

dated and pronounced March 17, 2026 (the “Receivership Order”) entered by the Court of King’s Bench of Alberta in Judicial Centre of Edmonton, Alberta, Canada, Court File No. 2603-02889 (the “Canadian Court” and the “Canadian Proceeding”), pending under Canada’s *Bankruptcy and Insolvency Act* (“BIA”), files this *Notice of Designation as a Complex Chapter 15 Case*. The undersigned counsel of the Foreign Representative believes that this chapter 15 case qualifies as a complex chapter 15 case because:

- The Debtors have a total debt of more than \$10 million;
- There are more than 50 parties in interest in this case;
- Claims against the Debtor are publicly traded;
- Other (Substantial explanation is required. Attach additional sheets if necessary.)

Dated: March 30, 2026.

Respectfully submitted,

MUNSCH HARDT KOPF & HARR, P.C.

By: /s/ John D. Cornwell

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in its Capacity as Court-Appointed Receiver and
Manager of the Debtors***

2. The Debtors must give notice of this Order to all parties in interest within seven days. If a party-in-interest objects to the provisions of this Order, that party may file an appropriate motion within 14 days after service of the Order.

3. The Bankruptcy Local Rules apply to this case, subject to the following modifications:

- a. Bankruptcy Local Rule 1001-1(b) does not apply.
- b. Local District Court Civil Rule 83.1 applies.
- c. Appendix A to the Local Rules of the District Court applies.
- d. If a conflict exists between the Bankruptcy Local Rules and the Procedures for Complex Cases in the Southern District of Texas, the Procedures for Complex Cases in the Southern District of Texas govern.

Signed: _____, 2026.

THE HONORABLE ALFREDO R. PEREZ
UNITED STATES BANKRUPTCY JUDGE