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## CANADA PROVINCE OF QUEBEC DISTRICT OF MONTREAL

COPIE CERTIFIÉE CONFORME AU DOCUMENT DÉTENU PAR LA COUR

Personne désignée par le greffier

NO.: 500-11-058800-208 **ESTATE NO.:** 41-2671994

NO.: 500-11-058844-206

**ESTATE NO.:** 41-2671995

SUPERIOR COURT (Commercial Division)

(Bankruptcy and Insolvency Act, R.S.C. 1985, c. B-3)

IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF EACH OF:

9775269 CANADA INC. (formerly Groupe Essentia Inc. / Essentia Group Inc.):

-and-

6860966 CANADA INC.;

Debtors/Petitioners

-and-

MNP LTD.:

Trustee

Me Chantal Flamand, registraire

MOTION TO EXTEND THE DELAY TO MAKE A PROPOSAL

(Section 50.4(9) of the Bankruptcy and Insolvency Act, R.S.C. 1985, c. B-3)

TO ONE OF THE HONOURABLE JUDGES OF THE SUPERIOR COURT, SITTING IN THE COMMERCIAL DIVISION, IN AND FOR THE DISTRICT OF MONTREAL, OR TO ONE OF ITS REGISTRARS, THE PETITIONERS RESPECTFULLY SUBMIT AS FOLLOWS:

- On September 14, 2020, each of 9772569 Canada Inc. (then, Essentia Group Inc.) ("977") and 6860966 Canada Inc. ("686" and together with 977 collectively, the "Debtors" and each a "Debtor") filed a Notice of Intention to Make a Proposal (the "NOIs") pursuant to the relevant provisions of the Bankruptcy and Insolvency Act, Canada, and named MNP Ltd. (the "Trustee") as trustee thereto.
- 2. On September 22, 2020, this Honourable Court issued an approval and vesting order approving the sale of certain of the Debtors' assets (the "Vesting Order"), the whole as appears of record herein.
- Prior to the issuance of the Vesting Order, 977 was a domestic manufacturer and 3. distributor of natural memory foam mattresses (the "Business") while 686 owned intellectual property related to such mattresses, including trademarks and a patent. The Purchaser under the Vesting Order now operates the Business.