

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

NOTICE OF MOTION OF THE APPLICANT
(APPROVAL AND VESTING ORDER, DISTRIBUTION, WEPPA DECLARATION
AND STAY EXTENSION ORDER)
BEFORE THE HONOURABLE MADAM JUSTICE GRAMMOND
Monday, July 27, 2026, at 9:00 a.m.

PITBLADO LLP
2500 - 360 Main Street
Winnipeg, Manitoba
R3C 4H6

Catherine E. Howden

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(File No. 71453.1)

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

NOTICE OF MOTION

The Applicant will make a motion before the Honourable Madam Justice Grammond on Monday, the 27th day of July, 2026 at 9:00 o'clock in the forenoon, or so soon after that time as the motion can be heard, at the Law Courts, 408 York Avenue, Winnipeg, Manitoba.

THE MOTION IS FOR:

1. Orders substantially in the forms attached hereto as Schedule A (Approval and Vesting Order) and Schedule B (Distribution, WEPPA Declaration and Stay Extension Order) to this Notice of Motion which provide for, *inter alia*, an order:

- (a) Abridging the time for service, validating service or dispensing with service if necessary of this Notice of Motion and the materials filed in support thereof, such that this motion is properly returnable on Monday, July 27, 2026 at 9:00 a.m. and dispensing with further service thereof;

- (b) Approving the sale transaction (the “**IP Transaction**”) contemplated by the asset purchase agreement dated July 17, 2026 (the “**Sale Agreement**”) between the Applicant, as Vendor and YM Inc. (Sales) as Purchaser (the “**Purchaser**”);
- (c) Vesting in the Purchaser all of the Applicant’s right, title and interest in and to the assets described in the Sale Agreement (the “**Purchased Assets**”) free and clear of any claims or encumbrances, all as set out in the proposed Approval and Vesting Order;
- (d) Sealing the Confidential Appendix to the Second Report (the “**Confidential Appendix**”) until the completion of the Transaction;
- (e) Approving and authorizing the distribution and payment to Highgate Capital Ltd., in its capacity as lender (in such capacity, the “**Senior Lender**”) in an amount equal to the aggregate outstanding obligations under the Applicant’s Senior Credit Facility (the “**Senior Credit Facility**”);
- (f) Declaring that the Applicant meets the criteria prescribed by Section 3.2 of the *Wage Earner Protection Program Regulations*, SOR 2008-222 and that the Applicant’s former employees are eligible individuals to whom the *Wage Earner Protection Program Act*, S.C. 2005, c. 47, s.1 (the “**WEPPA**”) applies; and
- (g) Extending the stay of proceedings granted in the Amended and Restated Initial Order pronounced by the Honourable Madam Justice Grammond on May 15, 2026 (the “**ARIO**”) from September 11, 2026 to and including December 18, 2026 (the “**Stay Period**”);

2. Such further and other relief as this Honourable Court may deem just.

THE GROUNDS FOR THE MOTION ARE:

1. *Companies' Creditors Arrangement Act* R.S.C. 1985, c. C-36, as amended ("**CCAA**") section 11, 11.02(2), 11.02(3), 36(1), 36(2), 36(3) and 36(6);
2. The Court of King's Bench Rules 1.04, 2.03, 3.02(1), 16.04(1), 16.08, 37.08(2) and 59.06;
3. *The Court of King's Bench Act*, C.C.S.M. c. C280, sections 37 and 77;
4. Rules 3, 4.6, 11 and 13 of the *Bankruptcy and Insolvency General Rules*; C.R.C.C. 368, as amended;
5. *Wage Earner Protection Program Act*, S.C. 2005, c. 47, s. 1, 5(1)(b)(iv), 5(5);
6. *Wage Earner Protection Program Regulations* SOR/2008-222, section 3.2;

Background

7. On May 6, 2026 this Honourable Court granted an Initial Order under the CCAA (hereinafter the "**Initial Order**") which ordered, *inter alia*, an initial stay of proceedings against the Applicant and the Monitor until May 15, 2026 (the "**Initial Stay Period**"), appointed Alvarez & Marsal Canada Inc. as monitor (in such capacity the "**Monitor**"), approved a DIP Loan and DIP Agreement to fund the Applicant's financial requirements during the Initial Stay Period, authorized payment of certain pre-filing amounts with the consent of the Monitor, and granted certain priority Charges over the Applicant's Property (as defined in the Initial Order);
8. On May 15, 2026, this Honourable Court granted the ARIO, which ordered, *inter alia*, an extension of the stay of proceedings to September 11, 2026, approved Sale Guidelines with respect to the liquidation and sale of the Applicant's inventory and furniture, fixtures and equipment ("**FF&E**") at each of the Applicant's retail store locations (the "**Liquidation Sale**"), and

authorized the Applicant, in consultation with the Monitor, to pursue all opportunities for sale, assignment or other transactions in respect of the Applicant's business and its remaining property, subject to Court approval of any material transaction;

Activities During the Stay Period

9. Since the pronouncement of the ARIO, the Applicant, with the assistance of the Monitor, has been acting in good faith and with due diligence to, *inter alia*,

- (a) Complete the Liquidation Sale of its inventory and FF&E in accordance with the Sale Guidelines;
- (b) Disclaim all of its retail store leases, and vacate all retail store locations;
- (c) Terminate employees; and
- (d) Pursue opportunities for the sale of the Applicant's remaining property, including its intellectual property (the "IP");

Approval and Vesting Order

10. Pursuant to the ARIO, the Applicant was authorized, in consultation with the Monitor, to pursue all opportunities for any sale, assignment or other transaction to maximize the value of the Applicant's Business and its remaining property, including the IP Transaction, subject to Court approval of any material Transaction;

11. The Monitor engaged in a marketing process with respect to the Applicant's IP. The Applicant, in consultation with the Monitor, has determined that the IP Transaction for the sale of the Purchased Assets under the Sale Agreement is the most favourable transaction available, and requests Court approval thereof;

12. The marketing process was commercially reasonable and fair, and the Applicant consulted with the Monitor and made sufficient efforts to obtain the best price for the Purchased Assets, and has not acted improvidently. The Applicant and Monitor are of the opinion that further marketing of the Purchased Assets will not result in a better offer;

13. The Monitor, Senior Lender, DIP Lender and the Affiliate Lenders support the IP Transaction;

Sealing Order

14. The Confidential Appendix to the Second Report contains sensitive commercial information, and a sealing order is necessary as there is a real and substantial risk of harm to the interest of stakeholders in this CCAA proceedings in the event such sensitive information is disclosed to the public in advance of the completion of the IP Transaction;

15. The salutary effects of a sealing order with respect to the Confidential Appendix outweigh any consideration relating to the public interest in open and accessible court proceedings;

16. The information proposed to be sealed is limited in scope and will be sealed until closing of the IP Transaction, or by further order of the Court;

Distribution

17. As the Liquidation Sale is now substantially complete and the Applicant has a cash balance of approximately \$14.0 million as July 10, 2026, the Applicant is seeking approval to distribute funds to the Senior Lender in payment in full of the obligations under the Senior Credit Facility. As of June 30, 2026, the aggregate obligations under the Senior Credit Facility were approximately \$7.2 million.

