 15 of the Bankruptcy Code are core matters pursuant to 28 U.S.C. § 157(b)(2)(P).

2. These chapter 15 cases have been properly commenced pursuant to sections 1504 and 1509 of the Bankruptcy Code by the filing of petitions for recognition of the Canadian Proceeding under section 1515 of the Bankruptcy Code.

3. Venue is proper before the Court pursuant to 28 U.S.C. § 1410.

4. The bases for the relief requested herein are sections 105(a) and 1501 of the Bankruptcy Code and Bankruptcy Rules 2002 and 9007.

BACKGROUND

5. On March 18, 2025, National Bank of Canada (“NBC”), as administrative agent, collateral agent and hypothecary representative (in such capacity, the “Agent”), of a syndicated secure loan which includes NBC, Bank of Montreal, Fédération des Caisses Desjardins du Québec and Toronto Dominion Bank (collectively the “Lenders”) commenced the Canadian Proceeding under the CCAA in respect of the Debtors to initiate restructuring proceedings under the

supervision of the Canadian Court. On March 19, 2025, the Canadian Court issued an initial order (the “Initial Order”) enforcing a broad stay against the Debtors and their directors and officers, appointing FTI as monitor of the Debtors (in its capacity as such, the “Monitor”), and authorizing FTI to act as Foreign Representative of the Debtors.

6. On the date hereof (the “Petition Date”), the Foreign Representative filed petitions on behalf of each of the Debtors (the “Chapter 15 Petitions”) under chapter 15 of the Bankruptcy Code and the Verified Petition for recognition of the Canadian Proceeding, thereby commencing the Debtors’ above-captioned chapter 15 cases (these “Chapter 15 Cases”).

7. Additional information about the Debtors’ business and operations, the events leading up to the filing of the Chapter 15 Petitions and the facts and circumstances surrounding the Canadian Proceeding and these chapter 15 cases can be found in the *Declaration of Martin Franco in Support of the Foreign Representative’s Verified Petition for (I) Recognition of Foreign Main Proceeding, (II) Recognition of Foreign Representative, (III) Recognition of Initial Order, Amended and Restated Initial Order, and SISP Order, and (IV) Related Relief* (the “Franco Declaration”) filed concurrently herewith.

RELIEF REQUESTED

8. The Foreign Representative seeks entry of the Proposed Order: (i) scheduling the Recognition Hearing; (ii) establishing the Recognition Objection Deadline; (iii) approving the form of the Recognition Hearing Notice; and (iv) approving the manner of service of the Recognition Hearing Notice.

I Recognition Hearing

9. The Foreign Representative respectfully requests that the Court set a date for the Recognition Hearing approximately twenty-one (21) days after service of the Recognition Hearing Notice as set forth herein.

II Objections or Responses to Recognition and Replies

10. The Foreign Representative further requests that the Court require that any responses, answers, or objections to the Chapter 15 Petitions, the Verified Petition and the Court's entry of the Recognition Order: (a) be in writing, (b) set forth in detail the factual and legal bases therefor, (c) comply with the Bankruptcy Code, the Bankruptcy Rules, and any applicable local rules, (d) be filed with the Office of the Clerk of the Court, and (e) be served upon (i) local counsel to the Foreign Representative, Haynsworth Sinkler Boyd, P.A., 1201 Main Street, 22nd Floor Columbia, SC 29201, Attn: Mary M. Caskey (mcaskey@hsblawfirm.com), and (ii) counsel for the Foreign Representative, Troutman Pepper Locke LLP, Hercules Plaza, 1313 N. Market Street, Suite 1000, Wilmington, Delaware 19899, Attn: David M. Fournier (david.fournier@troutman.com), Evelyn J. Meltzer (evelyn.meltzer@troutman.com); and Kenneth A. Listwak (ken.listwak@troutman.com), so as to be received not later than seven (7) days before the Recognition Hearing. The Foreign Representative also respectfully requests that this Court set the deadline to file a reply, if any, at 4:00 pm. (ET) three (3) business days before Recognition Hearing.

