

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

In re:)	
)	Chapter 15
GROUPE DYNAMITE INC., <i>et al</i>)	
)	Case No. 20-12085 (CSS)
Debtors in a Foreign Proceeding ¹)	
)	(Jointly Administered)
)	

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

PLEASE TAKE NOTICE that, on September 8, 2020, Groupe Dynamite Inc., as the authorized foreign representative (the “Foreign Representative”) of the above-captioned debtors (collectively, the “Debtors”), which are the subject of jointly-administered proceedings under the Companies’ Creditors Arrangement Act, R.S.C. 1985, c. C-36 (as amended, the “CCAA”) in the Superior Court of Quebec, Commercial Division (the “Canadian Proceedings”), filed a *Verified Petition for (I) Recognition of Foreign Main Proceedings, (II) Recognition of Foreign Representative, and (III) Related Relief under Chapter 15 of the Bankruptcy Code* [Docket No. 3] (the “Verified Petition”) pursuant to 11 U.S.C. §§ 1504, 1515, and 1517 with the United States Bankruptcy Court for the District of Delaware.

PLEASE TAKE FURTHER NOTICE that, among other things, the Debtors seek entry of an order recognizing the Canadian Proceedings as foreign main proceedings pursuant to section 1517 of title 11 of the United States Code (the “Bankruptcy Code”) and granting certain

¹ The last four digits of the Debtors’ tax identification number are as follows: (a) Groupe Dynamite Inc. (4210); (b) GRG USA Holdings Inc. (4293); and (c) GRG USA LLC (4008). Additional case information can be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.omniagentsolutions.com/groupedynamite>. The location of the Debtors’ service address for purposes of these chapter 15 cases is 5592 Ferrier Street, Montreal, Quebec, Canada, H4P 1M2.

additional relief pursuant to sections 105(a), 1507, 1510, 1515, and 1521 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that the Court has scheduled a hearing with respect to the Verified Petition (the “Recognition Hearing”) for **3:00 p.m. (prevailing Eastern Time) on October 13, 2020**, in Courtroom #6 of the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, Third Floor, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that the Foreign Representative filed the *Motion for Provisional Relief Pursuant to Section 1519 of the Bankruptcy Code* [Docket No. 5] (the “Provisional Relief Motion”) contemporaneously with filing the petitions for recognition.

PLEASE TAKE FURTHER NOTICE that, on September 9, 2020, the Bankruptcy Court entered the *Order Granting Provisional Relief Pursuant to Section 1519 of the Bankruptcy Code* [Docket No. 25] (the “Provisional Order”), which granted, on a provisional basis, recognition of the Canadian Proceedings and gives effect in the United States to the initial order entered in the Canadian Proceedings (the “Initial Order”), which, among other things:

- authorizes the Foreign Representative to operate the Debtors’ businesses and administer the Debtors’ assets on a provisional basis;
- prohibits contract and lease counterparties from terminating their contracts or agreements with the Debtors solely because of the Debtors’ bankruptcy;
- grants the Debtors authority to disclaim or resiliate (*i.e.*, cancel) leases and contracts, subject to the notice procedures and other requirements of the CCAA; and
- prevents parties from taking actions against the Debtors and their assets.

PLEASE TAKE FURTHER NOTICE that responses or objections to recognition of the Canadian Proceedings as foreign main proceedings, or the Verified Petition and the relief requested therein must (i) be in writing, (ii) detail the factual and legal basis for the response or objection, (iii) comply with the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules of

Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and (iv) be filed with the Office of the Clerk of the Court, 824 N. Market Street, Third Floor, Wilmington, Delaware 19801, and served upon the following **so as to be received on or before October 6, 2020**: counsel for the Foreign Representative (a) Kirkland & Ellis LLP, 300 North LaSalle Street, Chicago, Illinois 60654, Attn.: Patrick J. Nash, Jr., P.C. and Kirkland & Ellis LLP, 1301 Pennsylvania Avenue N.W., Washington, D.C. 20004, Attn.: AnnElyse Scarlet Gains, and (b) Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, P.O. Box 8705, Wilmington, Delaware 19899-8705, Attn: Laura Davis Jones.

PLEASE TAKE FURTHER NOTICE that copies of the Verified Petition, the Provisional Relief Motion, the Provisional Relief Order, and other documents filed by the Foreign Representative may be obtained (a) by visiting the Court’s website at <http://www.ecf.deb.uscourts.gov> PACER login and password are required to retrieve a document), free of charge at the webpage maintained by the Foreign Representative’s noticing agent <https://cases.omniagentsolutions.com/groupedynamite>, (b) upon written request to the Foreign Representative’s United States counsel addressed to (i) Kirkland & Ellis LLP, 300 North LaSalle Street, Chicago, Illinois 60654, Attn.: Patrick J. Nash, Jr., P.C. and Kirkland & Ellis LLP, 1301 Pennsylvania Avenue N.W., Washington, D.C. 20004, Attn.: AnnElyse Scarlet Gains and (ii) Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, P.O. Box 8705, Wilmington, Delaware 19899-8705, Attn: Laura Davis Jones; (c) by calling (866) 771-0564 (US and Canada toll-free) or (818) 581-2982 (international toll); or (d) by emailing dynamiteinquiries@omniagnt.com.

PLEASE TAKE FURTHER NOTICE that hearings in this matter, including the Recognition Hearing, shall take place at the United States Bankruptcy Court for the District of

Delaware, 824 N. Market Street, Third Floor, Wilmington, Delaware 19801. All parties wishing to appear at the Recognition Hearing by telephone must, in accordance with the *Instructions for Telephonic Appearances Effective April 5, 2005, revised May 11, 2018*, contact CourtCall via telephone (for callers calling from within the United States of America: 866-582-6878; for callers calling from outside of the United States of America: 310-743-1886) or facsimile (for parties sending facsimiles from within the United States of America: 866-533-2946; for parties sending facsimiles from outside of the United States of America: 310-743-1850) **by no later than noon (prevailing Eastern Time) one business day prior to the Recognition Hearing** to register their telephonic appearances. At the same time, you must notify the counsel listed above of your intent to appear by telephone at the Recognition Hearing.

PLEASE TAKE FURTHER NOTICE that at such hearing the Court may order the scheduling of a case management conference to consider the efficient administration of these chapter 15 cases.

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

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

PLEASE TAKE FURTHER NOTICE that the Foreign Representative does not currently intend to conduct a claims process in these chapter 15 cases. To the extent there is a claims process established in the Canadian Proceedings, parties are directed to the Canadian Proceedings. Accordingly, there is no need to file proofs of claim in these chapter 15 cases. Parties are directed to the Canadian Proceedings at www.insolvencies.deloitte.ca/gdi for information on filing proofs of claim.

Dated: September 9, 2020
Wilmington, Delaware

/s/ Laura Davis Jones

Laura Davis Jones (DE Bar No. 2436)
PACHULSKI STANG ZIEHL & JONES LLP
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com

-and-

Patrick J. Nash, P.C. (*pro hac vice* pending)
KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
300 North LaSalle Street
Chicago, Illinois 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
Email: patrick.nash@kirkland.com

-and-

AnnElyse Scarlett Gains (*pro hac vice* pending)
KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
1301 Pennsylvania Avenue N.W.
Washington, D.C. 20004
Telephone: (202) 389-5000
Facsimile: (202) 389-5200
Email: annelyse.gains@kirkland.com

Counsel to the Foreign Representative