18. The proposed distribution will limit the Applicant's interest expense on the Senior Credit Facility, to the benefit of the Affiliate Lenders who, following the proposed distribution, will be the only stakeholders with a remaining economic interest in the Applicant.

19. The Monitor supports the proposed distribution and based on the Updated Cash Flow Forecast, the Applicant will have sufficient liquidity to fund the remaining costs to wind down the Applicant's business operations and complete the CCAA process.

20. As set out in the Updated Cash Flow Forecast, the Applicant has generated positive cash flow over the course of the Stay Period as a result of the liquidation process, and no funds have been borrowed by the Applicant under the DIP Loan throughout the CCAA process;

WEPPA Declaration

21. As of July 31, 2026, the Applicant will have terminated all of its employees other than a limited number of head office employees retained to wind-down the Applicant's business operations. The Applicant meets the criteria set out in Section 3.2 of the *Wage Earner Protection Program Regulations*, SOR 2008-222, and its former employees are eligible individuals to whom WEPPA applies;

22. As such, the Applicant requests a declaration under s. 5(5) of WEPPA that the criteria have been met so that its former eligible employees are able to apply for payment from WEPPA at the earliest opportunity, with the assistance of the Applicant and the Monitor;

Stay Extension

23. The Applicant is seeking to extend the Stay Period in the ARIO from September 11, 2026 up to and including December 18, 2026 (the "**Stay Period**");

24. The extension of the Stay Period is necessary and appropriate for the Applicant, with the assistance of the Monitor, to complete the Liquidation Sale and the proposed IP Transaction, and to pursue all transaction or restructuring opportunities to maximize the value of the Applicant's business and its remaining property and ancillary assets, specifically the real property located in Kenora, Ontario, subject to Court approval of any material transaction;

25. Further, the extension of the Stay Period will allow the Applicant, with the assistance of the Monitor, to complete the steps necessary to wind down corporate operations following the closure of all retail store locations;

26. The cash flow projections prepared by the Applicant with the assistance of the Monitor (the "**Updated Cash Flow Forecast**") set out in the Second Report, support that the Applicant will have sufficient liquidity during the Stay Period to complete an orderly liquidation and wind-down, and fund the costs of the CCAA proceedings, without drawing any funds on the DIP Loan;

27. No party will be materially prejudiced by the extension of the Stay Period;

28. The Monitor, Senior Lender, DIP Lender and Affiliate Lenders are in support of the extension of the Stay Period to and including December 18, 2026;

Conclusion

29. It is just and convenient and in the interests of the Applicant and its stakeholders that the Approval and Vesting Order, and the Distribution, WEPPA Declaration and Stay Extension Order be granted;

30. The Applicant is acting in good faith and with due diligence in the CCAA proceedings;

31. The Monitor, Senior Lender, DIP Lender and Affiliated Lenders support the relief requested by the Applicant;

32. Such further and other grounds as counsel may advise and as this Honourable Court may allow.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the Motion:

- (a) Affidavit of Shamsh Kassam affirmed May 1, 2026;
- (b) Pre-Filing Report of the Monitor dated May 4, 2026;
- (c) Initial Order, pronounced by Madam Justice Grammond on May 6, 2026;
- (d) First Report of the Monitor, dated May 12, 2026;
- (e) Amended and Restated Initial Order, pronounced by Madam Justice Grammond on May 15, 2026;
- (f) Second Report of the Monitor, dated July 20, 2026;
- (g) Confidential Appendix to the Second Report of the Monitor, to be filed;
- (h) Such further and other evidence as counsel may advise and this Honourable Court may allow.

July 20, 2026

PITBLADO LLP
Barristers and Solicitors
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Catherine E. Howden
Counsel for the Applicant

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Facsimile No. 957-0227

TO: THE ATTACHED SERVICE LIST

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

APPROVAL AND VESTING ORDER

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(File No. 71453.1)

THE KING'S BENCH

WINNIPEG CENTRE

THE HONOURABLE	)	MONDAY THE 27TH
MADAM JUSTICE GRAMMOND	)	DAY OF JULY, 2026
	)	

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

APPROVAL AND VESTING ORDER

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 approving the sale transaction (the "**Transaction**") contemplated by an asset purchase agreement (the "**Sale Agreement**") between the Applicant, as vendor, and YM Inc. (Sales), as purchaser (the "**Purchaser**"), dated July 17, 2026 and appended to the Second Report dated July 20, 2026 (the "**Second Report**") of Alvarez & Marsal Canada Inc., in its capacity as Monitor of the Applicant (the "**Monitor**"), and vesting in the Purchaser the Applicant's right, title and interest in and to the Purchased Assets (as defined in the Sale Agreement) 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 Second Report, and on hearing the submissions of counsel for the Applicant, counsel for the Monitor, counsel for the Purchaser, and counsel for Highgate Capital Ltd., WHO Industries Inc. and R.I.S. Media Ltd., no one appearing for any other interested parties although duly served as appears from the Affidavit of Service of **[Elenore Kesterke sworn July 1, 2026]**,

1. **THIS COURT ORDERS** that the time for service of the Notice of Motion and the supporting materials is hereby abridged and validated so that this Motion is properly returnable today and hereby dispenses with further service thereof.

2. **THIS COURT ORDERS** that capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Sale Agreement.

3. **THIS COURT ORDERS AND DECLARES** that the Transaction is hereby approved, and the execution of the Sale Agreement by the Applicant is hereby authorized approved and ratified, with such minor amendments as the Applicant (with the consent of the Monitor) and the Purchaser may agree to. The Applicant and the Monitor are hereby authorized and directed to take such additional steps and execute such additional documents as may be necessary or desirable for the completion of the Transaction and for the conveyance of the Purchased Assets to the Purchaser.

4. **THIS COURT ORDERS AND DECLARES** that upon the delivery of a Monitor's certificate to the Purchaser substantially in the form attached as Schedule "A" hereto (the "**Monitor's Certificate**"), all of the Applicant's right, title and interest in and to the Purchased Assets shall be transferred to and shall vest absolutely in the Purchaser, free and clear of and from any and all security interests (whether contractual, statutory, or otherwise), hypothecs, mortgages, trusts or deemed trusts (whether contractual, statutory, or otherwise), liens, executions, levies, charges, or other financial or monetary claims, whether or not they have attached or been perfected, registered or filed and whether secured, unsecured or otherwise (collectively, the "**Claims**") including, without limiting the generality of the foregoing: (i) any encumbrances or charges created by the Amended and Restated Initial Order of the Honourable Madam Justice Grammond dated May 15, 2026 or any other Order of this Court in these proceedings under the CCAA; and

(ii) all charges, security interests or claims evidenced by registrations pursuant to *The Personal Property Security Act* (Manitoba) or any other personal property registry system (all of which are collectively referred to as the “**Encumbrances**”). For greater certainty, this Court orders that all of the Encumbrances affecting or relating to the Purchased Assets are hereby expunged and discharged as against the Purchased Assets.

