

**Fill in this information to identify the case:**

United States Bankruptcy Court for the:  
 District of Delaware  
 Case number (if known): \_\_\_\_\_ Chapter 15

Check if this is an amended filing

Official Form 401

**Chapter 15 Petition for Recognition of a Foreign Proceeding**

12/15

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write debtor's name and case number (if known).

1. Debtor's name 1012595 DE Inc.

2. Debtor's unique identifier

**For non-individual debtors:**

Federal Employer Identification Number (EIN) 3 3 -3 8 9 4 4 5 9

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

**For individual debtors:**

Social Security number: xxx - xx- \_\_\_\_\_

Individual Taxpayer Identification number (ITIN): 9 xx - xx - \_\_\_\_\_

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

3. Name of foreign representative(s) FTI Consulting Canada Inc.

4. Foreign proceeding in which appointment of the foreign representative(s) occurred CCAA Proceeding – Court of King's Bench of Alberta (Calgary)

5. Nature of the foreign proceeding

Check one:

Foreign main proceeding

Foreign nonmain proceeding

Foreign main proceeding, or in the alternative foreign nonmain proceeding

6. Evidence of the foreign proceeding

A certified copy, translated into English, of the decision commencing the foreign proceeding and appointing the foreign representative is attached.

A certificate, translated into English, from the foreign court, affirming the existence of the foreign proceeding and of the appointment of the foreign representative, is attached.

Other evidence of the existence of the foreign proceeding and of the appointment of the foreign representative is described below, and relevant documentation, translated into English, is attached.  
Copy of the Initial Order will be filed with the Court.

7. Is this the only foreign proceeding with respect to the debtor known to the foreign representative(s)?

No. (Attach a statement identifying each country in which a foreign proceeding by, regarding, or against the debtor is pending.)

Yes

Debtor 1012595 DE Inc.  
Name

Case number (if known) \_\_\_\_\_

**8. Others entitled to notice**

Attach a list containing the names and addresses of:

- (i) all persons or bodies authorized to administer foreign proceedings of the debtor,
- (ii) all parties to litigation pending in the United States in which the debtor is a party at the time of filing of this petition, and
- (iii) all entities against whom provisional relief is being sought under § 1519 of the Bankruptcy Code.

**9. Addresses**

**Country where the debtor has the center of its main interests:**

Canada

**Debtor's registered office:**

800 North State Street, Suite 304  
Number Street

P.O. Box \_\_\_\_\_

Dover, Delaware 19901  
City State/Province/Region ZIP/Postal Code

United States of America  
Country

**Individual debtor's habitual residence:**

\_\_\_\_\_  
Number Street

P.O. Box \_\_\_\_\_

\_\_\_\_\_  
City State/Province/Region ZIP/Postal Code

\_\_\_\_\_  
Country

**Address of foreign representative(s):**

520 5th Ave SW, Suite 1610  
Number Street

P.O. Box \_\_\_\_\_

Calgary, Alberta T2P 3R7  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**10. Debtor's website (URL)**

https://monettefarms.ca/

**11. Type of debtor**

Check one:

- Non-individual (check one):
  - Corporation. Attach a corporate ownership statement containing the information described in Fed. R. Bankr. P. 7007.1.
  - Partnership
  - Other. Specify: \_\_\_\_\_
- Individual

Debtor 1012595 DE Inc.  
Name

Case number (if known) \_\_\_\_\_

12. Why is venue proper in this district?

Check one:

- Debtor's principal place of business or principal assets in the United States are in this district.
- Debtor does not have a place of business or assets in the United States, but the following action or proceeding in a federal or state court is pending against the debtor in this district:  
\_\_\_\_\_
- If neither box is checked, venue is consistent with the interests of justice and the convenience of the parties, having regard to the relief sought by the foreign representative, because:  
\_\_\_\_\_

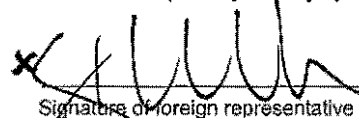
13. Signature of foreign representative(s)

I request relief in accordance with chapter 15 of title 11, United States Code.

I am the foreign representative of a debtor in a foreign proceeding, the debtor is eligible for the relief sought in this petition, and I am authorized to file this petition.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct,

  
Signature of foreign representative

D. HELKAA  
Printed name

Executed on 04/21/2026  
MM / DD / YYYY

X  
Signature of foreign representative

Printed name

Executed on \_\_\_\_\_  
MM / DD / YYYY

14. Signature of attorney

X /s/ Jacob R. Kirkham  
Signature of Attorney for foreign representative

Date 04/21/2026  
MM / DD / YYYY

Jacob R. Kirkham  
Printed name

Kobre & Kim LLP  
Firm name

600 North King Street, Suite 501

Wilmington  
Number Street City

DE 19801  
State ZIP Code

(302) 518-6456  
Contact phone

Jacob.Kirkham@kobrekim.com  
Email address

5768  
Bar number

DE  
State

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

In re:

1012595 DE INC.,

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 26-\_\_\_\_\_( )

(Joint Administration Requested)

**CONSOLIDATED LIST PURSUANT TO BANKRUPTCY RULE 1007(a)(4)  
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

FTI Consulting Canada Inc. (“FTI”), in its capacity as the court-appointed monitor (in such capacity, the “Monitor”) and authorized foreign representative (in such capacity, the “Foreign Representative”) of each of the above-captioned debtors (collectively, the “Debtors”), which are the subject of proceedings (the “Canadian Proceedings”) under Canada’s *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36 (as amended, the “CCAA”), pending before the Court of King’s Bench of Alberta (the “Canadian Court”) hereby submits this list on behalf of the Debtors in compliance with the requirements of Rule 1007(a)(4) of the Federal Rules of Bankruptcy Procedure.

**I. All Administrators of the Debtors in Foreign Proceedings**

FTI is the authorized Foreign Representative and court-appointed Monitor in the Canadian Proceedings. To the best of the Foreign Representative’s knowledge, other than the Canadian Proceedings, there are no foreign proceedings pending with respect to any of the Debtors.

The Foreign Representative’s and Monitor’s address is:

FTI Consulting Canada Inc.  
520 5th Avenue SW, Suite 1610  
Calgary, AB T2P 3R7  
Canada

**II. All Parties to Litigation Pending in the United States**

There is no pending litigation in which the Debtors are a party in the United States.

**III. Entities Against Whom Provisional Relief Is Sought**

The Foreign Representative seeks provisional relief on behalf of the Debtors to stay the execution or transfer of assets of the Debtors, and the application of 11 U.S.C. § 362 in the Debtors' Chapter 15 Cases on a provisional basis, against all known creditors of the Debtors and other interested parties, including without limitation, the persons on the creditor matrix.

**IV. Corporate Ownership Statement Pursuant to Rules 1007(a) and 7007 of the Federal Rules of Bankruptcy Procedure**

Pursuant to Rules 1007(a) and 7007.1 of the Federal Rules of Bankruptcy Procedure, the Foreign Representative submits the following list of entities that hold ownership interests in the Debtors. A corporate ownership chart is embedded below for reference. No publicly held corporation owns more than 10% of the stock in any of the Debtors.

**Parent Corporations**

- The Debtors' corporate structure consists of 5 parent corporations:
  - Monette Farms Ltd. ("Monette Farms");
  - Monette Land Corporation ("Monette Land");
  - DMO Holdings Ltd. ("DMO Holdings");
  - Goat's Peak Winery Ltd. ("Goat's Peak Winery"); and
  - Monette Farms BC Ltd. ("Monette Farms BC").
- Darrell Monette owns 100% of the ownership interests in Monette Land, DMO Holdings, Goat's Peak Winery, and Monette Farms BC, and 100% of the preferred shares of Monette Farms.
- The Monette Farms Family Trust owns 100% of the common shares of Monette Farms.

**Monette Farms and Subsidiaries**

- Monette Farms holds 100% of the ownership interests in Monette Farms Ontario Corp., NexGen Seeds Ltd., Monette Produce Ltd., Monette Seeds Ltd., Monette Farms Land GP Ltd., and Monette Farms Land GP II Ltd.

**Monette Land**

- Monette Land Corp. does not have any subsidiaries.

**DMO Holdings and Subsidiaries**

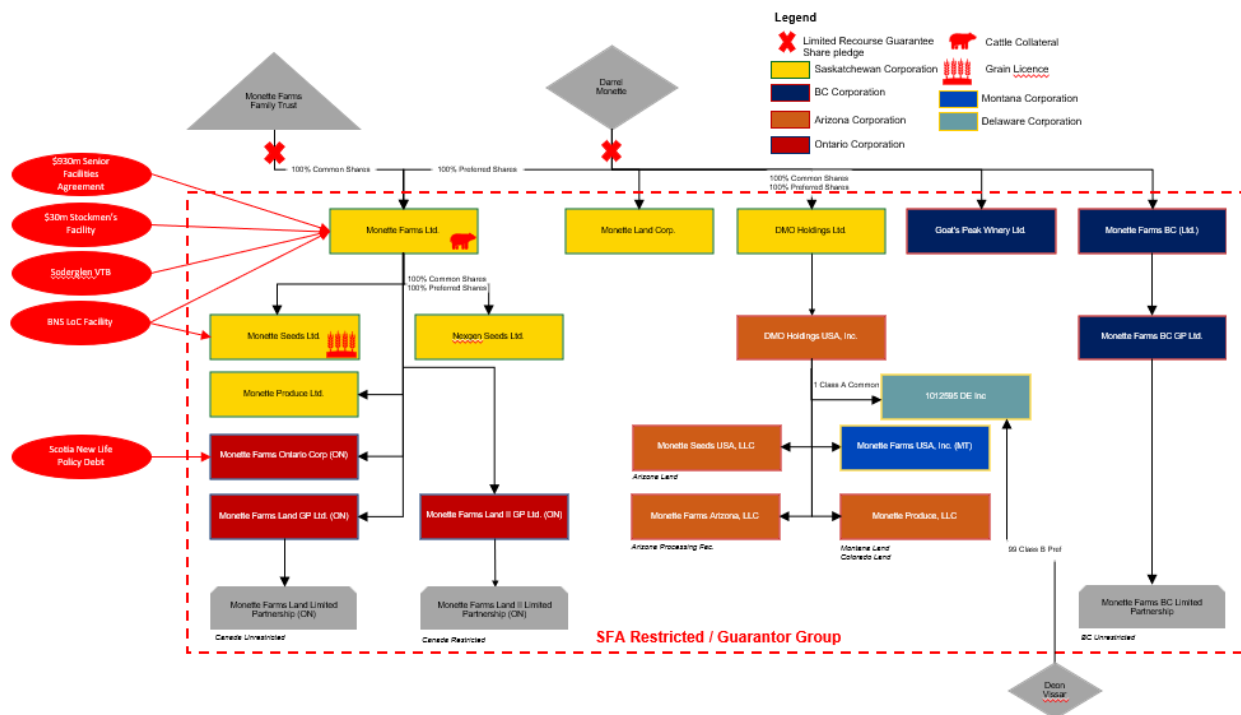
- DMO Holdings owns 100% of the ownership interests in DMO Holdings USA, Inc. (“DMO Holdings USA”).
- DMO Holdings USA owns 100% of the ownership interests in Monette Seeds USA, Monette Farms Arizona, LLC, Monette Farms USA, Inc., and Monette Produce, LLC.
- DMO Holdings is also the majority and sole voting shareholder in 1012595 DE Inc. 1012595 DE Inc.’s second shareholder is an individual named Deon Vissar, who holds 99 Class B Preference Shares (non-voting).

**Goat’s Peak Winery**

- Goat’s Peak Winery does not have any subsidiaries.

**Monette Farms BC**

- Monette Farms BC holds 100% of the ownership interests in Monette Farms BC GP Ltd.



Dated: April 21, 2026  
Wilmington, Delaware

Respectfully submitted,

/s/ Jacob R. Kirkham

**KOBRE & KIM LLP**

Jacob R. Kirkham (No. 5768)  
Stephen J. Astringer (No. 6375)  
600 North King Street, Suite 501  
Wilmington, Delaware 19801  
Telephone: (302) 518-6451  
Facsimile: (302) 518-6461  
jacob.kirkham@kobrekim.com  
stephen.astringer@kobrekim.com

-and-

Daniel J. Saval (*pro hac vice* pending)  
John G. Conte (*pro hac vice* pending)  
Vincent Yiu (*pro hac vice* pending)  
Alaina Heine (*pro hac vice* pending)  
800 Third Avenue  
New York, New York 10022  
Telephone: (212) 488-1259  
Facsimile: (212) 488-1220  
daniel.savall@kobrekim.com  
john.conte@kobrekim.com  
vincent.yiu@kobrekim.com  
alaina.heine@kobrekim.com

*Counsel to the Foreign Representative*

Fill in this information to identify the case:

United States Bankruptcy Court for the:

District of Delaware

Case number (if known): \_\_\_\_\_ Chapter 15

Check if this is an amended filing

Official Form 401

Chapter 15 Petition for Recognition of a Foreign Proceeding

12/15

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write debtor's name and case number (if known).

1. Debtor's name DMO Holdings Ltd.

2. Debtor's unique identifier

For non-individual debtors:

Federal Employer Identification Number (EIN) \_\_\_\_\_

Other 734883689 Describe identifier Business Number

For individual debtors:

Social Security number: xxx - xx- \_\_\_\_\_

Individual Taxpayer Identification number (ITIN): 9 xx - xx - \_\_\_\_\_

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

3. Name of foreign representative(s) FTI Consulting Canada Inc.

4. Foreign proceeding in which appointment of the foreign representative(s) occurred CCAA Proceeding - Court of King's Bench of Alberta (Calgary)

5. Nature of the foreign proceeding

Check one:

Foreign main proceeding

Foreign nonmain proceeding

Foreign main proceeding, or in the alternative foreign nonmain proceeding

6. Evidence of the foreign proceeding

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A certificate, translated into English, from the foreign court, affirming the existence of the foreign proceeding and of the appointment of the foreign representative, is attached.

Other evidence of the existence of the foreign proceeding and of the appointment of the foreign representative is described below, and relevant documentation, translated into English, is attached. Copy of the Initial Order will be filed with the Court.

7. Is this the only foreign proceeding with respect to the debtor known to the foreign representative(s)?

No. (Attach a statement identifying each country in which a foreign proceeding by, regarding, or against the debtor is pending.)

Yes

Debtor DMO Holdings Ltd.  
Name

Case number (if known) \_\_\_\_\_

**8. Others entitled to notice**

Attach a list containing the names and addresses of:

- (i) all persons or bodies authorized to administer foreign proceedings of the debtor,
- (ii) all parties to litigation pending in the United States in which the debtor is a party at the time of filing of this petition, and
- (iii) all entities against whom provisional relief is being sought under § 1519 of the Bankruptcy Code.

**9. Addresses**

**Country where the debtor has the center of its main interests:**

Canada

**Debtor's registered office:**

51 1st Ave NW  
Number Street

\_\_\_\_\_  
P.O. Box

Swift Current, Saskatchewan S9H 0M5  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**Individual debtor's habitual residence:**

\_\_\_\_\_  
Number Street

\_\_\_\_\_  
P.O. Box

\_\_\_\_\_  
City State/Province/Region ZIP/Postal Code

\_\_\_\_\_  
Country

**Address of foreign representative(s):**

520 5th Ave SW, Suite 1610  
Number Street

\_\_\_\_\_  
P.O. Box

Calgary, Alberta T2P 3R7  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**10. Debtor's website (URL)**

https://monettefarms.ca/

**11. Type of debtor**

Check one:

- Non-individual (check one):
  - Corporation. Attach a corporate ownership statement containing the information described in Fed. R. Bankr. P. 7007.1.
  - Partnership
  - Other. Specify: \_\_\_\_\_
- Individual

Debtor DMO Holdings Ltd.  
Name

Case number (if known) \_\_\_\_\_

**12. Why is venue proper in this district?**

Check one:

- Debtor's principal place of business or principal assets in the United States are in this district.
- Debtor does not have a place of business or assets in the United States, but the following action or proceeding in a federal or state court is pending against the debtor in this district: \_\_\_\_\_
- If neither box is checked, venue is consistent with the interests of justice and the convenience of the parties, having regard to the relief sought by the foreign representative, because: Affiliate chapter 15 case is pending in this district. \_\_\_\_\_

**13. Signature of foreign representative(s)**

I request relief in accordance with chapter 15 of title 11, United States Code.

I am the foreign representative of a debtor in a foreign proceeding, the debtor is eligible for the relief sought in this petition, and I am authorized to file this petition.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct,

x [Signature]  
Signature of foreign representative

D. HELKAA  
Printed name

Executed on 04/21/2026  
MM / DD / YYYY

x \_\_\_\_\_  
Signature of foreign representative

Printed name

Executed on \_\_\_\_\_  
MM / DD / YYYY

**14. Signature of attorney**

x /s/ Jacob R. Kirkham  
Signature of Attorney for foreign representative

Date 04/21/2026  
MM / DD / YYYY

Jacob R. Kirkham

Printed name  
Kobre & Kim LLP

Firm name  
600 North King Street, Suite 501

Number Street  
Wilmington  
City

DE 19801  
State ZIP Code

(302) 518-6456  
Contact phone

Jacob.Kirkham@kobrekim.com  
Email address

5768  
Bar number

DE  
State

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

In re:	Chapter 15
DMO Holdings Ltd.,	Case No. 26-_____( )
Debtors in a Foreign Proceeding.	(Joint Administration Requested)

**CONSOLIDATED LIST PURSUANT TO BANKRUPTCY RULE 1007(a)(4)  
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

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Calgary, AB T2P 3R7  
Canada

**II. All Parties to Litigation Pending in the United States**

There is no pending litigation in which the Debtors are a party in the United States.

**III. Entities Against Whom Provisional Relief Is Sought**

The Foreign Representative seeks provisional relief on behalf of the Debtors to stay the execution or transfer of assets of the Debtors, and the application of 11 U.S.C. § 362 in the Debtors' Chapter 15 Cases on a provisional basis, against all known creditors of the Debtors and other interested parties, including without limitation, the persons on the creditor matrix.

**IV. Corporate Ownership Statement Pursuant to Rules 1007(a) and 7007 of the Federal Rules of Bankruptcy Procedure**

Pursuant to Rules 1007(a) and 7007.1 of the Federal Rules of Bankruptcy Procedure, the Foreign Representative submits the following list of entities that hold ownership interests in the Debtors. A corporate ownership chart is embedded below for reference. No publicly held corporation owns more than 10% of the stock in any of the Debtors.

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  - Monette Land Corporation ("Monette Land");
  - DMO Holdings Ltd. ("DMO Holdings");
  - Goat's Peak Winery Ltd. ("Goat's Peak Winery"); and
  - Monette Farms BC Ltd. ("Monette Farms BC").
- Darrell Monette owns 100% of the ownership interests in Monette Land, DMO Holdings, Goat's Peak Winery, and Monette Farms BC, and 100% of the preferred shares of Monette Farms.
- The Monette Farms Family Trust owns 100% of the common shares of Monette Farms.

**Monette Farms and Subsidiaries**

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**Monette Land**

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**DMO Holdings and Subsidiaries**

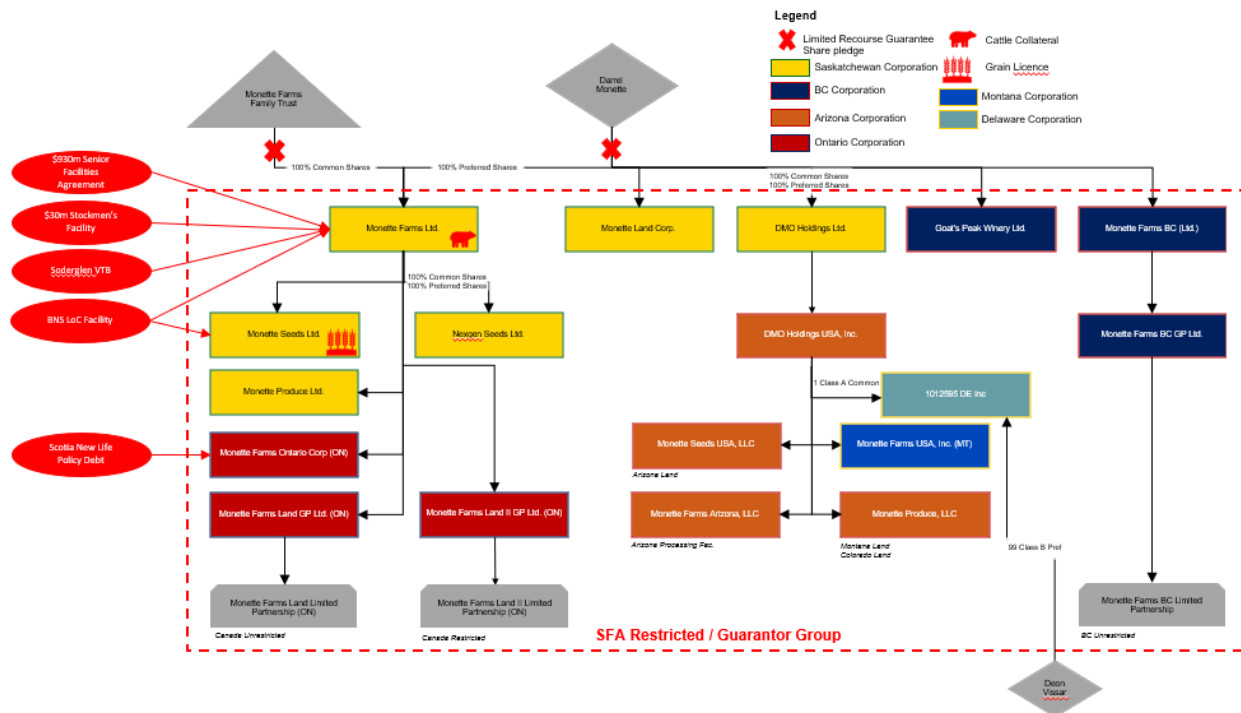
- DMO Holdings owns 100% of the ownership interests in DMO Holdings USA, Inc. (“DMO Holdings USA”).
- DMO Holdings USA owns 100% of the ownership interests in Monette Seeds USA, Monette Farms Arizona, LLC, Monette Farms USA, Inc., and Monette Produce, LLC.
- DMO Holdings is also the majority and sole voting shareholder in 1012595 DE Inc. 1012595 DE Inc.’s second shareholder is an individual named Deon Vissar, who holds 99 Class B Preference Shares (non-voting).

**Goat’s Peak Winery**

- Goat’s Peak Winery does not have any subsidiaries.

**Monette Farms BC**

- Monette Farms BC holds 100% of the ownership interests in Monette Farms BC GP Ltd.



Dated: April 21, 2026  
Wilmington, Delaware

Respectfully submitted,

/s/ Jacob R. Kirkham

**KOBRE & KIM LLP**

Jacob R. Kirkham (No. 5768)  
Stephen J. Astringer (No. 6375)  
600 North King Street, Suite 501  
Wilmington, Delaware 19801  
Telephone: (302) 518-6451  
Facsimile: (302) 518-6461  
jacob.kirkham@kobrekim.com  
stephen.astringer@kobrekim.com

-and-

Daniel J. Saval (*pro hac vice* pending)  
John G. Conte (*pro hac vice* pending)  
Vincent Yiu (*pro hac vice* pending)  
Alaina Heine (*pro hac vice* pending)  
800 Third Avenue  
New York, New York 10022  
Telephone: (212) 488-1259  
Facsimile: (212) 488-1220  
daniel.savall@kobrekim.com  
john.conte@kobrekim.com  
vincent.yiu@kobrekim.com  
alaina.heine@kobrekim.com

*Counsel to the Foreign Representative*

**Fill in this information to identify the case:**

United States Bankruptcy Court for the:  
 District of Delaware  
 Case number (if known): \_\_\_\_\_ Chapter 15

Check if this is an amended filing

Official Form 401

**Chapter 15 Petition for Recognition of a Foreign Proceeding**

12/15

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write debtor's name and case number (if known).

1. Debtor's name DMO Holdings USA, Inc.

2. Debtor's unique identifier

**For non-individual debtors:**

Federal Employer Identification Number (EIN) 8 4 -4 9 4 7 6 4 1

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

**For individual debtors:**

Social Security number: xxx - xx- \_\_\_\_\_

Individual Taxpayer Identification number (ITIN): 9 xx - xx - \_\_\_\_\_

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

3. Name of foreign representative(s) FTI Consulting Canada Inc.

4. Foreign proceeding in which appointment of the foreign representative(s) occurred CCAA Proceeding – Court of King's Bench of Alberta (Calgary)

5. Nature of the foreign proceeding

Check one:

Foreign main proceeding

Foreign nonmain proceeding

Foreign main proceeding, or in the alternative foreign nonmain proceeding

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Copy of the Initial Order will be filed with the Court.

7. Is this the only foreign proceeding with respect to the debtor known to the foreign representative(s)?

No. (Attach a statement identifying each country in which a foreign proceeding by, regarding, or against the debtor is pending.)

Yes

Debtor DMO Holdings USA, Inc.  
Name

Case number (if known) \_\_\_\_\_

**8. Others entitled to notice**

Attach a list containing the names and addresses of:

- (i) all persons or bodies authorized to administer foreign proceedings of the debtor,
- (ii) all parties to litigation pending in the United States in which the debtor is a party at the time of filing of this petition, and
- (iii) all entities against whom provisional relief is being sought under § 1519 of the Bankruptcy Code.

