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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	
	:	Chapter 15
Inscap Corporation, <i>et al.</i> , <sup>1</sup>	:	
	:	Case No. 23-
	:	
	:	(Joint Administration Requested)
Debtors in a Foreign Proceeding.	:	
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**LIST FILED PURSUANT TO  
FEDERAL RULE OF BANKRUPTCY PROCEDURE 1007(A)(4)**

Inscap Corporation is the court-appointed foreign representative (the “Foreign Representative”) of the above-captioned debtors (the “Debtors”) in 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 Ontario Superior Court of Justice (Commercial List). On January 23, 2023, the Foreign Representative commenced these chapter 15 cases (the “Chapter 15 Cases”) by filing, on behalf of each of the Debtors, the *Verified Petition for Entry of Order Recognizing Foreign Main Proceedings and Granting Additional Relief*, along with Official Form

<sup>1</sup> The Debtors in these Chapter 15 cases, along with the last four digits of each Debtor’s U.S. Federal Employer Identification Number (“FEIN”) or Canada Revenue Agency Business Number (“BN”), are: (i) Inscap Corporation (“Inscap”) (BN 1738), (ii) Inscap Inc., a Delaware Corporation (“Inscap Delaware”) (FEIN 1804), and (iii) Inscap (New York) Inc., a New York Corporation (“Inscap New York”) (FEIN 7231).

401 (*Chapter 15 Petition for Recognition of a Foreign Proceeding*) for each of the Debtors (collectively, the “Chapter 15 Petitions”) pursuant to sections 1504 and 1515 of the Bankruptcy Code.<sup>2</sup>

The Foreign Representative hereby files this list pursuant to Rule 1007(a)(4) of the Federal Rules of Bankruptcy Procedure and states as follows:

**A. Foreign Proceedings Concerning the Debtors**

1. Inscape Corporation is the duly authorized foreign representative, as that term is defined in Section 101(24) of the Bankruptcy Code, because it has been authorized by court order in the Canadian Proceedings to “act as the foreign representative . . . in respect of the [Canadian Proceedings] for the purpose of having [such] proceedings recognized in a jurisdiction outside Canada” and is “authorized to apply for foreign recognition of [the Canadian Proceedings], as necessary, in any jurisdiction outside of Canada, including the United States pursuant to Chapter 15 of Title 11 of the United States Code . . . .” See Amended Initial CCAA Order, dated January 20, 2023 (annexed as Ex. B to the Ehgoetz Declaration) at ¶¶ 47-48.

2. Other than the Canadian Proceedings and these Chapter 15 cases, there are no foreign proceedings (as such term is defined in section 101(23) of the Bankruptcy Code) pending with respect to the Debtors that are known to the Foreign Representative.

3. Inscape Corporation’s address is:

67 Toll Road  
Holland Landing, Ontario, Canada L9N 1H2

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<sup>2</sup> Additional background concerning (a) the basis for these Chapter 15 Cases; (b) the Canadian Proceedings and the Debtors’ business, corporate organization, and capital structure; and (c) the circumstances leading to the Chapter 15 Cases is set forth in the Declaration of Eric Ehgoetz in Support of Verified Petition for Entry of an Order Recognizing Foreign Main Proceedings and Granting Additional Relief (the “Ehgoetz Declaration”) filed contemporaneously herewith.

**B. Parties to Litigation**

4. The following is a list of parties to litigation pending in the United States in which any of the Debtors is a party at the time of the filing of the Chapter 15 Cases and the names and addresses of such parties:

a. *Fastenal Company v. Inscape (New York) Inc.*, Index No. EK12021001133, Supreme Court of the State of New York, County of Chautauqua;

- Plaintiff: Fastenal Company, P.O. Box 1286, Winona, Minnesota 55987-1286;
- Defendant: Inscape (New York) Inc., 221 Lister Avenue, Falconer, New York 14733;
- Attorney for Fastenal Company: Joseph M. Shur, Esq., Relin, Goldstein & Crane, LLP, 28 East Main Street, Suite 1800, Rochester, New York 14614;
- Attorney for Inscape (New York) Inc.: James P. Blenk, Esq., Lippes Mathias, LLP, 50 Fountain Plaza, Suite 1700, Buffalo, New York 14202;

b. *Andrew Larsen v. Marine Estates LLC, Rose Associates, Inc., Chelsea Landmark LLC, Texton Builders, LLC, Nash Electric Services Inc., Fairway Chelsea LLC and Plaza Construction Corporation*, Index No. 24718/2017E, Supreme Court of the State of New York, County of Bronx;

