CANADA
PROVINCE OF QUEBEC
DISTRICT OF MONTRÉAL

No.: 500-11-067437-265

SUPERIOR COURT
(Commercial Division)

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED:

PREMIER HEALTH OF AMERICA INC. / PREMIER SOIN D'AMÉRIQUE INC.
-and-
9104-8306 QUÉBEC INC.
-and-
6150977 CANADA INC.
-and-
10544485 CANADA INC.
-and-
SOLUTIONS NURSING PHA INC.
-and-
8961760 CANADA INC.

Debtors

-and-

ROYAL BANK OF CANADA

Secured Creditor

-and-

FTI CONSULTING CANADA INC.

Monitor / Applicant

APPLICATION FOR THE ISSUANCE OF AN ORDER EXTENDING THE STAY OF PROCEEDINGS, APPROVING AN INTERIM DISTRIBUTION, AND FOR ANCILLARY RELIEF

(Sections 11 and 11.02(2) of the *Companies' Creditors Arrangement Act*, R.S.C., 1985, c. C-36)

TO THE HONOURABLE MARTIN CASTONGUAY, J.S.C., OF THE SUPERIOR COURT SITTING IN THE COMMERCIAL DIVISION, IN AND FOR THE JUDICIAL DISTRICT OF MONTRÉAL, THE MONITOR, ACTING FOR AND ON BEHALF OF THE DEBTORS, RESPECTFULLY SUBMIT AS FOLLOWS:

I. ORDERS SOUGHT

1. By the present *Application for the Issuance of an Order Extending the Stay of Proceedings, Approving an Interim Distribution, and for Ancillary Relief* (the

“**Application**”), FTI Consulting Canada Inc. (“**FTI**”), in its capacity as Court-appointed monitor (the “**Monitor**”), acting for and on behalf of Premier Health of America Inc. / Premier Soin d’Amérique Inc. (“**PHA**”), 9104-8306 Québec Inc. (“**Code Bleu**”), 6150977 Canada Inc. (“**Placement Premier Soin**”), 10544485 Canada Inc. (“**10544485**”), Solutions Nursing PHA Inc. (“**Nursing PHA**”), and 8961760 Canada Inc. (the “**Guarantor**”, and collectively with the foregoing entities, the “**PHA Group**” or the “**Debtors**”), seeks the issuance of an Order (the “**Draft Order**”) pursuant to the *Companies’ Creditors Arrangement Act*, R.S.C., 1985, c. C-36, as amended (the “**CCAA**”), in respect of the proceedings commenced thereunder (the “**CCAA Proceedings**”), substantially in the form of the draft order communicated herewith as **Exhibit R-1**, providing, *inter alia,* for:

(a) the extension of the stay of proceedings (the “**Stay Period**”) until and including January 29, 2027;

(b) the termination and discharge of the directors’ and officers’ charge established under the Amended and Restated Initial Order dated July 3, 2026 (the “**ARIO**”), in the amount of $400,000 (the “**D&O Charge**”) and the release and discharge of the directors and officers of the Debtors (the “**D&Os**”) from any claims that could have been secured by the D&O Charge; and

(c) the authorization for the Monitor to make an interim distribution to the Royal Bank of Canada (“**RBC**”), BDC Capital Inc. (“**BDC**”) and Desjardins Capital PME S.E.C. (“**Desjardins**”) (collectively, the “**Senior Lenders**”) in the amount of $7,600,000, currently held in trust by the Monitor, in accordance with the priorities established under the ARIO and the Intercreditor Agreement (as defined below) (the “**Interim Distribution**”).

2. In support of this Application, the Monitor has prepared its second report (the “**Second Report**”), which sets out the Monitor’s observations and recommendations with respect to the Draft Order. The Second Report will be communicated before the hearing on the Application.

3. It is respectfully submitted that the orders sought herein are reasonable and appropriate in the circumstances and are in the best interests of the Debtors and their stakeholders.

