



ONTARIO SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

COUNSEL/ENDORSEMENT SLIP

COURT FILE NO.: CV-25-00738613-00CL

DATE: June 26, 2026

NO. ON LIST: 2

TITLE OF PROCEEDING: HUDSON'S BAY COMPANY ULC COMPAGNIE DE LA BAIE D'HUDSON SRI; HBC CANADA PARENT HOLDINGS INC; HBC CANADA PARENT HOLDINGS 2 INC; HBC BAY HOLDINGS I INC; HBC BAY HOLDINGS II ULC; HBC HOLDINGS GP INC; THE BAY HOLDINGS ULC; HBC CENTERPOINT GP INC; HBC YSS2LP INC; SN OSPMIS LIMITED; HBC YSS 1 LP INC; 2472596 ONTARIO INC; 2472598 ONTARIO INC v. REVENU QUÉBEC; Chelsey Boucher; Lucio Cammisa; Orazio Mazzotta; Mozac Mohammed-Ali; SCHINDLER ELEVATOR CORPORATION; His Majesty the King in Right of Canada as represented by the Minister of National Revenue; INDO COUNT INDUSTRIES INDIA LIMITED; DIESEL CANADA INC; UNITED STEELWORKERS Local 1-417; LEVI STRAUSS & CO; RICHEMONT CANADA INC; MAPLE LEAF SPORTS & ENTERTAINMENT PARTNERSHIP; HIS MAJESTY THE KING IN RIGHT OF ONTARIO; HIS MAJESTY THE KING IN RIGHT OF MANITOBA; Restore Capital LLC, in its capacity as FILO AGENT; HCS 102, LLC; Tiger Asset Solutions Canada, ULC; 1903 Partners, LLC; WESTCLIFF MANAGEMENT LTD.; GA Group Solutions LLC; ATTORNEY GENERAL OF CANADA; RAPID CONSTRUCTION SOLUTIONS INC.; DKRT FAMILY CORP.; THE ASSOCIATION FOR MANITOBA ARCHIVES; RUBY LIU COMMERCIAL INVESTMENT CORP. ; ROYAL TRUST CORPORATION OF CANADA

BEFORE: JUSTICE KIMMEL

PARTICIPANT INFORMATION

For Plaintiff, Applicant, Moving Party:

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For Other, Self-Represented:

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ENDORSEMENT OF JUSTICE KIMMEL:

The Motion

[1] The Applicants are seeking:

- (a) An Order appointing the following representative counsel to represent the interests of each person included in the Hudson's Bay Company Pension Plan (the "Pension Plan") wind-up effective September 1, 2025, including (i) Pension Plan members whose employment was terminated between March 7, 2025 and August 31, 2025; (ii) any person claiming (or who may hereafter claim or purport to claim) an interest under or on behalf of such person; and (iii) any individual who had been a member of the Pension Plan or predecessor plans, claiming an entitlement to the Pension Surplus (collectively, the "Represented Pension Plan Members"):
 - i. Koskie Minsky LLP on behalf of Persons who, as of December 31, 2001, had an entitlement under the defined benefit provision of the Dumai Plan, and who may also have an entitlement to defined benefits determined in accordance with Part "E" of the Pension Plan (in their capacity as such, the "Dumai Group");
 - ii. Ursel Phillips Fellows Hopkinson LLP ("Ursel Phillips") on behalf of persons with entitlements under either or both of the defined benefit provision and defined contribution provision under the Pension Plan (other than the Dumai Group); (the "Non Dumai Members").
- (b) A Mediation Order appointing the Retired Chief Justice Geoffrey B. Morawetz of Morawetz Chambers Inc. as mediator in respect of the Pension Surplus matters; and

(c) A Stay Extension and Second KERP Approval Order:

- i. extending the Stay Period from June 30, 2026, until and including October 31, 2026; and
- ii. approving the Second KERP, granting a Second KERP Charge in the maximum amount of \$527,500 as security for payment under the Second KERP, and sealing the unredacted Second KERP pending further order of this Court.

[2] This motion is supported by two Affidavits of Thomas Obersteiner sworn June 18, 2026 in respect of the Appointment of Pension Plan Representative Counsel and Mediator (the "Pension Rep Counsel Affidavit") and sworn June 18, 2026 in respect of the Stay Extension and Second KERP (the "Stay Extension Affidavit", and together with the Pension Rep Counsel Affidavit, the "Obersteiner Affidavits"), as well as the Monitor's Sixteenth Report dated June 24, 2026. No stakeholder opposed the relief sought.