**9. Addresses**

**Country where the debtor has the center of its main interests:**

Canada

**Debtor's registered office:**

39332 W. Camelback Rd.  
Number Street

P.O. Box \_\_\_\_\_

Tonopah, Arizona 85354  
City State/Province/Region ZIP/Postal Code

United States of America  
Country

**Individual debtor's habitual residence:**

\_\_\_\_\_  
Number Street

P.O. Box \_\_\_\_\_

\_\_\_\_\_  
City State/Province/Region ZIP/Postal Code

\_\_\_\_\_  
Country

**Address of foreign representative(s):**

520 5th Ave SW, Suite 1610  
Number Street

P.O. Box \_\_\_\_\_

Calgary, Alberta T2P 3R7  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**10. Debtor's website (URL)**

https://monettefarms.ca/

**11. Type of debtor**

Check one:

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Debtor DMO Holdings USA, Inc.  
Name

Case number (if known)

**12. Why is venue proper in this district?**

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- Debtor does not have a place of business or assets in the United States, but the following action or proceeding in a federal or state court is pending against the debtor in this district:  
 \_\_\_\_\_
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I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct,

*[Handwritten Signature]* D. HELKAA  
Signature of foreign representative Printed name

Executed on 4/21/2026  
MM / DD / YYYY

X \_\_\_\_\_  
Signature of foreign representative Printed name

Executed on \_\_\_\_\_  
MM / DD / YYYY

**14. Signature of attorney**

X /s/ Jacob R. Kirkham 04/21/2026  
Signature of Attorney for foreign representative Date  
MM / DD / YYYY

Jacob R. Kirkham  
Printed name

Kobre & Kim LLP  
Firm name

600 North King Street, Suite 501

Wilmington DE 19801  
City State ZIP Code

(302) 518-6456 Jacob.Kirkham@kobrekim.com  
Contact phone Email address

5768 DE  
Bar number State

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

In re:	Chapter 15
DMO Holdings USA, Inc.,	Case No. 26-_____( )
Debtors in a Foreign Proceeding.	(Joint Administration Requested)

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**Parent Corporations**

- The Debtors' corporate structure consists of 5 parent corporations:
  - Monette Farms Ltd. ("Monette Farms");
  - Monette Land Corporation ("Monette Land");
  - DMO Holdings Ltd. ("DMO Holdings");
  - Goat's Peak Winery Ltd. ("Goat's Peak Winery"); and
  - Monette Farms BC Ltd. ("Monette Farms BC").
- Darrell Monette owns 100% of the ownership interests in Monette Land, DMO Holdings, Goat's Peak Winery, and Monette Farms BC, and 100% of the preferred shares of Monette Farms.
- The Monette Farms Family Trust owns 100% of the common shares of Monette Farms.

**Monette Farms and Subsidiaries**

- Monette Farms holds 100% of the ownership interests in Monette Farms Ontario Corp., NexGen Seeds Ltd., Monette Produce Ltd., Monette Seeds Ltd., Monette Farms Land GP Ltd., and Monette Farms Land GP II Ltd.

**Monette Land**

- Monette Land Corp. does not have any subsidiaries.

**DMO Holdings and Subsidiaries**

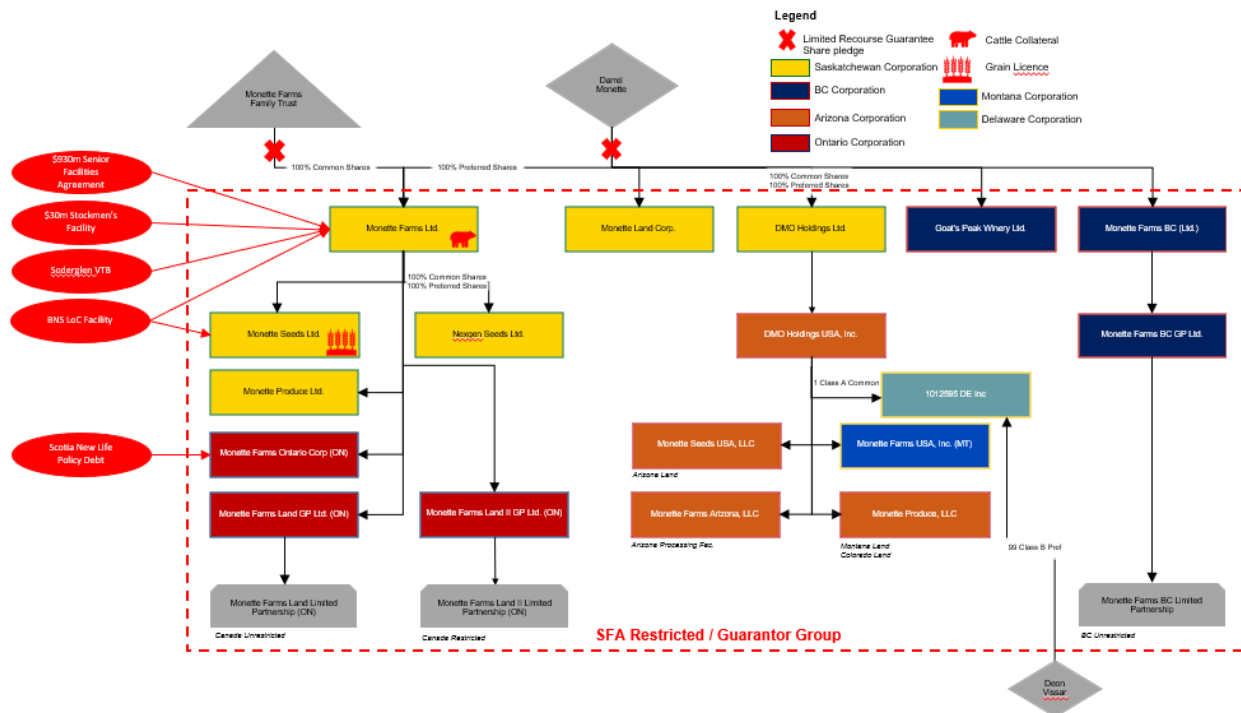
- DMO Holdings owns 100% of the ownership interests in DMO Holdings USA, Inc. (“DMO Holdings USA”).
- DMO Holdings USA owns 100% of the ownership interests in Monette Seeds USA, Monette Farms Arizona, LLC, Monette Farms USA, Inc., and Monette Produce, LLC.
- DMO Holdings is also the majority and sole voting shareholder in 1012595 DE Inc. 1012595 DE Inc.’s second shareholder is an individual named Deon Vissar, who holds 99 Class B Preference Shares (non-voting).

**Goat’s Peak Winery**

- Goat’s Peak Winery does not have any subsidiaries.

**Monette Farms BC**

- Monette Farms BC holds 100% of the ownership interests in Monette Farms BC GP Ltd.



Dated: April 21, 2026  
Wilmington, Delaware

Respectfully submitted,

/s/ Jacob R. Kirkham

**KOBRE & KIM LLP**

Jacob R. Kirkham (No. 5768)  
Stephen J. Astringer (No. 6375)  
600 North King Street, Suite 501  
Wilmington, Delaware 19801  
Telephone: (302) 518-6451  
Facsimile: (302) 518-6461  
jacob.kirkham@kobrekim.com  
stephen.astringer@kobrekim.com

-and-

Daniel J. Saval (*pro hac vice* pending)  
John G. Conte (*pro hac vice* pending)  
Vincent Yiu (*pro hac vice* pending)  
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800 Third Avenue  
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daniel.savall@kobrekim.com  
john.conte@kobrekim.com  
vincent.yiu@kobrekim.com  
alaina.heine@kobrekim.com

*Counsel to the Foreign Representative*

**Fill in this information to identify the case:**

United States Bankruptcy Court for the:  
 District of Delaware  
 Case number (if known): \_\_\_\_\_ Chapter 15

Check if this is an amended filing

Official Form 401

**Chapter 15 Petition for Recognition of a Foreign Proceeding**

12/15

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write debtor's name and case number (if known).

1. Debtor's name Goat's Peak Winery Ltd.

2. Debtor's unique identifier

**For non-individual debtors:**

Federal Employer Identification Number (EIN) \_\_\_\_\_ - \_\_\_\_\_

Other 744920281. Describe identifier Business Number.

**For individual debtors:**

Social Security number: xxx - xx- \_\_\_\_\_

Individual Taxpayer Identification number (ITIN): 9 xx - xx - \_\_\_\_\_

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

3. Name of foreign representative(s) FTI Consulting Canada Inc.

4. Foreign proceeding in which appointment of the foreign representative(s) occurred CCAA Proceeding – Court of King's Bench of Alberta (Calgary)

5. Nature of the foreign proceeding

Check one:

Foreign main proceeding

Foreign nonmain proceeding

Foreign main proceeding, or in the alternative foreign nonmain proceeding

6. Evidence of the foreign proceeding

A certified copy, translated into English, of the decision commencing the foreign proceeding and appointing the foreign representative is attached.

A certificate, translated into English, from the foreign court, affirming the existence of the foreign proceeding and of the appointment of the foreign representative, is attached.

Other evidence of the existence of the foreign proceeding and of the appointment of the foreign representative is described below, and relevant documentation, translated into English, is attached.  
Copy of the Initial Order will be filed with the Court.

7. Is this the only foreign proceeding with respect to the debtor known to the foreign representative(s)?

No. (Attach a statement identifying each country in which a foreign proceeding by, regarding, or against the debtor is pending.)

Yes



Debtor Goat's Peak Winery Ltd.  
Name

Case number (if known) \_\_\_\_\_

12. Why is venue proper in this district?

Check one:

- Debtor's principal place of business or principal assets in the United States are in this district.
- Debtor does not have a place of business or assets in the United States, but the following action or proceeding in a federal or state court is pending against the debtor in this district:  
\_\_\_\_\_
- If neither box is checked, venue is consistent with the interests of justice and the convenience of the parties, having regard to the relief sought by the foreign representative, because:  
\_\_\_\_\_

13. Signature of foreign representative(s)

I request relief in accordance with chapter 15 of title 11, United States Code.

I am the foreign representative of a debtor in a foreign proceeding, the debtor is eligible for the relief sought in this petition, and I am authorized to file this petition.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct,

  
Signature of foreign representative

D. HELKAA  
Printed name

Executed on 04/21/2026  
MM / DD / YYYY

\_\_\_\_\_  
Signature of foreign representative

Printed name

Executed on \_\_\_\_\_  
MM / DD / YYYY

14. Signature of attorney

/s/ Jacob R. Kirkham  
Signature of Attorney for foreign representative

Date 04/21/2026  
MM / DD / YYYY

Jacob R. Kirkham  
Printed name

Kobre & Kim LLP  
Firm name

600 North King Street, Suite 501  
Number Street

Wilmington DE 19801  
City State ZIP Code

(302) 518-6456 Jacob.Kirkham@kobrekim.com  
Contact phone Email address

5768 DE  
Bar number State

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

In re:	Chapter 15
Goat's Peak Winery Ltd.,	Case No. 26-_____( )
Debtors in a Foreign Proceeding.	(Joint Administration Requested)

**CONSOLIDATED LIST PURSUANT TO BANKRUPTCY RULE 1007(a)(4)  
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

FTI Consulting Canada Inc. ("FTI"), in its capacity as the court-appointed monitor (in such capacity, the "Monitor") and authorized foreign representative (in such capacity, the "Foreign Representative") of each of the above-captioned debtors (collectively, the "Debtors"), which are the subject of proceedings (the "Canadian Proceedings") under Canada's *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36 (as amended, the "CCAA"), pending before the Court of King's Bench of Alberta (the "Canadian Court") hereby submits this list on behalf of the Debtors in compliance with the requirements of Rule 1007(a)(4) of the Federal Rules of Bankruptcy Procedure.

**I. All Administrators of the Debtors in Foreign Proceedings**

FTI is the authorized Foreign Representative and court-appointed Monitor in the Canadian Proceedings. To the best of the Foreign Representative's knowledge, other than the Canadian Proceedings, there are no foreign proceedings pending with respect to any of the Debtors.

The Foreign Representative's and Monitor's address is:

FTI Consulting Canada Inc.  
520 5th Avenue SW, Suite 1610  
Calgary, AB T2P 3R7  
Canada

**II. All Parties to Litigation Pending in the United States**

There is no pending litigation in which the Debtors are a party in the United States.

**III. Entities Against Whom Provisional Relief Is Sought**

The Foreign Representative seeks provisional relief on behalf of the Debtors to stay the execution or transfer of assets of the Debtors, and the application of 11 U.S.C. § 362 in the Debtors' Chapter 15 Cases on a provisional basis, against all known creditors of the Debtors and other interested parties, including without limitation, the persons on the creditor matrix.

**IV. Corporate Ownership Statement Pursuant to Rules 1007(a) and 7007 of the Federal Rules of Bankruptcy Procedure**

Pursuant to Rules 1007(a) and 7007.1 of the Federal Rules of Bankruptcy Procedure, the Foreign Representative submits the following list of entities that hold ownership interests in the Debtors. A corporate ownership chart is embedded below for reference. No publicly held corporation owns more than 10% of the stock in any of the Debtors.

**Parent Corporations**

- The Debtors' corporate structure consists of 5 parent corporations:
  - Monette Farms Ltd. ("Monette Farms");
  - Monette Land Corporation ("Monette Land");
  - DMO Holdings Ltd. ("DMO Holdings");
  - Goat's Peak Winery Ltd. ("Goat's Peak Winery"); and
  - Monette Farms BC Ltd. ("Monette Farms BC").
- Darrell Monette owns 100% of the ownership interests in Monette Land, DMO Holdings, Goat's Peak Winery, and Monette Farms BC, and 100% of the preferred shares of Monette Farms.
- The Monette Farms Family Trust owns 100% of the common shares of Monette Farms.

**Monette Farms and Subsidiaries**

- Monette Farms holds 100% of the ownership interests in Monette Farms Ontario Corp., NexGen Seeds Ltd., Monette Produce Ltd., Monette Seeds Ltd., Monette Farms Land GP Ltd., and Monette Farms Land GP II Ltd.

**Monette Land**

- Monette Land Corp. does not have any subsidiaries.

**DMO Holdings and Subsidiaries**

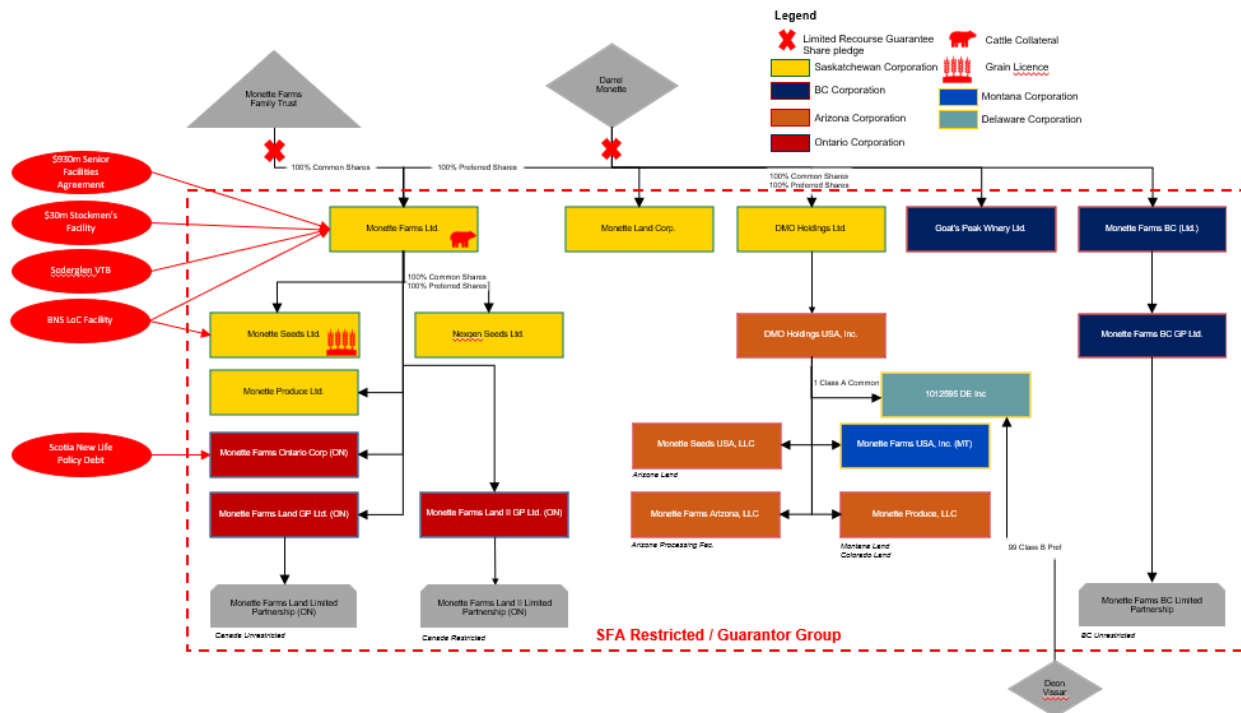
- DMO Holdings owns 100% of the ownership interests in DMO Holdings USA, Inc. (“DMO Holdings USA”).
- DMO Holdings USA owns 100% of the ownership interests in Monette Seeds USA, Monette Farms Arizona, LLC, Monette Farms USA, Inc., and Monette Produce, LLC.
- DMO Holdings is also the majority and sole voting shareholder in 1012595 DE Inc. 1012595 DE Inc.’s second shareholder is an individual named Deon Vissar, who holds 99 Class B Preference Shares (non-voting).

**Goat’s Peak Winery**

- Goat’s Peak Winery does not have any subsidiaries.

**Monette Farms BC**

- Monette Farms BC holds 100% of the ownership interests in Monette Farms BC GP Ltd.



Dated: April 21, 2026  
Wilmington, Delaware

Respectfully submitted,

/s/ Jacob R. Kirkham

**KOBRE & KIM LLP**

Jacob R. Kirkham (No. 5768)  
Stephen J. Astringer (No. 6375)  
600 North King Street, Suite 501  
Wilmington, Delaware 19801  
Telephone: (302) 518-6451  
Facsimile: (302) 518-6461  
jacob.kirkham@kobrekim.com  
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John G. Conte (*pro hac vice* pending)  
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Alaina Heine (*pro hac vice* pending)  
800 Third Avenue  
New York, New York 10022  
Telephone: (212) 488-1259  
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daniel.savall@kobrekim.com  
john.conte@kobrekim.com  
vincent.yiu@kobrekim.com  
alaina.heine@kobrekim.com

*Counsel to the Foreign Representative*

**Fill in this information to identify the case:**

United States Bankruptcy Court for the:  
 District of Delaware  
 Case number (if known): \_\_\_\_\_ Chapter 15

Check if this is an amended filing

Official Form 401

**Chapter 15 Petition for Recognition of a Foreign Proceeding**

12/15

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write debtor's name and case number (if known).

1. Debtor's name Monette Farms Arizona, LLC

2. Debtor's unique identifier

**For non-individual debtors:**

Federal Employer Identification Number (EIN) 8 4 -4 9 0 4 5 0 2

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

**For individual debtors:**

Social Security number: xxx - xx- \_\_\_\_\_

Individual Taxpayer Identification number (ITIN): 9 xx - xx - \_\_\_\_\_

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

3. Name of foreign representative(s) FTI Consulting Canada Inc.

4. Foreign proceeding in which appointment of the foreign representative(s) occurred CCAA Proceeding – Court of King's Bench of Alberta (Calgary)

5. Nature of the foreign proceeding

Check one:

Foreign main proceeding

Foreign nonmain proceeding

Foreign main proceeding, or in the alternative foreign nonmain proceeding

6. Evidence of the foreign proceeding

A certified copy, translated into English, of the decision commencing the foreign proceeding and appointing the foreign representative is attached.

A certificate, translated into English, from the foreign court, affirming the existence of the foreign proceeding and of the appointment of the foreign representative, is attached.

Other evidence of the existence of the foreign proceeding and of the appointment of the foreign representative is described below, and relevant documentation, translated into English, is attached.  
Copy of the Initial Order will be filed with the Court.

7. Is this the only foreign proceeding with respect to the debtor known to the foreign representative(s)?

No. (Attach a statement identifying each country in which a foreign proceeding by, regarding, or against the debtor is pending.)

Yes

Debtor Monette Farms Arizona, LLC  
Name

Case number (if known) \_\_\_\_\_

**8. Others entitled to notice**

Attach a list containing the names and addresses of:

- (i) all persons or bodies authorized to administer foreign proceedings of the debtor,
- (ii) all parties to litigation pending in the United States in which the debtor is a party at the time of filing of this petition, and
- (iii) all entities against whom provisional relief is being sought under § 1519 of the Bankruptcy Code.

**9. Addresses**

**Country where the debtor has the center of its main interests:**

Canada

**Debtor's registered office:**

39332 W. Camelback Rd.  
Number Street

P.O. Box \_\_\_\_\_

Tonopah, Arizona 85354  
City State/Province/Region ZIP/Postal Code

United States of America  
Country

**Individual debtor's habitual residence:**

\_\_\_\_\_  
Number Street

P.O. Box \_\_\_\_\_

\_\_\_\_\_  
City State/Province/Region ZIP/Postal Code

\_\_\_\_\_  
Country

**Address of foreign representative(s):**

520 5th Ave SW, Suite 1610  
Number Street

P.O. Box \_\_\_\_\_

Calgary, Alberta T2P 3R7  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**10. Debtor's website (URL)**

https://monettefarms.ca/

**11. Type of debtor**

Check one:

- Non-individual (check one):
  - Corporation. Attach a corporate ownership statement containing the information described in Fed. R. Bankr. P. 7007.1.
  - Partnership
  - Other. Specify: \_\_\_\_\_
- Individual

Debtor Monette Farms Arizona, LLC  
Name

Case number (if known) \_\_\_\_\_

**12. Why is venue proper in this district?**

Check one:

- Debtor's principal place of business or principal assets in the United States are in this district.
- Debtor does not have a place of business or assets in the United States, but the following action or proceeding in a federal or state court is pending against the debtor in this district:  
 \_\_\_\_\_
- If neither box is checked, venue is consistent with the interests of justice and the convenience of the parties, having regard to the relief sought by the foreign representative, because:  
 Affiliate chapter 15 case is pending in this district.  
 \_\_\_\_\_

**13. Signature of foreign representative(s)**

I request relief in accordance with chapter 15 of title 11, United States Code.

I am the foreign representative of a debtor in a foreign proceeding, the debtor is eligible for the relief sought in this petition, and I am authorized to file this petition.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct,

*[Signature]*  
 Signature of foreign representative

D. HELKAN  
 Printed name

Executed on 04/26/2026  
MM / DD / YYYY

X  
 Signature of foreign representative

Printed name

Executed on \_\_\_\_\_  
MM / DD / YYYY

**14. Signature of attorney**

X /s/ Jacob R. Kirkham  
 Signature of Attorney for foreign representative

Date 04/21/2026  
MM / DD / YYYY

Jacob R. Kirkham

Printed name

Kobre & Kim LLP

Firm name

600 North King Street, Suite 501

Number Street

Wilmington

City

DE 19801

State ZIP Code

(302) 518-6456

Contact phone

Jacob.Kirkham@kobrekim.com

Email address

5768

Bar number

DE

State

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

In re:	Chapter 15
Monette Farms Arizona, LLC,	Case No. 26-_____( )
Debtors in a Foreign Proceeding.	(Joint Administration Requested)

**CONSOLIDATED LIST PURSUANT TO BANKRUPTCY RULE 1007(a)(4)  
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

FTI Consulting Canada Inc. (“FTI”), in its capacity as the court-appointed monitor (in such capacity, the “Monitor”) and authorized foreign representative (in such capacity, the “Foreign Representative”) of each of the above-captioned debtors (collectively, the “Debtors”), which are the subject of proceedings (the “Canadian Proceedings”) under Canada’s *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36 (as amended, the “CCAA”), pending before the Court of King’s Bench of Alberta (the “Canadian Court”) hereby submits this list on behalf of the Debtors in compliance with the requirements of Rule 1007(a)(4) of the Federal Rules of Bankruptcy Procedure.

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The Foreign Representative’s and Monitor’s address is:

FTI Consulting Canada Inc.  
520 5th Avenue SW, Suite 1610  
Calgary, AB T2P 3R7  
Canada

**II. All Parties to Litigation Pending in the United States**

There is no pending litigation in which the Debtors are a party in the United States.

**III. Entities Against Whom Provisional Relief Is Sought**

The Foreign Representative seeks provisional relief on behalf of the Debtors to stay the execution or transfer of assets of the Debtors, and the application of 11 U.S.C. § 362 in the Debtors' Chapter 15 Cases on a provisional basis, against all known creditors of the Debtors and other interested parties, including without limitation, the persons on the creditor matrix.

**IV. Corporate Ownership Statement Pursuant to Rules 1007(a) and 7007 of the Federal Rules of Bankruptcy Procedure**

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**Parent Corporations**

- The Debtors' corporate structure consists of 5 parent corporations:
  - Monette Farms Ltd. ("Monette Farms");
  - Monette Land Corporation ("Monette Land");
  - DMO Holdings Ltd. ("DMO Holdings");
  - Goat's Peak Winery Ltd. ("Goat's Peak Winery"); and
  - Monette Farms BC Ltd. ("Monette Farms BC").
- Darrell Monette owns 100% of the ownership interests in Monette Land, DMO Holdings, Goat's Peak Winery, and Monette Farms BC, and 100% of the preferred shares of Monette Farms.
- The Monette Farms Family Trust owns 100% of the common shares of Monette Farms.