III Recognition Hearing Notice

11. The Foreign Representative respectfully requests that the Court approve the Recognition Hearing Notice in substantially the form attached to the Proposed Order as Exhibit 1.

12. The Recognition Hearing Notice will: (a) notify the Notice Parties (defined below) of the filing of the Chapter 15 Petitions and the Verified Petition and of the relief sought in the Verified Petition; (b) set forth the Recognition Objection Deadline and the date and time of the Recognition Hearing; (c) notify the Notice Parties of the Court's entry of the Provisional Relief Order and that copies of the Chapter 15 Petitions, the Verified Petition, and the Provisional Relief Order are available and may be obtained (i) at the Court's Electronic Case Filing System, which can be accessed from the Bankruptcy Court's website, (ii) free of charge, upon written request (including by email) to the Foreign Representative's counsel, or (iii) free of charge at the website established by the Monitor for the Canadian Proceeding.

13. In accordance with section 1514 of the Bankruptcy Code and Bankruptcy Rule 2002(q), the Foreign Representative proposes to serve the Recognition Hearing Notice by first-class mail postage prepaid or, for entities with addresses that are not in the United States, by mail or electronic mail, no later than three (3) business days after entry of the Proposed Order, upon the following entities or their counsel, if known (collectively, the "Notice Parties"): (a) the Debtors; (b) all persons or bodies authorized to administer foreign proceedings of the Debtors, including the Monitor; (c) all parties to litigation pending in the United States in which a Debtor is a party at the time of the filing of the Chapter 15 Petitions; (d) the Lenders; (e) parties that have appeared in the Canadian Proceeding as of the date of service; (f) the Office of the United States Trustee for the District of South Carolina (the "U.S. Trustee"); (g) any party that has requested notice pursuant to Bankruptcy Rule 2002 ((a) through (g) collectively, the "Core Notice Parties"); (h) all parties against whom provisional relief is being sought under section 1519 of the Bankruptcy Code (the "1519 Parties"); and (i) all parties listed on the Debtors' creditor matrix for whom the Debtors have a mailing address or email address.

14. Additionally, in accordance with section 1514 of the Bankruptcy Code and Bankruptcy Rule 2002(q), the Foreign Representative proposes to serve: (i) the Chapter 15 Petitions (including all attachments without duplication), (ii) the Verified Petition (excluding exhibits), and (iii) the proposed order thereon (the “Notice Package”) by first-class mail postage prepaid or, for entities with addresses that are not in the United States, by mail or electronic mail, no later than three (3) business days after entry of the Proposed Order, upon the Core Notice Parties and the 1519 Parties, or their counsel, if known.

15. The Foreign Representative respectfully requests that the Bankruptcy Court declare such service due and sufficient, and no further notice be required.

16. The Foreign Representative respectfully requests that any subsequent notice, motion, or other pleading in these chapter 15 cases be served on counsel to the Foreign Representative, the Core Notice Parties, and any other entity that files a notice of appearance in these chapter 15 cases, in accordance with Bankruptcy Rules 2002(m), 2002(q). and 9007, or as otherwise required by the Bankruptcy Code and the Bankruptcy Rules.

BASIS FOR RELIEF

17. Bankruptcy Rule 2002(q)(1) provides that parties are to be given 21-days’ notice of a hearing to consider a petition for recognition of a foreign proceeding. Fed. R. Bankr. P. 2002(q)(1). The notice is required to further state whether the petition seeks recognition as a foreign main proceeding or foreign nonmain proceeding, and include any other document that the court may require. *See id.* Bankruptcy Rule 2002(m) and 9007 provide that when notice is to be given under the Bankruptcy Rules, the court may enter orders designating the form and manner in which such notice shall be given. Fed. R. Bankr. P. 2002(m) and 9007. Further, section 105(a) of the Bankruptcy Code provides the Court with the power to grant the relief requested herein by the Foreign Representative. *See* 11 U.S.C. § 105(a) (stating that a bankruptcy court “may issue any

order, process, or judgment that is necessary or appropriate to carry out the provisions of the [Bankruptcy Code]”); *see also* 11 U.S.C. § 103(a) (chapter 1 is applicable in a case under chapter 15).