[3] The Applicants' factum and the Monitor's Sixteenth Report filed in support of this motion provide detailed justifications for each of the heads of relief.

[4] Capitalized terms not otherwise defined in this endorsement shall have the meanings ascribed to them in the factum of the Applicants.

Pension Plan Representative Counsel Order

[5] The Company established and sponsors a registered pension plan, the Hudson's Bay Company Pension Plan, which includes both defined benefit and defined contribution components. The Pension Plan is registered with FSRA, pursuant to the Pension Benefits Act (Ontario) (the "PBA").

[6] The Pension Plan and Predecessor Plans have a lengthy and complex history, first established in 1961, involving numerous amendments, restatements, corporate acquisitions, plan mergers, and divestitures.

[7] Prior to April 3, 2025, the Company was the administrator of the Pension Plan. On April 3, 2025, FSRA appointed TELUS Health (Canada) Ltd. as the Independent Pension Administrator in respect of the Pension Plan. On September 8, 2025, FSRA issued a notice of intended decision to wind up the Pension Plan effective September 1, 2025, and subsequently issued a wind-up order on October 20, 2025. The Wind-Up Order includes members who terminated employment with the Company between March 7, 2025, and August 31, 2025.

[8] Based on the most recent actuarial valuation report, the Pension Plan's assets substantially exceed the amounts required to pay all accrued pension benefits on both a going concern and wind-up basis. A significant Pension Surplus is expected following the wind-up.

[9] On July 7, 2025, the Company advised the Independent Pension Administrator of its intention to seek a claim over the Pension Surplus, which would form a significant source of recovery for the Company's secured creditors.

[10] In light of the existing mandate of Employee Representative Counsel, Ursel Phillips was approached and has expressed a willingness to expand its existing mandate to include issues relating to the Pension Surplus: specifically, to act on behalf of all members of the Pension Plan with entitlements under either or both of the DB and DC provision under the Pension Plan (other than the Dumai Group).

[11] Koskie Minsky had a historical and an existing retainer with the members of the Dumai Plan in the initial Class Action (the "Dumai Decision"), as well as the proposed Uncertified Class Action Application which was commenced on June 6, 2025. The Dumai Members are in a unique position as the Dumai Decision is relevant to their potential entitlement to the Pension Surplus. Accordingly, the Company believes it is appropriate that separate representative counsel be appointed for the Dumai Members.

- [12] The Company has consulted with the Monitor, Independent Pension Administrator, FILO Agent, Pathlight, and the proposed Pension Plan Representative Counsel regarding the proposed process to address the Pension Surplus. This process includes the use of Pension Plan Representative Counsel and a Pre-Mediation Negotiation period, followed by a mediated negotiation with a Court-appointed Mediator, all aimed at reaching a resolution and Pension Surplus Sharing Agreement for Court approval. The three orders now sought support all steps in this process and will assist in resolving one of the final material steps in the CCAA Proceedings and potentially facilitate additional recovery to the Applicants' secured creditors.
- [13] The Company intends to engage with the Monitor, the Independent Pension Administrator, Pension Plan Representative Counsel (if appointed), the FILO Agent and Pathlight (the "Surplus Mediation Parties") to attempt to resolve entitlement to the Pension Surplus consensually. The parties propose an initial 60-day period, with a possible 45-day extension (if consented to by the Monitor), to negotiate directly (the "Pre-Mediation Negotiation").
- [14] In this court's May 1, 2025 endorsement (*Hudson's Bay Company, Re*, 2025 ONSC 2724, the "ERC Appointment Decision") appointing Ursell Phillips as employee representative counsel ("ERC") the mandate did not extend to assisting with any entitlements of current and former employees under the Pension Plan because it was not then in wind-up and the Independent Pension Administrator had only recently been appointed by FSRA. Now, over a year later, the pension issues need to be addressed and the Independent Pension Administrator supports the appointment of the proposed representative counsel so that the various stakeholder interests, including those of the vulnerable class of retirees, can be fairly represented in the context of any negotiated or, if necessary adjudicated, resolution of the entitlements to the Pension Surplus.
- [15] The relevant legal principles to be considered in determining whether to appoint representative counsel in these circumstances are the same as were outlined by the court in the ERC Appointment Decision (at paras. 21-27):

21. Section 11 of the CCAA as well as the Rules of Civil Procedure give this Court broad jurisdiction to appoint Representative Counsel for vulnerable stakeholder groups such as employees. In addition, Rule 10.01 provides for the appointment of Representative Counsel for people who have a present, future, contingent or unascertained interest in, or may be affected by, the proceeding.