**Monette Farms and Subsidiaries**

- Monette Farms holds 100% of the ownership interests in Monette Farms Ontario Corp., NexGen Seeds Ltd., Monette Produce Ltd., Monette Seeds Ltd., Monette Farms Land GP Ltd., and Monette Farms Land GP II Ltd.

**Monette Land**

- Monette Land Corp. does not have any subsidiaries.

**DMO Holdings and Subsidiaries**

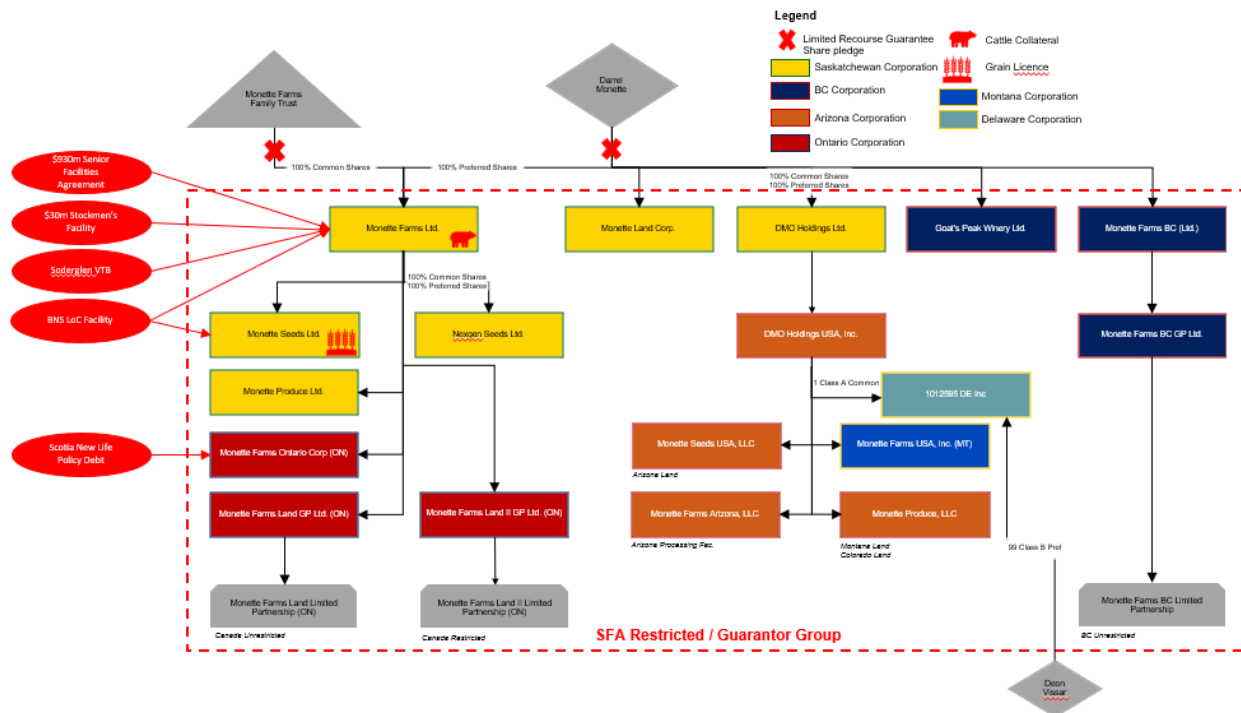
- DMO Holdings owns 100% of the ownership interests in DMO Holdings USA, Inc. (“DMO Holdings USA”).
- DMO Holdings USA owns 100% of the ownership interests in Monette Seeds USA, Monette Farms Arizona, LLC, Monette Farms USA, Inc., and Monette Produce, LLC.
- DMO Holdings is also the majority and sole voting shareholder in 1012595 DE Inc. 1012595 DE Inc.’s second shareholder is an individual named Deon Vissar, who holds 99 Class B Preference Shares (non-voting).

**Goat’s Peak Winery**

- Goat’s Peak Winery does not have any subsidiaries.

**Monette Farms BC**

- Monette Farms BC holds 100% of the ownership interests in Monette Farms BC GP Ltd.



Dated: April 21, 2026  
Wilmington, Delaware

Respectfully submitted,

/s/ Jacob R. Kirkham

**KOBRE & KIM LLP**

Jacob R. Kirkham (No. 5768)  
Stephen J. Astringer (No. 6375)  
600 North King Street, Suite 501  
Wilmington, Delaware 19801  
Telephone: (302) 518-6451  
Facsimile: (302) 518-6461  
jacob.kirkham@kobrekim.com  
stephen.astringer@kobrekim.com

-and-

Daniel J. Saval (*pro hac vice* pending)  
John G. Conte (*pro hac vice* pending)  
Vincent Yiu (*pro hac vice* pending)  
Alaina Heine (*pro hac vice* pending)  
800 Third Avenue  
New York, New York 10022  
Telephone: (212) 488-1259  
Facsimile: (212) 488-1220  
daniel.savall@kobrekim.com  
john.conte@kobrekim.com  
vincent.yiu@kobrekim.com  
alaina.heine@kobrekim.com

*Counsel to the Foreign Representative*

**Fill in this information to identify the case:**

United States Bankruptcy Court for the:  
 District of Delaware  
 Case number (if known): \_\_\_\_\_ Chapter 15

Check if this is an amended filing

Official Form 401

**Chapter 15 Petition for Recognition of a Foreign Proceeding**

12/15

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write debtor's name and case number (if known).

1. Debtor's name Monette Farms BC GP Ltd.

2. Debtor's unique identifier

**For non-individual debtors:**

Federal Employer Identification Number (EIN) \_\_\_\_\_ - \_\_\_\_\_

Other 728370958. Describe identifier Business Number.

**For individual debtors:**

Social Security number: xxx - xx- \_\_\_\_\_

Individual Taxpayer Identification number (ITIN): 9 xx - xx - \_\_\_\_\_

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

3. Name of foreign representative(s) FTI Consulting Canada Inc.

4. Foreign proceeding in which appointment of the foreign representative(s) occurred CCAA Proceeding – Court of King's Bench of Alberta (Calgary)

5. Nature of the foreign proceeding

Check one:

Foreign main proceeding

Foreign nonmain proceeding

Foreign main proceeding, or in the alternative foreign nonmain proceeding

6. Evidence of the foreign proceeding

A certified copy, translated into English, of the decision commencing the foreign proceeding and appointing the foreign representative is attached.

A certificate, translated into English, from the foreign court, affirming the existence of the foreign proceeding and of the appointment of the foreign representative, is attached.

Other evidence of the existence of the foreign proceeding and of the appointment of the foreign representative is described below, and relevant documentation, translated into English, is attached.  
Copy of the Initial Order will be filed with the Court.

7. Is this the only foreign proceeding with respect to the debtor known to the foreign representative(s)?

No. (Attach a statement identifying each country in which a foreign proceeding by, regarding, or against the debtor is pending.)

Yes

Debtor Monette Farms BC GP Ltd.  
Name

Case number (if known) \_\_\_\_\_

**8. Others entitled to notice**

Attach a list containing the names and addresses of:

- (i) all persons or bodies authorized to administer foreign proceedings of the debtor,
- (ii) all parties to litigation pending in the United States in which the debtor is a party at the time of filing of this petition, and
- (iii) all entities against whom provisional relief is being sought under § 1519 of the Bankruptcy Code.

**9. Addresses**

**Country where the debtor has the center of its main interests:**

Canada

**Debtor's registered office:**

1800 – 510 West Georgia Street  
Number Street

\_\_\_\_\_  
P.O. Box

Vancouver, British Columbia V6M 0M3  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**Individual debtor's habitual residence:**

\_\_\_\_\_  
Number Street

\_\_\_\_\_  
P.O. Box

\_\_\_\_\_  
City State/Province/Region ZIP/Postal Code

\_\_\_\_\_  
Country

**Address of foreign representative(s):**

520 5th Ave SW, Suite 1610  
Number Street

\_\_\_\_\_  
P.O. Box

Calgary, Alberta T2P 3R7  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**10. Debtor's website (URL)**

https://monettefarms.ca/

**11. Type of debtor**

*Check one:*

- Non-individual (*check one*):
  - Corporation. Attach a corporate ownership statement containing the information described in Fed. R. Bankr. P. 7007.1.
  - Partnership
  - Other. Specify: \_\_\_\_\_
- Individual

Debtor Monette Farms BC GP Ltd.  
Name

Case number (if known) \_\_\_\_\_

**12. Why is venue proper in this district?**

Check one:

- Debtor's principal place of business or principal assets in the United States are in this district.
- Debtor does not have a place of business or assets in the United States, but the following action or proceeding in a federal or state court is pending against the debtor in this district:  
\_\_\_\_\_
- If neither box is checked, venue is consistent with the interests of justice and the convenience of the parties, having regard to the relief sought by the foreign representative, because:  
\_\_\_\_\_

**13. Signature of foreign representative(s)**

I request relief in accordance with chapter 15 of title 11, United States Code.

I am the foreign representative of a debtor in a foreign proceeding, the debtor is eligible for the relief sought in this petition, and I am authorized to file this petition.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct,

  
Signature of foreign representative

Deryck Helkaa  
Senior Managing Director at FTI Consulting Canada Inc.  
Printed name

Executed on 04/21/2024  
MM / DD / YYYY

X \_\_\_\_\_  
Signature of foreign representative

\_\_\_\_\_  
Printed name

Executed on \_\_\_\_\_  
MM / DD / YYYY

**14. Signature of attorney**

X /s/ Jacob R. Kirkham  
Signature of Attorney for foreign representative

Date 04/21/2026  
MM / DD / YYYY

Jacob R. Kirkham  
Printed name

Kobre & Kim LLP  
Firm name

600 North King Street, Suite 501  
Number Street

Wilmington  
City

DE 19801  
State ZIP Code

(302) 518-6456  
Contact phone

Jacob.Kirkham@kobrekim.com  
Email address

5768  
Bar number

DE  
State

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

In re:	Chapter 15
Monette Farms BC GP Ltd.,	Case No. 26-_____( )
Debtors in a Foreign Proceeding.	(Joint Administration Requested)

**CONSOLIDATED LIST PURSUANT TO BANKRUPTCY RULE 1007(a)(4)  
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

FTI Consulting Canada Inc. (“FTI”), in its capacity as the court-appointed monitor (in such capacity, the “Monitor”) and authorized foreign representative (in such capacity, the “Foreign Representative”) of each of the above-captioned debtors (collectively, the “Debtors”), which are the subject of proceedings (the “Canadian Proceedings”) under Canada’s *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36 (as amended, the “CCAA”), pending before the Court of King’s Bench of Alberta (the “Canadian Court”) hereby submits this list on behalf of the Debtors in compliance with the requirements of Rule 1007(a)(4) of the Federal Rules of Bankruptcy Procedure.

**I. All Administrators of the Debtors in Foreign Proceedings**

FTI is the authorized Foreign Representative and court-appointed Monitor in the Canadian Proceedings. To the best of the Foreign Representative’s knowledge, other than the Canadian Proceedings, there are no foreign proceedings pending with respect to any of the Debtors.

The Foreign Representative’s and Monitor’s address is:

FTI Consulting Canada Inc.  
520 5th Avenue SW, Suite 1610  
Calgary, AB T2P 3R7  
Canada

**II. All Parties to Litigation Pending in the United States**

There is no pending litigation in which the Debtors are a party in the United States.

**III. Entities Against Whom Provisional Relief Is Sought**

The Foreign Representative seeks provisional relief on behalf of the Debtors to stay the execution or transfer of assets of the Debtors, and the application of 11 U.S.C. § 362 in the Debtors' Chapter 15 Cases on a provisional basis, against all known creditors of the Debtors and other interested parties, including without limitation, the persons on the creditor matrix.

**IV. Corporate Ownership Statement Pursuant to Rules 1007(a) and 7007 of the Federal Rules of Bankruptcy Procedure**

Pursuant to Rules 1007(a) and 7007.1 of the Federal Rules of Bankruptcy Procedure, the Foreign Representative submits the following list of entities that hold ownership interests in the Debtors. A corporate ownership chart is embedded below for reference. No publicly held corporation owns more than 10% of the stock in any of the Debtors.

**Parent Corporations**

- The Debtors' corporate structure consists of 5 parent corporations:
  - Monette Farms Ltd. ("Monette Farms");
  - Monette Land Corporation ("Monette Land");
  - DMO Holdings Ltd. ("DMO Holdings");
  - Goat's Peak Winery Ltd. ("Goat's Peak Winery"); and
  - Monette Farms BC Ltd. ("Monette Farms BC").
- Darrell Monette owns 100% of the ownership interests in Monette Land, DMO Holdings, Goat's Peak Winery, and Monette Farms BC, and 100% of the preferred shares of Monette Farms.
- The Monette Farms Family Trust owns 100% of the common shares of Monette Farms.

**Monette Farms and Subsidiaries**

- Monette Farms holds 100% of the ownership interests in Monette Farms Ontario Corp., NexGen Seeds Ltd., Monette Produce Ltd., Monette Seeds Ltd., Monette Farms Land GP Ltd., and Monette Farms Land GP II Ltd.

**Monette Land**

- Monette Land Corp. does not have any subsidiaries.

**DMO Holdings and Subsidiaries**

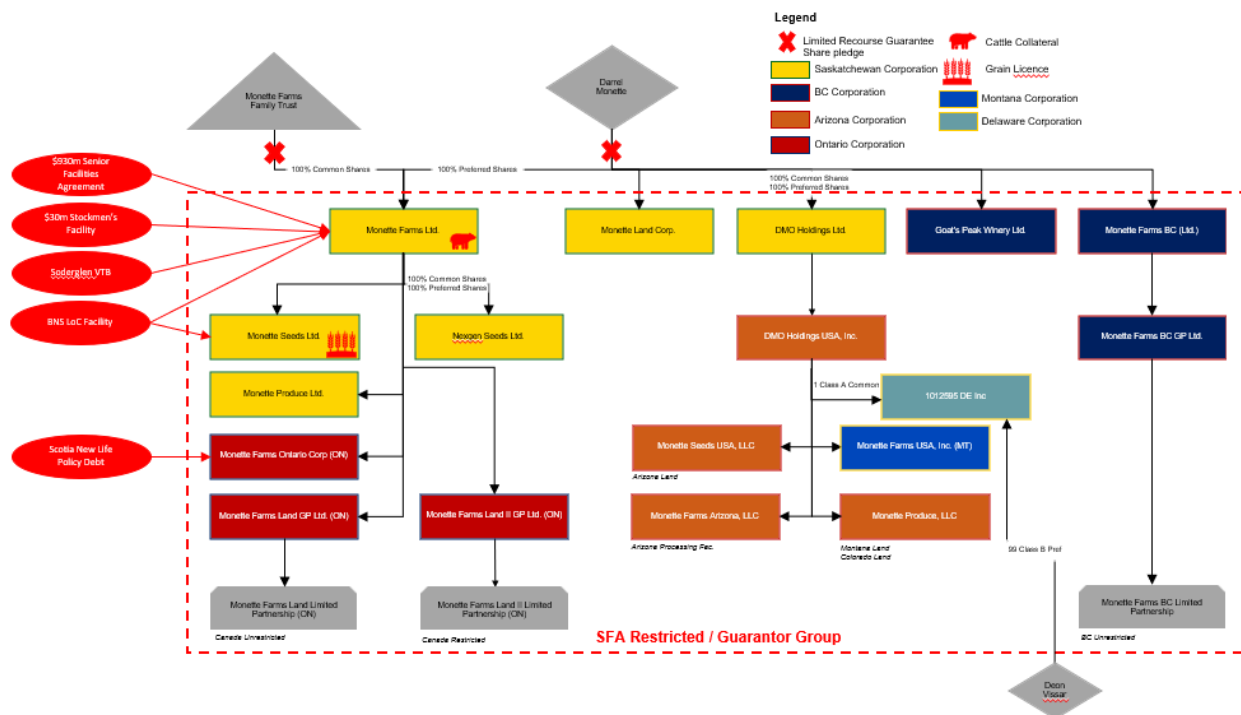
- DMO Holdings owns 100% of the ownership interests in DMO Holdings USA, Inc. (“DMO Holdings USA”).
- DMO Holdings USA owns 100% of the ownership interests in Monette Seeds USA, Monette Farms Arizona, LLC, Monette Farms USA, Inc., and Monette Produce, LLC.
- DMO Holdings is also the majority and sole voting shareholder in 1012595 DE Inc. 1012595 DE Inc.’s second shareholder is an individual named Deon Vissar, who holds 99 Class B Preference Shares (non-voting).

**Goat’s Peak Winery**

- Goat’s Peak Winery does not have any subsidiaries.

**Monette Farms BC**

- Monette Farms BC holds 100% of the ownership interests in Monette Farms BC GP Ltd.



Dated: April 21, 2026  
Wilmington, Delaware

Respectfully submitted,

/s/ Jacob R. Kirkham

**KOBRE & KIM LLP**

Jacob R. Kirkham (No. 5768)  
Stephen J. Astringer (No. 6375)  
600 North King Street, Suite 501  
Wilmington, Delaware 19801  
Telephone: (302) 518-6451  
Facsimile: (302) 518-6461  
jacob.kirkham@kobrekim.com  
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-and-

Daniel J. Saval (*pro hac vice* pending)  
John G. Conte (*pro hac vice* pending)  
Vincent Yiu (*pro hac vice* pending)  
Alaina Heine (*pro hac vice* pending)  
800 Third Avenue  
New York, New York 10022  
Telephone: (212) 488-1259  
Facsimile: (212) 488-1220  
daniel.savall@kobrekim.com  
john.conte@kobrekim.com  
vincent.yiu@kobrekim.com  
alaina.heine@kobrekim.com

*Counsel to the Foreign Representative*

**Fill in this information to identify the case:**

United States Bankruptcy Court for the:  
 District of Delaware  
 Case number (if known): \_\_\_\_\_ Chapter 15

Check if this is an amended filing

Official Form 401

**Chapter 15 Petition for Recognition of a Foreign Proceeding**

12/15

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write debtor's name and case number (if known).

1. Debtor's name Monette Farms BC Ltd.

2. Debtor's unique identifier

**For non-individual debtors:**

Federal Employer Identification Number (EIN) \_\_\_\_\_ - \_\_\_\_\_

Other 802133314. Describe identifier Business Number.

**For individual debtors:**

Social Security number: xxx - xx- \_\_\_\_\_

Individual Taxpayer Identification number (ITIN): 9 xx - xx - \_\_\_\_\_

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

3. Name of foreign representative(s) FTI Consulting Canada Inc.

4. Foreign proceeding in which appointment of the foreign representative(s) occurred CCAA Proceeding – Court of King's Bench of Alberta (Calgary)

5. Nature of the foreign proceeding

Check one:

Foreign main proceeding

Foreign nonmain proceeding

Foreign main proceeding, or in the alternative foreign nonmain proceeding

6. Evidence of the foreign proceeding

A certified copy, translated into English, of the decision commencing the foreign proceeding and appointing the foreign representative is attached.

A certificate, translated into English, from the foreign court, affirming the existence of the foreign proceeding and of the appointment of the foreign representative, is attached.

Other evidence of the existence of the foreign proceeding and of the appointment of the foreign representative is described below, and relevant documentation, translated into English, is attached.  
Copy of the Initial Order will be filed with the Court.

7. Is this the only foreign proceeding with respect to the debtor known to the foreign representative(s)?

No. (Attach a statement identifying each country in which a foreign proceeding by, regarding, or against the debtor is pending.)

Yes

Debtor Monette Farms BC Ltd.  
Name

Case number (if known) \_\_\_\_\_

**8. Others entitled to notice**

Attach a list containing the names and addresses of:

- (i) all persons or bodies authorized to administer foreign proceedings of the debtor,
- (ii) all parties to litigation pending in the United States in which the debtor is a party at the time of filing of this petition, and
- (iii) all entities against whom provisional relief is being sought under § 1519 of the Bankruptcy Code.

**9. Addresses**

**Country where the debtor has the center of its main interests:**

Canada

**Debtor's registered office:**

1800 – 1631 Dickson Ave  
Number Street

\_\_\_\_\_  
P.O. Box

Kelowna, British Columbia V1Y 0B5  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**Individual debtor's habitual residence:**

\_\_\_\_\_  
Number Street

\_\_\_\_\_  
P.O. Box

\_\_\_\_\_  
City State/Province/Region ZIP/Postal Code

\_\_\_\_\_  
Country

**Address of foreign representative(s):**

520 5th Ave SW, Suite 1610  
Number Street

\_\_\_\_\_  
P.O. Box

Calgary, Alberta T2P 3R7  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**10. Debtor's website (URL)**

https://monettefarms.ca/

**11. Type of debtor**

Check one:

- Non-individual (check one):
  - Corporation. Attach a corporate ownership statement containing the information described in Fed. R. Bankr. P. 7007.1.
  - Partnership
  - Other. Specify: \_\_\_\_\_
- Individual

Debtor Monette Farms BC Ltd.  
Name

Case number (if known) \_\_\_\_\_

12. Why is venue proper in this district?

Check one:

- Debtor's principal place of business or principal assets in the United States are in this district.
- Debtor does not have a place of business or assets in the United States, but the following action or proceeding in a federal or state court is pending against the debtor in this district:  
\_\_\_\_\_
- If neither box is checked, venue is consistent with the interests of justice and the convenience of the parties, having regard to the relief sought by the foreign representative, because:  
\_\_\_\_\_

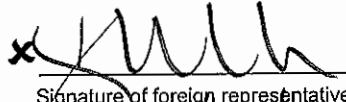
13. Signature of foreign representative(s)

I request relief in accordance with chapter 15 of title 11, United States Code.

I am the foreign representative of a debtor in a foreign proceeding, the debtor is eligible for the relief sought in this petition, and I am authorized to file this petition.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct,

  
Signature of foreign representative

D. HELKAA  
Printed name

Executed on 4/21/2026  
MM / DD / YYYY

X  
Signature of foreign representative

Printed name

Executed on \_\_\_\_\_  
MM / DD / YYYY

14. Signature of attorney

X /s/ Jacob R. Kirkham  
Signature of Attorney for foreign representative

Date 04/21/2026  
MM / DD / YYYY

Jacob R. Kirkham  
Printed name

Kobre & Kim LLP  
Firm name

600 North King Street, Suite 501  
Number Street

Wilmington  
City

DE 19801  
State ZIP Code

State ZIP Code

(302) 518-6456  
Contact phone

Jacob.Kirkham@kobrekim.com  
Email address

5768  
Bar number

DE  
State

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

In re:	Chapter 15
Monette Farms BC Ltd.,	Case No. 26-_____( )
Debtors in a Foreign Proceeding.	(Joint Administration Requested)

**CONSOLIDATED LIST PURSUANT TO BANKRUPTCY RULE 1007(a)(4)  
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

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The Foreign Representative’s and Monitor’s address is:

FTI Consulting Canada Inc.  
520 5th Avenue SW, Suite 1610  
Calgary, AB T2P 3R7  
Canada

**II. All Parties to Litigation Pending in the United States**

There is no pending litigation in which the Debtors are a party in the United States.

**III. Entities Against Whom Provisional Relief Is Sought**

The Foreign Representative seeks provisional relief on behalf of the Debtors to stay the execution or transfer of assets of the Debtors, and the application of 11 U.S.C. § 362 in the Debtors' Chapter 15 Cases on a provisional basis, against all known creditors of the Debtors and other interested parties, including without limitation, the persons on the creditor matrix.

**IV. Corporate Ownership Statement Pursuant to Rules 1007(a) and 7007 of the Federal Rules of Bankruptcy Procedure**

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  - DMO Holdings Ltd. ("DMO Holdings");
  - Goat's Peak Winery Ltd. ("Goat's Peak Winery"); and
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**Monette Farms and Subsidiaries**

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**Monette Land**

- Monette Land Corp. does not have any subsidiaries.