18. The Recognition Hearing Notice and proposed service procedures described herein should be approved. Notably, the Foreign Representative’s proposed service complies with Bankruptcy Rule 2002(q). The parties receiving the Notice Package include all parties required to be served under Bankruptcy Rule 2002(q), and the Foreign Representative intends to give such parties at least 21 days’ notice of the Recognition Hearing. Further, the Notice Parties receiving the Recognition Hearing notice actually extend beyond the parties required to be served under Bankruptcy Rule 2002(q). The proposed notice procedures ensure parties receive sufficient notice of the Petitions and Recognition Hearing. Further, in light of the large number of Notice Parties, the Foreign Representative submits that limiting service of certain pleadings to the Core Notice Parties is appropriate under the circumstances, as filing and serving all pleadings filed in these chapter 15 cases would place a substantial cost and burden on the Foreign Representative. *See In re The Lion Electric Company*, Case No. 24-18898 (Bankr. N.D. Ill., Dec. 20, 2024 (approving notice procedures delineating service between all creditors and a smaller “core” group of notice parties); *In re CDS U.S. Holdings, Inc.*, Case No. 20-11719 (CSS) (Bankr. D. Del., July 2, 2020) (same). To the extent any pleading affects parties outside of the Core Notice Parties, such additional parties will be given notice of such pleadings. The Foreign Representative therefore believes that the procedures herein are appropriate and should be approved.

WAIVER OF REQUIREMENT UNDER SECTION 1514(c)

19. Section 1514(c) of the Bankruptcy Code states that when “a notification of commencement of a case is to be given to foreign creditors, such notification shall (1) indicate the time period for filing proofs of claim and specify the place for filing such proofs of claim; [and]

(2) indicate whether secured creditors need to file proofs of claim” See 11 U.S.C. § 1514(c). The Foreign Representative respectfully requests that such requirements be waived in this matter because the Foreign Representative does not intend to conduct a claims process in the chapter 15 cases.

20. Courts have granted requests for similar relief under 11 U.S.C. § 1514(c) in other chapter 15 cases. See, e.g., *In re The Lion Electric Company*, Case No. 24-18898 (Bankr. N.D. Ill., Dec. 20, 2024 (noting § 1514(c) is hereby waived or inapplicable in the chapter 15 cases); *In re Good Natured Products Inc.*, Case No. 24-80891 (TML) (Bankr. N.D. Ill. July 3, 2024) (same); *In re IMV Inc.*, No. 23-10589 (KBO) (Bankr. D. Del. May 9, 2023) (same).

NOTICE

21. The Foreign Representative will provide notice of this Motion to the Core Notice Parties. The Foreign Representative respectfully requests that, in light of the nature of the relief requested, no other or further notice of the Motion need be given.

WHEREFORE the Foreign Representative respectfully requests that this Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and such other and further relief as may be just and proper.

Dated: March 19, 2025
Columbia, South Carolina

Respectfully Submitted,

/s/ Mary M. Caskey

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EXHIBIT A

Proposed Order

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

In re:

Pelican International Inc., *et al.*,

Debtors in a Foreign Proceeding.¹

Chapter 15

Case No. 25-01030

(Jointly Administered)

ORDER (A) SCHEDULING HEARING ON RECOGNITION OF CHAPTER 15 HEARING AND (B) SPECIFYING FORM AND MANNER OF SERVICE OF NOTICE