22. In *Nortel Networks Corporation (Re)*, 2009 CanLII 26603, Justice Morawetz (as he then was) held that representative counsel should be appointed to allow vulnerable stakeholders (in that case, employees and retirees) to participate in the CCAA proceedings: [I]t is submitted that employees and retirees are a vulnerable group of creditors in an insolvency because they have little means to pursue a claim in complex CCAA proceedings or other related insolvency proceedings. It was further submitted that the former employees of Nortel have little means to pursue their claims in respect of pension, termination, severance, and retirement payments and other benefit claims and that the former employees would benefit from an order appointing representative counsel. In addition, the granting of a representation order would provide a social benefit by assisting by assisting former employees and that representative counsel would provide a reliable

resource for former employees for information about the process. The appointment of representative counsel would also have the benefit of streamlining and introducing efficiency to the process for all parties involved in Nortel's insolvency. I am in agreement with these submissions.

23. In *CanWest Publishing Inc. (Re)*, 2010 ONSC 1328, Pepall, J. (as she then was) summarized the appropriate factors to be considered in a determination of whether a representative counsel order is appropriate: (a) the vulnerability and resources of the group sought to be represented; (b) any benefit to the companies under CCAA protection; (c) any social benefit to be derived from representation of the group; (d) the facilitation of the administration of the proceeding and efficiency; (e) the avoidance of multiplicity of legal retainers; (f) the balance of convenience and whether it is fair and just including to the creditors of the estate; (g) whether representative counsel has already been appointed for those who have similar interests to the group seeking representation and who is also prepared to act for the group seeking the order; and (h) the position of other stakeholders and the Monitor.

24. The factors listed above are neither exhaustive nor mandatory. Factors not enumerated in *CanWest* may be relevant to the analysis in a particular case, and each one of the *CanWest* factors need not be satisfied before the Court can conclude that the appointment of representative counsel may be appropriate. Rather, as Pepall, J. stated, the factors enumerated are considerations in what is to be a holistic analysis informed by the particular circumstances of each case.

25. The ability for representative counsel to provide for effective communication and efficiency within the proceedings have been highlighted as particularly important factors: *Quadriga Fintech Solutions Corp (Re)*, 2019 NSSC 65 at para 9.

...

27. Exercising its broad jurisdiction, this Court has previously appointed representative counsel in CCAA proceedings. For example, courts have granted such orders in the following CCAA proceedings: (a) *Target Canada Co.*: representative counsel was appointed for all employees other than officers and directors; (b) *Nordstrom Canada*: representative counsel was appointed for all store-level employees, all non-store level employees, other than non-store level employees eligible for a KERF Payment, directors and officers of the Nordstrom Canada Entities, and the Senior Vice President, Regional Manager for Canada; (c) *Sears Canada*: representative counsel was appointed for non-unionized active and former employees; (d) *Nortel Networks Corp.*: representative counsel was appointed for all former employees

and pensioners; (e) *Fraser Papers Inc.*: representative counsel was appointed for former unionized members and non-unionized active and retired members; and (f) *CanWest*: representative counsel was appointed for non-unionized salaried employees and retirees.