**DMO Holdings and Subsidiaries**

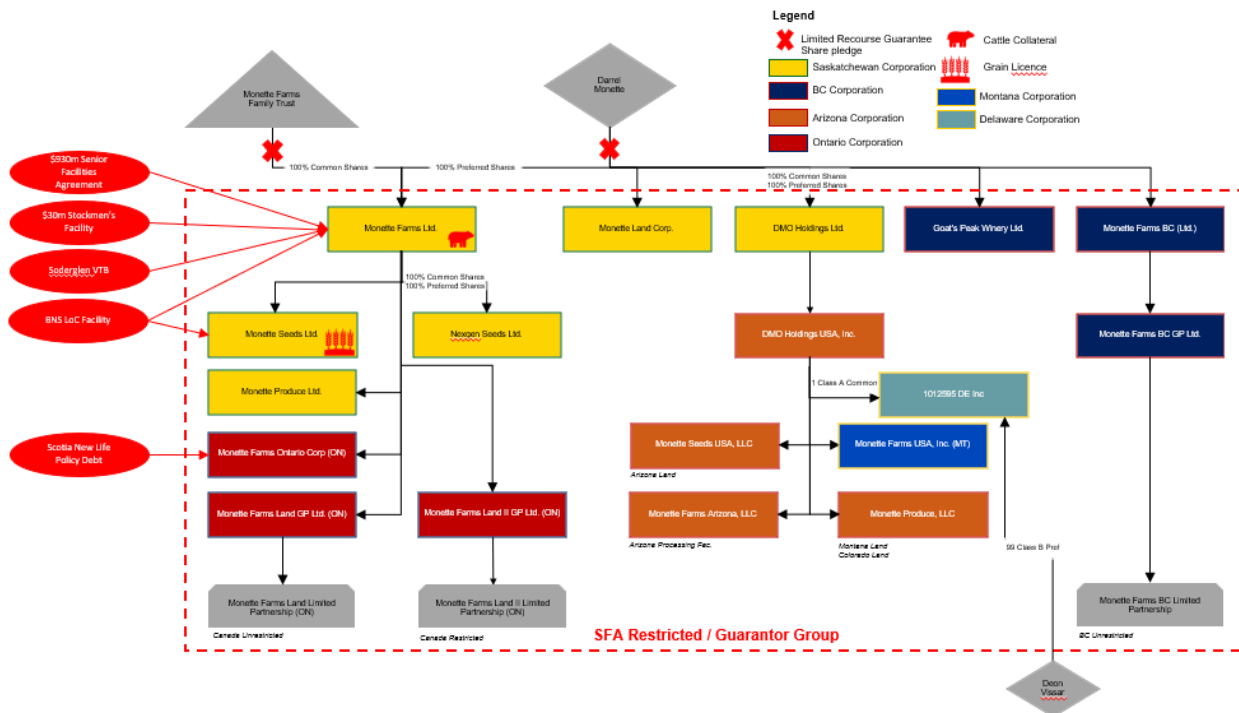
- DMO Holdings owns 100% of the ownership interests in DMO Holdings USA, Inc. (“DMO Holdings USA”).
- DMO Holdings USA owns 100% of the ownership interests in Monette Seeds USA, Monette Farms Arizona, LLC, Monette Farms USA, Inc., and Monette Produce, LLC.
- DMO Holdings is also the majority and sole voting shareholder in 1012595 DE Inc. 1012595 DE Inc.’s second shareholder is an individual named Deon Vissar, who holds 99 Class B Preference Shares (non-voting).

**Goat’s Peak Winery**

- Goat’s Peak Winery does not have any subsidiaries.

**Monette Farms BC**

- Monette Farms BC holds 100% of the ownership interests in Monette Farms BC GP Ltd.



Dated: April 21, 2026  
Wilmington, Delaware

Respectfully submitted,

/s/ Jacob R. Kirkham

**KOBRE & KIM LLP**

Jacob R. Kirkham (No. 5768)  
Stephen J. Astringer (No. 6375)  
600 North King Street, Suite 501  
Wilmington, Delaware 19801  
Telephone: (302) 518-6451  
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jacob.kirkham@kobrekim.com  
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Daniel J. Saval (*pro hac vice* pending)  
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daniel.savall@kobrekim.com  
john.conte@kobrekim.com  
vincent.yiu@kobrekim.com  
alaina.heine@kobrekim.com

*Counsel to the Foreign Representative*

**Fill in this information to identify the case:**

United States Bankruptcy Court for the:  
 District of Delaware  
 Case number (if known): \_\_\_\_\_ Chapter 15

Check if this is an amended filing

Official Form 401

**Chapter 15 Petition for Recognition of a Foreign Proceeding**

12/15

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write debtor's name and case number (if known).

1. Debtor's name Monette Farms Land GP Ltd.

2. Debtor's unique identifier

**For non-individual debtors:**

Federal Employer Identification Number (EIN) \_\_\_\_\_ - \_\_\_\_\_

Other 766179220. Describe identifier Business Number.

**For individual debtors:**

Social Security number: xxx - xx- \_\_\_\_\_

Individual Taxpayer Identification number (ITIN): 9 xx - xx - \_\_\_\_\_

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

3. Name of foreign representative(s) FTI Consulting Canada Inc.

4. Foreign proceeding in which appointment of the foreign representative(s) occurred CCAA Proceeding – Court of King's Bench of Alberta (Calgary)

5. Nature of the foreign proceeding

Check one:

Foreign main proceeding

Foreign nonmain proceeding

Foreign main proceeding, or in the alternative foreign nonmain proceeding

6. Evidence of the foreign proceeding

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Copy of the Initial Order will be filed with the Court.

7. Is this the only foreign proceeding with respect to the debtor known to the foreign representative(s)?

No. (Attach a statement identifying each country in which a foreign proceeding by, regarding, or against the debtor is pending.)

Yes

Debtor Monette Farms Land GP Ltd.  
Name

Case number (if known) \_\_\_\_\_

**8. Others entitled to notice**

Attach a list containing the names and addresses of:

- (i) all persons or bodies authorized to administer foreign proceedings of the debtor,
- (ii) all parties to litigation pending in the United States in which the debtor is a party at the time of filing of this petition, and
- (iii) all entities against whom provisional relief is being sought under § 1519 of the Bankruptcy Code.

**9. Addresses**

**Country where the debtor has the center of its main interests:**

Canada

**Debtor's registered office:**

222 Bay Street, Suite 3000  
Number Street

P.O. Box \_\_\_\_\_

Toronto, Ontario M5K 1E7  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**Individual debtor's habitual residence:**

\_\_\_\_\_  
Number Street

P.O. Box \_\_\_\_\_

\_\_\_\_\_  
City State/Province/Region ZIP/Postal Code

\_\_\_\_\_  
Country

**Address of foreign representative(s):**

520 5th Ave SW, Suite 1610  
Number Street

P.O. Box \_\_\_\_\_

Calgary, Alberta T2P 3R7  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**10. Debtor's website (URL)**

https://monettefarms.ca/

**11. Type of debtor**

Check one:

- Non-individual (check one):
  - Corporation. Attach a corporate ownership statement containing the information described in Fed. R. Bankr. P. 7007.1.
  - Partnership
  - Other. Specify: \_\_\_\_\_
- Individual

Debtor Monette Farms Land GP Ltd.  
Name

Case number (if known) \_\_\_\_\_

12. Why is venue proper in this district?

Check one:

- Debtor's principal place of business or principal assets in the United States are in this district.
- Debtor does not have a place of business or assets in the United States, but the following action or proceeding in a federal or state court is pending against the debtor in this district:  
\_\_\_\_\_
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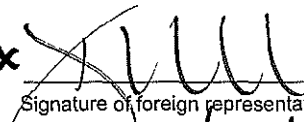
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I request relief in accordance with chapter 15 of title 11, United States Code.

I am the foreign representative of a debtor in a foreign proceeding, the debtor is eligible for the relief sought in this petition, and I am authorized to file this petition.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct,

x   
Signature of foreign representative

Deryck Helkaa  
Senior Managing Director at FTI Consulting Canada Inc.  
Printed name

Executed on 4/21/2026  
MM / DD / YYYY

x \_\_\_\_\_  
Signature of foreign representative

Printed name

Executed on \_\_\_\_\_  
MM / DD / YYYY

14. Signature of attorney

x /s/ Jacob R. Kirkham  
Signature of Attorney for foreign representative

Date 04/21/2026  
MM / DD / YYYY

Jacob R. Kirkham  
Printed name  
Kobre & Kim LLP  
Firm name

600 North King Street, Suite 501  
Number Street  
Wilmington City DE 19801  
State ZIP Code

(302) 518-6456  
Contact phone  
Jacob.Kirkham@kobrekim.com  
Email address

5768  
Bar number DE  
State

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

In re:	Chapter 15
Monette Farms Land GP Ltd.,	Case No. 26-_____( )
Debtors in a Foreign Proceeding.	(Joint Administration Requested)

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  - Goat's Peak Winery Ltd. ("Goat's Peak Winery"); and
  - Monette Farms BC Ltd. ("Monette Farms BC").
- Darrell Monette owns 100% of the ownership interests in Monette Land, DMO Holdings, Goat's Peak Winery, and Monette Farms BC, and 100% of the preferred shares of Monette Farms.
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**DMO Holdings and Subsidiaries**

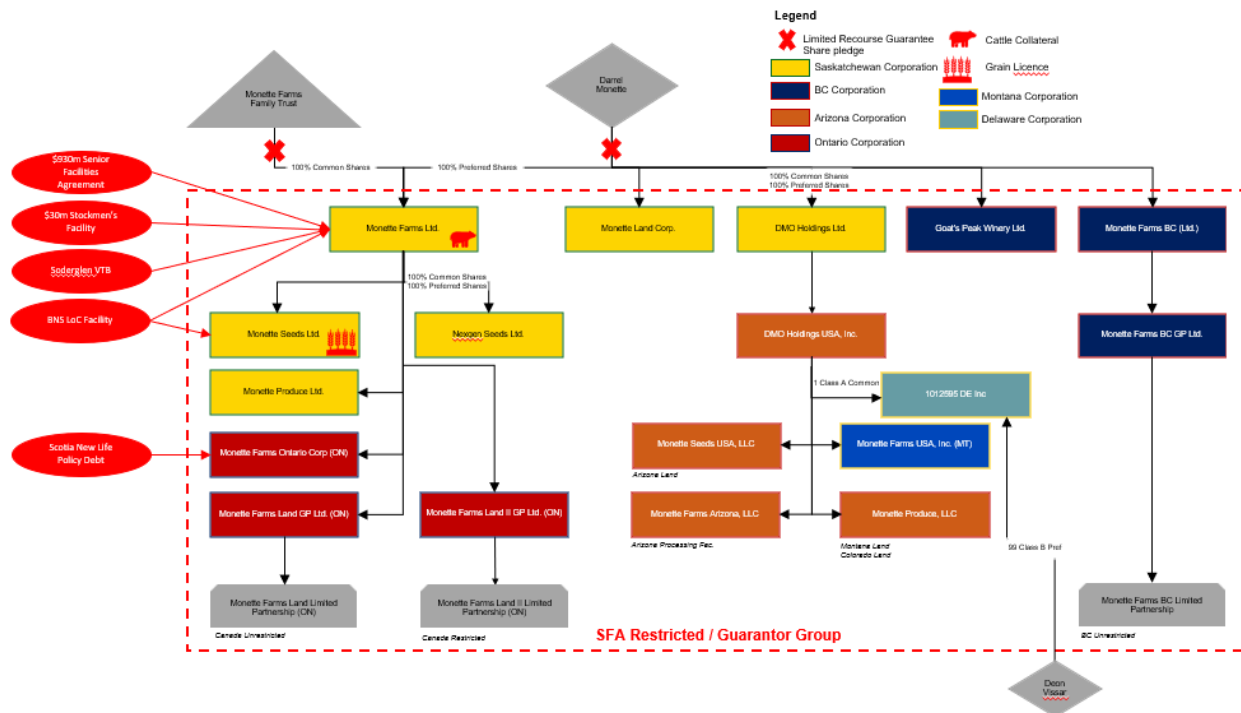
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**Goat’s Peak Winery**

- Goat’s Peak Winery does not have any subsidiaries.

**Monette Farms BC**

- Monette Farms BC holds 100% of the ownership interests in Monette Farms BC GP Ltd.



Dated: April 21, 2026  
Wilmington, Delaware

Respectfully submitted,

/s/ Jacob R. Kirkham

**KOBRE & KIM LLP**

Jacob R. Kirkham (No. 5768)  
Stephen J. Astringer (No. 6375)  
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alaina.heine@kobrekim.com

*Counsel to the Foreign Representative*

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 Case number (if known): \_\_\_\_\_ Chapter 15

Check if this is an amended filing

Official Form 401

**Chapter 15 Petition for Recognition of a Foreign Proceeding**

12/15

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2. Debtor's unique identifier

**For non-individual debtors:**

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Other 766172423. Describe identifier Business Number.

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Debtor Monette Farms Land II GP Ltd.  
Name

Case number (if known) \_\_\_\_\_

**8. Others entitled to notice**

Attach a list containing the names and addresses of:

- (i) all persons or bodies authorized to administer foreign proceedings of the debtor,
- (ii) all parties to litigation pending in the United States in which the debtor is a party at the time of filing of this petition, and
- (iii) all entities against whom provisional relief is being sought under § 1519 of the Bankruptcy Code.

**9. Addresses**

**Country where the debtor has the center of its main interests:**

Canada

**Debtor's registered office:**

222 Bay Street, Suite 3000  
Number Street

\_\_\_\_\_  
P.O. Box

Toronto, Ontario M5K 1E7  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**Individual debtor's habitual residence:**

\_\_\_\_\_  
Number Street

\_\_\_\_\_  
P.O. Box

\_\_\_\_\_  
City State/Province/Region ZIP/Postal Code

\_\_\_\_\_  
Country

**Address of foreign representative(s):**

520 5th Ave SW, Suite 1610  
Number Street

\_\_\_\_\_  
P.O. Box

Calgary, Alberta T2P 3R7  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**10. Debtor's website (URL)**

https://monettefarms.ca/

**11. Type of debtor**

Check one:

- Non-individual (check one):
  - Corporation. Attach a corporate ownership statement containing the information described in Fed. R. Bankr. P. 7007.1.
  - Partnership
  - Other. Specify: \_\_\_\_\_
- Individual

Debtor Monette Farms Land II GP Ltd.  
Name

Case number (if known) \_\_\_\_\_

**12. Why is venue proper in this district?**

Check one:

- Debtor's principal place of business or principal assets in the United States are in this district.
- Debtor does not have a place of business or assets in the United States, but the following action or proceeding in a federal or state court is pending against the debtor in this district:  
 \_\_\_\_\_
- If neither box is checked, venue is consistent with the interests of justice and the convenience of the parties, having regard to the relief sought by the foreign representative, because:  
 \_\_\_\_\_

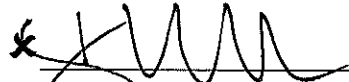
**13. Signature of foreign representative(s)**

I request relief in accordance with chapter 15 of title 11, United States Code.

I am the foreign representative of a debtor in a foreign proceeding, the debtor is eligible for the relief sought in this petition, and I am authorized to file this petition.

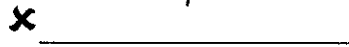
I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct,

  
 \_\_\_\_\_  
 Signature of foreign representative

Deryck Helkaa  
 Senior Managing Director at FTI Consulting Canada Inc.  
 \_\_\_\_\_  
 Printed name

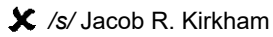
Executed on 04/21/2026  
MM / DD / YYYY

  
 \_\_\_\_\_  
 Signature of foreign representative

\_\_\_\_\_  
 Printed name

Executed on \_\_\_\_\_  
MM / DD / YYYY

**14. Signature of attorney**

 /s/ Jacob R. Kirkham  
 \_\_\_\_\_  
 Signature of Attorney for foreign representative

Date 04/21/2026  
MM / DD / YYYY

Jacob R. Kirkham  
 \_\_\_\_\_  
 Printed name

Kobre & Kim LLP  
 \_\_\_\_\_  
 Firm name

600 North King Street, Suite 501  
 \_\_\_\_\_

Number Street  
 Wilmington

DE 19801  
 State ZIP Code

(302) 518-6456  
 \_\_\_\_\_  
 Contact phone

Jacob.Kirkham@kobrekim.com  
 \_\_\_\_\_  
 Email address

5768  
 \_\_\_\_\_  
 Bar number State

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

In re:	Chapter 15
Monette Farms Land II GP Ltd.,	Case No. 26-_____( )
Debtors in a Foreign Proceeding.	(Joint Administration Requested)

**CONSOLIDATED LIST PURSUANT TO BANKRUPTCY RULE 1007(a)(4)  
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

FTI Consulting Canada Inc. (“FTI”), in its capacity as the court-appointed monitor (in such capacity, the “Monitor”) and authorized foreign representative (in such capacity, the “Foreign Representative”) of each of the above-captioned debtors (collectively, the “Debtors”), which are the subject of proceedings (the “Canadian Proceedings”) under Canada’s *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36 (as amended, the “CCAA”), pending before the Court of King’s Bench of Alberta (the “Canadian Court”) hereby submits this list on behalf of the Debtors in compliance with the requirements of Rule 1007(a)(4) of the Federal Rules of Bankruptcy Procedure.

**I. All Administrators of the Debtors in Foreign Proceedings**

FTI is the authorized Foreign Representative and court-appointed Monitor in the Canadian Proceedings. To the best of the Foreign Representative’s knowledge, other than the Canadian Proceedings, there are no foreign proceedings pending with respect to any of the Debtors.

The Foreign Representative’s and Monitor’s address is:

FTI Consulting Canada Inc.  
520 5th Avenue SW, Suite 1610  
Calgary, AB T2P 3R7  
Canada

**II. All Parties to Litigation Pending in the United States**

There is no pending litigation in which the Debtors are a party in the United States.

**III. Entities Against Whom Provisional Relief Is Sought**

The Foreign Representative seeks provisional relief on behalf of the Debtors to stay the execution or transfer of assets of the Debtors, and the application of 11 U.S.C. § 362 in the Debtors' Chapter 15 Cases on a provisional basis, against all known creditors of the Debtors and other interested parties, including without limitation, the persons on the creditor matrix.

**IV. Corporate Ownership Statement Pursuant to Rules 1007(a) and 7007 of the Federal Rules of Bankruptcy Procedure**

Pursuant to Rules 1007(a) and 7007.1 of the Federal Rules of Bankruptcy Procedure, the Foreign Representative submits the following list of entities that hold ownership interests in the Debtors. A corporate ownership chart is embedded below for reference. No publicly held corporation owns more than 10% of the stock in any of the Debtors.

**Parent Corporations**

- The Debtors' corporate structure consists of 5 parent corporations:
  - Monette Farms Ltd. ("Monette Farms");
  - Monette Land Corporation ("Monette Land");
  - DMO Holdings Ltd. ("DMO Holdings");
  - Goat's Peak Winery Ltd. ("Goat's Peak Winery"); and
  - Monette Farms BC Ltd. ("Monette Farms BC").
- Darrell Monette owns 100% of the ownership interests in Monette Land, DMO Holdings, Goat's Peak Winery, and Monette Farms BC, and 100% of the preferred shares of Monette Farms.
- The Monette Farms Family Trust owns 100% of the common shares of Monette Farms.

**Monette Farms and Subsidiaries**

- Monette Farms holds 100% of the ownership interests in Monette Farms Ontario Corp., NexGen Seeds Ltd., Monette Produce Ltd., Monette Seeds Ltd., Monette Farms Land GP Ltd., and Monette Farms Land GP II Ltd.

**Monette Land**

- Monette Land Corp. does not have any subsidiaries.

**DMO Holdings and Subsidiaries**

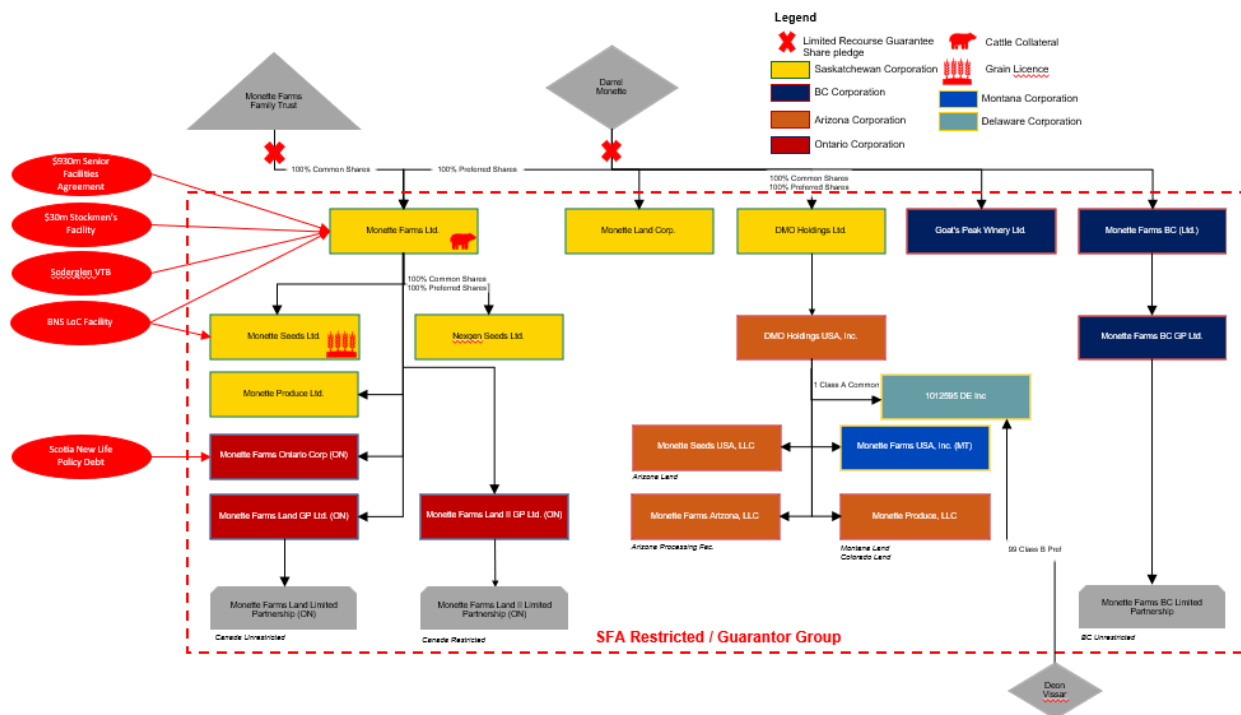
- DMO Holdings owns 100% of the ownership interests in DMO Holdings USA, Inc. (“DMO Holdings USA”).
- DMO Holdings USA owns 100% of the ownership interests in Monette Seeds USA, Monette Farms Arizona, LLC, Monette Farms USA, Inc., and Monette Produce, LLC.
- DMO Holdings is also the majority and sole voting shareholder in 1012595 DE Inc. 1012595 DE Inc.’s second shareholder is an individual named Deon Vissar, who holds 99 Class B Preference Shares (non-voting).

**Goat’s Peak Winery**

- Goat’s Peak Winery does not have any subsidiaries.

**Monette Farms BC**

- Monette Farms BC holds 100% of the ownership interests in Monette Farms BC GP Ltd.



Dated: April 21, 2026  
Wilmington, Delaware

Respectfully submitted,

/s/ Jacob R. Kirkham

**KOBRE & KIM LLP**

Jacob R. Kirkham (No. 5768)  
Stephen J. Astringer (No. 6375)  
600 North King Street, Suite 501  
Wilmington, Delaware 19801  
Telephone: (302) 518-6451  
Facsimile: (302) 518-6461  
jacob.kirkham@kobrekim.com  
stephen.astringer@kobrekim.com

-and-

Daniel J. Saval (*pro hac vice* pending)  
John G. Conte (*pro hac vice* pending)  
Vincent Yiu (*pro hac vice* pending)  
Alaina Heine (*pro hac vice* pending)  
800 Third Avenue  
New York, New York 10022  
Telephone: (212) 488-1259  
Facsimile: (212) 488-1220  
daniel.savall@kobrekim.com  
john.conte@kobrekim.com  
vincent.yiu@kobrekim.com  
alaina.heine@kobrekim.com

*Counsel to the Foreign Representative*

**Fill in this information to identify the case:**

United States Bankruptcy Court for the:

District of Delaware

Case number (if known): \_\_\_\_\_ Chapter 15

Check if this is an amended filing

Official Form 401

**Chapter 15 Petition for Recognition of a Foreign Proceeding**

12/15

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write debtor's name and case number (if known).

1. Debtor's name Monette Farms Ltd.

2. Debtor's unique identifier

**For non-individual debtors:**

Federal Employer Identification Number (EIN) \_\_\_\_\_ - \_\_\_\_\_

Other 821340221. Describe identifier Business Number.

**For individual debtors:**

Social Security number: xxx - xx- \_\_\_\_\_

Individual Taxpayer Identification number (ITIN): 9 xx - xx - \_\_\_\_\_

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

3. Name of foreign representative(s) FTI Consulting Canada Inc.

4. Foreign proceeding in which appointment of the foreign representative(s) occurred CCAA Proceeding – Court of King's Bench of Alberta (Calgary)

5. Nature of the foreign proceeding

Check one:

Foreign main proceeding

Foreign nonmain proceeding

Foreign main proceeding, or in the alternative foreign nonmain proceeding

6. Evidence of the foreign proceeding

A certified copy, translated into English, of the decision commencing the foreign proceeding and appointing the foreign representative is attached.

A certificate, translated into English, from the foreign court, affirming the existence of the foreign proceeding and of the appointment of the foreign representative, is attached.

Other evidence of the existence of the foreign proceeding and of the appointment of the foreign representative is described below, and relevant documentation, translated into English, is attached.  
Copy of the Initial Order will be filed with the Court.

7. Is this the only foreign proceeding with respect to the debtor known to the foreign representative(s)?

No. (Attach a statement identifying each country in which a foreign proceeding by, regarding, or against the debtor is pending.)

Yes

**8. Others entitled to notice**

Attach a list containing the names and addresses of:

- (i) all persons or bodies authorized to administer foreign proceedings of the debtor,
- (ii) all parties to litigation pending in the United States in which the debtor is a party at the time of filing of this petition, and
- (iii) all entities against whom provisional relief is being sought under § 1519 of the Bankruptcy Code.

