

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:  
HEMATITE HOLDINGS INC., *et al.*,<sup>1</sup>  
Debtors in a Foreign Proceeding.

Chapter 15  
Case No. 20-12387 (MFW)  
Jointly Administered  
Related Docket Nos.: 1, 3, 6, 10, 12  
Objection Deadline: October 13, 2020 at 4:00 p.m. (ET)  
Hearing Date: October 19, 2020 at 2:00 p.m. (ET)

**NOTICE OF FILING AND HEARING ON VERIFIED PETITION  
OF FOREIGN MAIN PROCEEDING AND RELATED RELIEF**

**PLEASE TAKE NOTICE** that on September 22, 2020, Hematite Holdings Inc., in its capacity as the Canadian Court-appointed and authorized foreign representative (the “Foreign Representative”) for the above-captioned debtors (collectively, the “Debtors”) in a reorganization proceeding (the “CCAA Proceeding”) commenced under Canada’s Companies’ Creditors Arrangement Act (the “CCAA”) pending before the Ontario Superior Court of Justice (Commercial List) (Court File No. CV-20-00647824-00CL) in Ontario, Canada, by the Foreign Representative’s undersigned United States counsel, filed an *Official Form Petition* for each of the Debtors, the *Verified Petition for (I) Recognition of Foreign Main Proceeding, (II) Recognition of Foreign Representative, (III) Recognition of Initial Order and Amended Initial Order, and (IV) Related Relief Under Chapter 15 of the Bankruptcy Code* [Docket No. 3], and the *Motion of Hematite Holdings Inc., as Foreign Representative, For an Order Granting Certain Provisional Relief* [Docket No. 6] (together with all exhibits, declarations and other documents appended thereto or filed in connection therewith, the “Petitions for Recognition”) commencing chapter 15 cases ancillary to the CCAA Proceeding and seeking (i) recognition of such foreign proceeding as “foreign main proceeding” and (ii) relief in aid of the CCAA Proceeding in the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”) with respect to the Debtors, including certain additional relief pursuant to sections 105, 362, 363, 365, 1507, and 1521 of the Bankruptcy Code.

**PLEASE TAKE FURTHER NOTICE** that, on September 23, 2020, the Bankruptcy Court entered the *Order Granting Provisional Relief* [Docket No. 10] (the “Provisional Relief Order”), granting certain provisional relief pursuant to sections 105(a), 362, 363, 364(e), 365(e), 1517, 1519, and 1521 of the Bankruptcy Code.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the *Order Scheduling Hearing on Verified Chapter 15 Petition and Specifying Form and Manner of Notice of Hearing* [Docket No. 12] (the “Scheduling Order”), the Bankruptcy Court has scheduled a hearing on **October 19, 2020 at 2:00 p.m. (prevailing Eastern Time)** (the “Hearing”) before the Honorable Mary F. Walrath, United States

<sup>1</sup> The U.S. Debtors in these chapter 15 cases and the last four digits of their U.S. Federal Employer Identification Numbers are as follows: Pavaco Holdings U.S. Inc. (5569); Hematite, Inc. (3799); and Hematite Automotive Products Inc. (5382). The Canadian Debtors in these chapter 15 cases and the last four digits of their unique identifier are as follows: Hematite Holdings Inc. (8581); Hematite Manufacturing Inc. (4900); Hematite Industrial Products Inc. (7706); and Canadian Pavaco Inc. (5315). The U.S. Debtors and the Canadian Debtors are referred to herein, collectively, as the “Debtors.” The Debtors’ principal offices are located at 659 Speedvale Avenue West, Guelph, Ontario, N1K 1E6, Canada.

Bankruptcy Judge, at the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 5th Floor, Courtroom #4, Wilmington, Delaware 19801, United States of America.

**PLEASE TAKE FURTHER NOTICE** that any response or objection to the relief requested in the Petitions for Recognition must be (i) in writing describing the basis therefor; (ii) filed with the Clerk of the Bankruptcy Court, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801, United States of America, **on or before October 13, 2020 at 4:00 p.m. (prevailing Eastern Time)** (the “**Objection Deadline**”); and (iii) served upon Womble Bond Dickinson (US) LLP, 1313 N. Market Street, Suite 1200, Wilmington, Delaware 19801, United States of America (Attention: Matthew P. Ward, Esq., [matthew.ward@wbd-us.com](mailto:matthew.ward@wbd-us.com); Morgan L. Patterson, Esq., [morgan.patterson@wbd-us.com](mailto:morgan.patterson@wbd-us.com); and Todd A. Atkinson, Esq., [todd.atkinson@wbd-us.com](mailto:todd.atkinson@wbd-us.com)), United States counsel to the Foreign Representative, on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE** that all parties in interest opposed to the Petitions for Recognition or the Foreign Representative’s request for relief must appear at the Hearing at the time and place set forth above. Further, the Hearing may be adjourned from time to time without further notice other than an announcement in open court at the Hearing of the adjourned date or dates or any further adjourned hearing.

**PLEASE TAKE FURTHER NOTICE** that the Foreign Representative intends to raise issues pertaining to foreign law, specifically Canadian insolvency law including the CCAA, in connection with the Petitions for Recognition: (i) recognizing the CCAA Proceeding as a foreign main proceeding pursuant to chapter 15 of the Bankruptcy Code and the Foreign Representative as the Debtors’ foreign representative under Bankruptcy Code sections 1509 and 1517; (ii) granting automatic relief pursuant to Bankruptcy Code section 1520; and (iii) granting other and additional relief pursuant to Bankruptcy Code sections 1507 and 1521(a) and (b).

**PLEASE TAKE FURTHER NOTICE** that if no response or objection is timely filed and served as provided above, the Bankruptcy Court may grant the recognition and relief requested by the Foreign Representative without further notice. Copies of the Petitions for Recognition, the Provisional Relief Order and the Scheduling Order may be obtained for a fee by visiting the Bankruptcy Court’s website at <https://www.deb.uscourts.gov/>, or free of charge by contacting the undersigned United States counsel to the Foreign Representative.

Dated: September 24, 2020  
Wilmington, Delaware

WOMBLE BOND DICKINSON (US) LLP

*/s/ Todd A. Atkinson*

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