4. It should be noted that, pursuant to the terms of the RVOs (as defined below), since the issuance, on July 14, 2026, of the Monitor’s Certificates (as defined below), former Debtors Premier Soin Nordik Inc. / Premier Health Nordik Inc. (“**Nordik Québec**”), Premier Health Nordik Ontario Inc. (“**Nordik Ontario**”), Canadian Health Care Agency Ltd. (“**CHCA**”) and Solutions Staffing Inc. (“**SSI**”) have ceased to be Debtors in the CCAA Proceedings. The style of cause reflects the remaining Debtors only.

II. CONTEXT AND PROCEDURAL BACKGROUND

5. The PHA Group is a group of companies that provided specialized healthcare staffing services across Canada including to remote and Indigenous communities, through (a) federal government entities including Indigenous Services Canada (“**ISC**”), (b) provincial government-related entities, and (c) private-sector clients.

6. The PHA Group experienced significant financial and operational difficulties resulting from, *inter alia*, the impact of Québec’s Bill 10, an ineligibility order issued by the *Autorité des marchés publics* placing the Québec-based subsidiaries on the *Registre des entreprises non admissibles aux contrats publics* for five (5) years, and the GoHealth initiative in British Columbia which reduced SSI’s market share. As a result, the PHA Group generated negative EBITDA of approximately $1,500,000 in fiscal 2025 and had an accumulated deficit of approximately $29,500,000 as of December 31, 2025.

7. On May 7, 2026, FTI Capital Advisors (“**FTICA**”) was retained to conduct an expedited sale and investment solicitation process (the “**SISP**”). In total, 16 parties were contacted, four binding offers were received by the Phase 2 bid deadline of June 17, 2026, and, following a comprehensive review in consultation with the Senior Lenders, the bid submitted by Polar Valley Investments Limited (“**Polar Valley**”), the parent company of Bayshore HealthCare Ltd., was selected as the successful bid.

8. On June 22, 2026, RBC, as the Debtors’ principal secured creditor holding claims in excess of $27,984,903.94, filed an *Application for the Issuance of an Initial Order and an Amended and Restated Initial Order* (the “**Initial Application**”).

9. On June 23, 2026, this Court granted the Initial Application and rendered an initial order (the “**Initial Order**”) providing, *inter alia*, for:

    (a) the application of the CCAA to the Debtors;

    (b) the appointment of FTI as Monitor with extended powers, including the authority to direct and control the Debtors’ financial affairs, pursue the SISP, and select a successful bid;

    (c) a Stay Period until July 3, 2026;

    (d) the establishment of an interim facility of up to $1,500,000 from RBC (in its capacity as interim lender, the “**Interim Lender**”) secured by an interim financing charge of up to $1,800,000 (the “**Interim Financing Charge**”);

    (e) the establishment of an administration charge of $250,000 (the “**Administration Charge**”);

    (f) the establishment of a D&O Charge of $400,000;

    (g) a declaration that the Senior Lenders are unaffected creditors in the CCAA Proceedings; and

(h) the authorization for the Debtors and the Monitor not to incur any further expense in relation to any securities filings, disclosures, core or non-core documents, press releases and other reporting or disclosure obligations that may otherwise be required under applicable securities laws, capital markets laws, stock exchange rules or similar requirements (collectively, the “**Securities Filings**”).

10. On June 30, 2026, RBC filed the *Amended Application for the Issuance of an Initial Order, an Amended and Restated Initial Order, Approval and Reverse Vesting Orders and Ancillary Relief* (the “**Amended Application**”).