**9. Addresses**

**Country where the debtor has the center of its main interests:**

Canada

**Debtor's registered office:**

717 South Railway Street West  
Number Street

\_\_\_\_\_  
P.O. Box

Swift Current, Saskatchewan S9H 2Y9  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**Individual debtor's habitual residence:**

\_\_\_\_\_  
Number Street

\_\_\_\_\_  
P.O. Box

\_\_\_\_\_  
City State/Province/Region ZIP/Postal Code

\_\_\_\_\_  
Country

**Address of foreign representative(s):**

520 5th Ave SW, Suite 1610  
Number Street

\_\_\_\_\_  
P.O. Box

Calgary, Alberta T2P 3R7  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**10. Debtor's website (URL)**

https://monettefarms.ca/

**11. Type of debtor**

Check one:

- Non-individual (check one):
  - Corporation. Attach a corporate ownership statement containing the information described in Fed. R. Bankr. P. 7007.1.
  - Partnership
  - Other. Specify: \_\_\_\_\_
- Individual

12. Why is venue proper in this district?

- Check one:
- Debtor's principal place of business or principal assets in the United States are in this district.
  - Debtor does not have a place of business or assets in the United States, but the following action or proceeding in a federal or state court is pending against the debtor in this district:  
\_\_\_\_\_
  - If neither box is checked, venue is consistent with the interests of justice and the convenience of the parties, having regard to the relief sought by the foreign representative, because:  
\_\_\_\_\_

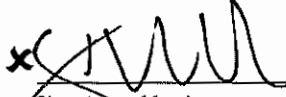
13. Signature of foreign representative(s)

I request relief in accordance with chapter 15 of title 11, United States Code.

I am the foreign representative of a debtor in a foreign proceeding, the debtor is eligible for the relief sought in this petition, and I am authorized to file this petition.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct,

 D. HELKAA  
Signature of foreign representative Printed name

Executed on 4/21/2026  
MM / DD / YYYY

X \_\_\_\_\_  
Signature of foreign representative Printed name

Executed on \_\_\_\_\_  
MM / DD / YYYY

14. Signature of attorney

X /s/ Jacob R. Kirkham Date 04/21/2026  
Signature of Attorney for foreign representative MM / DD / YYYY

Jacob R. Kirkham  
Printed name

Kobre & Kim LLP  
Firm name

600 North King Street, Suite 501  
Number Street

Wilmington DE 19801  
City State ZIP Code

(302) 518-6456 Jacob.Kirkham@kobrekim.com  
Contact phone Email address

5768 DE  
Bar number State

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

In re:

Monette Farms Ltd.,

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 26-\_\_\_\_\_( )

(Joint Administration Requested)

**CONSOLIDATED LIST PURSUANT TO BANKRUPTCY RULE 1007(a)(4)  
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

FTI Consulting Canada Inc. (“FTI”), in its capacity as the court-appointed monitor (in such capacity, the “Monitor”) and authorized foreign representative (in such capacity, the “Foreign Representative”) of each of the above-captioned debtors (collectively, the “Debtors”), which are the subject of proceedings (the “Canadian Proceedings”) under Canada’s *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36 (as amended, the “CCAA”), pending before the Court of King’s Bench of Alberta (the “Canadian Court”) hereby submits this list on behalf of the Debtors in compliance with the requirements of Rule 1007(a)(4) of the Federal Rules of Bankruptcy Procedure.

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The Foreign Representative’s and Monitor’s address is:

FTI Consulting Canada Inc.  
520 5th Avenue SW, Suite 1610  
Calgary, AB T2P 3R7  
Canada

**II. All Parties to Litigation Pending in the United States**

There is no pending litigation in which the Debtors are a party in the United States.

### **III. Entities Against Whom Provisional Relief Is Sought**

The Foreign Representative seeks provisional relief on behalf of the Debtors to stay the execution or transfer of assets of the Debtors, and the application of 11 U.S.C. § 362 in the Debtors' Chapter 15 Cases on a provisional basis, against all known creditors of the Debtors and other interested parties, including without limitation, the persons on the creditor matrix.

### **IV. Corporate Ownership Statement Pursuant to Rules 1007(a) and 7007 of the Federal Rules of Bankruptcy Procedure**

Pursuant to Rules 1007(a) and 7007.1 of the Federal Rules of Bankruptcy Procedure, the Foreign Representative submits the following list of entities that hold ownership interests in the Debtors. A corporate ownership chart is embedded below for reference. No publicly held corporation owns more than 10% of the stock in any of the Debtors.

#### **Parent Corporations**

- The Debtors' corporate structure consists of 5 parent corporations:
  - Monette Farms Ltd. ("Monette Farms");
  - Monette Land Corporation ("Monette Land");
  - DMO Holdings Ltd. ("DMO Holdings");
  - Goat's Peak Winery Ltd. ("Goat's Peak Winery"); and
  - Monette Farms BC Ltd. ("Monette Farms BC").
- Darrell Monette owns 100% of the ownership interests in Monette Land, DMO Holdings, Goat's Peak Winery, and Monette Farms BC, and 100% of the preferred shares of Monette Farms.
- The Monette Farms Family Trust owns 100% of the common shares of Monette Farms.

#### **Monette Farms and Subsidiaries**

- Monette Farms holds 100% of the ownership interests in Monette Farms Ontario Corp., NexGen Seeds Ltd., Monette Produce Ltd., Monette Seeds Ltd., Monette Farms Land GP Ltd., and Monette Farms Land GP II Ltd.

## Monette Land

- Monette Land Corp. does not have any subsidiaries.

## DMO Holdings and Subsidiaries

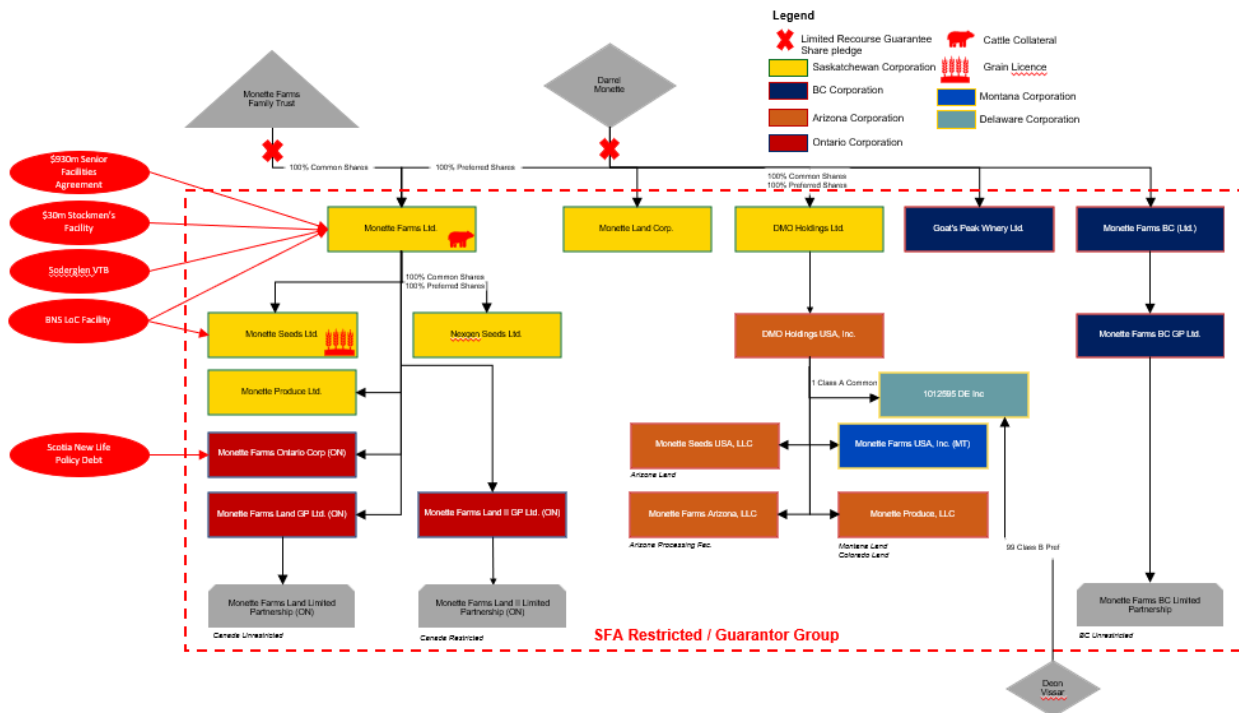
- DMO Holdings owns 100% of the ownership interests in DMO Holdings USA, Inc. (“DMO Holdings USA”).
- DMO Holdings USA owns 100% of the ownership interests in Monette Seeds USA, Monette Farms Arizona, LLC, Monette Farms USA, Inc., and Monette Produce, LLC.
- DMO Holdings is also the majority and sole voting shareholder in 1012595 DE Inc. 1012595 DE Inc.’s second shareholder is an individual named Deon Vissar, who holds 99 Class B Preference Shares (non-voting).

## Goat’s Peak Winery

- Goat’s Peak Winery does not have any subsidiaries.

## Monette Farms BC

- Monette Farms BC holds 100% of the ownership interests in Monette Farms BC GP Ltd.



Dated: April 21, 2026  
Wilmington, Delaware

Respectfully submitted,

/s/ Jacob R. Kirkham

**KOBRE & KIM LLP**

Jacob R. Kirkham (No. 5768)  
Stephen J. Astringer (No. 6375)  
600 North King Street, Suite 501  
Wilmington, Delaware 19801  
Telephone: (302) 518-6451  
Facsimile: (302) 518-6461  
jacob.kirkham@kobrekim.com  
stephen.astringer@kobrekim.com

-and-

Daniel J. Saval (*pro hac vice* pending)  
John G. Conte (*pro hac vice* pending)  
Vincent Yiu (*pro hac vice* pending)  
Alaina Heine (*pro hac vice* pending)  
800 Third Avenue  
New York, New York 10022  
Telephone: (212) 488-1259  
Facsimile: (212) 488-1220  
daniel.savall@kobrekim.com  
john.conte@kobrekim.com  
vincent.yiu@kobrekim.com  
alaina.heine@kobrekim.com

*Counsel to the Foreign Representative*

**Fill in this information to identify the case:**

United States Bankruptcy Court for the:  
 District of Delaware  
 Case number (if known): \_\_\_\_\_ Chapter 15

Check if this is an amended filing

Official Form 401

**Chapter 15 Petition for Recognition of a Foreign Proceeding**

12/15

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write debtor's name and case number (if known).

1. Debtor's name Monette Farms Ontario Corp.

2. Debtor's unique identifier

**For non-individual debtors:**

Federal Employer Identification Number (EIN) \_\_\_\_\_ - \_\_\_\_\_

Other 745133538. Describe identifier Business Number.

**For individual debtors:**

Social Security number: xxx - xx- \_\_\_\_\_

Individual Taxpayer Identification number (ITIN): 9 xx - xx - \_\_\_\_\_

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

3. Name of foreign representative(s) FTI Consulting Canada Inc.

4. Foreign proceeding in which appointment of the foreign representative(s) occurred CCAA Proceeding – Court of King's Bench of Alberta (Calgary)

5. Nature of the foreign proceeding

Check one:

- Foreign main proceeding
- Foreign nonmain proceeding
- Foreign main proceeding, or in the alternative foreign nonmain proceeding

6. Evidence of the foreign proceeding

- A certified copy, translated into English, of the decision commencing the foreign proceeding and appointing the foreign representative is attached.
- A certificate, translated into English, from the foreign court, affirming the existence of the foreign proceeding and of the appointment of the foreign representative, is attached.
- Other evidence of the existence of the foreign proceeding and of the appointment of the foreign representative is described below, and relevant documentation, translated into English, is attached.  
Copy of the Initial Order will be filed with the Court.

7. Is this the only foreign proceeding with respect to the debtor known to the foreign representative(s)?

- No. (Attach a statement identifying each country in which a foreign proceeding by, regarding, or against the debtor is pending.)
- Yes

Debtor Monette Farms Ontario Corp.  
Name

Case number (if known) \_\_\_\_\_

**8. Others entitled to notice**

Attach a list containing the names and addresses of:

- (i) all persons or bodies authorized to administer foreign proceedings of the debtor,
- (ii) all parties to litigation pending in the United States in which the debtor is a party at the time of filing of this petition, and
- (iii) all entities against whom provisional relief is being sought under § 1519 of the Bankruptcy Code.

**9. Addresses**

**Country where the debtor has the center of its main interests:**

Canada

**Debtor's registered office:**

16 Neekaunis Road  
Number Street

P.O. Box \_\_\_\_\_

Waubauskene, Ontario L0K 2C0  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**Individual debtor's habitual residence:**

\_\_\_\_\_  
Number Street

P.O. Box \_\_\_\_\_

\_\_\_\_\_  
City State/Province/Region ZIP/Postal Code

\_\_\_\_\_  
Country

**Address of foreign representative(s):**

520 5th Ave SW, Suite 1610  
Number Street

P.O. Box \_\_\_\_\_

Calgary, Alberta T2P 3R7  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**10. Debtor's website (URL)**

https://monettefarms.ca/

**11. Type of debtor**

Check one:

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Debtor Monette Farms Ontario Corp.  
Name

Case number (if known) \_\_\_\_\_

**12. Why is venue proper in this district?**

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I declare under penalty of perjury that the foregoing is true and correct,

*[Handwritten Signature]*  
Signature of foreign representative

D HELKAA  
Printed name

Executed on 4/21/2026  
MM / DD / YYYY

X  
Signature of foreign representative

Printed name

Executed on \_\_\_\_\_  
MM / DD / YYYY

**14. Signature of attorney**

X /s/ Jacob R. Kirkham  
Signature of Attorney for foreign representative

Date 04/21/2026  
MM / DD / YYYY

Jacob R. Kirkham  
Printed name

Kobre & Kim LLP  
Firm name

600 North King Street, Suite 501  
Number Street

Wilmington DE 19801  
City State ZIP Code

(302) 518-6456 Jacob.Kirkham@kobrekim.com  
Contact phone Email address

5768 DE  
Bar number State

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

In re:	Chapter 15
Monette Farms Ontario Corp.,	Case No. 26-_____( )
Debtors in a Foreign Proceeding.	(Joint Administration Requested)

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FTI Consulting Canada Inc.  
520 5th Avenue SW, Suite 1610  
Calgary, AB T2P 3R7  
Canada

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  - Monette Land Corporation ("Monette Land");
  - DMO Holdings Ltd. ("DMO Holdings");
  - Goat's Peak Winery Ltd. ("Goat's Peak Winery"); and
  - Monette Farms BC Ltd. ("Monette Farms BC").
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- The Monette Farms Family Trust owns 100% of the common shares of Monette Farms.

**Monette Farms and Subsidiaries**

- Monette Farms holds 100% of the ownership interests in Monette Farms Ontario Corp., NexGen Seeds Ltd., Monette Produce Ltd., Monette Seeds Ltd., Monette Farms Land GP Ltd., and Monette Farms Land GP II Ltd.

**Monette Land**

- Monette Land Corp. does not have any subsidiaries.

**DMO Holdings and Subsidiaries**

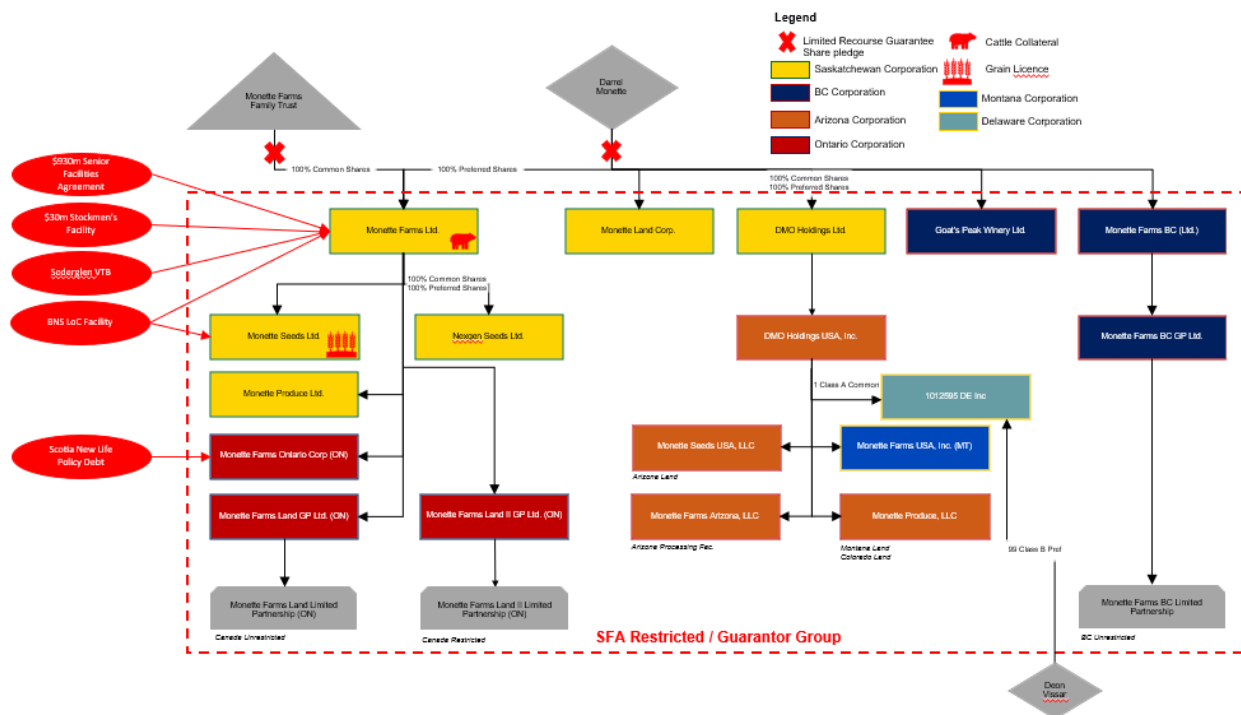
- DMO Holdings owns 100% of the ownership interests in DMO Holdings USA, Inc. (“DMO Holdings USA”).
- DMO Holdings USA owns 100% of the ownership interests in Monette Seeds USA, Monette Farms Arizona, LLC, Monette Farms USA, Inc., and Monette Produce, LLC.
- DMO Holdings is also the majority and sole voting shareholder in 1012595 DE Inc. 1012595 DE Inc.’s second shareholder is an individual named Deon Vissar, who holds 99 Class B Preference Shares (non-voting).

**Goat’s Peak Winery**

- Goat’s Peak Winery does not have any subsidiaries.

**Monette Farms BC**

- Monette Farms BC holds 100% of the ownership interests in Monette Farms BC GP Ltd.



Dated: April 21, 2026  
Wilmington, Delaware

Respectfully submitted,

/s/ Jacob R. Kirkham

**KOBRE & KIM LLP**

Jacob R. Kirkham (No. 5768)  
Stephen J. Astringer (No. 6375)  
600 North King Street, Suite 501  
Wilmington, Delaware 19801  
Telephone: (302) 518-6451  
Facsimile: (302) 518-6461  
jacob.kirkham@kobrekim.com  
stephen.astringer@kobrekim.com

-and-

Daniel J. Saval (*pro hac vice* pending)  
John G. Conte (*pro hac vice* pending)  
Vincent Yiu (*pro hac vice* pending)  
Alaina Heine (*pro hac vice* pending)  
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john.conte@kobrekim.com  
vincent.yiu@kobrekim.com  
alaina.heine@kobrekim.com

*Counsel to the Foreign Representative*

**Fill in this information to identify the case:**

United States Bankruptcy Court for the:  
 District of Delaware  
 Case number (if known): \_\_\_\_\_ Chapter 15

Check if this is an amended filing

Official Form 401

**Chapter 15 Petition for Recognition of a Foreign Proceeding**

12/15

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write debtor's name and case number (if known).

1. Debtor's name Monette Farms USA, Inc.

2. Debtor's unique identifier

**For non-individual debtors:**

Federal Employer Identification Number (EIN) 3 2 -0 5 8 2 4 4 2

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

**For individual debtors:**

Social Security number: xxx - xx- \_\_\_\_\_

Individual Taxpayer Identification number (ITIN): 9 xx - xx - \_\_\_\_\_

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

3. Name of foreign representative(s) FTI Consulting Canada Inc.

4. Foreign proceeding in which appointment of the foreign representative(s) occurred CCAA Proceeding - Court of King's Bench of Alberta (Calgary)

5. Nature of the foreign proceeding

Check one:

Foreign main proceeding

Foreign nonmain proceeding

Foreign main proceeding, or in the alternative foreign nonmain proceeding

6. Evidence of the foreign proceeding

A certified copy, translated into English, of the decision commencing the foreign proceeding and appointing the foreign representative is attached.

A certificate, translated into English, from the foreign court, affirming the existence of the foreign proceeding and of the appointment of the foreign representative, is attached.

Other evidence of the existence of the foreign proceeding and of the appointment of the foreign representative is described below, and relevant documentation, translated into English, is attached.  
Copy of the Initial Order will be filed with the Court.

7. Is this the only foreign proceeding with respect to the debtor known to the foreign representative(s)?

No. (Attach a statement identifying each country in which a foreign proceeding by, regarding, or against the debtor is pending.)

Yes

Debtor Monette Farms USA, Inc.  
Name

Case number (if known) \_\_\_\_\_

**8. Others entitled to notice**

Attach a list containing the names and addresses of:

- (i) all persons or bodies authorized to administer foreign proceedings of the debtor,
- (ii) all parties to litigation pending in the United States in which the debtor is a party at the time of filing of this petition, and
- (iii) all entities against whom provisional relief is being sought under § 1519 of the Bankruptcy Code.

**9. Addresses**

**Country where the debtor has the center of its main interests:**

Canada

**Debtor's registered office:**

1555 Campus Way, Suite 201  
Number Street

P.O. Box \_\_\_\_\_

Billings, Montana 59102  
City State/Province/Region ZIP/Postal Code

United States of America  
Country

**Individual debtor's habitual residence:**

\_\_\_\_\_  
Number Street

P.O. Box \_\_\_\_\_

\_\_\_\_\_  
City State/Province/Region ZIP/Postal Code

\_\_\_\_\_  
Country

**Address of foreign representative(s):**

520 5th Ave SW, Suite 1610  
Number Street

P.O. Box \_\_\_\_\_

Calgary, Alberta T2P 3R7  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**10. Debtor's website (URL)**

https://monettefarms.ca/

**11. Type of debtor**

Check one:

- Non-individual (check one):
  - Corporation. Attach a corporate ownership statement containing the information described in Fed. R. Bankr. P. 7007.1.
  - Partnership
  - Other. Specify: \_\_\_\_\_
- Individual

Debtor Monette Farms USA, Inc.  
Name

Case number (if known) \_\_\_\_\_

**12. Why is venue proper in this district?**

Check one:

- Debtor's principal place of business or principal assets in the United States are in this district.
- Debtor does not have a place of business or assets in the United States, but the following action or proceeding in a federal or state court is pending against the debtor in this district:  
 \_\_\_\_\_
- If neither box is checked, venue is consistent with the interests of justice and the convenience of the parties, having regard to the relief sought by the foreign representative, because:  
 Affiliate chapter 15 case is pending in this district.  
 \_\_\_\_\_

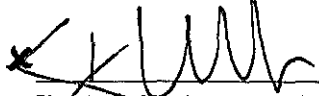
**13. Signature of foreign representative(s)**

I request relief in accordance with chapter 15 of title 11, United States Code.

I am the foreign representative of a debtor in a foreign proceeding, the debtor is eligible for the relief sought in this petition, and I am authorized to file this petition.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct,

 D. HELKAA  
Signature of foreign representative Printed name

Executed on 04/21/2026  
MM / DD / YYYY

X \_\_\_\_\_  
Signature of foreign representative Printed name

Executed on \_\_\_\_\_  
MM / DD / YYYY

**14. Signature of attorney**

X /s/ Jacob R. Kirkham Date 04/21/2026  
Signature of Attorney for foreign representative MM / DD / YYYY

Jacob R. Kirkham  
Printed name

Kobre & Kim LLP  
Firm name

600 North King Street, Suite 501

Wilmington DE 19801  
City State ZIP Code

(302) 518-6456 Jacob.Kirkham@kobrekim.com

5768 DE  
Bar number State

5768 DE  
Bar number State

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

In re:	Chapter 15
Monette Farms USA, Inc.,	Case No. 26-_____( )
Debtors in a Foreign Proceeding.	(Joint Administration Requested)

**CONSOLIDATED LIST PURSUANT TO BANKRUPTCY RULE 1007(a)(4)  
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

FTI Consulting Canada Inc. (“FTI”), in its capacity as the court-appointed monitor (in such capacity, the “Monitor”) and authorized foreign representative (in such capacity, the “Foreign Representative”) of each of the above-captioned debtors (collectively, the “Debtors”), which are the subject of proceedings (the “Canadian Proceedings”) under Canada’s *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36 (as amended, the “CCAA”), pending before the Court of King’s Bench of Alberta (the “Canadian Court”) hereby submits this list on behalf of the Debtors in compliance with the requirements of Rule 1007(a)(4) of the Federal Rules of Bankruptcy Procedure.

**I. All Administrators of the Debtors in Foreign Proceedings**

FTI is the authorized Foreign Representative and court-appointed Monitor in the Canadian Proceedings. To the best of the Foreign Representative’s knowledge, other than the Canadian Proceedings, there are no foreign proceedings pending with respect to any of the Debtors.

The Foreign Representative’s and Monitor’s address is:

FTI Consulting Canada Inc.  
520 5th Avenue SW, Suite 1610  
Calgary, AB T2P 3R7  
Canada

**II. All Parties to Litigation Pending in the United States**

There is no pending litigation in which the Debtors are a party in the United States.

**III. Entities Against Whom Provisional Relief Is Sought**

The Foreign Representative seeks provisional relief on behalf of the Debtors to stay the execution or transfer of assets of the Debtors, and the application of 11 U.S.C. § 362 in the Debtors' Chapter 15 Cases on a provisional basis, against all known creditors of the Debtors and other interested parties, including without limitation, the persons on the creditor matrix.