- [16] The same reasoning and guiding factors that were considered and applied in the ERC Appointment Decision continue to apply now, to the extension of the ERC's mandate to include the previously excluded role of assisting with any entitlements of current and former employees who are Non Dumai Members under the Pension Plan.
- [17] I agree with the specific rationale put forward in the Applicants' factum with respect to the applicable enumerated factors. Among other considerations, the Represented Pension Plan Members comprise a diverse and vulnerable group of approximately 16,219 individuals with entitlements under the Pension Plan and Predecessor Plans, including approximately 3,000 members with DB entitlements and 13,000 members with DC entitlements. The Company's goal is to reach a consensual, negotiated resolution of the competing interests of the Represented Pension Plan Members and the Company on a cost-efficient and expedient basis. The appointment of Pension Plan Representative Counsel will facilitate those negotiations.
- [18] What has changed since the ERC Appointment Endorsement, is that it is now apparent that the ERC cannot adequately, fairly and appropriately represent all of the employees who are Pension Plan Members because the interests and entitlements of the Dumai Members in and to the Pension Surplus are specific and unique and may not be entirely aligned with the interests and entitlements of the Non Dumai Members. Accordingly, it is now appropriate to have two different representative counsel. I am satisfied that Koskie Minsky is qualified and appropriate to take on that role for the Dumai Members, particularly given their familiarity with the Pension Plan and the interests and claimed entitlements of the Dumai Members because of their continuing role as class action counsel in the Dumai class action.
- [19] Each of the proposed Pension Plan Representative Counsel have confirmed their willingness to act as such. They each have the requisite independence, experience, ability to communicate with current and former employees, and retirees, and demonstrated interest in working with the Monitor. Their appointment is supported by the Independent Pension Administrator and the Monitor.
- [20] All of the participating stakeholders have carefully reviewed the proposed form of Appointment Order, and its provisions and mechanics have been the subject to a fulsome review and negotiation among these participating groups. Aside from the bespoke, staged negotiation and mediation, the specific terms of the proposed form of order (including the proposed protections for Representative Counsel) are consistent with other orders that this court has granted appointing representative counsel. Because of the unique and continuing involvement of the Independent Pension Administrator, the added protections included for it are also appropriate. Furthermore, any individual Represented Pension Plan Member who does not wish to be represented by their respective Pension Plan Representative Counsel in the Pension Surplus Proceedings may, within thirty (30) days of receiving notice of the appointment, deliver an Opt- Out Notice to the Monitor and shall thereafter not be bound by the actions of such Pension Plan Representative Counsel.
- [21] The court requested one change, to provide for oversight by both the Independent Pension Administrator and the Monitor (not just the Independent Pension Administrator) with respect to the review and payment of the accounts the Representative Counsel for the Non Dumai Members out of the Pension Plan assets. This change has been incorporated into the revised form of Pension Plan Representative Counsel Order that I have approved and will now sign.

Court Appointed Mediator Order

- [22] Pursuant to section 11 of the CCAA, this Court has broad discretionary power to "make any order that it considers appropriate in the circumstances." This jurisdiction extends to appointing a mediator to facilitate resolution of complex matters in CCAA proceedings. CCAA Courts have appointed mediators in numerous proceedings to assist with complicated negotiations: see *In the Matter of a Plan of Compromise or Arrangement of Imperial Tobacco Canada Limited and Imperial Tobacco Company Limited* (March 12, 2019), Ont. SCJ, Court File No. CV-19-616077-00CL, (ARIO) at paras 39-44; *Laurentian University of Sudbury*, 2021 ONSC 659 at para 72-79.
- [23] The combined outcome under the Pension Plan Representative Counsel Order and the Court Appointed Mediator Order is that, if a consensual resolution cannot be reached without the assistance of a third party, the mediator will facilitate a formal mediation process, in furtherance of the Company's goal to reach a consensual, negotiated resolution of the competing interests of the Represented Pension Plan Members and the Company on a cost-efficient and expedient basis.
- [24] The Mediation Order envisions an initial 60-day Pre-Mediation Negotiation period, with potential 45-day extensions (if the Monitor consents), before proceeding to formal mediation if necessary. To avoid delay and permit the mediator to commence preparation, the Applicants and Surplus Mediation Parties seek the mediator's appointment now.
- [25] The process provides that either directly, or with the assistance of the mediator, the Pension Surplus Mediation Parties, will seek to negotiate an arrangement governing the Pension Surplus consistent with the PBA and other applicable law. If the parties are able to reach a settlement, the Applicants will return to this Court to seek approval of the settlement.
- [26] The proposed Mediator, retired Chief Justice Morawetz, is unquestionably qualified and his appointment is supported by all of the Pension Surplus Mediation Parties. I agree that it is appropriate for the court to approve this appointment now so that the Mediator is available if his services are needed. The Mediation Order places the responsibility on the Monitor to advise the Mediator if the Pre-Mediation Negotiations are completed without a resolution, after which the Mediator shall commence his role. During the Pre-Mediation Time Period, the Mediator may commence his preparation for the potential mediation.
- [27] The provisions of the proposed Mediation Order, including the proposed protections for the Mediator, are consistent with other mediation orders that have been granted by this court, but tailored to the specific circumstances of this case. A similar change to the proposed draft order, regarding the Monitor's oversight of the Mediator's fees, as was requested by the court in respect of the Pension Plan Representative Counsel Order has also been incorporated into the final form of Mediation Order that I have approved and will now sign.