5. **THIS COURT ORDERS** that for the purposes of determining the nature and priority of Claims, the net proceeds from the sale of the Purchased Assets shall stand in the place and stead of the Purchased Assets, and that from and after the delivery of the Monitor’s Certificate all Claims and Encumbrances shall attach to the net proceeds from the sale of the Purchased Assets with the same priority as they had with respect to the Purchased Assets immediately prior to the sale, as if the Purchased Assets had not been sold and remained in the possession or control of the person having that possession or control immediately prior to the sale.

6. **THIS COURT ORDERS AND DIRECTS** the Monitor to file with the Court a copy of the Monitor’s Certificate, forthwith after delivery thereof.

7. **THIS COURT ORDERS** that upon delivery of a copy of the Monitor’s Certificate and a copy of this Order, together with any applicable registration fees, each governmental authority, department, agency, bureau, registry, registrar or other governmental representative exercising jurisdiction with respect to the Purchased Assets (each a “**Governmental Authority**”), including, without limitation, the Canadian Intellectual Property Office (“**CIPO**”), is hereby authorized, requested and directed to (a) record and register the Purchaser as the owner of the Purchased Assets, free and clear of all Claims and Encumbrances; and (b) cancel, discharge and expunge any registrations filed with such Governmental Authority evidencing or creating any Encumbrance as against the Purchased Assets. Presentment of a copy of the Monitor’s Certificate and a copy of this Order shall be sufficient evidence and authority for any Governmental Authority, including, without limitation, CIPO, to make and complete any of the foregoing registrations in respect of any of the Purchased Assets.

8. **THIS COURT ORDERS** that the Monitor, the Applicant and the Purchaser are authorized to take such steps and execute such documents as may be necessary or desirable, with any Governmental Authority, domain name registrar or social media account provider, to effect the transfer of any right, title and interest in and to the Purchased Assets and the discharge of any Claims or Encumbrances as against the Purchased Assets, in accordance with the terms of this Order.

9. **THIS COURT ORDERS** that, pursuant to clause 7(3)(c) of the *Personal Information Protection and Electronic Documents Act* (Canada), the Applicant and the Monitor, as applicable, are authorized and permitted to disclose and transfer to the Purchaser all personal information in the Applicant's records constituting Purchased Assets. The Purchaser shall maintain and protect the privacy of such information in accordance with Applicable Laws. The Purchaser shall be entitled to use the personal information provided to it in a manner which is in all material respects identical to the prior use of such information by the Applicant.

10. **THIS COURT ORDERS** that, notwithstanding:

- (a) the pendency of these proceedings;
- (b) any applications for a bankruptcy order now or hereafter issued pursuant to the *Bankruptcy and Insolvency Act* (Canada) (the "**BIA**") in respect of the Applicant and any bankruptcy order issued pursuant to any such applications; and
- (c) any assignment in bankruptcy made in respect of the Applicant,

the Sale Agreement and the Transaction, including, without limitation, the transfer and vesting of the Purchased Assets in and to the Purchaser pursuant to this Order, shall be binding on any trustee in bankruptcy that may be appointed in respect of the Applicant, shall not be void or voidable by creditors of the Applicant, nor shall they constitute nor be deemed to be a fraudulent preference, assignment, fraudulent conveyance, transfer at undervalue, or other reviewable transaction under the BIA or any other applicable federal

or provincial legislation, nor shall it constitute oppressive or unfairly prejudicial conduct or action other than in good faith pursuant to any applicable federal or provincial legislation.

11. **THIS COURT ORDERS** that Confidential Appendix “C” to the Second Report (the “**Confidential Appendix**”) shall be sealed, kept confidential and shall not form part of the public record, and shall remain in a sealed envelope and/or be stored electronically with this Court on an encrypted basis, limiting access only to the Registrar of this Court and the Presiding Judge, except (a) by further Order of this Court; or (b) upon the date on which the Monitor files the Monitor’s Certificate with the Court certifying the completion of the Transaction, whichever shall first occur, whereupon the Confidential Appendix shall form part of the public record and shall no longer be sealed.

12. **THIS COURT ORDERS** that (a) within 30 days after Closing, and in accordance with the Sale Agreement, the Applicant is hereby authorized and directed to execute and file articles of amendment or such other documents or instruments as may be necessary to change its legal name, and such articles, documents or other instruments shall be deemed to be duly authorized, valid and effective without any requirement to obtain any shareholder, director or other consent or approval; and (b) upon the official change to the legal name of the Applicant and as soon as practical, the Applicant shall take any and all steps necessary to delete and replace the name of the Applicant in the within title of proceedings with the new legal name of the Applicant, and any document filed thereafter in this proceeding (other than the Monitor’s Certificate) shall be filed using such revised title of proceedings.

13. **THIS COURT ORDERS** that this Order shall have full force and effect in all provinces and territories in Canada.

14. **THIS COURT HEREBY REQUESTS** the aid and recognition of any court, tribunal or regulatory or administrative body having jurisdiction in Canada or in any foreign jurisdiction to give effect to this Order and to assist the Applicant, the Monitor, the Purchaser and their respective agents in carrying out the terms of this Order. All courts, tribunals and regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to the Applicant, the Purchaser and 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 Purchaser and the Monitor and their respective agents in carrying out the terms of this Order.

July 27, 2026

J.

I, CATHERINE HOWDEN, OF THE FIRM OF PITBLADO LLP 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. AND LYDIA YU AND DAVID SEIFER OF DICKINSON WRIGHT LLP, COUNSEL FOR YM INC. (SALES)

AS DIRECTED BY THE HONOURABLE MADAM JUSTICE GRAMMOND

SCHEDULE "A"
FORM OF MONITOR'S CERTIFICATE

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

MONITOR'S CERTIFICATE

RECITALS

1. Pursuant to an Order of the Honourable Madam Justice Grammond of the Manitoba Court of King's Bench (the "**Court**") dated May 6, 2026, Warehouse One Clothing Ltd. (the "**Applicant**") was granted protection pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "**CCAA**"), and Alvarez & Marsal Canada Inc. was appointed as the monitor of the Applicant (the "**Monitor**").

2. Pursuant to an Approval and Vesting Order (the "**Order**") of the Court dated July 27, 2026, the Court, *inter alia*, approved the Asset Purchase Agreement dated July 17, 2026 (including the exhibits and schedules attached thereto, the "**Sale Agreement**") between the Applicant and YM Inc. (Sales) (the "**Purchaser**") and provided for the vesting in the Purchaser of the Applicant's right, title and interest in and to the Purchased Assets, which vesting is to be effective with respect to the Purchased Assets upon the delivery by the Monitor to the Purchaser of a certificate confirming (i) the payment by the Purchaser

of the Purchase Price for the Purchased Assets; (ii) that the conditions to Closing have been satisfied or waived by the Parties; and (iii) the Transaction has been completed to the satisfaction of the Monitor.

3. Unless otherwise indicated herein, terms with initial capitals have the meanings set out in the Order or Sale Agreement, as applicable.