Upon the motion (the “Motion”)² of FTI Consulting Canada Inc., in its capacity as the duly appointed foreign representative (the “Foreign Representative”) for the above-captioned debtors (collectively, the “Debtors”), for entry of an order (a) scheduling a hearing to consider the recognition of the Canadian Proceeding as a foreign main proceeding under Chapter 15 of the Bankruptcy Code and the relief requested in the Verified Petition (the “Recognition Hearing”) and (b) approving the form and manner of service of notice, substantially in the form annexed to this Order as of notice, substantially in the form annexed to this Order as **Exhibit 1**, of the Verified Petition and the Recognition Hearing (the “Recognition Hearing Notice”); and the Court having found that (a) it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157, (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(P), (c) venue is proper in this district pursuant to 28 U.S.C. § 1410, (d) the chapter 15 cases have been properly commenced by the duly appointed Foreign Representative, and (e) due and sufficient notice of the Motion has been given and no

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² Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Motion.

other or further notice need be provided; and upon consideration of the Franco Declaration; and it appearing that the relief requested in the Motion is in the best interest of the Debtors and other parties in interest in these chapter 15 cases; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The Recognition Hearing is scheduled for _____, 2025, at ____:____.m. (ET). The date and time of the Recognition Hearing may be adjourned or continued to a subsequent date without further notice except for an “in court” announcement at the Recognition Hearing or a filing on the docket of the above-captioned chapter 15 cases of the date and time to which the Recognition Hearing has been adjourned.
3. The Recognition Hearing Notice in the form attached to this Order as **Exhibit 1** is approved. No later than three (3) business days after entry of this Order, the Foreign Representative shall serve, or cause to be served, copies of the Recognition Hearing Notice by first-class mail postage prepaid or, for entities with addresses that are not in the United States, by mail or electronic mail, upon the following entities or their counsel, if known (collectively, the “Notice Parties”): (a) the Debtors; (b) all persons or bodies authorized to administer foreign proceedings of the Debtors, including the Monitor; (c) all parties to litigation pending in the United States in which a Debtor is a party at the time of the filing of the Chapter 15 Petitions; (d) the Lenders; (e) parties that have appeared in the Canadian Proceeding as of the date of service; (f) the U.S. Trustee; (g) any party that has requested notice pursuant to Bankruptcy Rule 2002 ((a) through (g) collectively, the “Core Notice Parties”); (h) all parties against whom provisional relief is being sought under section 1519

of the Bankruptcy Code (the “1519 Parties”); and (i) all parties listed on the Debtors’ creditor matrix for whom the Debtors have a mailing address or email address.

4. No later than three (3) business days after entry of this Order, the Foreign Representative shall serve, or cause to be served, copies of the (i) Chapter 15 Petitions (including all attachments without duplication), (ii) the Verified Petition (excluding exhibits); and (iii) the proposed order thereon (the “Notice Package”), by first-class mail postage prepaid or, for entities with addresses that are not in the United States, by mail or electronic mail, upon the Core Notice Parties and the 1519 Parties, or their counsel, if known.

5. If any entity files a notice of appearance in these Chapter 15 Cases after the initial service of the Recognition Hearing Notice, but before the Recognition Hearing, the Foreign Representative will serve, or cause to be served, the Recognition Hearing Notice and the Notice Package and any subsequent, relevant notices upon such entity no later than three (3) business days after the filing of such notice of appearance, if such documents have not been already served on such entity (or its counsel).

6. Any subsequent notice, motion, or other pleading filed in the Chapter 15 Cases shall be served on the Foreign Representative, the Core Notice Parties, and any other entity that files a notice of appearance in these chapter 15 cases, unless otherwise directed by the Court, in accordance with Bankruptcy Rule 2002(q) or as otherwise required by the Bankruptcy Code, Bankruptcy Rules, the local rules of this Court, or any order entered in the Chapter 15 Cases by the Court.

7. Service of the Recognition Hearing Notice and the Notice Package in accordance with this Order is approved as adequate, due, and sufficient on all interested parties under the Bankruptcy Code and the Bankruptcy Rules.