Second KERP Approval and Sealing Order Over KERP Summary

- [28] The jurisdiction to approve a KERP and grant a KERP charge is grounded in the Court's general power under section 11 of the CCAA to make any order it sees fit in a CCAA proceeding: see *Cinram International Inc., Re*, 2012 ONSC 3767 at para 91.
- [29] This Court has approved employee retention plans and charges in numerous proceedings. In the current CCAA Proceedings, on March 21, 2025 this court approved the First KERP and First KERP Charge in the amount of \$3 million to secure payments to Key Employees, finding it necessary and appropriate: see *Hudson's Bay Company ULC et al., Re*, (March 26, 2025) Ont SCJ Court File No. CV-25- 00738613-00CL (Endorsement of ARIO), at para. 90.
- [30] The First KERP has been implemented in accordance with its terms and all amounts secured by the First KERP Charge have been paid.

- [31] The Applicants and the Monitor are completing the remaining wind-up steps in the CCAA Proceedings with the assistance of this small number of Key Employees. These Key Employees possess institutional knowledge critical to addressing remaining unresolved issues, including SERP and Pension-related matters. To ensure their continued involvement, the Company and the Monitor have designed and support the Second KERP.
- [32] The Applicants now seek approval of a Second KERP and a corresponding Second KERP Charge to secure such payments in the amount of \$527,500. This Second KERP Charge would replace and stand in the same priority as the First KERP Charge, ranking behind the Administration Charge but in priority to all other charges.
- [33] The Second KERP has been designed in consultation with the Monitor to incentivize the remaining five Key Employees (two of whom were designed as Key Employees under the First KERP) to continue their employment with the Company in order to facilitate an orderly conclusion of the remaining wind-down matters, maximize recoveries for stakeholders, and assist with the resolution of the Term Sheet and Hardship Program matters, the SERP matters, and the Pension Surplus. On June 15, 2026, the Board of Directors of the Company approved the proposed Second KERP. The Monitor is supportive of the proposed Second KERP and the Second KERP Charge. The FILO Agent and Pathlight were advised of the proposed Second KERP. The FILO Agent has approved the Second KERP and no opposition was raised by Pathlight.
- [34] Each case is fact specific. As summarized in paragraphs 55-57 of the Applicants' factum and detailed in Article 6.0 of the Monitor's Sixteenth Report, all of the factors generally considered by the court in deciding whether to approve a KERP are engaged here, namely: (a) the Monitor approves of the KERP; (b) the beneficiaries of the KERP would consider other employment opportunities if the charge was not approved; (c) the beneficiaries of the KERP are crucial to the successful restructuring of the debtor company; (d) a replacement could not likely be found in a timely manner; (e) the board of directors exercised their business judgment in developing and approving the KERP; and (f) the KERP is supported or consented to by secured creditors of the debtor: *Aralez Pharmaceuticals Inc. (Re)*, 2018 ONSC 6980, at para. 29.
- [35] The additional considerations to be applied in evaluating the business judgement underlying a KERP also support the court's approval of the KERP, namely: (i) the existence of arm's length input of the monitor into the scope and design of the KERP; (ii) the necessity of the retention program on a case-by-case basis; and (iii) whether the KERP's design reasonably relates to the goals pursued, which goals must be of demonstrable benefit to the objectives of the restructuring process: see *Aralez*, at para. 30.
- [36] An essential component of the KERP is the Applicants' ability to pay the Key Employees their retention payments in accordance with the terms of the KERP Agreements. This obligation is to be secured by the Second KERP Charge.
- [37] The KERP's terms are comparable to other key employee retention plans approved in CCAA Proceedings. The justification for the KERP aligns with the factors to be considered in the approval of such plans. The Second KERP and the corresponding Second KERP Charge are approved on that basis.
- [38] The Applicants seek to seal the KERP Summary appended at Confidential Appendix 1 to the Monitor's Sixteenth Report. The KERP Summary contains identifiable individual information and compensation information for each of the Key Employees, that if made public may cause harm to the Key Employees and disruption to the Company. The employees have not consented to the disclosure of this private information. This Court has granted similar sealing orders in the past see: *Xiwang Iovate Holdings Company Limited et al*, 2026 ONSC 676 and *Just Energy Group Inc. et al.*, 2021 ONSC 7630, at paras. 26-29, and previously in this CCAA proceeding when the First KERP was approved.