**IV. Corporate Ownership Statement Pursuant to Rules 1007(a) and 7007 of the Federal Rules of Bankruptcy Procedure**

Pursuant to Rules 1007(a) and 7007.1 of the Federal Rules of Bankruptcy Procedure, the Foreign Representative submits the following list of entities that hold ownership interests in the Debtors. A corporate ownership chart is embedded below for reference. No publicly held corporation owns more than 10% of the stock in any of the Debtors.

**Parent Corporations**

- The Debtors' corporate structure consists of 5 parent corporations:
  - Monette Farms Ltd. ("Monette Farms");
  - Monette Land Corporation ("Monette Land");
  - DMO Holdings Ltd. ("DMO Holdings");
  - Goat's Peak Winery Ltd. ("Goat's Peak Winery"); and
  - Monette Farms BC Ltd. ("Monette Farms BC").
- Darrell Monette owns 100% of the ownership interests in Monette Land, DMO Holdings, Goat's Peak Winery, and Monette Farms BC, and 100% of the preferred shares of Monette Farms.
- The Monette Farms Family Trust owns 100% of the common shares of Monette Farms.

**Monette Farms and Subsidiaries**

- Monette Farms holds 100% of the ownership interests in Monette Farms Ontario Corp., NexGen Seeds Ltd., Monette Produce Ltd., Monette Seeds Ltd., Monette Farms Land GP Ltd., and Monette Farms Land GP II Ltd.

**Monette Land**

- Monette Land Corp. does not have any subsidiaries.

**DMO Holdings and Subsidiaries**

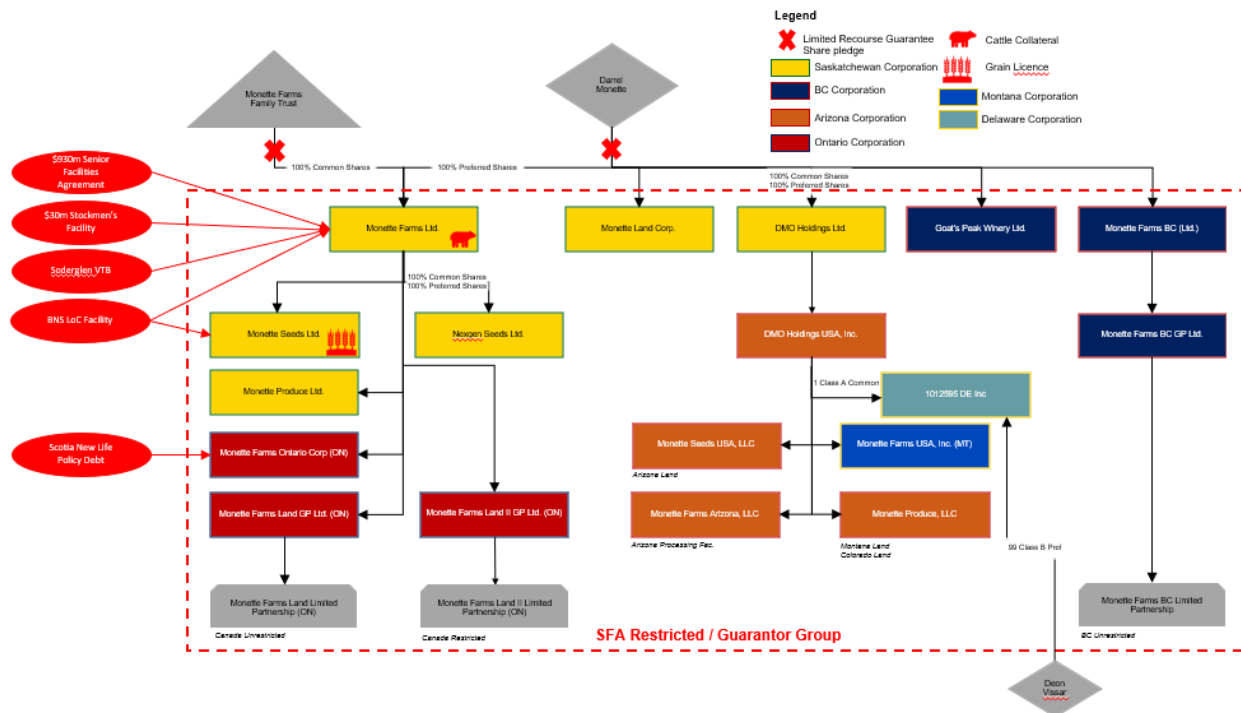
- DMO Holdings owns 100% of the ownership interests in DMO Holdings USA, Inc. (“DMO Holdings USA”).
- DMO Holdings USA owns 100% of the ownership interests in Monette Seeds USA, Monette Farms Arizona, LLC, Monette Farms USA, Inc., and Monette Produce, LLC.
- DMO Holdings is also the majority and sole voting shareholder in 1012595 DE Inc. 1012595 DE Inc.’s second shareholder is an individual named Deon Vissar, who holds 99 Class B Preference Shares (non-voting).

**Goat’s Peak Winery**

- Goat’s Peak Winery does not have any subsidiaries.

**Monette Farms BC**

- Monette Farms BC holds 100% of the ownership interests in Monette Farms BC GP Ltd.



Dated: April 21, 2026  
Wilmington, Delaware

Respectfully submitted,

/s/ Jacob R. Kirkham

**KOBRE & KIM LLP**

Jacob R. Kirkham (No. 5768)  
Stephen J. Astringer (No. 6375)  
600 North King Street, Suite 501  
Wilmington, Delaware 19801  
Telephone: (302) 518-6451  
Facsimile: (302) 518-6461  
jacob.kirkham@kobrekim.com  
stephen.astringer@kobrekim.com

-and-

Daniel J. Saval (*pro hac vice* pending)  
John G. Conte (*pro hac vice* pending)  
Vincent Yiu (*pro hac vice* pending)  
Alaina Heine (*pro hac vice* pending)  
800 Third Avenue  
New York, New York 10022  
Telephone: (212) 488-1259  
Facsimile: (212) 488-1220  
daniel.savall@kobrekim.com  
john.conte@kobrekim.com  
vincent.yiu@kobrekim.com  
alaina.heine@kobrekim.com

*Counsel to the Foreign Representative*

**Fill in this information to identify the case:**

United States Bankruptcy Court for the:  
 District of Delaware  
 Case number (if known): \_\_\_\_\_ Chapter 15

Check if this is an amended filing

Official Form 401

**Chapter 15 Petition for Recognition of a Foreign Proceeding**

12/15

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write debtor's name and case number (if known).

1. Debtor's name Monette Land Corp.

2. Debtor's unique identifier

**For non-individual debtors:**

Federal Employer Identification Number (EIN) \_\_\_\_\_ - \_\_\_\_\_

Other Business Number \_\_\_\_\_ Describe identifier 736239609

**For individual debtors:**

Social Security number: xxx - xx- \_\_\_\_\_

Individual Taxpayer Identification number (ITIN): 9 xx - xx - \_\_\_\_\_

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

3. Name of foreign representative(s) FTI Consulting Canada Inc.

4. Foreign proceeding in which appointment of the foreign representative(s) occurred CCAA Proceeding – Court of King's Bench of Alberta (Calgary)

5. Nature of the foreign proceeding

Check one:

- Foreign main proceeding
- Foreign nonmain proceeding
- Foreign main proceeding, or in the alternative foreign nonmain proceeding

6. Evidence of the foreign proceeding

- A certified copy, translated into English, of the decision commencing the foreign proceeding and appointing the foreign representative is attached.
- A certificate, translated into English, from the foreign court, affirming the existence of the foreign proceeding and of the appointment of the foreign representative, is attached.
- Other evidence of the existence of the foreign proceeding and of the appointment of the foreign representative is described below, and relevant documentation, translated into English, is attached.  
Copy of the Initial Order will be filed with the Court.

7. Is this the only foreign proceeding with respect to the debtor known to the foreign representative(s)?

- No. (Attach a statement identifying each country in which a foreign proceeding by, regarding, or against the debtor is pending.)
- Yes

Debtor Monette Land Corp.  
Name

Case number (if known) \_\_\_\_\_

**8. Others entitled to notice**

Attach a list containing the names and addresses of:

- (i) all persons or bodies authorized to administer foreign proceedings of the debtor,
- (ii) all parties to litigation pending in the United States in which the debtor is a party at the time of filing of this petition, and
- (iii) all entities against whom provisional relief is being sought under § 1519 of the Bankruptcy Code.

**9. Addresses**

**Country where the debtor has the center of its main interests:**

Canada

**Debtor's registered office:**

51 1st Ave NW  
Number Street

\_\_\_\_\_  
P.O. Box

Swift Current, Saskatchewan S9H 0M5  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**Individual debtor's habitual residence:**

\_\_\_\_\_  
Number Street

\_\_\_\_\_  
P.O. Box

\_\_\_\_\_  
City State/Province/Region ZIP/Postal Code

\_\_\_\_\_  
Country

**Address of foreign representative(s):**

520 5th Ave SW, Suite 1610  
Number Street

\_\_\_\_\_  
P.O. Box

Calgary, Alberta T2P 3R7  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**10. Debtor's website (URL)**

https://monettefarms.ca/

**11. Type of debtor**

Check one:

- Non-individual (check one):
  - Corporation. Attach a corporate ownership statement containing the information described in Fed. R. Bankr. P. 7007.1.
  - Partnership
  - Other. Specify: \_\_\_\_\_
- Individual

Debtor Monette Land Corp.  
Name

Case number (if known) \_\_\_\_\_

**12. Why is venue proper in this district?**

Check one:

- Debtor's principal place of business or principal assets in the United States are in this district.
- Debtor does not have a place of business or assets in the United States, but the following action or proceeding in a federal or state court is pending against the debtor in this district:  
\_\_\_\_\_
- If neither box is checked, venue is consistent with the interests of justice and the convenience of the parties, having regard to the relief sought by the foreign representative, because:  
\_\_\_\_\_

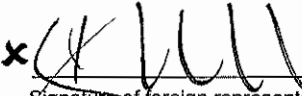
**13. Signature of foreign representative(s)**

I request relief in accordance with chapter 15 of title 11, United States Code.

I am the foreign representative of a debtor in a foreign proceeding, the debtor is eligible for the relief sought in this petition, and I am authorized to file this petition.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct,

 D. HELKAA  
Signature of foreign representative Printed name

Executed on 4/21/2026  
MM / DD / YYYY

X \_\_\_\_\_  
Signature of foreign representative Printed name

Executed on \_\_\_\_\_  
MM / DD / YYYY

**14. Signature of attorney**

X /s/ Jacob R. Kirkham Date 04/21/2026  
Signature of Attorney for foreign representative MM / DD / YYYY

Jacob R. Kirkham  
Printed name

Kobre & Kim LLP  
Firm name

600 North King Street, Suite 501

Wilmington DE 19801  
City State ZIP Code

(302) 518-6456 Jacob.Kirkham@kobrekim.com  
Contact phone Email address

5768 DE  
Bar number State

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

In re:	Chapter 15
Monette Land Corp.,	Case No. 26-_____( )
Debtors in a Foreign Proceeding.	(Joint Administration Requested)

**CONSOLIDATED LIST PURSUANT TO BANKRUPTCY RULE 1007(a)(4)  
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

FTI Consulting Canada Inc. (“FTI”), in its capacity as the court-appointed monitor (in such capacity, the “Monitor”) and authorized foreign representative (in such capacity, the “Foreign Representative”) of each of the above-captioned debtors (collectively, the “Debtors”), which are the subject of proceedings (the “Canadian Proceedings”) under Canada’s *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36 (as amended, the “CCAA”), pending before the Court of King’s Bench of Alberta (the “Canadian Court”) hereby submits this list on behalf of the Debtors in compliance with the requirements of Rule 1007(a)(4) of the Federal Rules of Bankruptcy Procedure.

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FTI is the authorized Foreign Representative and court-appointed Monitor in the Canadian Proceedings. To the best of the Foreign Representative’s knowledge, other than the Canadian Proceedings, there are no foreign proceedings pending with respect to any of the Debtors.

The Foreign Representative’s and Monitor’s address is:

FTI Consulting Canada Inc.  
520 5th Avenue SW, Suite 1610  
Calgary, AB T2P 3R7  
Canada

**II. All Parties to Litigation Pending in the United States**

There is no pending litigation in which the Debtors are a party in the United States.

**III. Entities Against Whom Provisional Relief Is Sought**

The Foreign Representative seeks provisional relief on behalf of the Debtors to stay the execution or transfer of assets of the Debtors, and the application of 11 U.S.C. § 362 in the Debtors' Chapter 15 Cases on a provisional basis, against all known creditors of the Debtors and other interested parties, including without limitation, the persons on the creditor matrix.

**IV. Corporate Ownership Statement Pursuant to Rules 1007(a) and 7007 of the Federal Rules of Bankruptcy Procedure**

Pursuant to Rules 1007(a) and 7007.1 of the Federal Rules of Bankruptcy Procedure, the Foreign Representative submits the following list of entities that hold ownership interests in the Debtors. A corporate ownership chart is embedded below for reference. No publicly held corporation owns more than 10% of the stock in any of the Debtors.

**Parent Corporations**

- The Debtors' corporate structure consists of 5 parent corporations:
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  - Monette Land Corporation ("Monette Land");
  - DMO Holdings Ltd. ("DMO Holdings");
  - Goat's Peak Winery Ltd. ("Goat's Peak Winery"); and
  - Monette Farms BC Ltd. ("Monette Farms BC").
- Darrell Monette owns 100% of the ownership interests in Monette Land, DMO Holdings, Goat's Peak Winery, and Monette Farms BC, and 100% of the preferred shares of Monette Farms.
- The Monette Farms Family Trust owns 100% of the common shares of Monette Farms.

**Monette Farms and Subsidiaries**

- Monette Farms holds 100% of the ownership interests in Monette Farms Ontario Corp., NexGen Seeds Ltd., Monette Produce Ltd., Monette Seeds Ltd., Monette Farms Land GP Ltd., and Monette Farms Land GP II Ltd.

**Monette Land**

- Monette Land Corp. does not have any subsidiaries.

**DMO Holdings and Subsidiaries**

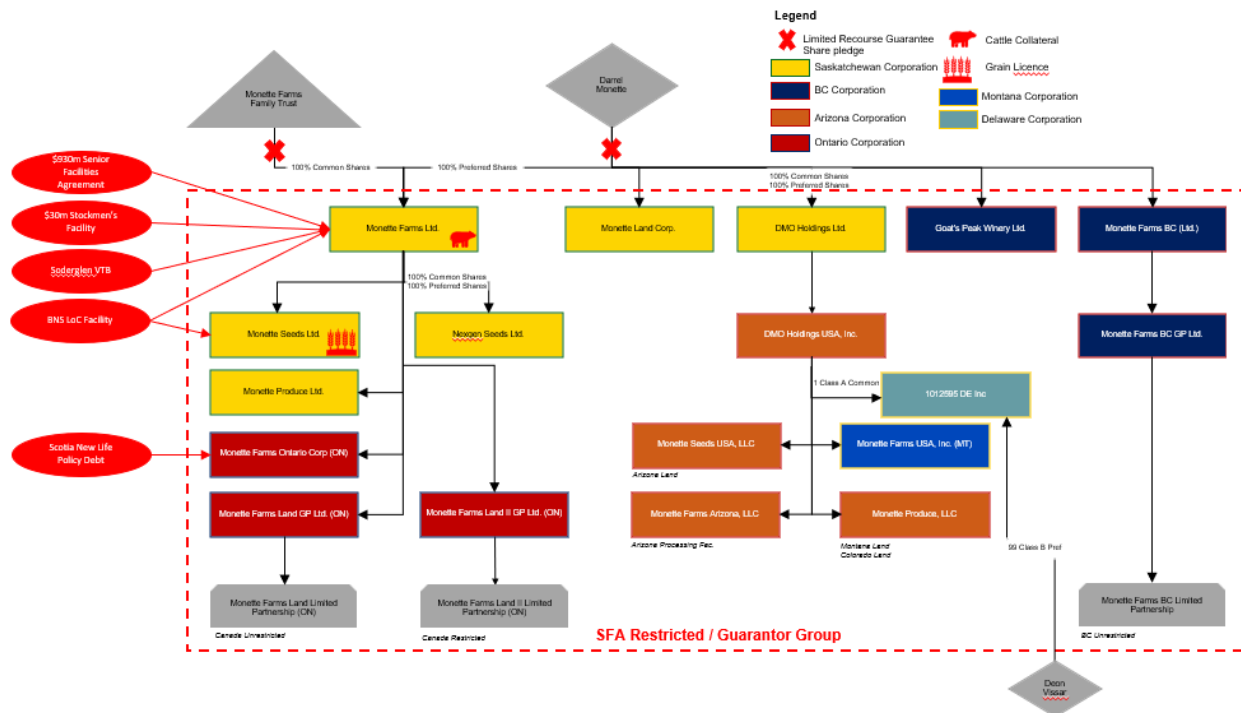
- DMO Holdings owns 100% of the ownership interests in DMO Holdings USA, Inc. (“DMO Holdings USA”).
- DMO Holdings USA owns 100% of the ownership interests in Monette Seeds USA, Monette Farms Arizona, LLC, Monette Farms USA, Inc., and Monette Produce, LLC.
- DMO Holdings is also the majority and sole voting shareholder in 1012595 DE Inc. 1012595 DE Inc.’s second shareholder is an individual named Deon Vissar, who holds 99 Class B Preference Shares (non-voting).

**Goat’s Peak Winery**

- Goat’s Peak Winery does not have any subsidiaries.

**Monette Farms BC**

- Monette Farms BC holds 100% of the ownership interests in Monette Farms BC GP Ltd.



Dated: April 21, 2026  
Wilmington, Delaware

Respectfully submitted,

/s/ Jacob R. Kirkham

**KOBRE & KIM LLP**

Jacob R. Kirkham (No. 5768)  
Stephen J. Astringer (No. 6375)  
600 North King Street, Suite 501  
Wilmington, Delaware 19801  
Telephone: (302) 518-6451  
Facsimile: (302) 518-6461  
jacob.kirkham@kobrekim.com  
stephen.astringer@kobrekim.com

-and-

Daniel J. Saval (*pro hac vice* pending)  
John G. Conte (*pro hac vice* pending)  
Vincent Yiu (*pro hac vice* pending)  
Alaina Heine (*pro hac vice* pending)  
800 Third Avenue  
New York, New York 10022  
Telephone: (212) 488-1259  
Facsimile: (212) 488-1220  
daniel.savall@kobrekim.com  
john.conte@kobrekim.com  
vincent.yiu@kobrekim.com  
alaina.heine@kobrekim.com

*Counsel to the Foreign Representative*

**Fill in this information to identify the case:**

United States Bankruptcy Court for the:  
 District of Delaware  
 Case number (if known): \_\_\_\_\_ Chapter 15

Check if this is an amended filing

Official Form 401

**Chapter 15 Petition for Recognition of a Foreign Proceeding**

12/15

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write debtor's name and case number (if known).

1. Debtor's name Monette Produce Ltd.

2. Debtor's unique identifier

**For non-individual debtors:**

Federal Employer Identification Number (EIN) \_\_\_\_\_ - \_\_\_\_\_

Other 753340959. Describe identifier Business Number.

**For individual debtors:**

Social Security number: xxx - xx- \_\_\_\_\_

Individual Taxpayer Identification number (ITIN): 9 xx - xx - \_\_\_\_\_

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

3. Name of foreign representative(s) FTI Consulting Canada Inc.

4. Foreign proceeding in which appointment of the foreign representative(s) occurred CCAA Proceeding – Court of King's Bench of Alberta (Calgary)

5. Nature of the foreign proceeding

Check one:

- Foreign main proceeding
- Foreign nonmain proceeding
- Foreign main proceeding, or in the alternative foreign nonmain proceeding

6. Evidence of the foreign proceeding

- A certified copy, translated into English, of the decision commencing the foreign proceeding and appointing the foreign representative is attached.
- A certificate, translated into English, from the foreign court, affirming the existence of the foreign proceeding and of the appointment of the foreign representative, is attached.
- Other evidence of the existence of the foreign proceeding and of the appointment of the foreign representative is described below, and relevant documentation, translated into English, is attached.  
Copy of the Initial Order will be filed with the Court.

7. Is this the only foreign proceeding with respect to the debtor known to the foreign representative(s)?

- No. (Attach a statement identifying each country in which a foreign proceeding by, regarding, or against the debtor is pending.)
- Yes

Debtor Monette Produce Ltd.  
Name

Case number (if known) \_\_\_\_\_

**8. Others entitled to notice**

Attach a list containing the names and addresses of:

- (i) all persons or bodies authorized to administer foreign proceedings of the debtor,
- (ii) all parties to litigation pending in the United States in which the debtor is a party at the time of filing of this petition, and
- (iii) all entities against whom provisional relief is being sought under § 1519 of the Bankruptcy Code.

**9. Addresses**

**Country where the debtor has the center of its main interests:**

Canada

**Debtor's registered office:**

410-475 2nd Avenue South  
Number Street

\_\_\_\_\_  
P.O. Box

Saskatoon, Saskatchewan S7K 1P4  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**Individual debtor's habitual residence:**

\_\_\_\_\_  
Number Street

\_\_\_\_\_  
P.O. Box

\_\_\_\_\_  
City State/Province/Region ZIP/Postal Code

\_\_\_\_\_  
Country

**Address of foreign representative(s):**

520 5th Ave SW, Suite 1610  
Number Street

\_\_\_\_\_  
P.O. Box

Calgary, Alberta T2P 3R7  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**10. Debtor's website (URL)**

https://monettefarms.ca/

**11. Type of debtor**

Check one:

- Non-individual (check one):
  - Corporation. Attach a corporate ownership statement containing the information described in Fed. R. Bankr. P. 7007.1.
  - Partnership
  - Other. Specify: \_\_\_\_\_
- Individual

Debtor Monette Produce Ltd.  
Name

Case number (if known) \_\_\_\_\_

12. Why is venue proper in this district?

Check one:

- Debtor's principal place of business or principal assets in the United States are in this district.
- Debtor does not have a place of business or assets in the United States, but the following action or proceeding in a federal or state court is pending against the debtor in this district:  
\_\_\_\_\_
- If neither box is checked, venue is consistent with the interests of justice and the convenience of the parties, having regard to the relief sought by the foreign representative, because:  
\_\_\_\_\_

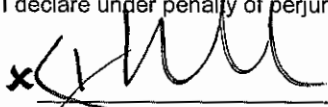
13. Signature of foreign representative(s)

I request relief in accordance with chapter 15 of title 11, United States Code.

I am the foreign representative of a debtor in a foreign proceeding, the debtor is eligible for the relief sought in this petition, and I am authorized to file this petition.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct,

 D. HELKAN  
Signature of foreign representative Printed name

Executed on 4/21/2026  
MM / DD / YYYY

X \_\_\_\_\_  
Signature of foreign representative Printed name

Executed on \_\_\_\_\_  
MM / DD / YYYY

14. Signature of attorney

X /s/ Jacob R. Kirkham Date 04/21/2026  
Signature of Attorney for foreign representative MM / DD / YYYY

Jacob R. Kirkham  
Printed name  
Kobre & Kim LLP  
Firm name  
600 North King Street, Suite 501  
Number Street  
Wilmington DE 19801  
City State ZIP Code  
(302) 518-6456 Jacob.Kirkham@kobrekim.com  
Contact phone Email address  
5768 DE  
Bar number State

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

In re:	Chapter 15
Monette Produce Ltd.,	Case No. 26-_____( )
Debtors in a Foreign Proceeding.	(Joint Administration Requested)

**CONSOLIDATED LIST PURSUANT TO BANKRUPTCY RULE 1007(a)(4)  
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

FTI Consulting Canada Inc. (“FTI”), in its capacity as the court-appointed monitor (in such capacity, the “Monitor”) and authorized foreign representative (in such capacity, the “Foreign Representative”) of each of the above-captioned debtors (collectively, the “Debtors”), which are the subject of proceedings (the “Canadian Proceedings”) under Canada’s *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36 (as amended, the “CCAA”), pending before the Court of King’s Bench of Alberta (the “Canadian Court”) hereby submits this list on behalf of the Debtors in compliance with the requirements of Rule 1007(a)(4) of the Federal Rules of Bankruptcy Procedure.

**I. All Administrators of the Debtors in Foreign Proceedings**

FTI is the authorized Foreign Representative and court-appointed Monitor in the Canadian Proceedings. To the best of the Foreign Representative’s knowledge, other than the Canadian Proceedings, there are no foreign proceedings pending with respect to any of the Debtors.

The Foreign Representative’s and Monitor’s address is:

FTI Consulting Canada Inc.  
520 5th Avenue SW, Suite 1610  
Calgary, AB T2P 3R7  
Canada

**II. All Parties to Litigation Pending in the United States**

There is no pending litigation in which the Debtors are a party in the United States.

**III. Entities Against Whom Provisional Relief Is Sought**

The Foreign Representative seeks provisional relief on behalf of the Debtors to stay the execution or transfer of assets of the Debtors, and the application of 11 U.S.C. § 362 in the Debtors' Chapter 15 Cases on a provisional basis, against all known creditors of the Debtors and other interested parties, including without limitation, the persons on the creditor matrix.

