

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 15
	)	
	)	
MOTORCYCLE TIRES & ACCESSORIES	)	Case No. 19-12706 (KBO)
LLC, <i>et al.</i> , ¹	)	Joint Administration Requested
	)	
Debtors in a Foreign Proceeding	)	Hearing Date: October 22, 2020 at 11:00 a.m. ET
	)	Objection Deadline: October 15, 2020 at 4:00 p.m. ET

**FOREIGN REPRESENTATIVE’S FINAL REPORT AND MOTION FOR ORDER
APPROVING ENTRY OF FINAL DECREE**

KPMG, Inc., (“KPMG” or the “Foreign Representative”), in its capacity as the court-appointed monitor and authorized foreign representative of Motorcycle Tires & Accessories LLC (“MTA”) and certain of its wholly-owned subsidiaries (collectively, the “Debtors”), in Canadian proceedings (the “Canadian Proceeding”) commenced under the Companies’ Creditors Arrangement Act, R.S.C. 1985, c. C-36, as amended (the “CCAA”), pending before the Superior Court in Commercial Division in the District of Montreal (the “Canadian Court”), hereby files this final report (the “Final Report”) with respect to the Debtors’ Chapter 15 cases (the “Chapter 15 Cases”) and moves (this “Motion”) this Court for the entry of an order, pursuant to sections 105(a), 350(a) and 1517(d) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”) and Rule 5009(c) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), in substantially the form attached hereto, approving the entry of a final decree closing the Debtors’ Chapter 15 Cases. In support thereof, the Foreign Representative relies upon the *Declaration of Maxime Codère in Support of Foreign Representative’s (I) Verified Petitions Under Chapter 15, (II) Motion for Joint Administration, (III) Motion for*

¹ The Debtors in these chapter 15 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Motorcycle Tires & Accessories LLC (8629); Moncy Holding Company, Inc. (6755); Moncy Financial Services Company, Inc. (7515); Moncy LLC (3654); and Nichols Motorcycle Supply, Inc. (4371). The Debtors’ mailing address is 1550 Melissa Court, Corona, CA 92879.

Provisional and Final Relief in Recognition of A Foreign Main Proceeding, (IV) Motion to Establish Certain Notice Procedures in Connection with Filing of Verified Petitions Under Chapter 15 and (V) Motion to Assume Agency Agreement [D.I. 4] filed on the Petition Date (as defined below), which is incorporated herein by reference. In further support of the relief requested herein, the Foreign Representative respectfully represents as follows:

Jurisdiction

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).
2. Venue is proper in this Court and this District pursuant to 28 U.S.C. § 1410.
3. The statutory predicates for the relief requested herein are sections 105(a), 350(a) and 1517(d) of the Bankruptcy Code and Bankruptcy Rule 5009(c).

Background

4. On December 19, 2019 (the “Petition Date”), the Foreign Representative commenced the Debtors’ Chapter 15 Cases by filing petitions pursuant to sections 1504 and 1515 of the Bankruptcy Code.
5. The Canadian Proceeding was commenced under the CCAA, pursuant to which the Canadian Court entered an order appointing KPMG as monitor and authorizing it to act as foreign representative of the Debtors on December 2, 2019 (as amended and restated on December 12, 2019, the “CCAA Order”).
6. Prior to the Petition Date, the Debtors distributed, exported, and manufactured parts and accessories for motorcycles, snowmobiles, MX and All-Terrain Vehicles (“ATV”) / Utility Task Vehicles (“UTV”) across Canada. The Debtors’ head office was located in Montréal, Québec, Canada with additional office locations and distribution centers in

Boucherville, Québec; Edmonton, Alberta; London, Ontario. The Debtors also had distribution centers in the United States that were operated by MTA. Prior to the filing of the Canadian Proceeding, MTA operated major distribution centers in New York, South Carolina, Louisiana, California and Ohio, but as of the Petition Date, only the Louisiana, California and Ohio distribution centers remained open. The Debtors' primary assets were inventory, as well as their customer base and employees.