8. Prior to serving the Recognition Hearing Notice, the Foreign Representative may complete any missing dates and other information, correct any typographical errors, conform the provisions regarding the Recognition Hearing Notice to the provisions of this Order, and make such other and further non-substantive changes as the Foreign Representative deems necessary or appropriate.

9. Any responses, answers, or objections to the Chapter 15 Petitions, the Verified Petition, the requested recognition of the Canadian Proceeding as a foreign main proceeding, related relief, or other papers filed in connection therewith must: (a) be in writing, (b) set forth in detail the factual and legal bases therefor, (c) comply with the Bankruptcy Code, the Bankruptcy Rules, and any applicable local rules, (d) be filed with the Office of the Clerk of the Court, and (e) be served upon (i) local counsel to the Foreign Representative, Haynsworth Sinkler Boyd, P.A., 1201 Main Street, 22nd Floor Columbia, SC 29201, Attn: Mary M. Caskey (mcaskey@hsblawfirm.com), and (ii) counsel for the Foreign Representative, Troutman Pepper Hamilton Sanders, Hercules Plaza, Suite 1000, 1313 N. Market Street P.O. Box 1709, Wilmington, Delaware 19899, Attn: David M. Fournier (david.fournier@troutman.com), Evelyn J. Meltzer (evelyn.meltzer@troutman.com), and Kenneth A. Listwak (ken.listwak@troutman.com), so as to be received on or before _____, 2025, at 4:00 p.m. (ET). Replies, if any, shall be filed by 4:00 p.m. (ET) three business days before the Recognition Hearing.

10. The requirements of section 1514(c) of the Bankruptcy Code are waived or otherwise deemed inapplicable to these chapter 15 cases.

11. The Foreign Representative is authorized to take all actions necessary to effectuate the relief granted by this Order.

12. The Bankruptcy Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

13. Notwithstanding any applicability of any Bankruptcy Rules or the local rules of this Court, the terms and conditions of this order shall be immediately effective and enforceable upon its entry and shall constitute a final order within the meaning of 28 U.S.C. § 158(a).

EXHIBIT 1

Form of Recognition Hearing Notice

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

In re:

Pelican International Inc., *et al.*,

Debtors in a Foreign Proceeding.¹

Chapter 15

Case No. 25-01030

(Jointly Administered)

**NOTICE OF (A) FILING CHAPTER 15 PETITIONS AND RELATED DOCUMENTS SEEKING
RECOGNITION OF CANADIAN PROCEEDING AS FOREIGN MAIN PROCEEDING AND
(B) RECOGNITION HEARING**

PLEASE TAKE NOTICE that on March 19, 2025, FTI Consulting Canada Inc. in its capacity as the duly-appointed foreign representative (the “Foreign Representative”) for the above-captioned debtors (collectively, the “Debtors”), which are the subject of a proceeding (collectively, the “Canadian Proceeding”) pending before the Superior Court of Québec (Commercial Division) (the “Canadian Court”), initiated pursuant to the *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36 (as amended, the “CCAA”), filed an Official Form 401 Petition for each of the Debtors [Docket No. 1 in each of the debtors’ respective chapter 15 cases] (collectively, the “Chapter 15 Petitions”) under chapter 15 of title 11 of the United States Code (the “Bankruptcy Code”) commencing these proceedings ancillary to the Canadian Proceeding, and also the *Verified Petition for (I) Recognition of Foreign Main Proceeding, (II) Recognition of Foreign Representative, (III) Recognition of Initial Order, Amended and Restated Initial Order, and SISP Order, and (IV) Related Relief* [Docket No. 2] (the “Verified Petition”) seeking recognition of the Canadian Proceeding as a foreign main proceeding within the meaning of chapter 15 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that on March __, 2025, the Bankruptcy Court entered the *Order Granting Provisional Relief* [Docket No. __] (the “Provisional Relief Order”), granting provisional, injunctive, and related relief, including, but not limited to, granting recognition and giving effect in the United States to certain provisions of the *Initial Order* entered in the Canadian Proceeding.

