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*Attorneys for FTI Consulting Canada Inc.,
in its Capacity as Authorized Foreign Representative for the Debtor*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

IMPERIAL TOBACCO CANADA LIMITED,

Debtor in a Foreign Proceeding.¹

Chapter 15

Case No. 19-10771 (JPM)

**NOTICE OF MOTION OF THE FOREIGN REPRESENTATIVE
FOR RECOGNITION AND ENFORCEMENT OF THE ORDERS OF
THE CANADIAN COURT: (I) APPROVING THE IMPERIAL CCAA PLAN;
(II) ENJOINING THE SOLICITATION OF CLAIMANTS; AND (III) APPOINTING
THE FOREIGN REPRESENTATIVE AS PLAN ADMINISTRATOR UNDER THE CCAA**

PLEASE TAKE NOTICE that, on August 1, 2025, FTI Consulting Canada Inc. (“FTI”), in its capacities as the authorized foreign representative of Imperial Tobacco Canada Limited (the “Debtor”) and as the court-appointed monitor (the “Monitor”) and CCAA Plan Administrator of the Debtor and Imperial Tobacco Company Limited in a proceeding (the “Canadian Proceeding”)

¹ The last four digits of the Debtor’s taxpayer identification number are 4374. The Debtor’s registered office is located at 30 Pedigree Court, Brampton (Ontario) Canada L6T 5T8.



under Canada's *Companies' Creditors Arrangement Act*, R.S.C. 1985 c. C-36, as amended, pending before the Ontario Superior Court of Justice (Commercial List) in Toronto, Ontario (the "Canadian Court"), filed a motion seeking entry of an order recognizing and enforcing in the United States (i) the order of the Canadian Court dated March 6, 2025 sanctioning the *Third Amended and Restated Court-Appointed Mediator's and Monitor's CCAA Plan of Compromise and Arrangement* (the "Imperial Plan"), (ii) the order of the Canadian Court dated March 26, 2025 granting injunctive relief with respect to unauthorized solicitation efforts outside of approved Plan solicitation procedures, and (iii) the order of the Canadian Court dated March 6, 2025 appointing FTI as CCAA Plan Administrator with respect to the Imperial Plan (the "Motion").

PLEASE TAKE FURTHER NOTICE that the Court has scheduled a hearing to consider the relief requested in the Motion on **August 26, 2025 at 11:00 a.m., prevailing Eastern Time** (the "Hearing") or as soon thereafter as counsel may be heard, before the Honorable John P. Mastando III, United States Bankruptcy Judge, the United States Bankruptcy Court for the Southern District of New York (the "Court"), One Bowling Green, New York, NY 10004-1408.

PLEASE TAKE FURTHER NOTICE that a copy of the Motion and/or related documents are available free of charge by visiting the website of Verita at <https://www.veritaglobal.net/ITCAN>. You may also obtain copies of any pleadings by visiting the Court's website at <https://www.nysb.uscourts.gov/> in accordance with the procedures and fees set forth therein. Documents relating to the Canadian Proceeding can be obtained from the Monitor's website at <http://cfcanada.fticonsulting.com/imperialtobacco/default.htm>.

PLEASE TAKE FURTHER NOTICE that any party in interest wishing to submit a response or objection to the Motion, or the relief request therein, must do so in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Rules for the U.S.

Bankruptcy Court for the Southern District of New York, setting forth in the writing the basis thereof. Any responses or objections must be filed with the Court no later than **4:00 p.m., prevailing Eastern Time, on August 19, 2025** (the “Objection Deadline”) and served upon Morgan, Lewis & Bockius LLP, counsel to the Monitor, 101 Park Avenue, New York, NY, Attn: Jennifer Feldsher (jennifer.feldsher@morganlewis.com) and One State Street, Hartford, CT, Attn: David Shim (david.shim@morganlewis.com).

PLEASE TAKE FURTHER NOTICE that all parties in interest opposing the Motion, or the relief requested therein, must appear at the Hearing as set forth above.

PLEASE TAKE FURTHER NOTICE that, if no response or objection is timely filed and served on or before the Objection Deadline, the Court may grant the relief requested in the Motion without further notice.

PLEASE TAKE FURTHER NOTICE that the Hearing may be adjourned from time to time without further notice other than an announcement in open court, or a notice of adjournment filed with the Court, of the adjourned date or dates of the Hearing or any other further adjourned hearing.

Dated: August 1, 2025
New York, New York

MORGAN, LEWIS & BOCKIUS LLP

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