11. On July 3, 2026, this Court issued the following orders:

(a) an *Amended and Restated Initial Order* (the “**ARIO**”) extending the Stay Period to August 28, 2026, increasing the Interim Facility to $2,500,000, increasing the Administration Charge to $500,000, confirming the D&O Charge, and authorizing interim distributions to the Interim Lender from the proceeds of the Polar Valley Transaction;

(b) three (3) Approval and Reverse Vesting Orders (the “**RVOs**”) approving the transaction (the “**Polar Valley Transaction**”), consisting in the acquisition by Polar Valley of the equity interests in SSI, CHCA and Nordik Québec (including its wholly-owned subsidiary, Nordik Ontario), pursuant to three (3) subscription agreements dated June 30, 2026 (collectively, the “**Polar Valley Subscription Agreements**”); and

(c) three (3) Discharge Orders (*Ordonnances de radiation*) ordering the reduction of the security registrations affecting the retained assets of SSI, CHCA and Nordik Québec at the applicable registries.

12. On July 14, 2026, the Polar Valley Transaction closed, as appears from the Monitor’s certificates (the “**Monitor’s Certificates**”) issued on the same date in respect of each of SSI, CHCA and Nordik Québec, and filed with this Court, as appears from the Court record.

13. Pursuant to the terms of the RVOs, upon issuance of the Monitor’s certificates:

(a) the Excluded Assets, Excluded Contracts and Excluded Liabilities (as defined in the Polar Valley Subscription Agreements) of each of SSI, CHCA and Nordik Québec (including Nordik Ontario) were deemed transferred to, assumed by and vested absolutely and exclusively in 10544485 as a residual entity (“**ResidualCo**”), such that SSI, CHCA and Nordik Québec were forever released and discharged from all obligations in respect thereof;

(b) ResidualCo, which was already a Debtor in the CCAA Proceedings, was acknowledged as continuing to be subject thereto notwithstanding the RVOs, and the CCAA Proceedings shall continue to apply to ResidualCo;

(c) all CCAA Charges and Encumbrances (as defined in the ARIO) previously granted over the property of SSI, CHCA and Nordik Québec attached to the net proceeds of the Polar Valley Transaction with the same priority as they had with respect to such property immediately prior to closing; and

(d) SSI, CHCA and Nordik Québec (including Nordik Ontario) ceased to be Debtors in the CCAA Proceedings and were deemed released from the purview of the orders of this Court, save and except for the RVOs, the terms of which continue to apply in all respects.

14. PHA, Code Bleu, Placement Premier Soin, ResidualCo, Nursing PHA and the Guarantor are the remaining Debtors and have no active operations, and their affairs are being administered exclusively by the Monitor.

15. Since the issuance of its first report dated July 2, 2026, the Monitor has undertaken the following activities:

(a) completed the closing of the Polar Valley Transaction and issued the Monitor's certificates in respect thereof;

(b) distributed to the Interim Lender the amounts owing under the interim facility, in accordance with the ARIO;

(c) administered the transition services arrangement contemplated by the Polar Valley Subscription Agreements, including the continued occupancy of certain premises by the acquired entities;

(d) consulted with the Senior Lenders and their respective counsel regarding the proposed Interim Distribution and the orderly wind-down of the Debtors;

(e) issued notices of disclaimer pursuant to section 32 of the CCAA in respect of certain contracts of the Debtors, including equipment leases held by Code Bleu (with Wells Fargo Equipment Finance and Delcom Groupe Melcarm) and a coworking space agreement held by PHA (with WeWork Canada LP ULC), copies of which are communicated herewith as **Exhibits R-2 and R-3**;

(f) delivered notices of stay of proceedings to the counterparties in pending litigation matters involving the Debtors, copies of which are communicated herewith, *en liasse*, as **Exhibit R-4**; and

(g) engaged in discussions to evaluate and, where appropriate, pursue the prosecution of pending litigation (the "**Ongoing Litigation**") instituted by the Debtors, with a view to maximizing the recovery available for the benefit of the Debtors' creditors; and

(h) responded to inquiries from stakeholders and creditors and addressed matters arising in the ordinary course of the CCAA Proceedings;

(i) exchanged correspondence with Leede Financial Inc. ("**Leede**"), as more fully described below; and

(j) prepared the Second Report.