*Texton Builders LLC, v. Blake Electrical Contracting Co., Inc., Inscape (New York) Inc., and Al-Lee Installations Inc.*, Index No. 43046/2018E, Supreme Court of the State of New York, County of Bronx;

*Inscape (New York) Inc. v. Teich Sales Group, Inc.*, Index No. 43187/2018E, Supreme Court of the State of New York, County of Bronx;

- Attorney for Andrew Larsen: Frank J. Lombardo, Esq., Wingate, Russotti, Shapiro & Halperin, LLP, 420 Lexington Avenue, Suite 2750, New York, New York 10170;
- Attorney for Marine Estates LLC: Terrance J. Ingrao, Esq., Salter & Ingrao, P.C., 204 Willis Avenue, Mineola, New York 11501;
- Attorney for Inscape (New York) Inc.: D. Bradford Sessa, Esq., Law Offices of Fishman & Cabrera, 120 White Plains Road, Suite 220, Tarrytown, New York 10591;
- Attorney for Rose Associates, Inc. and Chelsea Landmark, LLC: Patrick J. Corbett, Esq., The Law Offices of Margaret G. Klein & Associates, 200 Madison Avenue, New York, New York 10016;
- Attorney for Texton Builders, LLC: Anthony Martine, Esq., McMahon, Martine & Gallagher, LLP, 55 Washington Street, 7<sup>th</sup> Floor, Brooklyn, New York 11201;

- Attorney for Nash Electric Services, Inc.: Maria Miller Ostrover, Esq., Hannum Feretic Prendergast & Merlino, LLC, 55 Broadway, Suite 202, New York, New York 10006;
  - Attorney for Al-Lee Installations, Inc.: Donald L. Frum, Gambeski & Frum, Esq., 565 Taxter Road, Suite 150, Elmsford, New York 10523;
  - Attorney for Teich Sales Group, Inc.: Gregory Lewis, Esq., Law Office of Terrence F. Kuhn, One Penn Plaza, Suite 5003, New York, New York 10119;
  - Attorney for Blake Electrical Contracting: Nir M. Gadon, Esq., The Law Offices of Kevin P. Westerman, 565 Taxter Road, Suite 110, Elmsford, New York 10523;
  - Attorney for 162 Fifth Avenue Associates LLC: Joseph Minasi, Esq., Ahmuty Demers & McManus, 200 I U Willets Road, Albertson, New York 11507;
- c. *Lackenbauer, Eric v. L&K Partners, Inc., Inscape (New York) Inc., and Polo Electric Corp.*, Index No. 161333/ 2018, Supreme Court of the State of New York, County of New York;
- Attorney for Eric Lackenbauer: Stuart T. Spitzer, Esq., Malone, Tauber & Sohn, P.C., 147 West Merrick Road, Freeport, New York 11520;
  - Attorney for Eric Lackenbauer: Anthony Beneduce, Esq., Zaremba Brown, PLLC, 40 Wall Street, 52<sup>nd</sup> Floor, New York, New York 10005;
  - Attorney for Inscape (New York) Inc.: Maureen E. Peknic, Esq., Eustace, Prezioso & Yapchanyk, 55 Water Street, 28<sup>th</sup> Floor, New York, New York 10041;
  - Attorney for L&K Partners Inc.: John C. Spataro, Esq., Law Office of James J. Toomey, 485 Lexington Avenue, 7<sup>th</sup> Floor, New York, New York 10017;
  - Attorney for Polo Electric Corp.: Nathan Brill, Esq., Lester Schwab Katz & Dwyer LLP, 120 Broadway New York, New York 10271.

**C. Entities Against Whom Provisional Relief is Sought Pursuant to 11 U.S.C. § 1519**

5. The Debtors are not seeking provisional relief at this time.

Dated: January 23, 2023  
New York, New York

Respectfully submitted,  
WILLKIE FARR & GALLAGHER LLP

By: /s/ Weston T. Eguchi  
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