THE MONITOR CERTIFIES the following:

1. The Purchaser has paid and the Monitor has received the Purchase Price for the Purchased Assets payable on the Closing Date pursuant to the Sale Agreement;
2. The conditions to Closing in the Sale Agreement have been satisfied or waived by the Parties; and
3. The Transaction has been completed to the satisfaction of the Monitor.

This Monitor's Certificate was delivered by the Monitor on _____, 2026.

Alvarez & Marsal Canada Inc., solely in its capacity as Monitor of the Applicant, and not in its personal or corporate capacity

SCHEDULE B

File No. CI 26-01-57065

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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)

SCHEDULE B

File No. CI 26-01-57065

THE KING'S BENCH
WINNIPEG CENTRE

THE HONOURABLE MADAM)
) Monday, the 27th day of July, 2026
JUSTICE GRAMMOND)
)

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

DISTRIBUTION, WEPPA DECLARATION AND STAY EXTENSION ORDER

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 [●], 2026 and the Affidavit of Service of Erik Axell sworn July [●], 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

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.

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

SERVICE LIST
As at July 17, 2026

PITBLADO LLP
2500 - 360 Main Street
Winnipeg, Manitoba
R3C 4H6

Catherine E. Howden / Johanna Thiessen

Phone No. (204) 956-3532/(204) 956-3577

Fax No. (204) 957-0227

Email. howden@pitblado.com / jthiessen@pitblado.com

(File No. 71453.1)

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

SERVICE LIST

Party/Counsel	Telephone	Facsimile	Party Represented
WAREHOUSE ONE CLOTHING LTD. c/o Stern Partners Inc. Suite 2650, 744 Seymour Street Vancouver, BC V6B 0S6 Shamsh Kassam skassam@sternpartners.com Andrew Bull abull@sternpartners.com Amelia Cook acook@sternpartners.com	604-646-3794 604-646-3601		Applicant
PITBLADO LLP 2500-360 Main Street Winnipeg, MB R3C 4H6 Catherine Howden howden@pitblado.com Johanna Thiessen jthiessen@pitblado.com	204-956-3532 204-956-3577	204-957-0227	Counsel for the Applicant

Party/Counsel	Telephone	Facsimile	Party Represented
ALVAREZ & MARSAL CANADA INC. Royal Bank Plaza, South Tower Suite 2900, 200 Bay Street PO Box 22 Toronto, ON J5J 2J1 Josh Nevsky jnevsky@alvarezandmarsal.com Zach Gold zgold@alvarezandmarsal.com Josh Marks jmarks@alvarezandmarsal.com	416-847-5200		Proposed Monitor
GOODMANS LLP Bay Adelaide Centre, West Tower Suite 3400, 333 Bay Street Toronto, ON M5H 2S7 Bradley Wiffen bwiffen@goodmans.ca Erik Axell eaxell@goodmans.ca	416-597-4208 416-840-2579		Counsel for the Proposed Monitor
MLT AIKINS LLP 360 Main Street, Suite 3000 Winnipeg, MB R3C 4G1 J.J. Burnell jburnell@mltaikins.com	204-957-4663	204-957-0840	Counsel for WHO Industries Ltd., Highgate Capital Ltd., and R.I.S. Media Ltd.
4565038 Manitoba Ltd. 102-1015 Wilkes Avenue Winnipeg, MB R3P 2R8 Donna Maryk mmaryk@shaw.ca			4565038 Manitoba Ltd.

Party/Counsel	Telephone	Facsimile	Party Represented
MANITOBA JUSTICE Crown Counsel, Legal Services Branch, Manitoba Justice 730 - 405 Broadway Avenue Winnipeg, MB R3C 3L6 Nicholas Warsza nicholas.warsza@gov.mb.ca	204-390-4399		Counsel for the Minister of Finance
SURREY NATIONAL VERIFICATION AND COLLECTION CENTRE CANADA REVENUE AGENCY 9755 King George Boulevard Surrey BC V3T 5E1	1-866-891-7403	1-833-697-2390	Canada Revenue Agency
DEPARTMENT OF JUSTICE (CANADA) 601-400 St. Mary Avenue Winnipeg, MB R3C 4K5 Penny Piper penny.piper@justice.gc.ca	431-489-8662	204- 983-3636	Counsel for His Majesty the King
Camelino Galessiere 65 Queen Street West, Suite 440 Toronto, ON M5H 2M5 Linda Galessiere lgalesiere@cglegal.ca	416-306-3827	416-306-3820	Counsel for Morguard Investments, SmaratCentres, RioCan, Salthill, Cushman Wakefield and Ivanhoe (JLL) (Landlords)
Dell Financial Services Canada Limited 155 Gordon Baker Rd, Suite 501 North York, ON M2H 3N5 salesupport@office365.dell.com			Secured Creditor
Moneris Solutions Corporation 3250 Bloor Street West, 14 th Floor Toronto, ON M8X 2X9 codeofconduct@moneris.com			Secured Creditor