A. Exchanges with Leede

16. In June 2025, the PHA Group retained Leede as its financial advisor to evaluate strategic alternatives. Leede conducted a sale and investment solicitation process which involved outreach to approximately 150 potential counterparties but yielded no offers.

17. On July 14, 2026, following the closing of the Polar Valley Transaction, Leede sent a notice to the Monitor (the "**Leede Notice**") asserting an entitlement to a completion fee under its engagement agreement with PHA (the "**Leede Agreement**"), as appears from a copy of the Leede notice dated July 14, 2026, communicated herewith as **Exhibit R-5**.

18. On July 17, 2026, having reviewed and considered the arguments set forth in the Leede Notice, the Monitor's counsel responded that no completion fee or other amount was owing under the Leede Agreement, as appears from a copy of the letter dated July 17, 2026, communicated herewith as **Exhibit R-6**.

19. On July 20, 2026, Leede responded seeking notably to obtain copies of the Polar Valley Subscription Agreements, as appears from a copy of the letter dated July 20, 2026, communicated herewith as **Exhibit R-7**.

20. On July 21, 2026, the Monitor responded that it was open to providing the Polar Valley Subscription Agreements to Leede, subject to a customary confidentiality undertaking, as appears from a copy of the letter dated July 21, 2026, communicated herewith as **Exhibit R-8**.

21. Leede has not responded to the Monitor's letter dated July 21, 2026, and has elected not to obtain copies of the Polar Valley Subscription Agreements.

22. In any event, the Monitor remains of the view that no completion fee or other amount is owing under the Leede Agreement and is only bringing this matter to the attention of the Court as the Leede Notice sought to prevent any distribution of the proceeds of the Polar Valley Transaction.

23. Moreover, even if Leede's alleged completion fee claim were valid, which is denied, such claim would constitute an unsecured claim ranking behind the Senior Lenders, whose first-ranking secured indebtedness significantly exceeds the available proceeds. Accordingly, Leede's claim, if any, does not affect the proposed Interim Distribution.

III. GROUNDS FOR THE RELIEF SOUGHT

C. Extension of the Stay of Proceedings

24. The Monitor respectfully submits that it is appropriate to extend the Stay Period until and including January 29, 2027, in order to, *inter alia*:

(a) complete the wind-down of the Debtors' corporate affairs;

(b) address remaining administrative matters, including obligations under the transition services agreement;

(c) address the Ongoing Litigation and any outstanding claims or matters, in order to maximize recovery for the Senior Lenders; and

(d) take all necessary steps to bring the CCAA Proceedings to an orderly conclusion.

25. Based on the cash flow projections set out in the Second Report, the Monitor expects to have sufficient funding and liquidity to cover anticipated costs and expenses during the extended Stay Period.

26. The principal objectives of these CCAA Proceedings have now been achieved following completion of the Polar Valley Transaction. The requested extension is required principally to complete the orderly wind-down of the remaining Debtors and the realization of any potential remaining assets that can be monetized, address the Ongoing Litigation and conclude the administration of the CCAA Proceedings.

27. The Monitor continues to assess the merits and realizable value of the remaining litigation claims and will pursue only those claims that are economically justified and likely to generate additional value for the benefit of the Debtors' stakeholders.

28. The Monitor has acted and continues to act in good faith and with due diligence. No creditor will be unduly prejudiced by the extension being sought.

29. The Senior Lenders being the principal secured creditors of the Debtors, support the extension and relief sought herein.

D. Discharge and Termination of the D&O Charge and Release for the D&Os

30. Pursuant to the ARIO, the D&O Charge in the amount of $400,000 was established against the Debtors' property to secure indemnification obligations towards the D&Os, in connection with potential liabilities that could arise during the CCAA Proceedings, to the extent that such potential liabilities were not covered by existing D&O's insurance policies (the "**D&O Insurance**").

