

File No. CI 26-01-57065

THE KING'S BENCH
WINNIPEG CENTRE

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

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF
WAREHOUSE ONE CLOTHING LTD.

(the “**Applicant**”)

APPLICATION UNDER: *THE COMPANIES' CREDITORS ARRANGEMENT*
ACT, R.S.C., c. C-36, AS AMENDED

DISTRIBUTION, WEPPA DECLARATION AND STAY EXTENSION ORDER

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(File No. 71453.1)

THE KING'S BENCH
WINNIPEG CENTRE

THE HONOURABLE MADAM

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Monday, the 27th day of July, 2026

JUSTICE GRAMMOND

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THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C., c. C-36, AS AMENDED

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THIS MOTION made by the Applicant pursuant to the *Companies' Creditors Arrangement Act*, R.S.C., 1985, c. C-36, as amended (the "CCAA") for an order (i) authorizing an interim distribution to Highgate Capital Ltd. in repayment of the Senior Credit Facility; (ii) granting a declaration in respect of the *Wage Earner Protection Program Act*, S.C. 2005, c. 47, s.1 (the "**WEPPA**") and (iii) extending the Stay Period (as defined in the Amended and Restated Initial Order pronounced May 15, 2026 (the "**ARIO**")), was heard this day at the Law Courts Building at 408 York Avenue, in the City of Winnipeg, in the Province of Manitoba.

ON READING the Affidavit of Shamsh Kassam affirmed May 1, 2026, the Pre-Filing Report dated May 4, 2026 of Alvarez and Marsal Canada Inc. ("**A&M**") in its capacity as proposed Monitor, the First Report dated May 12, 2026 of A&M in its capacity as Monitor of the Applicant (the "**Monitor**"), and the Second Report of the Monitor dated July 20, 2026, and on

hearing the submissions of counsel for the Applicant, counsel for the Monitor, and counsel for Highgate Capital Ltd., WHO Industries Inc. and R.I.S. Media Ltd., no one appearing for any other person on the service list, although properly served as appears from the Affidavit of Service of Elenore Kesterke sworn July 22, 2026 and the Affidavit of Service of Erik Axell sworn July 23, 2026;

1. THIS COURT ORDERS that the time for service of the Notice of Motion and the supporting materials is hereby abridged and validated such that this motion is properly returnable today and hereby dispenses with further service thereof.
2. THIS COURT ORDERS that the Applicant is hereby authorized and directed to make a distribution to Highgate Capital Ltd., in its capacity as lender, by assignment (in such capacity, the “**Senior Lender**”) under the credit agreement dated as of April 16, 2010 between the Applicant and Canadian Imperial Bank of Commerce (as amended and modified from time to time, the “**Senior Credit Agreement**”), in an amount equal to the aggregate outstanding obligations (including, without limitation, principal, interest and fees and expenses) owing by the Applicant to the Senior Lender under the Senior Credit Agreement and all related loan and security documents.
3. THIS COURT ORDERS AND DECLARES that, pursuant to subsections 5(a)(b)(iv) and 5(5) of WEPPA, the Applicant meets the criteria prescribed by section 3.2 of the *Wage Earner Protection Program Regulations*, SOR/2008-222, and its former employees are individuals to whom WEPPA applies.
4. THIS COURT ORDERS that the Stay Period is hereby extended from September 11, 2026 to and including December 18, 2026.

5. THIS COURT HEREBY REQUESTS the aid and recognition of any court, tribunal, regulatory or administrative body having jurisdiction in Canada or in the United States to give effect to this Order. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to the Applicant or the Monitor as an officer of this Court, as may be necessary or desirable to give effect to this Order or to assist the Applicant, the Monitor and their agents in carrying out the terms of this Order.

July , 2026

Justice

Grammond

Digitally signed by
Justice Grammond

Date: 2026.07.28
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I, CATHERINE HOWDEN OF THE FIRM OF PITBLADO LLP, COUNSEL FOR THE APPLICANT HEREBY CERTIFY THAT I HAVE RECEIVED THE CONSENTS AS TO FORM OF THE FOLLOWING PARTIES: BRADLEY WIFFEN OF GOODMAN LLP, COUNSEL FOR THE MONITOR, ALVAREZ & MARSAL CANADA INC., JJ BURNELL OF MLT AIKINS LLP COUNSEL FOR HIGHGATE CAPITAL LTD., WHO INDUSTRIES LTD. AND R.I.S. MEDIA LTD. AS DIRECTED BY THE HONOURABLE MADAM JUSTICE GRAMMOND.