Party/Counsel	Telephone	Facsimile	Party Represented
Town Centre Properties 2018 Inc. 106 1Y639 131 Street Edmonton, Alberta T5N 1Y6 Attn: Matthew Stokes matthew@e-equities.ca Swainson Miki Preskett LLP Suite 2800, Bell Tower 10103 - 103 Avenue NW Edmonton, AB R4J 0H8 Attn: Christopher Young cyoung@smpllp.ca			Landlord Counsel for Town Centre Properties 2018 Inc.
Champlain Place (Moncton) Limited Partnership c/o Westcliff Management Ltd. 2900-600 de Maisonneuve Boulevard West, Montreal, Quebec H3A 3J2 Attn: Landlord info@westcliff.ca			Landlord
Killam Investments (P.E.I.) Inc. & Pan American Properties Inc. Kilam Apartment REIT 3700 Kempt Road, Suite 100 Halifax, Nova Scotia B3K 4X8 Attention: Commercial Leasing moneill@killamreit.com			Landlord
Garden City (WPG) Limited Partnership, by its General Partner, Garden City (WPG) GP Inc. c/o McCor Management (MB) Inc. Garden Centre Shopping Centre (Warehouse One) Winnipeg, MB kyee@mccor.ca Rebecca Hyatt rhvatt@mccor.ca			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
3829708 Manitoba Limited c/o Shindico Reality Inc. 200-1355 Taylor Avenue Winnipeg, MB R3M 3Y9 Corral Centre Brandon (Warehouse One) Brandon, MB ksmith@shindico.com			Landlord
Otineka Development Corporation Ltd. PO Box 10310 Opaskwayak, Manitoba R0B 2J0 Otineka Mall The Pas (Warehouse One) The Pas, MB otinekamallmgr@pbdcltd.com			Landlord
5326151 Manitoba Ltd. c/o Shelter Canadian Properties Limited 2500-7 Evergreen Place Winnipeg, MB R3Y 1W7 Clearspring Centre Steinbach (Warehouse One) Steinbach, MB ekatz@scpl.com			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
Bentall GreenOak (Canada) Limited Partnership Lloyd Mall (Bootlegger) Lloydminster, AB s.colson@leyad.ca Parkwood Place (Warehouse One) Prince George, BC le.ling@bgo.com Hillside Centre (Warehouse One) Victoria, BC megan.scott@bgo.com Village Green Mall (Warehouse One) Vernon, BC shane.epp@bgo.com Pen Centre (Bootlegger) St. Catherines, ON pencentrerent@leyad.ca			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
Primaris Management Inc. 181 Bay Street, Suite 2720 Toronto, ON M5J 2T3 Attn: General Counsel & Corporate Secretary <u>Ms. Eline Towie</u> etowie@primarisreit.com Kildonan Place (Warehouse One) Winnipeg, MB dmaesoneill@primarisreit.com Sunridge Mall (Warehouse One) Calgary, AB mdorsey@primarisreit.com Regent Mall (Warehouse One) Fredericton, NB Medicine Hat Mall (Bootlegger) Medicine Hat, AB Peter Pond Shopping Centre (Bootlegger) Fort McMurray, AB lmurray@primarisreit.com New Sudbury Centre (Warehouse One) Sudbury, ON trana@primarisreit.com Orchard Park (Warehouse One) Kelowna, BC kscott@primarisreit.com Park Place (Bootlegger) Lethbridge, AB jchen@primarisreit.com			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
Triad Holdings (1990) Ltd. 121 Main Street Flin Flon, MB R8A 1J9 Flin Flon (Warehouse One) Flin Flon, MB triad@mymts.net			Landlord
City Centre LP. 421 7 th Ave SW, Suite 1600 Calgary, Alberta T2P 4K9 City Centre Mall Thompson (Warehouse One) Thompson, MB will@r2capital.ca			Landlord
7421444 Manitoba Ltd. c/o Shindico Realty Inc. 200-1355 Taylor Avenue Winnipeg, MB R3M 3Y9 Winkler Crossing (Warehouse One) Winkler, MB ksmith@shindico.com			Landlord
Canadian Tire Properties Inc. c/o CT REIT 2180 Young Street P.O. Box 770 Station K Toronto, ON M4P 2V8 Parkland Mall (SK) (Warehouse One) Yorkton, SK ash.roberts@jll.com Jessica Farber - Property Admin Jessica.Farber@ctreit.com	250-785-3537		Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
Leyad St Vital Centre Holdings Inc. 86-1225 St. Mary's Road Winnipeg, MB R2M 5E5 Attn: Kyle Waterman St. Vital Centre (Warehouse One) Winnipeg, MB k.waterman@leyad.ca			Landlord
Anthem Properties Group Ltd. Suite 1100, Bentall 4 Box 49200 1055 Dunsmuir Street Vancouver, BC V7X 1K8 Centre Village Mall (Warehouse One) Lethbridge, AB btattle@anthemproperties.com Waneta Plaza (Bootlegger) Trail, BC chall@anthemproperties.com Parks West Mall (Warehouse One) Hinton, AB parkswestar@anthemproperties.com			Landlord
Capital City Shopping Centre Limited c/o Salthill Property Management Inc. 1001-130 Bloor Street W. Toronto, ON M5S 1N5 Attn: Donald Burton notices@salthillcapital.com			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
Mic Mac Mall Limited Partnership by its General Partner, 4239474 Canada Inc. c/o Cushman & Wakefield Asset Services ULC 21 Mic Mac Boulevard Dartmouth, NS B3A 4N3 Attn: Tamitha Oakley rmackesey@mccor.ca Attn: Lori Stuart lori.stuart@cushwake.com Gaetz Ave Crossing Red Deer (Warehouse One) Red Deer, AB kwren@salthillcapital.com	902-463-5891		Landlord
RFA Asset Management Suite 410, 1331 Macleod Trail SE, Calgary, AB T2G 0K3 Northern Lights Shopping Centre II (Warehouse One) Fort McMurray, AB rmudryk@artisreit.com	403-705-3535		Landlord
First Willow Developments Limited 3200 Highway 7 Vaughan, Ontario L4K 5Z5 Attn: Legal Department legalnotices@smartcentres.com Regina East Power Centre (Warehouse One) Regina, SK Lethbridge South (Warehouse One) Lethbridge South, AB cramirez@smartcentres.com			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
3829678 Manitoba Ltd. c/o Shindico Realty Inc. 200-1355 Taylor Avenue Winnipeg, MB R3M 3Y9 Selkirk Crossing (Warehouse One) Selkirk, MB ksmith@shindico.com			Landlord
ROYOP Development Corporation Magan Karmali mkarmali@royop.com Maria Rivera mrivera@royop.com Southlands Crossing (Warehouse One) Medicine Hat, AB jthal@royop.com			Landlord
CT Reit Totem Mall (Warehouse One) Fort St. John, BC ash.roberts@jll.com			Landlord
1187400 Alberta Ltd. Unit 200, 17616107 Avenue Edmonton, Alberta T5S 1G8 Whitecourt Walmart Shopping Centre (Warehouse One) Whitecourt, AB arthurb@northerndevelopments.com		780-456-0091	Landlord
4231 Investments Ltd. c/o Warrington PCI Management 1030 W Georgia St Vancouver, BC V6E 2Y3 Spall Plaza (Warehouse One) Kelowna, BC jchasmar@warringtonpci.com			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
Pioneer Thinking Capital Corp. Town "N" Country Mall (Warehouse One) Moose Jaw, SK porellana@salthillcapital.com			Landlord
0832958 B.C. Ltd. Suite 300-1060 Manhattan Drive Kelowna, BC V1Y 9X9 Attn: Tenant Services TenantServices@ArgusProperties.ca Chilkoot Centre Whitehorse (Warehouse One) Whitehorse, YT slundin@argusproperties.ca	250-763-6789	250-763-6799	Landlord
Loon Properties (Skeena) Inc. 1202-838 West Hastings St Vancouver, B.C., V6C 0A6 Skeena Mall (Warehouse One) Terrace, BC West Park Mall (Warehouse One) Quesnel, BC akamer@bosa.com Dawson Creek (Warehouse One) Dawson Creek, BC akamer@bosa.com		604-299-6460	Landlord
Calloway REIT (Kamloops) Inc. 3200 Highway 7 Vaughan, Ontario L4K 5Z5 legalnotices@smartcentres.com Kamloops Smart Centre (Warehouse One) Kamloops, BC cramirez@smartcentres.com			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
2398506 Alberta Ltd. c/o Northern Development & Investment Group Suite 1601 Bell Tower10104-103 Avenue NW Edmonton, Alberta T5J 0H8 Attn: Annie Bartolome annieb@northerndevelopments.com Dodson Plaza (Warehouse One) Drayton Valley, AB	780-456-0066		Landlord
St Albert Centre Holdings Inc. 511 Place d'Armes, Suite 800, Montreal, QC H2Y 2W7 Attn: Greg Castiel, Director – Commercial Properties greg@leyad.ca St. Albert Centre (Warehouse One) St. Albert, AB julianne@leyad.ca			Landlord
569710 Ontario Inc. c/o Barrett Sports 35-2 Whyte Ave. Dryden, ON P8N 1Z2 Attn: Don Barrett Dryden (Warehouse One) Dryden, ON donmail56@gmail.com			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