7. On the Petition Date, the Foreign Representative filed the *Foreign Representative's Motion for Provisional and Final Relief in Recognition of a Foreign Main Proceeding Pursuant to Sections 105(a), 1507, 1517, 1519, 1520 and 1521 of the Bankruptcy Code* [D.I. 9], requesting (i) entry of a provisional order (the "Provisional Relief Order") entrusting management of the Debtors' assets in the United States to the Foreign Representative, and (ii) entry of a final order (the "Recognition Order") granting recognition of the Canadian Proceeding as a foreign main proceeding of the Bankruptcy Code and enforcing the CCAA Order on a permanent basis in the United States.

8. On December 20, 2019 and January 22, 2020, this Court entered the Provisional Relief Order [D.I. 23] and the Recognition Order [D.I. 38], respectively.

9. On the Petition Date, the Debtors also filed the *Foreign Representative's Motion for Interim and Final Orders Authorizing (I) the Debtors to Assume the Agency Agreement, (II) the Conduct of the Store Closing Sales, with Such Sales to Be Free and Clear of All Liens, Claims and Encumbrances, and (III) Granting Related Relief* [D.I. 8] (the "Agency Agreement Motion"), seeking authority for the Debtors to (i) assume that certain Agency Agreement (the "Agency Agreement"), by and between MTA on the one hand and Gordon Brothers Commercial & Industrial LLC ("Gordon Brothers"), on the other and (ii) conduct liquidation sales in

accordance with the terms of the Agency Agreement, with such sales to be free and clear of all liens, claims, and encumbrances.

10. The Court entered an order approving the Agency Agreement Motion on December 20, 2019 [D.I. 22].

11. Under the terms of the Agency Agreement, Gordon Brothers was engaged to serve as the exclusive agent to MTA for the purpose of conducting a sale of MTA's assets (the "Liquidation Sales") including but not limited to (a) all inventory, supplies, finished goods, raw materials, work-in-process, samples, in-transit, packaging materials and other inventory of MTA as set forth on Exhibit A to the Agency Agreement (the "Inventory"); (b) all accounts receivable and intercompany receivables (together the "Accounts Receivable") and (c) All equipment, computer systems, computer hardware, wiring & connections, vehicles, rolling stock, tools equipment, spare parts, furnishing, office equipment, fixtures, furniture, and other fixed Assets which are owned by MTA (collectively, the "Equipment and FF&E" and together with the Inventory and the Accounts Receivable the "Assets") wherever located, including MTA's warehouses in Louisiana, California, and Ohio (the "Facilities"), using the procedures outlined in the Agency Agreement, and, subject to the terms contained in the Agency Agreement.

12. Following Gordon Brother's conclusion of the Liquidation Sales, the Debtors filed the *Foreign Representative's Omnibus Motion Seeking Entry of an Order (I) Authorizing (A) The Rejection Of Certain Unexpired Leases And (B) Abandonment Of Certain Personal Property, If Any, Each Effective Nunc Pro Tunc To The Applicable Surrender Date And (Ii) Granting Related Relief* (the "Omnibus Motion to Reject Leases") seeking authority to (i) reject certain unexpired leases (each, a "Lease," and collectively, the "Leases") of nonresidential real property located at the premises (collectively, the "Premises") and (ii) abandon certain

equipment, fixtures, furniture, or other personal property (the “Personal Property”) that may be located at the Premises.

13. On March 31, 2020, the Court entered an order granting the relief requested in the Omnibus Motion to Reject Leases [D.I. 48] (the “Lease Rejection and Abandonment Order”).

14. The proceeds from the Liquidation Sales have been or will be distributed to the Debtors’ secured parties in the Canadian Proceeding under the supervision of the Canadian Court; however, these proceeds are insufficient to satisfy the total obligations of the secured parties in full.

15. The Foreign Representative has completed the necessary administration of these Chapter 15 Cases. No claims resolution procedure has or will take place in these Chapter 15 Cases, as the Recognition Order does not contemplate a claims process in the United States.