PLEASE TAKE FURTHER NOTICE that copies of the Chapter 15 Petitions, the Verified Petition, the Provisional Relief Order, and related filings in these chapter 15 cases are also available (a) on the Bankruptcy Court’s Electronic Case Filing System, which can be accessed from the Bankruptcy Court’s website at <https://ecf.scb.uscourts.gov/> (a PACER login and password are required), (b) free of charge, upon written request (including by email) to counsel for the Foreign Representative, Troutman Pepper Hamilton Sanders, Hercules Plaza, Suite 1000, 1313 N. Market Street P.O. Box 1709, Wilmington, Delaware 19899, Attn: Kenneth A. Listwak (ken.listwak@troutman.com), or (c) free of charge, at the following web address: <https://cfcanada.fticonsulting.com/Pelican/>.

PLEASE TAKE FURTHER NOTICE that the Bankruptcy Court has scheduled a hearing for _____, 2025, at __:__.m. (ET) before the Honorable Judge _____ (the “Recognition Hearing”) on the Verified Petition to consider the recognition of the Canadian Proceeding as a foreign main proceeding (or, in the lesser alternative, a foreign nonmain proceeding) and give full force and effect in the territorial jurisdiction of the United States to orders entered in the Canadian Proceeding and related relief in accordance with the relief requested in the Verified Petition.

¹ The Debtors in these chapter 15 proceedings, together with the last four digits of their employment identification number, are: Pelican International Inc. (“Pelican”) (6357); Pelican US Topco LLC (“US Topco”) (8910); and Confluence Outdoor Inc. (“Confluence”) (7554). The location of the Debtors’ headquarters is 21 avenue Peronne, Montréal, Québec, Canada, H3S 1X7. The address of the Foreign Representative is 1000 Sherbrooke West, Suite 915, Montréal, Québec, Canada, H3A 3G4.

PLEASE TAKE FURTHER NOTICE that any party in interest wishing to make a response, answer, or objection to the Verified Petition must do so pursuant to the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and any applicable local rules, and such response, answer, or objection must (a) be in writing, (b) set forth in detail the factual and legal bases therefor, (c) be filed with the Office of the Clerk of the Court, and (d) be served upon (i) local counsel to the Foreign Representative, Haynsworth Sinkler Boyd, P.A., 1201 Main Street, 22nd Floor Columbia, SC 29201, Attn: Mary M. Caskey (mcaskey@hsblawfirm.com), and (ii) counsel for the Foreign Representative, Troutman Pepper Hamilton Sanders, Hercules Plaza, Suite 1000, 1313 N. Market Street P.O. Box 1709, Wilmington, Delaware 19899, Attn: David M. Fournier (david.fournier@troutman.com), Evelyn J. Meltzer (evelyn.meltzer@troutman.com), and Kenneth A. Listwak (ken.listwak@troutman.com), so as to be received **on or before** _____, **2025, at 4:00 p.m. (ET).**

PLEASE TAKE FURTHER NOTICE that all parties in interest opposed to the Foreign Representative's request for relief in the Verified Petition must appear at the Recognition Hearing at the time and place set forth herein, which may be adjourned from time to time without further notice except for an "in court" announcement at the Recognition Hearing or a filing on the docket of these chapter 15 cases of the date and time to which the Recognition Hearing has been adjourned.

PLEASE TAKE FURTHER NOTICE that unless otherwise ordered by the Bankruptcy Court, any claims process for the Debtors will not occur in these chapter 15 cases.

PLEASE TAKE FURTHER NOTICE THAT IF NO RESPONSES OR OBJECTIONS ARE RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE VERIFIED PETITION WITHOUT FURTHER NOTICE OR HEARING.

Dated: _____, 2025
Columbia, South Carolina

/s/ _____
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