Sette Real Estate Holdings Inc. 516 Great Northern Road Sault Ste. Marie, ON P9B 4Z9 c/o Jim Clemente (705-759-0770/705-254-9135) Sault Ste. Marie (Warehouse One) Sault Ste. Marie, ON jim.clemente@remax.net			Landlord
1223471 Alberta Ltd. 9710-100 St., Box 684 La Crete, AB T0H 2H0 Attn: Carl Derksen La Crete (Warehouse One) Lacrete, AB carlderksen8@gmail.com			Landlord
Long Sky Developments Ltd. and Canadian Property Holdings (Alberta) Inc. c/o Trinity Property Services Inc. 10150-121 Street Edmonton, AB T5N 1K4 Olds Cornerstone (Warehouse One) Olds, AB pbarnett@trinity-group.com		780-488-1193	Landlord
Gulf & Pacific Equities Corp. 1240 Bay Street, Suite 800 Toronto, ON M5R 2A7 Tri-City Mall (Cold Lake) (Warehouse One) Cold Lake, AB dan@sitings.ca			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
Loon Properties (Dawson Creek) Inc. 1201-838 West Hastings Vancouver, B.C., V6C 0A6 cdrdwayn@telus.net			Landlord
Pollyco Group (Rupert Square) Shopping Centre Inc. 320-20780 Willoughby Town Centre Dr. Langley B.C. V2Y 0M7 Rupert Square Shopping Centre (Warehouse One) Prince Rupert, BC connie@pollycogroup.com			Landlord
Filcan Properties Ltd. c/o Crestwell Realty Inc. 606-450 SW Marine Drive Vancouver, B.C. V5X 0C3 PM@crestwell.com Spruce Grove Centre (Warehouse One) Spruce Grove, AB ichasmar@warringtonpci.com		604-664-0629	Landlord
CDR Developments Inc. Box 794 Provost, AB. T0B 3S0 Weyburn (Warehouse One) Weyburn, SK cdrdwayn@telus.net			Landlord
Prairie Fire (Okotoks) Limited Partnership by its General Partner Prairie Fire (Okotoks) GP Ltd. Springwood Okotoks Cornerstone (Warehouse One) Okotoks, AB Molly Obie – Property Administrator mobie@trinity-group.com	613-565-5864 ext 341		Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
Melcor REIT Limited Partnership, by its General Partner, Melcor REIT GP Inc. 900, 10310 Jasper Avenue NW Edmonton AB T5J 1Y8 Attn: Shauna Hazlett shazlett@melcor.ca Leduc Common (Warehouse One) Leduc, AB swilhauk@melcor.ca	780-945-2797		Landlord
RioCan Management Inc. 2300 Yonge St., Suite2200 Toronto, ON, M4P 1E4 Edmonton West Retail Centre (Stony Plain) (Warehouse One) Edmonton, AB ygoldstein@riocan.com Georgian Mall (Bootlegger) Barrie, ON malkins@riocan.com			Landlord
Jim Pattison Developments Ltd. #2300 – 1177 West Hastings Street Vancouver, BC V6E 2K3 Tania Cerantola, Senior Asset Manager Cherry Lane Shopping Centre (Warehouse One) Penticton, BC Cerantola@jpdevelopments.com		250-492-5257	Landlord
Pinnacle Capital Corporation c/o Adam Battistelli 200-280 Nelson Street Vancouver, B.C. V6B 2E2 Town Centre Mall (Warehouse One) High Level, AB adam@capitalwest.ca			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
Central Walk Woodgrove Shopping Centre Inc. 370-4400 Hazelbridge Way, Richmond BC V6X 3R8 Woodgrove Centre (Warehouse One) Nanaimo, BC elly.holmes@centralwalk.com			Landlord
Truro Mall Holdings Limited Partnership PMCO Inc. Truro Mall (The Hub) (Warehouse One) Truro, NS cduininck@pm-co.ca			Landlord
Crombie Developments Limited 5935 Airport Road, Suite 810, Mississauga, Ontario L4V 1W5 Attention: Legal Department legal@crombie.ca Highland Square Mall (Warehouse One) New Glasgow, NS barry.hamilton@crombie.ca Avalon Mall (Bootlegger) St. John's, NF marcel.elliott@crombie.ca			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
Rochdale Crossing Inc., c/o ICR Commercial 100-261 1 st Venue North Saskatoon, SK S7K 1X2 Humboldt Mall (Warehouse One) Humboldt, SK tusia.black@icrcommercial.com ICR Commercial Real Estate 100, 261 1st Avenue North Saskatoon, SK S7K 1X2 Attn: Chris Mourot chris.mourot@icrcommercial.com			Landlord Contact for Landlord
Emerald Hills 75 Limited Partnership c/o Shape Properties Emerald Hills Centre (Warehouse One) Sherwood Park, AB debora.mathias@shape.ca			Landlord
Mahie Smaiel and Smaiel Holdings Inc. PO Box 2010 Lac La Biche, AB T0A 2C0 Attn: Danny Smaiel Lac la Biche (Warehouse One) Lac la Biche, AB marwanson@hotmail.com			Landlord
Westcliff Management Ltd. Corner Brook Plaza (Bootlegger) Cornerbrook, NL mcotnoir@westcliff.ca Champlain Place (Bootlegger) Dieppe, NB sdakkak@westcliff.ca			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
Exploits Valley Mall Inc. 1 Westmount Square, Suite 1900 Westmount, QC H3Z 2P9 Attn: Howard Wiseman Exploits Valley Mall (Warehouse One) Grand Falls, NL wanda@emrealestate.ca Gander Mall (Warehouse One) Gander, NL kyle@econo-malls.com Leandra Paoloni legal@emrealestate.ca	514-938-2266	514-938-2200	Landlord
Toulon Development Corp 4060 St. Catherine Street West Suite 700 Montreal, QC H3Z 2Z3 Yarmouth Mall (Warehouse One) Yarmouth, NS Stephenville Mall (Warehouse One) Stephenville, NL neilc@toulondev.com			Landlord
Aberdeen Kamloops Mall Limited c/o Cushman & Wakefield Asset Services ULC Attn: Doug Basarowich Doug.Basarowich@cushwake.com	UNDELIVERABLE		Landlord
West Edmonton Mall Property Inc. 3000, 8882-170 Street Edmonton, AB T5T 4M2 West Edmonton Mall (Bootlegger) Edmonton, AB dean.shaben@wem.ca			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
CrossIron Mills Holdings Inc, 261055 CrossIron Blvd, Suite 800 Rocky View, AB T4A 0G3 c/o Jones Lang LaSalle Real Estate Services, Inc. 6365 Halcyon Way, Suite 970 Alpharetta, Georgia U.S.A. 30005 CrossIron Mills (Bootlegger) Rocky View, AB erin.reid@jll.com Piccadilly Place Mall (Warehouse One) Salmon Arm, BC tim.yeung@colliers.com			Landlord
1533830 B.C. Ltd. c/o JLL Canada #195C, 1151 10th Ave. S.W., Salmon Arm, B.C. V1E 1T3 Attn: Lori Cymbaluk Lori.cymbaluk@jll.com	250-832-0441		Landlord
WBCS Inc. 1 Water Street East, Mall Administration Office Cornwall, ON K6H 6M2 Attn: President Cornwall Square (Warehouse One) Cornwall, ON leodoucet@weavingbaskets.ca			Landlord
Cushman & Wakefield Asset Services ULC Mic Mac Mall (Warehouse One) Dartmouth, NS rmackesey@mccor.ca			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
Morguard Real Estate Investment Trust Shoppers Mall, Brandon (Warehouse One) Brandon, MB Morguard Real Estate Investment Trust Attention: Jenny Schmoisch jschmoisch@morguard.com Prairie Mall (Bootlegger) Grand Prairie, AB msnable@morguard.com Sevenoaks Shopping Centre (Warehouse One) Abbotsford, BC jschmoisch@morguard.com Parkland Mall (AB) (Warehouse One) Red Deer, AB marwanson@hotmail.com Lawson Heights (Bootlegger) Saskatoon, SK arossanese@morguard.com Intercity Shopping Centre (Bootlegger) Thunder Bay, ON noticeretail@morguard.com Lawson Heights (Warehouse One) Saskatoon, SK kpekalski@morguard.com Pine Centre Mall (Bootlegger) Prince George, BC Morguard Real Estate Investment Trust Attention: Jenny Schmoisch jschmoisch@morguard.com Coquitlam Centre (Bootlegger) Coquitlam, BC cvogel@morguard.com			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
SBLP Southland Mall Inc. c/o Salthill Capital Attn: JoAnn Graham Southland Mall (Warehouse One) Regina, SK jgraham@salthillcapital.com			Landlord
1540709 Ontario Limited 16775 Yonge Street, Suite 300 Newmarket, ON L3Y 8J4 Attn: Ben Volorney Gateway Mall (Warehouse One) Prince Albert, SK ben.volorney@avisonyoung.com			Landlord
Sherwood Park Mall Limited c/o Royop Acquisition Ltd. Attn: Ben Cowie Sherwood Park Mall (Bootlegger) Sherwood Park, AB gorysiuk@royop.com			Landlord
Gander Shopping Centre Limited 1 Westmount Square, Suite 1900 Westmount, QC H3Z 2P9 Attn: Howard Wiseman Aberdeen Mall (Warehouse One) Kamloops, BC kyle@econo-malls.com	514-938-2266	514-938-2200	Landlord
Optitrust Retail Inc. Attn: Shane Epp shane.epp@bgo.com			