**IV. Corporate Ownership Statement Pursuant to Rules 1007(a) and 7007 of the Federal Rules of Bankruptcy Procedure**

Pursuant to Rules 1007(a) and 7007.1 of the Federal Rules of Bankruptcy Procedure, the Foreign Representative submits the following list of entities that hold ownership interests in the Debtors. A corporate ownership chart is embedded below for reference. No publicly held corporation owns more than 10% of the stock in any of the Debtors.

**Parent Corporations**

- The Debtors' corporate structure consists of 5 parent corporations:
  - Monette Farms Ltd. ("Monette Farms");
  - Monette Land Corporation ("Monette Land");
  - DMO Holdings Ltd. ("DMO Holdings");
  - Goat's Peak Winery Ltd. ("Goat's Peak Winery"); and
  - Monette Farms BC Ltd. ("Monette Farms BC").
- Darrell Monette owns 100% of the ownership interests in Monette Land, DMO Holdings, Goat's Peak Winery, and Monette Farms BC, and 100% of the preferred shares of Monette Farms.
- The Monette Farms Family Trust owns 100% of the common shares of Monette Farms.

**Monette Farms and Subsidiaries**

- Monette Farms holds 100% of the ownership interests in Monette Farms Ontario Corp., NexGen Seeds Ltd., Monette Produce Ltd., Monette Seeds Ltd., Monette Farms Land GP Ltd., and Monette Farms Land GP II Ltd.

**Monette Land**

- Monette Land Corp. does not have any subsidiaries.

**DMO Holdings and Subsidiaries**

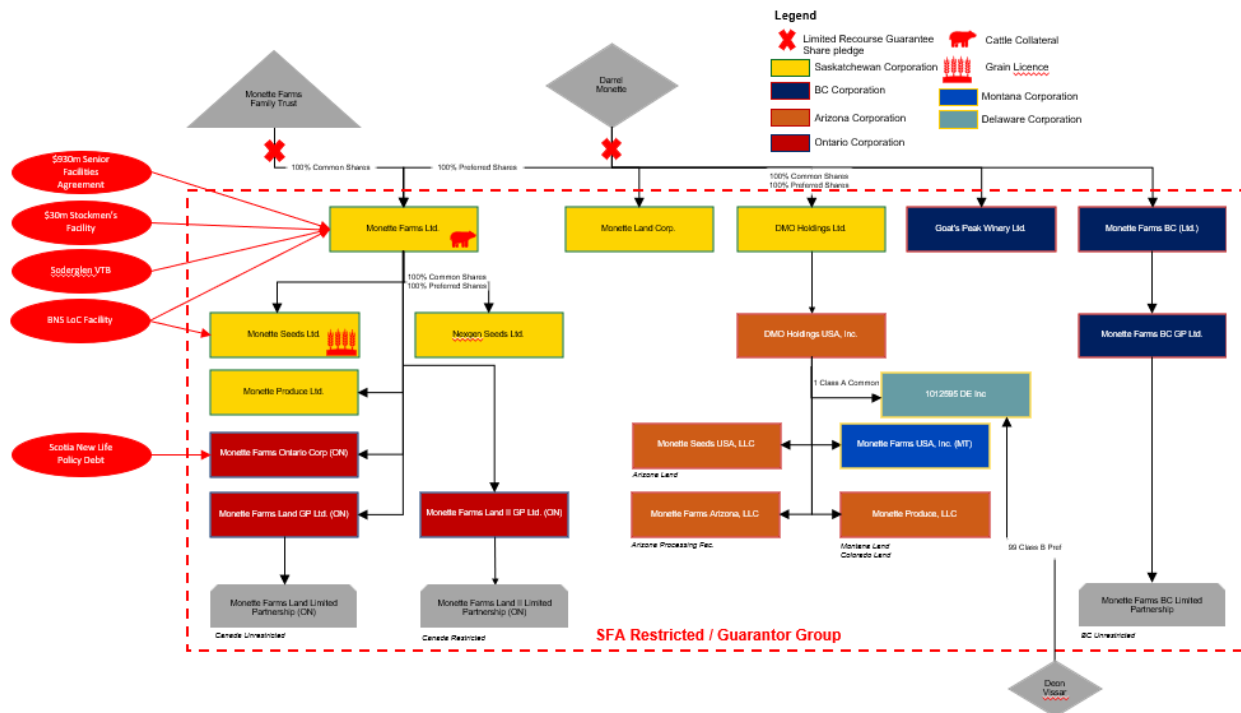
- DMO Holdings owns 100% of the ownership interests in DMO Holdings USA, Inc. (“DMO Holdings USA”).
- DMO Holdings USA owns 100% of the ownership interests in Monette Seeds USA, Monette Farms Arizona, LLC, Monette Farms USA, Inc., and Monette Produce, LLC.
- DMO Holdings is also the majority and sole voting shareholder in 1012595 DE Inc. 1012595 DE Inc.’s second shareholder is an individual named Deon Vissar, who holds 99 Class B Preference Shares (non-voting).

**Goat’s Peak Winery**

- Goat’s Peak Winery does not have any subsidiaries.

**Monette Farms BC**

- Monette Farms BC holds 100% of the ownership interests in Monette Farms BC GP Ltd.



Dated: April 21, 2026  
Wilmington, Delaware

Respectfully submitted,

/s/ Jacob R. Kirkham

**KOBRE & KIM LLP**

Jacob R. Kirkham (No. 5768)  
Stephen J. Astringer (No. 6375)  
600 North King Street, Suite 501  
Wilmington, Delaware 19801  
Telephone: (302) 518-6451  
Facsimile: (302) 518-6461  
jacob.kirkham@kobrekim.com  
stephen.astringer@kobrekim.com

-and-

Daniel J. Saval (*pro hac vice* pending)  
John G. Conte (*pro hac vice* pending)  
Vincent Yiu (*pro hac vice* pending)  
Alaina Heine (*pro hac vice* pending)  
800 Third Avenue  
New York, New York 10022  
Telephone: (212) 488-1259  
Facsimile: (212) 488-1220  
daniel.savall@kobrekim.com  
john.conte@kobrekim.com  
vincent.yiu@kobrekim.com  
alaina.heine@kobrekim.com

*Counsel to the Foreign Representative*

**Fill in this information to identify the case:**

United States Bankruptcy Court for the:  
 District of Delaware  
 Case number (if known): \_\_\_\_\_ Chapter 15

Check if this is an amended filing

Official Form 401

**Chapter 15 Petition for Recognition of a Foreign Proceeding**

12/15

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write debtor's name and case number (if known).

1. Debtor's name Monette Produce, LLC

2. Debtor's unique identifier

**For non-individual debtors:**

Federal Employer Identification Number (EIN) 9 9 -2 6 6 9 4 1 9

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

**For individual debtors:**

Social Security number: xxx - xx- \_\_\_\_\_

Individual Taxpayer Identification number (ITIN): 9 xx - xx - \_\_\_\_\_

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

3. Name of foreign representative(s) FTI Consulting Canada Inc.

4. Foreign proceeding in which appointment of the foreign representative(s) occurred CCAA Proceeding - Court of King's Bench of Alberta (Calgary)

5. Nature of the foreign proceeding

Check one:

Foreign main proceeding

Foreign nonmain proceeding

Foreign main proceeding, or in the alternative foreign nonmain proceeding

6. Evidence of the foreign proceeding

A certified copy, translated into English, of the decision commencing the foreign proceeding and appointing the foreign representative is attached.

A certificate, translated into English, from the foreign court, affirming the existence of the foreign proceeding and of the appointment of the foreign representative, is attached.

Other evidence of the existence of the foreign proceeding and of the appointment of the foreign representative is described below, and relevant documentation, translated into English, is attached.  
Copy of the Initial Order will be filed with the Court.

7. Is this the only foreign proceeding with respect to the debtor known to the foreign representative(s)?

No. (Attach a statement identifying each country in which a foreign proceeding by, regarding, or against the debtor is pending.)

Yes

Debtor Monette Produce, LLC  
Name

Case number (if known) \_\_\_\_\_

**8. Others entitled to notice**

Attach a list containing the names and addresses of:

- (i) all persons or bodies authorized to administer foreign proceedings of the debtor,
- (ii) all parties to litigation pending in the United States in which the debtor is a party at the time of filing of this petition, and
- (iii) all entities against whom provisional relief is being sought under § 1519 of the Bankruptcy Code.

**9. Addresses**

**Country where the debtor has the center of its main interests:**

Canada

**Debtor's registered office:**

39332 W. Camelback Rd.  
Number Street

P.O. Box

Tonopah, Arizona 85354  
City State/Province/Region ZIP/Postal Code

United States of America  
Country

**Individual debtor's habitual residence:**

Number Street

P.O. Box

City State/Province/Region ZIP/Postal Code

Country

**Address of foreign representative(s):**

520 5th Ave SW, Suite 1610  
Number Street

P.O. Box

Calgary, Alberta T2P 3R7  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**10. Debtor's website (URL)**

https://monettefarms.ca/

**11. Type of debtor**

Check one:

- Non-individual (check one):
  - Corporation. Attach a corporate ownership statement containing the information described in Fed. R. Bankr. P. 7007.1.
  - Partnership
  - Other. Specify: \_\_\_\_\_
- Individual

Debtor Monette Produce, LLC  
Name

Case number (if known) \_\_\_\_\_

12. Why is venue proper in this district?

Check one:

- Debtor's principal place of business or principal assets in the United States are in this district.
- Debtor does not have a place of business or assets in the United States, but the following action or proceeding in a federal or state court is pending against the debtor in this district:  
\_\_\_\_\_
- If neither box is checked, venue is consistent with the interests of justice and the convenience of the parties, having regard to the relief sought by the foreign representative, because:  
Affiliate chapter 15 case is pending in this district.  
\_\_\_\_\_

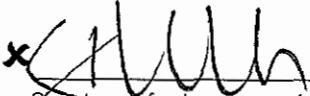

13. Signature of foreign representative(s)

I request relief in accordance with chapter 15 of title 11, United States Code.

I am the foreign representative of a debtor in a foreign proceeding, the debtor is eligible for the relief sought in this petition, and I am authorized to file this petition.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct,

   
Signature of foreign representative Printed name

Executed on 4/20/2026  
MM / DD / YYYY

X \_\_\_\_\_  
Signature of foreign representative Printed name

Executed on \_\_\_\_\_  
MM / DD / YYYY

14. Signature of attorney

X /s/ Jacob R. Kirkham Date 04/21/2026  
Signature of Attorney for foreign representative MM / DD / YYYY

Jacob R. Kirkham  
Printed name

Kobre & Kim LLP  
Firm name

600 North King Street, Suite 501  
Number Street

Wilmington DE 19801  
City State ZIP Code

(302) 518-6456 Jacob.Kirkham@Kobrekim.com  
Contact phone Email address

5768 DE  
Bar number State

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

In re:	Chapter 15
Monette Produce, LLC,	Case No. 26-_____( )
Debtors in a Foreign Proceeding.	(Joint Administration Requested)

**CONSOLIDATED LIST PURSUANT TO BANKRUPTCY RULE 1007(a)(4)  
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

FTI Consulting Canada Inc. (“FTI”), in its capacity as the court-appointed monitor (in such capacity, the “Monitor”) and authorized foreign representative (in such capacity, the “Foreign Representative”) of each of the above-captioned debtors (collectively, the “Debtors”), which are the subject of proceedings (the “Canadian Proceedings”) under Canada’s *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36 (as amended, the “CCAA”), pending before the Court of King’s Bench of Alberta (the “Canadian Court”) hereby submits this list on behalf of the Debtors in compliance with the requirements of Rule 1007(a)(4) of the Federal Rules of Bankruptcy Procedure.

**I. All Administrators of the Debtors in Foreign Proceedings**

FTI is the authorized Foreign Representative and court-appointed Monitor in the Canadian Proceedings. To the best of the Foreign Representative’s knowledge, other than the Canadian Proceedings, there are no foreign proceedings pending with respect to any of the Debtors.

The Foreign Representative’s and Monitor’s address is:

FTI Consulting Canada Inc.  
520 5th Avenue SW, Suite 1610  
Calgary, AB T2P 3R7  
Canada

**II. All Parties to Litigation Pending in the United States**

There is no pending litigation in which the Debtors are a party in the United States.

**III. Entities Against Whom Provisional Relief Is Sought**

The Foreign Representative seeks provisional relief on behalf of the Debtors to stay the execution or transfer of assets of the Debtors, and the application of 11 U.S.C. § 362 in the Debtors' Chapter 15 Cases on a provisional basis, against all known creditors of the Debtors and other interested parties, including without limitation, the persons on the creditor matrix.

**IV. Corporate Ownership Statement Pursuant to Rules 1007(a) and 7007 of the Federal Rules of Bankruptcy Procedure**

Pursuant to Rules 1007(a) and 7007.1 of the Federal Rules of Bankruptcy Procedure, the Foreign Representative submits the following list of entities that hold ownership interests in the Debtors. A corporate ownership chart is embedded below for reference. No publicly held corporation owns more than 10% of the stock in any of the Debtors.

**Parent Corporations**

- The Debtors' corporate structure consists of 5 parent corporations:
  - Monette Farms Ltd. ("Monette Farms");
  - Monette Land Corporation ("Monette Land");
  - DMO Holdings Ltd. ("DMO Holdings");
  - Goat's Peak Winery Ltd. ("Goat's Peak Winery"); and
  - Monette Farms BC Ltd. ("Monette Farms BC").
- Darrell Monette owns 100% of the ownership interests in Monette Land, DMO Holdings, Goat's Peak Winery, and Monette Farms BC, and 100% of the preferred shares of Monette Farms.
- The Monette Farms Family Trust owns 100% of the common shares of Monette Farms.

**Monette Farms and Subsidiaries**

- Monette Farms holds 100% of the ownership interests in Monette Farms Ontario Corp., NexGen Seeds Ltd., Monette Produce Ltd., Monette Seeds Ltd., Monette Farms Land GP Ltd., and Monette Farms Land GP II Ltd.

**Monette Land**

- Monette Land Corp. does not have any subsidiaries.

**DMO Holdings and Subsidiaries**

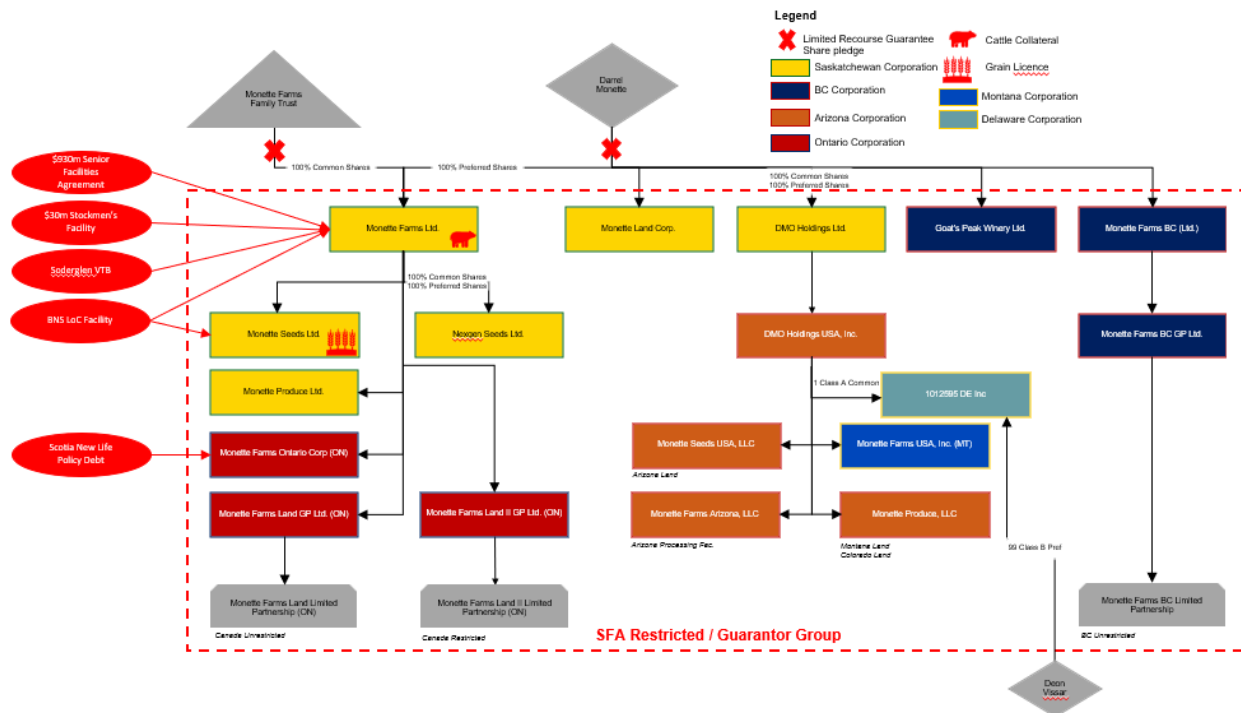
- DMO Holdings owns 100% of the ownership interests in DMO Holdings USA, Inc. (“DMO Holdings USA”).
- DMO Holdings USA owns 100% of the ownership interests in Monette Seeds USA, Monette Farms Arizona, LLC, Monette Farms USA, Inc., and Monette Produce, LLC.
- DMO Holdings is also the majority and sole voting shareholder in 1012595 DE Inc. 1012595 DE Inc.’s second shareholder is an individual named Deon Vissar, who holds 99 Class B Preference Shares (non-voting).

**Goat’s Peak Winery**

- Goat’s Peak Winery does not have any subsidiaries.

**Monette Farms BC**

- Monette Farms BC holds 100% of the ownership interests in Monette Farms BC GP Ltd.



Dated: April 21, 2026  
Wilmington, Delaware

Respectfully submitted,

/s/ Jacob R. Kirkham

**KOBRE & KIM LLP**

Jacob R. Kirkham (No. 5768)  
Stephen J. Astringer (No. 6375)  
600 North King Street, Suite 501  
Wilmington, Delaware 19801  
Telephone: (302) 518-6451  
Facsimile: (302) 518-6461  
jacob.kirkham@kobrekim.com  
stephen.astringer@kobrekim.com

-and-

Daniel J. Saval (*pro hac vice* pending)  
John G. Conte (*pro hac vice* pending)  
Vincent Yiu (*pro hac vice* pending)  
Alaina Heine (*pro hac vice* pending)  
800 Third Avenue  
New York, New York 10022  
Telephone: (212) 488-1259  
Facsimile: (212) 488-1220  
daniel.savall@kobrekim.com  
john.conte@kobrekim.com  
vincent.yiu@kobrekim.com  
alaina.heine@kobrekim.com

*Counsel to the Foreign Representative*

**Fill in this information to identify the case:**

United States Bankruptcy Court for the:  
 District of Delaware  
 Case number (if known): \_\_\_\_\_ Chapter 15

Check if this is an amended filing

Official Form 401

**Chapter 15 Petition for Recognition of a Foreign Proceeding**

12/15

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write debtor's name and case number (if known).

1. Debtor's name Monette Seeds Ltd.

2. Debtor's unique identifier

**For non-individual debtors:**

Federal Employer Identification Number (EIN) \_\_\_\_\_ - \_\_\_\_\_

Other 709865307. Describe identifier Business Number.

**For individual debtors:**

Social Security number: xxx - xx- \_\_\_\_\_

Individual Taxpayer Identification number (ITIN): 9 xx - xx - \_\_\_\_\_

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

3. Name of foreign representative(s) FTI Consulting Canada Inc.

4. Foreign proceeding in which appointment of the foreign representative(s) occurred CCAA Proceeding – Court of King's Bench of Alberta (Calgary)

5. Nature of the foreign proceeding

Check one:

Foreign main proceeding

Foreign nonmain proceeding

Foreign main proceeding, or in the alternative foreign nonmain proceeding

6. Evidence of the foreign proceeding

A certified copy, translated into English, of the decision commencing the foreign proceeding and appointing the foreign representative is attached.

A certificate, translated into English, from the foreign court, affirming the existence of the foreign proceeding and of the appointment of the foreign representative, is attached.

Other evidence of the existence of the foreign proceeding and of the appointment of the foreign representative is described below, and relevant documentation, translated into English, is attached.  
Copy of the Initial Order will be filed with the Court.

7. Is this the only foreign proceeding with respect to the debtor known to the foreign representative(s)?

No. (Attach a statement identifying each country in which a foreign proceeding by, regarding, or against the debtor is pending.)

Yes

Debtor Monette Seeds Ltd.  
Name

Case number (if known) \_\_\_\_\_

**8. Others entitled to notice**

Attach a list containing the names and addresses of:

- (i) all persons or bodies authorized to administer foreign proceedings of the debtor,
- (ii) all parties to litigation pending in the United States in which the debtor is a party at the time of filing of this petition, and
- (iii) all entities against whom provisional relief is being sought under § 1519 of the Bankruptcy Code.

**9. Addresses**

**Country where the debtor has the center of its main interests:**

Canada

**Debtor's registered office:**

51 1st Ave NW  
Number Street

\_\_\_\_\_  
P.O. Box

Swift Current, Saskatchewan S9H 0M5  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**Individual debtor's habitual residence:**

\_\_\_\_\_  
Number Street

\_\_\_\_\_  
P.O. Box

\_\_\_\_\_  
City State/Province/Region ZIP/Postal Code

\_\_\_\_\_  
Country

**Address of foreign representative(s):**

520 5th Ave SW, Suite 1610  
Number Street

\_\_\_\_\_  
P.O. Box

Calgary, Alberta T2P 3R7  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**10. Debtor's website (URL)**

https://monettefarms.ca/

**11. Type of debtor**

Check one:

- Non-individual (check one):
  - Corporation. Attach a corporate ownership statement containing the information described in Fed. R. Bankr. P. 7007.1.
  - Partnership
  - Other. Specify: \_\_\_\_\_
- Individual

Debtor Monette Seeds Ltd.  
Name

Case number (if known) \_\_\_\_\_

12. Why is venue proper in this district?

Check one:

- Debtor's principal place of business or principal assets in the United States are in this district.
- Debtor does not have a place of business or assets in the United States, but the following action or proceeding in a federal or state court is pending against the debtor in this district:  
\_\_\_\_\_
- If neither box is checked, venue is consistent with the interests of justice and the convenience of the parties, having regard to the relief sought by the foreign representative, because:  
\_\_\_\_\_

13. Signature of foreign representative(s)

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I declare under penalty of perjury that the foregoing is true and correct,

x [Signature] \_\_\_\_\_ Printed name D. HELKAA  
Signature of foreign representative  
Executed on 4/21/2026  
MM / DD / YYYY

x \_\_\_\_\_ Printed name \_\_\_\_\_  
Signature of foreign representative  
Executed on \_\_\_\_\_  
MM / DD / YYYY

14. Signature of attorney

x /s/ Jacob R. Kirkham \_\_\_\_\_ Date 04/21/2026  
Signature of Attorney for foreign representative MM / DD / YYYY

Jacob R. Kirkham \_\_\_\_\_  
Printed name  
Kobre & Kim LLP \_\_\_\_\_  
Firm name  
600 North King Street, Suite 501 \_\_\_\_\_  
Number Street  
Wilmington \_\_\_\_\_ DE 19801  
City State ZIP Code  
(302) 518-6456 \_\_\_\_\_ Jacob.Kirkham@kobrekim.com  
Contact phone Email address  
5768 \_\_\_\_\_ DE  
Bar number State

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

In re:	Chapter 15
Monette Seeds Ltd.,	Case No. 26-_____( )
Debtors in a Foreign Proceeding.	(Joint Administration Requested)

**CONSOLIDATED LIST PURSUANT TO BANKRUPTCY RULE 1007(a)(4)  
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520 5th Avenue SW, Suite 1610  
Calgary, AB T2P 3R7  
Canada

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There is no pending litigation in which the Debtors are a party in the United States.

**III. Entities Against Whom Provisional Relief Is Sought**

The Foreign Representative seeks provisional relief on behalf of the Debtors to stay the execution or transfer of assets of the Debtors, and the application of 11 U.S.C. § 362 in the Debtors' Chapter 15 Cases on a provisional basis, against all known creditors of the Debtors and other interested parties, including without limitation, the persons on the creditor matrix.

**IV. Corporate Ownership Statement Pursuant to Rules 1007(a) and 7007 of the Federal Rules of Bankruptcy Procedure**

Pursuant to Rules 1007(a) and 7007.1 of the Federal Rules of Bankruptcy Procedure, the Foreign Representative submits the following list of entities that hold ownership interests in the Debtors. A corporate ownership chart is embedded below for reference. No publicly held corporation owns more than 10% of the stock in any of the Debtors.

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  - Monette Farms Ltd. ("Monette Farms");
  - Monette Land Corporation ("Monette Land");
  - DMO Holdings Ltd. ("DMO Holdings");
  - Goat's Peak Winery Ltd. ("Goat's Peak Winery"); and
  - Monette Farms BC Ltd. ("Monette Farms BC").
- Darrell Monette owns 100% of the ownership interests in Monette Land, DMO Holdings, Goat's Peak Winery, and Monette Farms BC, and 100% of the preferred shares of Monette Farms.
- The Monette Farms Family Trust owns 100% of the common shares of Monette Farms.

**Monette Farms and Subsidiaries**

- Monette Farms holds 100% of the ownership interests in Monette Farms Ontario Corp., NexGen Seeds Ltd., Monette Produce Ltd., Monette Seeds Ltd., Monette Farms Land GP Ltd., and Monette Farms Land GP II Ltd.

**Monette Land**

- Monette Land Corp. does not have any subsidiaries.