[39] To grant this relief, the court must be satisfied of the test in *Sierra Club of Canada v. Canada (Minister of Finance)*, 2002 SCC 41, [2002] 2 S.C.R. 522, at para. 53, as modified by *Sherman Estate v. Donovan*, 2021 SCC 25, 72 C.R. (7th) 223, at paras. 38 and 43, having regard to:

- (a) The important public interest in the openness of courts and whether it poses a serious risk to some other important public interest;
- (b) Whether the order sought is necessary to prevent the risk to the other identified public interest because alternative measures are not available; and
- (c) As a matter of proportionality, the benefits of the sealing order outweigh its negative effects.

[40] All three factors delineated in the *Sherman Estate v. Donovan*, 2021 SCC 25, at para 38, are satisfied here.

- (d) As in *Just Energy*, the documents the applicants seek to seal contain the names of the KERP recipients and the amounts each will receive. Publicly disclosing employee compensation violates the privacy interest of those employees. The employees themselves have not initiated any court proceeding that would require production of that information and have not consented to its release. Broad publication of confidential income data could create risks for employee retention in this and other CCAA proceedings. This is an important public interest.
- (e) There is no reasonable alternative to granting the sealing relief requested. If such relief is not granted, it would lead to the disclosure of personally sensitive information for which the Key Employees have a reasonable expectation of privacy.

[41] The benefits of the sealing request outlined above outweigh any deleterious effects. The information contained in the KERP Summary is limited to the amounts that each employee is to receive in accordance with the KERP. Furthermore, there are no deleterious effects - the aggregate amount to be paid to the Key Employees has been disclosed within this motion, allowing stakeholders to assess the aggregate impact the KERP would have on the Applicants' financial position. There is no benefit to the stakeholders of the Applicants of having the KERP Summary made public when the disclosure of the KERP Summary would harm the Key Employees and breach their privacy interests

[42] Accordingly, the sealing order with respect to the KERP Summary at Confidential Appendix 1 to the Monitor's Sixteenth Report is approved.

Stay Extension

[43] As the current Stay Period expires on June 30, 2026, the Applicants are seeking to extend the Stay Period to and including October 31, 2026. The efforts that the Applicants have pursued in the course of the CCAA proceedings, in consultation with the Monitor, since the last stay extension was granted on March 19, 2026 to maximize value for stakeholders are described in detail in the support affidavits and the Sixteenth Monitor's Report and are summarized in paragraph 24 of the Applicants' factum.

[44] Pursuant to s. 11.02(2) of the CCAA, this Court is empowered to extend the stay of proceedings granted to a debtor company. In doing so, the Court must consider whether: (a) the order sought is appropriate in the circumstances; and (b) the applicant has been acting in good faith and with due diligence.

[45] The Monitor believes that no creditor will be prejudiced if the extension is granted and supports the requested extension. Further, the Monitor who is of the view that the Applicants are acting with good faith and due diligence. There is no evidence to suggest otherwise.

[46] The Cash Flow Forecast provided in the Monitor's Sixteenth Report reflects that there is sufficient funding to fund operations and the costs of these proceedings during the proposed extension period. All of these considerations favour granting the requested Stay Extension and the the requested stay extension is approved, accordingly.

Orders

[47] For the foregoing reasons, I have signed the three requested orders all dated and effective as of June 26, 2026: the Pension Plan Representative Counsel Appointment Order, the Court Appointed Mediator Order and the Second KERP And Stay Extension Approval Order

[48] Paragraph 21 of the Pension Plan Representative Counsel Order Endorsement provides that: the Dumai Uncertified Class Action Application is adjourned and no further steps shall be taken in the Dumai Uncertified Class Action Application pending further order of this Court. Koskie Minsky will be providing the court with similar language to include in an endorsement in the Dumai class action proceeding, which is also under my supervision.

Date: Jun 26, 2026



Jessica Kimmel