Party/Counsel	Telephone	Facsimile	Party Represented
Londonderry Shopping Centre Inc. 243, 1 Londonderry Mall NW Edmonton, AB T5C 3C8 Attn: Greg Castiel Londonderry Mall (Warehouse One) Edmonton, AB greg@leyad.ca			Landlord
1451945 Ontario Limited and Timmins Square Shopping Centre Inc. c/o Bayfield Advisors Attn: Chris McLaughlin Timmins Square (Warehouse One) Timmins, ON cmclaughlin@BayfieldAdvisors.com			Landlord
Lindsay Square Inc., by its agent, Davpart Inc. 4576 Yong Street, Suite 700 Toronto, ON M2N 7N4 Attn: Filomena Bellisario Lindsay Square (Warehouse One) Lindsay, ON bellisariof@davpart.com			Landlord
102142508 Saskatchewan Corp. 1 Springs Drive Swift Current, SK S9H 3X6 Attn: Bing Wang Swift Current Mall (Warehouse One) Swift Current, SK bing@ptccyvr.com			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
Terracap Investments (Frontier) Inc. 100 Sheppard Avenue East, Suite 502 Toronto, ON M2N 6N5 Attn: Dan Forsyth Frontier Mall (Warehouse One) North Battleford, SK dforsyth@terracap.ca			Landlord
Mountwater Capital Corp. #306-1168 Hamilton Street Vancouver, B.C. V6B 2S2 Attn: Chloe Yuen Victoria Square Mall (Warehouse One) Regina, SK chloe@mountwatercapital.com			Landlord
W.E. Roth Construction Limited 420, 10320-102 Avenue Edmonton, AB T5J 4A1 Attn: Twylene Hicks Duggan Mall (Warehouse One) Camrose, AB office@dugganwellnesscentre.ca			Landlord
3346200 Manitoba Limited c/o Shindico Reality Inc. 200-1355 Taylor Avenue Winnipeg, MB R3M 3Y9 Royal Plains Portage (Warehouse One) Portage la Prairie, MB ksmith@shindico.com			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
Holdings Ltd. c/o Hopewell Developments Inc. Dauphin Marketplace Mall (Warehouse One) Dauphin, MB cwatts@hopewell.com			Landlord
0840205 B.C. Ltd. #210-1200 West 73rd Avenue Vancouver, BC V6P 6G5 Attn: John Prosperity Ridge Shopping Centre (Warehouse One) Williams Lake, BC john@platformproperties.ca			Landlord
Yellowstone Investments L.P. 2120 Sherbrooke East, Suite 1118 Montreal, QC H2K 1C3 Attn: Greg Castiel Greg@leyad.ca Prince Albert Cornerstone (Warehouse One) Prince Alberta, SK	514-726-7937		Landlord
Canadian Property Holdings (Alberta) Inc. and Crestpoint (Slave Lake) Ltd. Suite 410, 330-5 th Ave. SW Calgary, AB T2P 0L4 Attn: Property Management (Retail) LegalChoiceREIT@choicereit.ca Slave Lake Cornerstone (Warehouse One) Slave Lake, AB rochelle.brown@choicereit.ca			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
Finix (Canada) Holdings Ltd. c/o Warrington PCI Management #300, 1030 West Georgia St. Vancouver B.C. V6E 2Y3 Cottonwood Mall (Warehouse One) Chilliwack, BC ichasmar@warringtonpci.com ndilberovic@warringtonpci.com			Landlord
Pellex Holdings Ltd. c/o Crestwell Realty Inc. 606-450 SW Marine Drive Vancouver, B.C. V5X 0C3 Tamarack Centre (Warehouse One) Cranbrook, BC PM@crestwell.com ichasmar@warringtonpci.com			
Realty Inc. ichasmar@warringtonpci.com			Landlord
bcIMC Realty Corporation and Westshore Town Centre Holdings Inc. Suite 800, 666 Burrard Street Vancouver, B.C. V6C 2X8 c/o QuadReal Property Group Limited Partnership Suite 147, 2945 Jacklin Road Langford, B.C. V9B 5E3 Westshore Town Centre (Warehouse One) Langford, BC raegan.farrell@quadreal.com			Landlord
First Aberdeen Properties Ltd. c/o ICR Commercial Real Estate Regina Estevan Shopping Mall (Warehouse One) Estavan, SK dawson.macauley@icrcommercial.com			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
Ranch Market Plaza Corp. c/o Alliance West Asset and Property Management Ltd. A210, 9705 Horton Road SW Calgary, AB T2V 2X5 Ranch Market (Warehouse One) Strathmore, AB solin@blackstonecommercial.com			Landlord
1235 Main Properties Ltd. 1249 Main Street PO Box 3400 Smithers, BC V0J 2N0 Attn: Wayne Callison Smithers (Warehouse One) Smithers, BC wcallison@vohora.ca			Landlord
Calloway Real Estate Investment Trust Inc. 700 Applewood Crescent Suite 100 Vaughan, ON L4K 5X3 cramirez@smartcentres.com			Landlord
Thunder Bay Centre Limited Partnership (Le Groupe Sterling) 1392 rue de l'Eglise Saint-Laurent, QC H4L 2H1 Thunder Bay Centre (Warehouse One) Thunder Bay, ON ibrahim.dossani@groupesterling.com			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
Gateway Crossing Ltd. c/o Ronmor Developers Inc. Suit #250, 5920-1A Street S.W. Calgary, AB T2H 0G3 Gateway Crossing (Warehouse One) Rocky Mtn. House, AB kmorton@ronmor.ca	403-253-8180	403-255-2516	Landlord
Altamart Investments (1993) Ltd. 9020-90 Street Peace River, AB T8S 1Z4 Freson Centre (Warehouse One) Peace River, AB sgavigan@freson.com	780-624-4200	780-624-1349	Landlord
Seasons Retail Corp. and The Outlet Collection at Winnipeg Limited c/o Jones Lang La Salle Real Estate Services, Inc. East Tower, 22 Adelaide Street West, 26 th Floor Toronto, ON M5H 4E3 Winnipeg Outlet (Warehouse One) Winnipeg, MB natalie.verhelst@jll.com Neil Fishman Neil.Fishman@jll.com			Landlord
RK (Burlington Mall) Inc. by its Agent, RioCan Management Inc. 2300 Yonge St., Suite 2200 Toronto, ON M4P 1E4 Attn: Bryan Kolle Burlington Mall (Warehouse One) Burlington, ON bkolle@riocan.com			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
Doral Holdings Limited and 430635 Ontario Inc. Seaway Mall, Suite GG1 880 Niagara Street North Welland, ON L3C 5Z4 Seaway Mall (Warehouse One) Welland, ON smb@seawaymall.com			Landlord
Royop Acquisition Ltd. Attn: Ben Cowie bcowier@royop.com			Landlord
Riocan Holdings Inc. Attn: Bryan Kolle BKolle@riocan.com Attn: Merrilee Pilz mpilz@riocan.com			Landlord
Killam Investments (P.E.I.) Inc. Royalty Crossing (Warehouse One) Charlottetown, PEI tbarrett@killamreit.com			Landlord
OBP Realty Inc. Attn: Shane Epp Station Mall (Bootlegger) Sault St. Marie, ON Shane.epp@bgo.com			Landlord
SM International Holdings Ltd. 293 Bay Street Sault St. Marie, ON P6A 1X3 Attn: Philip Wong Philip@thestationmall.com			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
Ontrea Inc. Attn: Samuel Ham Polo Park (Bootlegger) Winnipeg, MB samuel.ham@cadillacfairview.com			Landlord
Leyad St Vital Centre Holdings Inc. St. Vital Centre (Bootlegger) Winnipeg, MB k.waterman@leyad.ca			Landlord
Midtown Plaza Inc. Attn: Toran Eggert Midtown Plaza (Bootlegger) Saskatoon, SK toran@urbanreformrealty.com			Landlord
PFS Retail Two Inc. Attn: Shane Epp Shane. Epp@bgo.com			Landlord
CrossIron Mills Holdings Inc. by its Manager Jones Lang LaSalle Real Estate Services, Inc. Attn: Natalie Verhelst Natalie.Verhelst@jll.com			Landlord
West Edmonton Mall Property Inc. Suite 200, Phase III, West Edmonton Mall 8882-170 Street Edmonton, AB T5T 4M2 Attn Dean Shaben Dean.Shaben@wem.ca			Landlord