16. The primary purpose of these Chapter 15 Cases was to facilitate the liquidation of the Debtors’ assets and the associated wind-down of the Debtors’ businesses in conjunction with the Canadian Proceeding. With the completion of the Liquidation Sales, the rejection of the Leases and the abandonment of the remaining Personal Property, the Debtors no longer have any assets of value located within the United States. Accordingly, the Foreign Representative has accomplished its administrative tasks and there is no longer a reason for these Chapter 15 Cases to remain open.

17. The Foreign Representative has therefore determined that the protections afforded to the Debtors by Chapter 15 of the Bankruptcy Code are no longer necessary. In order to limit costs to the Debtors’ estate in the Canadian Proceeding and to relieve the burden on this Court, the Foreign Representative seeks the entry of a final decree closing these Chapter 15 Cases.

18. Since the Petition Date, the Foreign Representative has paid all required Court fees.

Relief Requested

19. By this Motion, the Foreign Representative seeks entry of an order substantially in the form attached hereto as **Exhibit A**, finding these Chapter 15 Cases are fully administered and closing these Chapter 15 Cases pursuant to sections 105, 350(a) and 1517(d) of the Bankruptcy Code, and Bankruptcy Rule 5009(c).

Basis for Relief Requested

20. Section 1517(d) of the Bankruptcy Code provides that “[a] case under this chapter [15] may be closed in the manner prescribed under section 350.” 11 U.S.C. § 1517(d). Section 350(a) of the Bankruptcy Code, in turn, provides that “[a]fter the estate is fully administered and the court has discharged the trustee, the court shall close the case.” *Id.* § 350(a).

21. Further, section 105 of the Bankruptcy Code provides that, “[t]he court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.” 11 U.S.C. § 105.

22. A chapter 15 case has no “estate” per se. See *In re Fairfield Sentry Ltd.*, 458 B.R. 665, 683 (S.D.N.Y. 2011) (citing *In re JSC BTA Bank*, 434 B.R. 334, 341 (Bankr. S.D.N.Y. 2010)). Neither the Bankruptcy Code nor the Bankruptcy Rules define the term “fully administered,” however, a case may be viewed as fully administered when all administrative claims are resolved and there are no motions, contested matters or adversary proceedings outstanding. See *In re Kliegl Bros. Univ. Elec. Stage Lighting Co., Inc.*, 238 BR 531, 542 (Bankr. E.D.N.Y. 1999); *In re Gould*, 437 B.R. 34, 38-39 (Bankr. D. Conn. 2010).²

² The Advisory Committee Note to the 1991 amendment to Bankruptcy Rule 3022 provides a non-exclusive list of six factors that a court may consider in determining whether an estate has been fully administered for

23. Here, there are no outstanding motions, contested matters or adversary proceedings, and there are no administrative claims that need to be addressed. Further, pursuant to the CCAA Order, the Liquidation Sales and the Lease Rejection and Abandonment Order, the Foreign Representative has disposed of substantially all of the Debtors' assets. As such, the Debtors have no United States' assets remaining to be administered in these Chapter 15 Cases. There is nothing further for the Foreign Representative to do in order to discharge its duties under the Recognition Order. Therefore, the requirements of Section 350(a) of the Bankruptcy Code have been satisfied and no further administration of these Chapter 15 Cases is necessary.

24. Further, Bankruptcy Rule 5009(c) provides that a foreign representative shall:

file a final report when the purpose of the representative's appearance in the court is completed. The report shall describe the nature and results of the representative's activities in the court. The foreign representative shall transmit the report to the United States trustee, and give notice of its filing to the debtor, all persons or bodies authorized to administer foreign proceedings of the debtor, all parties to litigation pending in the United States in which the debtor was a party at the time of the filing of the petition, and such other entities as the court may direct. The foreign representative shall file a certificate with the court that notice has been given. If no objection has been filed by the United States trustee or a party in interest within 30 days after the certificate is filed, there shall be a presumption that the case has been fully administered.

Fed. R. Bankr. P. 5009(c).