**DMO Holdings and Subsidiaries**

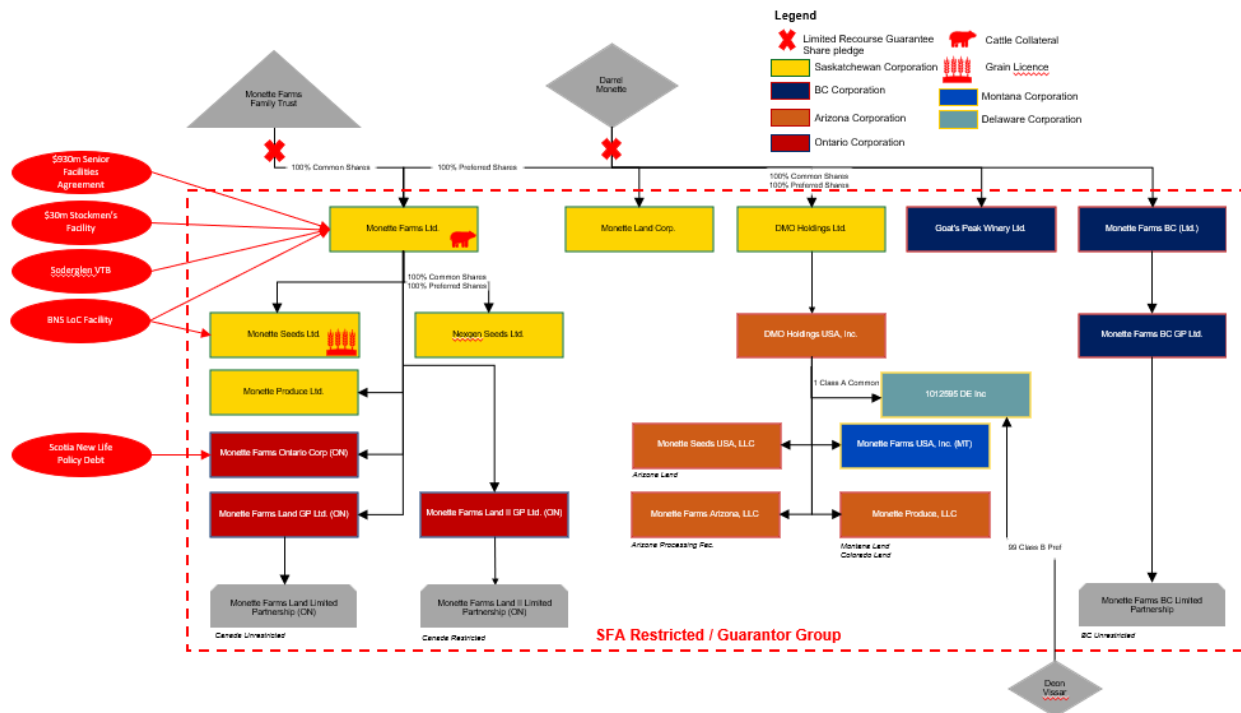
- DMO Holdings owns 100% of the ownership interests in DMO Holdings USA, Inc. (“DMO Holdings USA”).
- DMO Holdings USA owns 100% of the ownership interests in Monette Seeds USA, Monette Farms Arizona, LLC, Monette Farms USA, Inc., and Monette Produce, LLC.
- DMO Holdings is also the majority and sole voting shareholder in 1012595 DE Inc. 1012595 DE Inc.’s second shareholder is an individual named Deon Vissar, who holds 99 Class B Preference Shares (non-voting).

**Goat’s Peak Winery**

- Goat’s Peak Winery does not have any subsidiaries.

**Monette Farms BC**

- Monette Farms BC holds 100% of the ownership interests in Monette Farms BC GP Ltd.



Dated: April 21, 2026  
Wilmington, Delaware

Respectfully submitted,

/s/ Jacob R. Kirkham

**KOBRE & KIM LLP**

Jacob R. Kirkham (No. 5768)  
Stephen J. Astringer (No. 6375)  
600 North King Street, Suite 501  
Wilmington, Delaware 19801  
Telephone: (302) 518-6451  
Facsimile: (302) 518-6461  
jacob.kirkham@kobrekim.com  
stephen.astringer@kobrekim.com

-and-

Daniel J. Saval (*pro hac vice* pending)  
John G. Conte (*pro hac vice* pending)  
Vincent Yiu (*pro hac vice* pending)  
Alaina Heine (*pro hac vice* pending)  
800 Third Avenue  
New York, New York 10022  
Telephone: (212) 488-1259  
Facsimile: (212) 488-1220  
daniel.savall@kobrekim.com  
john.conte@kobrekim.com  
vincent.yiu@kobrekim.com  
alaina.heine@kobrekim.com

*Counsel to the Foreign Representative*

**Fill in this information to identify the case:**

United States Bankruptcy Court for the:  
 District of Delaware  
 Case number (if known): \_\_\_\_\_ Chapter 15

Check if this is an amended filing

Official Form 401

**Chapter 15 Petition for Recognition of a Foreign Proceeding**

12/15

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write debtor's name and case number (if known).

1. Debtor's name Monette Seeds USA, LLC

2. Debtor's unique identifier

**For non-individual debtors:**

Federal Employer Identification Number (EIN) 8 4 -4 8 7 7 4 3 0

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

**For individual debtors:**

Social Security number: xxx - xx- \_\_\_\_\_

Individual Taxpayer Identification number (ITIN): 9 xx - xx - \_\_\_\_\_

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

3. Name of foreign representative(s) FTI Consulting Canada Inc.

4. Foreign proceeding in which appointment of the foreign representative(s) occurred CCAA Proceeding – Court of King's Bench of Alberta (Calgary)

5. Nature of the foreign proceeding

Check one:

Foreign main proceeding

Foreign nonmain proceeding

Foreign main proceeding, or in the alternative foreign nonmain proceeding

6. Evidence of the foreign proceeding

A certified copy, translated into English, of the decision commencing the foreign proceeding and appointing the foreign representative is attached.

A certificate, translated into English, from the foreign court, affirming the existence of the foreign proceeding and of the appointment of the foreign representative, is attached.

Other evidence of the existence of the foreign proceeding and of the appointment of the foreign representative is described below, and relevant documentation, translated into English, is attached.  
Copy of the Initial Order will be filed with the Court.

7. Is this the only foreign proceeding with respect to the debtor known to the foreign representative(s)?

No. (Attach a statement identifying each country in which a foreign proceeding by, regarding, or against the debtor is pending.)

Yes

Debtor Monette Seeds USA, LLC  
Name

Case number (if known) \_\_\_\_\_

**8. Others entitled to notice**

Attach a list containing the names and addresses of:

- (i) all persons or bodies authorized to administer foreign proceedings of the debtor,
- (ii) all parties to litigation pending in the United States in which the debtor is a party at the time of filing of this petition, and
- (iii) all entities against whom provisional relief is being sought under § 1519 of the Bankruptcy Code.

**9. Addresses**

**Country where the debtor has the center of its main interests:**

Canada

**Debtor's registered office:**

39332 W. Camelback Rd.  
Number Street

P.O. Box \_\_\_\_\_

Tonopah, Arizona 85354  
City State/Province/Region ZIP/Postal Code

United States of America  
Country

**Individual debtor's habitual residence:**

\_\_\_\_\_  
Number Street

P.O. Box \_\_\_\_\_

\_\_\_\_\_  
City State/Province/Region ZIP/Postal Code

\_\_\_\_\_  
Country

**Address of foreign representative(s):**

520 5th Ave SW, Suite 1610  
Number Street

P.O. Box \_\_\_\_\_

Calgary, Alberta T2P 3R7  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**10. Debtor's website (URL)**

https://monettefarms.ca/

**11. Type of debtor**

Check one:

- Non-individual (check one):
  - Corporation. Attach a corporate ownership statement containing the information described in Fed. R. Bankr. P. 7007.1.
  - Partnership
  - Other. Specify: \_\_\_\_\_
- Individual

Debtor Monette Seeds USA, LLC  
Name

Case number (if known) \_\_\_\_\_

12. Why is venue proper in this district?

Check one:

- Debtor's principal place of business or principal assets in the United States are in this district.
- Debtor does not have a place of business or assets in the United States, but the following action or proceeding in a federal or state court is pending against the debtor in this district: \_\_\_\_\_
- If neither box is checked, venue is consistent with the interests of justice and the convenience of the parties, having regard to the relief sought by the foreign representative, because:  
Affiliate chapter 15 case is pending in this district.

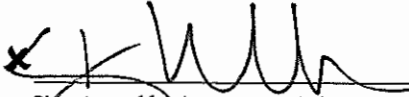
13. Signature of foreign representative(s)

I request relief in accordance with chapter 15 of title 11, United States Code.

I am the foreign representative of a debtor in a foreign proceeding, the debtor is eligible for the relief sought in this petition, and I am authorized to file this petition.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct,

 D. HELKAA  
Signature of foreign representative Printed name

Executed on 4/21/2026  
MM / DD / YYYY

X \_\_\_\_\_  
Signature of foreign representative Printed name

Executed on \_\_\_\_\_  
MM / DD / YYYY

14. Signature of attorney

X/s/ Jacob R. Kirkham Date 04/21/2026  
Signature of Attorney for foreign representative MM / DD / YYYY

Jacob R. Kirkham  
Printed name

Kobre & Kim LLP  
Firm name

600 North King Street, Suite 501  
Number Street

Wilmington DE 19801  
City State ZIP Code

(302) 518-6456 Jacob.Kirkham@kobrekim.com  
Contact phone Email address

5768 DE  
Bar number State

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

In re:	Chapter 15
Monette Seeds USA, LLC,	Case No. 26-_____( )
Debtors in a Foreign Proceeding.	(Joint Administration Requested)

**CONSOLIDATED LIST PURSUANT TO BANKRUPTCY RULE 1007(a)(4)  
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

FTI Consulting Canada Inc. (“FTI”), in its capacity as the court-appointed monitor (in such capacity, the “Monitor”) and authorized foreign representative (in such capacity, the “Foreign Representative”) of each of the above-captioned debtors (collectively, the “Debtors”), which are the subject of proceedings (the “Canadian Proceedings”) under Canada’s *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36 (as amended, the “CCAA”), pending before the Court of King’s Bench of Alberta (the “Canadian Court”) hereby submits this list on behalf of the Debtors in compliance with the requirements of Rule 1007(a)(4) of the Federal Rules of Bankruptcy Procedure.

**I. All Administrators of the Debtors in Foreign Proceedings**

FTI is the authorized Foreign Representative and court-appointed Monitor in the Canadian Proceedings. To the best of the Foreign Representative’s knowledge, other than the Canadian Proceedings, there are no foreign proceedings pending with respect to any of the Debtors.

The Foreign Representative’s and Monitor’s address is:

FTI Consulting Canada Inc.  
520 5th Avenue SW, Suite 1610  
Calgary, AB T2P 3R7  
Canada

**II. All Parties to Litigation Pending in the United States**

There is no pending litigation in which the Debtors are a party in the United States.

**III. Entities Against Whom Provisional Relief Is Sought**

The Foreign Representative seeks provisional relief on behalf of the Debtors to stay the execution or transfer of assets of the Debtors, and the application of 11 U.S.C. § 362 in the Debtors' Chapter 15 Cases on a provisional basis, against all known creditors of the Debtors and other interested parties, including without limitation, the persons on the creditor matrix.

**IV. Corporate Ownership Statement Pursuant to Rules 1007(a) and 7007 of the Federal Rules of Bankruptcy Procedure**

Pursuant to Rules 1007(a) and 7007.1 of the Federal Rules of Bankruptcy Procedure, the Foreign Representative submits the following list of entities that hold ownership interests in the Debtors. A corporate ownership chart is embedded below for reference. No publicly held corporation owns more than 10% of the stock in any of the Debtors.

**Parent Corporations**

- The Debtors' corporate structure consists of 5 parent corporations:
  - Monette Farms Ltd. ("Monette Farms");
  - Monette Land Corporation ("Monette Land");
  - DMO Holdings Ltd. ("DMO Holdings");
  - Goat's Peak Winery Ltd. ("Goat's Peak Winery"); and
  - Monette Farms BC Ltd. ("Monette Farms BC").
- Darrell Monette owns 100% of the ownership interests in Monette Land, DMO Holdings, Goat's Peak Winery, and Monette Farms BC, and 100% of the preferred shares of Monette Farms.
- The Monette Farms Family Trust owns 100% of the common shares of Monette Farms.

**Monette Farms and Subsidiaries**

- Monette Farms holds 100% of the ownership interests in Monette Farms Ontario Corp., NexGen Seeds Ltd., Monette Produce Ltd., Monette Seeds Ltd., Monette Farms Land GP Ltd., and Monette Farms Land GP II Ltd.

**Monette Land**

- Monette Land Corp. does not have any subsidiaries.

**DMO Holdings and Subsidiaries**

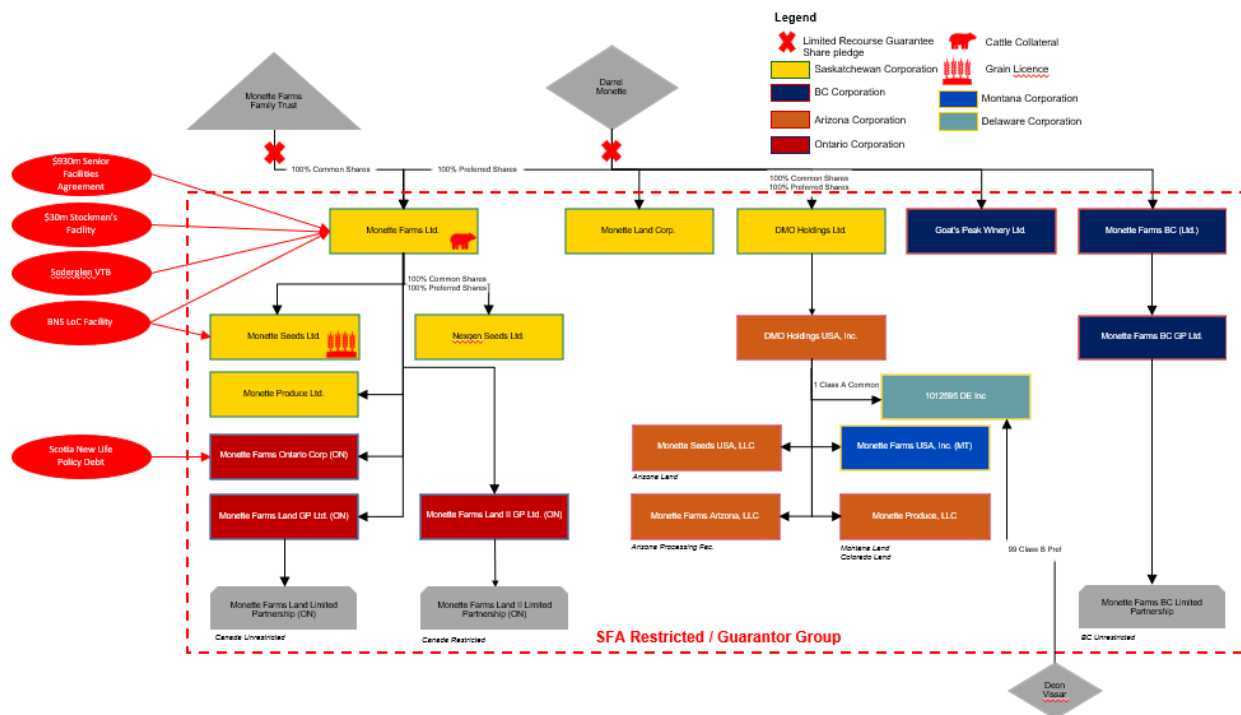
- DMO Holdings owns 100% of the ownership interests in DMO Holdings USA, Inc. (“DMO Holdings USA”).
- DMO Holdings USA owns 100% of the ownership interests in Monette Seeds USA, Monette Farms Arizona, LLC, Monette Farms USA, Inc., and Monette Produce, LLC.
- DMO Holdings is also the majority and sole voting shareholder in 1012595 DE Inc. 1012595 DE Inc.’s second shareholder is an individual named Deon Vissar, who holds 99 Class B Preference Shares (non-voting).

**Goat’s Peak Winery**

- Goat’s Peak Winery does not have any subsidiaries.

**Monette Farms BC**

- Monette Farms BC holds 100% of the ownership interests in Monette Farms BC GP Ltd.



Dated: April 21, 2026  
Wilmington, Delaware

Respectfully submitted,

/s/ Jacob R. Kirkham

**KOBRE & KIM LLP**

Jacob R. Kirkham (No. 5768)  
Stephen J. Astringer (No. 6375)  
600 North King Street, Suite 501  
Wilmington, Delaware 19801  
Telephone: (302) 518-6451  
Facsimile: (302) 518-6461  
jacob.kirkham@kobrekim.com  
stephen.astringer@kobrekim.com

-and-

Daniel J. Saval (*pro hac vice* pending)  
John G. Conte (*pro hac vice* pending)  
Vincent Yiu (*pro hac vice* pending)  
Alaina Heine (*pro hac vice* pending)  
800 Third Avenue  
New York, New York 10022  
Telephone: (212) 488-1259  
Facsimile: (212) 488-1220  
daniel.savall@kobrekim.com  
john.conte@kobrekim.com  
vincent.yiu@kobrekim.com  
alaina.heine@kobrekim.com

*Counsel to the Foreign Representative*

**Fill in this information to identify the case:**

United States Bankruptcy Court for the:  
 District of Delaware  
 Case number (if known): \_\_\_\_\_ Chapter 15

Check if this is an amended filing

Official Form 401

**Chapter 15 Petition for Recognition of a Foreign Proceeding**

12/15

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write debtor's name and case number (if known).

1. Debtor's name NexGen Seeds Ltd.

2. Debtor's unique identifier

**For non-individual debtors:**

Federal Employer Identification Number (EIN) \_\_\_\_\_ - \_\_\_\_\_

Other 724693684. Describe identifier Business Number.

**For individual debtors:**

Social Security number: xxx - xx- \_\_\_\_\_

Individual Taxpayer Identification number (ITIN): 9 xx - xx - \_\_\_\_\_

Other \_\_\_\_\_ Describe identifier \_\_\_\_\_

3. Name of foreign representative(s) FTI Consulting Canada Inc.

4. Foreign proceeding in which appointment of the foreign representative(s) occurred CCAA Proceeding – Court of King's Bench of Alberta (Calgary)

5. Nature of the foreign proceeding

Check one:

Foreign main proceeding

Foreign nonmain proceeding

Foreign main proceeding, or in the alternative foreign nonmain proceeding

6. Evidence of the foreign proceeding

A certified copy, translated into English, of the decision commencing the foreign proceeding and appointing the foreign representative is attached.

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Other evidence of the existence of the foreign proceeding and of the appointment of the foreign representative is described below, and relevant documentation, translated into English, is attached.  
Copy of the Initial Order will be filed with the Court.

7. Is this the only foreign proceeding with respect to the debtor known to the foreign representative(s)?

No. (Attach a statement identifying each country in which a foreign proceeding by, regarding, or against the debtor is pending.)

Yes

Debtor NexGen Seeds Ltd.  
Name

Case number (if known) \_\_\_\_\_

**8. Others entitled to notice**

Attach a list containing the names and addresses of:

- (i) all persons or bodies authorized to administer foreign proceedings of the debtor,
- (ii) all parties to litigation pending in the United States in which the debtor is a party at the time of filing of this petition, and
- (iii) all entities against whom provisional relief is being sought under § 1519 of the Bankruptcy Code.

**9. Addresses**

**Country where the debtor has the center of its main interests:**

Canada

**Debtor's registered office:**

51 1st Ave NW  
Number Street

\_\_\_\_\_  
P.O. Box

Swift Current, Saskatchewan S9H 0M5  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**Individual debtor's habitual residence:**

\_\_\_\_\_  
Number Street

\_\_\_\_\_  
P.O. Box

\_\_\_\_\_  
City State/Province/Region ZIP/Postal Code

\_\_\_\_\_  
Country

**Address of foreign representative(s):**

520 5th Ave SW, Suite 1610  
Number Street

\_\_\_\_\_  
P.O. Box

Calgary, Alberta T2P 3R7  
City State/Province/Region ZIP/Postal Code

Canada  
Country

**10. Debtor's website (URL)**

https://monettefarms.ca/

**11. Type of debtor**

Check one:

- Non-individual (check one):
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  - Other. Specify: \_\_\_\_\_
- Individual

Debtor NexGen Seeds Ltd.  
Name

Case number (if known) \_\_\_\_\_

12. Why is venue proper in this district?

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\_\_\_\_\_
- If neither box is checked, venue is consistent with the interests of justice and the convenience of the parties, having regard to the relief sought by the foreign representative, because:  
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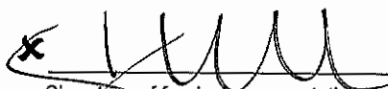
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 D. HELKAA  
Signature of foreign representative Printed name

Executed on 04/21/2026  
MM / DD / YYYY

X \_\_\_\_\_  
Signature of foreign representative Printed name

Executed on \_\_\_\_\_  
MM / DD / YYYY

14. Signature of attorney

X /s/ Jacob R. Kirkham Date 04/21/2026  
Signature of Attorney for foreign representative MM / DD / YYYY

Jacob R. Kirkham  
Printed name

Kobre & Kim LLP  
Firm name

600 North King Street, Suite 501  
Number Street

Wilmington DE 19801  
City State ZIP Code

(302) 518-6456 Jacob.Kirkham@kobrekim.com  
Contact phone Email address

5768 DE  
Bar number State

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

In re:	Chapter 15
NexGen Seeds Ltd.,	Case No. 26-_____( )
Debtors in a Foreign Proceeding.	(Joint Administration Requested)

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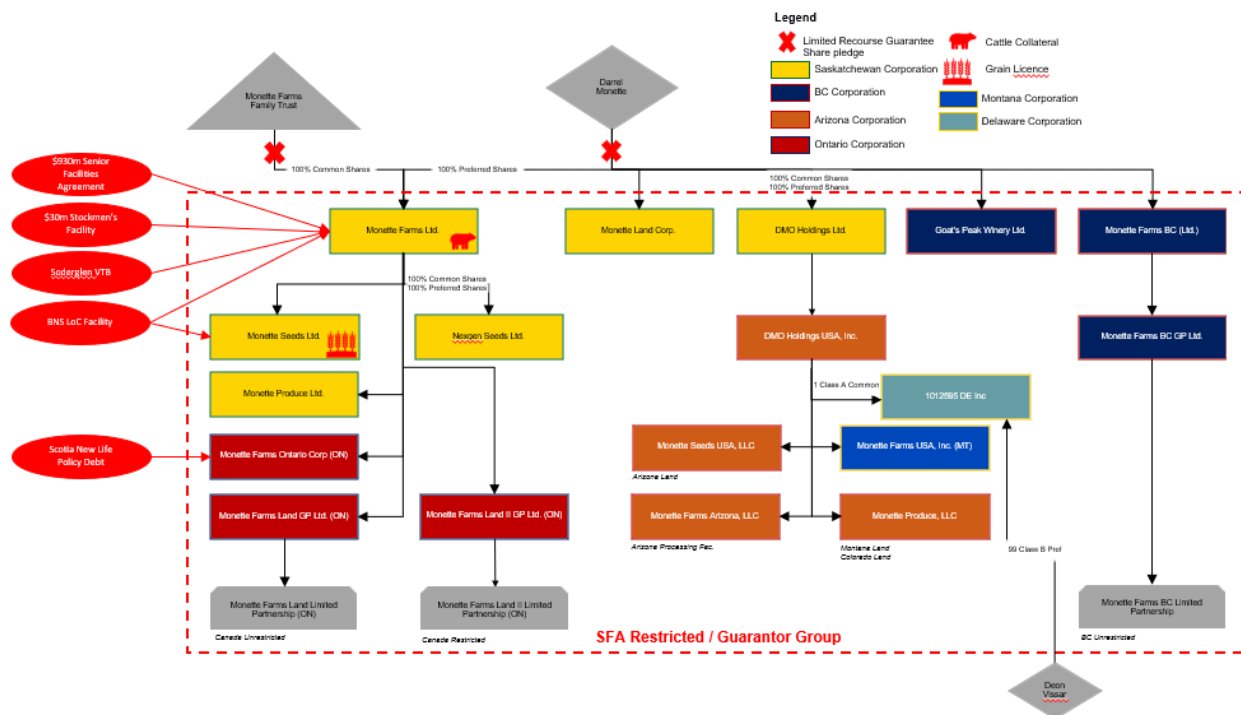
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**Goat’s Peak Winery**

- Goat’s Peak Winery does not have any subsidiaries.

**Monette Farms BC**

- Monette Farms BC holds 100% of the ownership interests in Monette Farms BC GP Ltd.



Dated: April 21, 2026  
Wilmington, Delaware

Respectfully submitted,

/s/ Jacob R. Kirkham

**KOBRE & KIM LLP**

Jacob R. Kirkham (No. 5768)  
Stephen J. Astringer (No. 6375)  
600 North King Street, Suite 501  
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Telephone: (302) 518-6451  
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jacob.kirkham@kobrekim.com  
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-and-

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John G. Conte (*pro hac vice* pending)  
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Alaina Heine (*pro hac vice* pending)  
800 Third Avenue  
New York, New York 10022  
Telephone: (212) 488-1259  
Facsimile: (212) 488-1220  
daniel.savall@kobrekim.com  
john.conte@kobrekim.com  
vincent.yiu@kobrekim.com  
alaina.heine@kobrekim.com

*Counsel to the Foreign Representative*