Party/Counsel	Telephone	Facsimile	Party Represented
Kingsway Garden Holdings Inc. Attn: Craig Mcginley Kingsway Mall (Bootlegger) Edmonton, AB cmcginley@oxfordproperties.com Daoust Vukovich LLP 20 Queen Street West, Suite 3000 Toronto, ON M5H 3R3 Attn: Dina Peat dpeat@dv-law.com			Landlord Counsel to Kingsway Garden Holdings Inc.
Central Walk Woodgrove Centre (Bootlegger) Nanaimo, BC elly.holmes@centralwalk.com			Landlord
G.C. Waneta Plaza Ltd. Suite 1100, Bentail 4, Box 49200 1055 Dunsmuir Street Vancouver, BC V7X1K8 Attn: Landlord khill@AnthemProperties.com nroos@AnthemProperties.com wanetaAR@anthemproperties.com chall@anthemproperties.com Willowbrook Shopping Centre (Bootlegger) Langley, BC stephanie.knight@quadreal.com			Landlord
2725312 Canada Inc., 2973758 Canada Inc., and Willowbrook Langley Holdings Inc. Attn: Christina Kogler christina.kogler@quadreal.com			Landlord

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Uline 1530 Gamble Place Winnipeg, MB Attn: Nancy B. arbankruptcy@uline.com			Trade Vendor
MINISTRY OF FINANCE (ONTARIO) Legal Services Branch 11-777 Bay Street Toronto, ON M5G 2C8 Steven Groeneveld Email: Steven.Groeneveld@ontario.ca Insolvency Unit Email: insolvency.unit@ontario.ca			
Gardiner Roberts LLP Bay Adelaide Centre - East Tower 22 Adelaide Street W, Suite 3600 Toronto, ON M5H 4E3 S. Michael Citak mcitak@grllp.com			Counsel for Crombie Developments Ltd.
Gowling WLG (Canada) LLP One Main Street West Hamilton ON L8P 4Z5 Kevin Kolumbus kevin.kolumbus@gowlingwlg.com			Counsel for China Export & Credit Insurance Corporation and Guangzhou Zichi Garment Co., Ltd.

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EULER HERMES CANADA 1155 René-Lévesque Blvd. Suite 2810 Montreal (Quebec) H3B 2L2 Ilan Schwarz Insolvency Department ilan.schwarz@amer.allianz-trade.com			Credit Insurance Company for Fleece Factory Inc. - and - 9149-5077 Quebec Inc. (Runner Clothing International)
Alsco Uniforms 406 45 th Street East Saskatoon, SK S7K 0W2 Sandi Fontaine sfontaine@alsco.com			Vendor
Dickinson Wright 199 Bay Street, Suite 2200 Commerce Court West Toronto, ON M5L 1G4 Lydia W. Yu lyu@dickinsonwright.com David Seifer dseifer@dickinsonwright.com	 416-644-2816 416-646-6867		Counsel for YM Inc. (Sales)