25. In accordance with the provisions of Bankruptcy Rule 5009(c), the Final Report set forth herein describes the Foreign Representative's activities in the Chapter 15 Cases.

purposes of entry of a final decree. The six factors are: (a) whether the order confirming the plan has become final; (b) whether deposits required by the plan have been distributed; (c) whether the property proposed by the plan to be transferred has been transferred; (d) whether the debtor or the successor of the debtor under the plan has assumed the business of the management of the property dealt with by the plan; (e) whether payments under the plan have commenced; and (f) whether all motions, contested matters, and adversary proceedings have been finally resolved. See Advisory Committee Note to Fed. R. Bankr. P. 3022 (1991). In determining whether a case has been fully administered, courts have frequently applied the six factors set forth in the Advisory Committee Note. See In re Union Home and Indus., Inc., 375 BR 912, 916-17 (B.A.P. 10th Cir. 2007). The Bankruptcy Court has recognized that these factors "are but a guide in determining whether a case has been fully administered, and not all factors need to be present before the case is closed." In re SLI, Inc., 2005 WL 1668396, at *2 (Bankr. D. Del. June 24, 2005) (citing In re Mold Makers, Inc., 124 B.R. 766, 768 (Bankr. N.D. Ill. 1990)).

26. Bankruptcy Rule 5009(c) provides that the absence of objection creates a presumption that the Chapter 15 Cases have been fully administered. The Foreign Representative anticipates that no objection to the Motion will be lodged during the 30-day mandated period. Further, in the event that any parties in interest do object, the Foreign Representative submits that the facts set forth herein demonstrate that these Chapter 15 Cases have been fully administered and a final decree is appropriate.

Notice

27. Notice of this Motion and Final Report has been given to the following parties or their counsel, if known: (i) counsel to BMO, (ii) the Office of the United States Trustee, (iii) parties to litigation pending in the United States in which the Debtor is a party; (iv) all persons or bodies authorized to administer foreign proceedings of the Debtors, (v) the United States of America, (vi) the Internal Revenue Service, (vii) the Securities and Exchange Commission, and (viii) all persons and entities who filed a request for notice pursuant to Bankruptcy Rule 2002.

WHEREFORE, the Foreign Representative respectfully requests the entry of an order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and granting such other and further relief as the Court deems just and proper.

Dated: September 18, 2020
Wilmington, Delaware

POTTER ANDERSON & CORROON LLP

/s/ R. Stephen McNeill

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*Counsel to KPMG Inc., as Monitor and
Foreign Representative for the Debtors*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 15
	)	
	)	
MOTORCYCLE TIRES & ACCESSORIES	)	Case No. 19-12706 (KBO)
LLC, <i>et al.</i> , ¹	)	Joint Administration Requested
	)	
Debtors in a Foreign Proceeding	)	Hearing Date: October 22, 2020 at 11:00 a.m. ET
	)	Objection Deadline: October 15, 2020 at 4:00 p.m. ET

NOTICE OF MOTION

PLEASE TAKE NOTICE that on September 18, 2020, KPMG, Inc., in its capacity as monitor and foreign representative for the above captioned debtors filed the attached **Foreign Representative’s Final Report and Motion for Order Approving Entry of Final Decree** (the “Final Report and Motion”).

PLEASE TAKE FURTHER NOTICE that any objections to the Final Report and Motion must be made in writing, filed with the Bankruptcy Court, 824 Market Street, Wilmington, DE 19801 on or before **October 15, 2020 at 4:00 p.m. (prevailing Eastern Time)** (the “Objection Deadline”) and served upon the undersigned counsel.

PLEASE TAKE FURTHER NOTICE that, if an objection is properly filed and served in accordance with the above procedures, a hearing on the Final Report and Motion will be held on **October 22, 2020 at 11:00 a.m. (prevailing Eastern Time)**, before the Honorable Karen B. Owens, at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom 3, Wilmington, Delaware 19801. Only those objections made in

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writing, timely filed, and served in accordance with the above procedures will be considered at such hearing.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO ENTRY OF AN ORDER ARE TIMELY FILED AND RECEIVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, AN ORDER MAY BE ENTERED GRANTING THE RELIEF REQUESTED IN THE FINAL REPORT AND MOTION WITHOUT FURTHER NOTICE OR A HEARING.