31. Since the commencement of the CCAA Proceedings, the D&Os remained in their positions and cooperated with the Monitor throughout the restructuring process,

including in connection with the SISP and the negotiation and implementation of the Polar Valley Transaction.

32. As mentioned above, since the Polar Valley Transaction, the Debtors have no active operations, and their affairs are being administered exclusively by the Monitor.

33. The Monitor understands that the existing D&O Insurance policy is scheduled to expire on December 3, 2026. Certain premium financing obligations remain outstanding in respect thereof. The Monitor has taken steps to address the immediate premium default pending presentation of this Application. However, the Monitor does not consider it appropriate to utilize estate funds to fund all remaining premium financing obligations or to procure any additional run-off or tail coverage, having regard to the significant deficiency that will be suffered by the Senior Lenders on their secured claims.

34. In these circumstances, the Monitor respectfully submits that it is appropriate to terminate and discharge the D&O Charge and release and discharge the D&Os from any claims that could have been secured by the D&O Charge, for the following reasons:

    (a) In the context of the Polar Valley Transaction, the operating entities (SSI, CHCA, and Nordik Québec) have ceased to be Debtors in the CCAA Proceedings and their operations are being continued by Polar Valley;

    (b) the remaining Debtors have no active operations;

    (c) there is no longer any need for active management or oversight of the Debtors' affairs;

    (d) since completion of the Polar Valley Transaction, the Debtors no longer conduct active operations, source deduction obligations remain current, employee and subcontractor obligations have been paid or reserved for, and the Monitor is of the view that continuation of the D&O Charge is no longer necessary or appropriate. The Monitor is not aware of any outstanding, threatened or asserted claims against the D&Os that would be secured by the D&O Charge; and

    (e) the D&O Insurance requires the payment of monthly premium financing obligations and their continued funding and/or additional tail coverage would further reduce recoveries available to the Senior Lenders, who will remain substantially under secured notwithstanding the proposed Interim Distribution.

35. In these circumstances, the Monitor respectfully submits that it is appropriate and economically justified to discharge and terminate the D&O Charge, release and discharge the D&Os from any claims that could have been secured thereby, and accordingly authorize the Monitor to discontinue the funding of premium financing obligations under the D&O Insurance policies. The funds so preserved will be

available for distribution to the Senior Lenders, thereby partially reducing their shortfall.

36. In light of the foregoing, including the absence of known claims against the D&Os, the cessation of the Debtors' operations, the completion of the Polar Valley Transaction and the lack of any continuing need for the D&O Charge, it is appropriate and fair in the circumstances that the D&Os benefit from the release sought herein. The release shall apply to any and all claims, liabilities or obligations relating directly or indirectly to the Debtors, their business, affairs or operations that could have been secured by the D&O Charge, but shall not extend to (i) any claim arising from gross negligence or wilful misconduct on the part of any D&O, or (ii) any claim that is not permitted to be released pursuant to section 5.1(2) of the CCAA.

37. The Monitor has considered whether additional run-off or "tail" insurance coverage should be obtained for the benefit of the D&Os following the termination of the D&O Charge. The Monitor does not recommend the purchase of such coverage. Notwithstanding the proposed Interim Distribution, the Senior Lenders will continue to suffer a substantial deficiency on their secured claims. In the Monitor's view, the use of estate funds to procure additional tail coverage would not constitute a reasonable or appropriate use of estate assets and would further diminish recoveries otherwise available to the Senior Lenders.

38. For greater certainty, the relief sought herein does not include any order approving, extending or requiring the purchase of additional D&O insurance coverage or tail coverage. The sole insurance-related consideration addressed herein is whether estate funds should continue to be utilized for such purposes. The Monitor does not recommend that they should.

39. The Senior Lenders support this relief and consent to the termination and discharge of the D&O Charge and the release of the D&Os as provided herein.

E. Interim Distribution

40. Pursuant to the RVOs and to paragraphs [37] and [62] to [63] of the ARIO, the CCAA Charges and all Encumbrances previously granted over the property of SSI, CHCA and Nordik Québec attached to the proceeds of the Polar Valley Transaction with the same priority as they had immediately prior to closing. As at the date of this Application, the funds available for distribution are being held in trust by the Monitor. The CCAA Charges and all Encumbrances shall continue to remain in full force with respect to the Debtors in accordance with the Initial Order.

41. As more fully set out in RBC's initial application, the Senior Lenders rank among themselves pursuant to an Intercreditor Agreement made as of November 9, 2023 (the "**Intercreditor Agreement**"). A copy of the Intercreditor Agreement is communicated herewith as **Exhibit R-9**.

42. The Interim Distribution is to be made in accordance with Section 4.3 of the Intercreditor Agreement, which provides for Cash Proceeds of Realization to be

applied to Senior Obligations (as such capitalized terms are defined under the Intercreditor Agreement) on a *pari passu* and *pro rata* basis.

43. As at June 22, 2026:

(a) All amounts outstanding under the RBC Facilities was $27,984,903.94;

(b) All amounts outstanding under the Desjardins Senior Term Loan was $2,048,007.53; and

(c) All amounts outstanding under the BDC Senior Term Loan was $2,048,007.53.

44. The amount of $7,600,000 is grossly insufficient to satisfy the Senior Lenders' *pari passu* and *pro rata* first-ranking secured claims in full.

45. Based on the Monitor's calculations, after payment of all amounts secured by the Administration Charge as of August 14, 2026, and full repayment of the Interim Facility, and subject to the discharge of the D&O Charge, the amount currently available for the Interim Distribution to the Senior Lenders, on account of their pari passu first-ranking secured claims, is $7,600,000.

46. Any remaining funds following the Interim Distribution shall continue to be held in trust by the Monitor to secure the payment of professional fees and expenses incurred in connection with these CCAA Proceedings, until further order of this Court.

47. The Polar Valley Transaction has now closed successfully, the Interim Facility has been repaid in full, and the remaining proceeds are insufficient to satisfy the Senior Lenders' first-ranking secured claims in full. As such, the Monitor respectfully submits that the proposed Interim Distribution is appropriate, consistent with the priorities established under the ARIO, and in the best interest of the Debtors' stakeholders.

48. The Monitor has obtained an independent opinion from its legal counsel confirming that the security granted in favor of the Senior Lenders are valid, enforceable and may be set up against third persons.

IV. CONCLUSION

49. For the reasons set forth above, the Monitor respectfully submits that the relief sought herein is both appropriate and necessary in the circumstances and that this Application is well-founded in fact and in law.

FOR THESE REASONS, MAY IT PLEASE THIS HONOURABLE COURT TO:

GRANT the present *Application for the Issuance of an Order Extending the Stay of Proceedings, Approving an Interim Distribution, and for Ancillary Relief* (the "**Application**").

ISSUE an order substantially in the form of the Draft Order communicated in support of the Application as **Exhibit R-1**.

THE WHOLE without costs, save in the case of contestation.

MONTREAL, August 21, 2026

Osler, Hoskin & Harcourt

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Our file: 1282558

SWORN STATEMENT

I the undersigned, Matt Budd, domiciled for the purpose hereof at 1000, Sherbrooke Street West, Suite 915, Montreal, Québec, H3A 0G6, solemnly declare the following:

1. I am Managing Director at FTI Consulting Canada Inc., the Monitor in this proceeding.
2. I have taken cognizance of the attached *Application for the Issuance of an Order Extending the Stay of Proceedings, Approving an Interim Distribution, and for Ancillary Relief* (the "**Application**").
3. All of the facts alleged in the Application of which I have personal knowledge are true.