Dated: September 18, 2020
Wilmington, Delaware

POTTER ANDERSON & CORROON LLP

/s/ R. Stephen McNeill

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*Counsel to KPMG Inc., as Monitor and
Foreign Representative for the Debtors*

EXHIBIT A

	)	Chapter 15
In re:	)	
	)	
MOTORCYCLE TIRES & ACCESSORIES	)	Case No. 19-12706 (KBO)
LLC, <i>et al.</i> , ¹	)	Joint Administration Requested
	)	
Debtors in a Foreign Proceeding	)	Re: Docket No. __
	)	

Upon consideration of the *Foreign Representative's Final Report and Motion for Entry of an Order Approving a Final Decree* (the "Motion")²; the Court finding that (i) it has jurisdiction over the matters raised in the Motion pursuant to 28 U.S.C. § 1334, (ii) this is a core proceeding pursuant to 28 U.S.C. §157(b), (iii) venue is proper before this Court pursuant to 28 U.S.C. § 1410, (iv) notice of the Motion and the hearing on the Motion was sufficient under the circumstances, and (v) the relief requested in the Motion is in the best interests of the Debtor's estate, its creditors, and other parties in interest; and after due deliberation and sufficient cause appearing therefor,

1. The Motion is GRANTED as set forth herein.
2. The Chapter 15 Cases shall be closed pursuant to sections 1517(d) and 350 of the Bankruptcy Code.

² Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

3. The Foreign Representative is empowered and authorized to take all actions necessary or appropriate to effect the relief granted in this Order and Final Decree.

4. The Clerk of Court shall enter this Order and Final Decree on the docket of the Chapter 15 Cases and thereafter such docket shall be marked as “Closed.”

5. This Court shall retain jurisdiction to construe and enforce the terms of the Motion and this Order and Final Decree.

CERTIFICATE OF SERVICE

I, R. Stephen McNeill, hereby certify that I am less than 18 years of age and that on this 18th day of September 2020, I caused a true and correct copy of the foregoing **Foreign Representative's Final Report and Motion for Order Approving Entry of Final Decree** to be served upon the parties on the attached service list via email and first class mail, postage pre-paid.

/s/ R. Stephen McNeill
R. Stephen McNeill (DE Bar No. 5210)

SERVICE LIST

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File a Motion:**19-12706-KBO Maxime Codere and Motorcycle Tires & Accessories LLC**

Type: bk

Chapter: 15 v

Office: 1 (Delaware)

Judge: KBO

Case Flag: LEAD

U.S. Bankruptcy Court**District of Delaware**

Notice of Electronic Filing

The following transaction was received from R. Stephen McNeill entered on 9/18/2020 at 12:03 PM EDT and filed on 9/18/2020

Case Name: Maxime Codere and Motorcycle Tires & Accessories LLC**Case Number:** [19-12706-KBO](#)**Document Number:** [54](#)**Docket Text:**

Motion for Final Decree Filed by Maxime Codere. Hearing scheduled for 10/22/2020 at 11:00 AM at US Bankruptcy Court, 824 Market St., 6th Fl., Courtroom #3, Wilmington, Delaware. Objections due by 10/15/2020. (Attachments: # (1) Notice # (2) Exhibit A # (3) Certificate of Service) (McNeill, R. Stephen)

The following document(s) are associated with this transaction:

Document description:Main Document**Original filename:**Motion for Final Decree.pdf**Electronic document Stamp:**

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Document description:Notice**Original filename:**C:\fakepath\Motion for Final Decree_Notice.pdf**Electronic document Stamp:**

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Document description:Exhibit A**Original filename:**C:\fakepath\Motion for Final Decree_Ex A.pdf**Electronic document Stamp:**

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Document description:Certificate of Service**Original filename:**C:\fakepath\Motion for Final Decree_COS.pdf**Electronic document Stamp:**

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