AND I HAVE SIGNED:

Matt Budd, CPA, CIRP, LIT

SOLEMNLY DECLARED before me by technological means in Montréal, Québec, on August 21, 2026

Lyne St-Amour
Commissioner for Oaths for the Province of Québec

NOTICE OF PRESENTATION
COMMERCIAL DIVISION

TO : THE SERVICE LIST

PRESENTATION OF THE PROCEEDING

TAKE NOTICE that the *Application for the Issuance of an Order Extending the Stay of Proceedings, Approving an Interim Distribution, and for Ancillary Relief* will be presented virtually for adjudication before the Honourable Martin Castonguay, Justice of the Superior Court of Québec, sitting in the Commercial Division, at the Montréal Courthouse, located at 1 Notre-Dame St. East, Montréal, on **August 26, 2026**, at a time to be determined, in **room 16.04**. Note that all participants may appear by Teams using the link below.

16.04	Rejoindre la réunion Microsoft Teams +1 581-319-2194 Canada, Quebec (Numéro payant) (833) 450-1741 Canada (Numéro gratuit) ID de conférence : 516 211 860# Numéros locaux | Réinitialiser le code confidentiel | En savoir plus sur Teams | Options de réunion Rejoindre à l'aide d'un dispositif de vidéoconférence teams@teams.justice.gouv.qc.ca ID de la conférence VTC : 1149478699 Autres instructions relatives à la numérotation VTC

DEFAULT TO PARTICIPATE IN THE CALLING OF THE ROLL

TAKE NOTICE that if you wish to contest the proceeding, you must inform the initiator of the said proceeding in writing at the coordinates mentioned in the present Notice of Presentation at least 48 hours before the date of presentation and participate at the virtual calling of the roll, failing which, judgment may be rendered during the presentation of the proceeding, without further notice or delay.

OBLIGATIONS

Cooperation

TAKE NOTICE that the parties are duty-bound to cooperate and, in particular, to keep one another informed at all times of the facts and particulars conducive to a fair debate and make sure that relevant evidence is preserved (s. 20, *Code of Civil Procedure*).

Dispute prevention and resolution processes

TAKE NOTICE that the parties must consider private prevention and resolution processes before referring their dispute to the courts, which are namely negotiation, mediation or arbitration, for which the parties call on a third party (*Code of Civil Procedure*, art. 2).

DO GOVERN YOURSELVES ACCORDINGLY.

MONTREAL, August 21, 2026

Osler, Hoskin & Harcourt

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CANADA
PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL

No.: 500-11-067437-265

S U P E R I O R C O U R T
(Commercial Division)

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Monitor / Applicant

s

LIST OF EXHIBITS

Exhibit R-1 : Draft Order.

Exhibit R-2 : Notice of Disclaimer to WeWork Canada LP ULC dated July 27, 2026.

Exhibit R-3 : Notice of Disclaimer to Wells Fargo and Delcom Groupe Melcarm dated July 28, 2026.

Exhibit R-4: Notices of Stay of Proceedings, *en liasse.*

Exhibit R-5: Leede Notice dated July 14, 2026.

Exhibit R-6: Letter from Monitor's Counsel to Leede dated July 17, 2026.

Exhibit R-7: Letter from Leede to Monitor's Counsel dated July 20, 2026.

Exhibit R-8: Letter from Monitor's Counsel to Leede dated July 21, 2026.

Exhibit R-9: Intercreditor Agreement dated November 9, 2023

MONTRÉAL, August 21, 2026

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APPLICATION FOR THE ISSUANCE OF AN ORDER EXTENDING THE STAY OF PROCEEDINGS, APPROVING AN INTERIM DISTRIBUTION, AND FOR ANCILLARY RELIEF , SWORN STATEMENT, NOTICE OF PRESENTATION, LIST OF EXHIBITS, AND EXHIBITS R-1 TO R-9

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