

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

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In re:

Chapter 15

3MotionAI Inc.,

Case No. 25-11864 (CTG)

Debtor in a foreign proceeding.

Hearing date: 12/10/25 at 3:00 p.m. (ET)
Obj. Deadline: 12/8/25 at 4:00 p.m. (ET)

RE: D.I. 33

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NOTICE OF HEARING ON ENFORCEMENT AND SALE MOTION

PLEASE TAKE NOTICE that, on November 24, 2025, TDB Restructuring Limited, in its capacity as the authorized foreign representative (the “Foreign Representative”) of the above-captioned debtor (the “Debtor”), which is the subject of a proceeding (the “BIA Proceeding”) under Canada’s Bankruptcy and Insolvency Act, R.S.C. 1985, c. B-3, as amended before the Ontario Superior Court of Justice (Commercial List) (the “Canadian Court”) , filed the *Foreign Representative’s Motion for Entry of an Order (I) Recognizing and Enforcing the BIA Approval and Vesting Order; (II) Approving the Sale of Substantially All of the Debtor’s Assets Free and Clear of Liens, Claims, and Encumbrances, and (III) Granting Related Relief* [D.I. 33] (the “Enforcement and Sale Motion”), seeking entry of an order (the “Order”): (i) recognizing and enforcing the Canadian Court’s order, approving, among other things, the sale of substantially all of the Debtor’s assets (the “Purchased Assets”) to the Purchaser, as that term is defined in the Enforcement and Sale Motion, pursuant to an agreed Asset Purchase Agreement (the “APA”); (ii) approving, under section 363 of the Bankruptcy Code, the sale of the Purchased Assets to the Purchaser pursuant to the APA, free and clear of all liens, claims, encumbrances, and other interests; and (iii) granting such other relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the *Order Granting Foreign Representative's Motion to Shorten Notice Period and Schedule an Expedited Hearing Regarding the Foreign Representative's Motion for Entry of an Order (I) Recognizing and Enforcing the BIA Approval and Vesting Order, (II) Approving the Sale of Substantially All of the Debtor's Assets Free and Clear of Liens, Claims, and Encumbrances, and (III) Granting Related Relief* [D.I. 40] (the "Order Expediting Hearing"), a hearing on the Enforcement and Sale Motion (the "Enforcement and Sale Hearing") is currently scheduled to take place **via Zoom** on **December 10, 2025, at 3:00 p.m. (ET)**, before the Honorable Craig T. Goldblatt, United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Courtroom No. 7, Wilmington, Delaware 19801. Please refer to Judge Goldblatt's Chambers Procedures (<https://www.deb.uscourts.gov/judge-craig-t-goldblatt>) and the Court's website (<http://www.deb.uscourts.gov/ecourt-appearances>) for information on who may participate remotely, the method of allowed participation (video or audio), Judge Goldblatt's expectations of remote participants, and the advance registration requirements.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Order Expediting Hearing, any objections or responses to the Enforcement and Sale Motion, and the relief requested therein, must be (i) in writing, (ii) filed with the Clerk of the Bankruptcy Court, 824 N. Market Street, Third Floor, Wilmington, Delaware 19801, on or before **December 8, 2025, at 4:00 p.m. (ET)** (the "Objection Deadline"); and (iii) served so as to be received on or before the Objection Deadline (a) Office of the United States Trustee, J. Caleb Boggs Federal Building, 844 King Street, Suite 207, Lockbox 35, Wilmington, DE 19801, Attn: Jonathan Lipshie, Esq. (jon.lipshie@usdoj.gov); (b) counsel to the Foreign Representative, Barclay Damon LLP, 1270 Avenue of the Americas, Suite 2310, New York, NY 10020, Attn: Janice B. Grubin, Esq.

(jgrubin@barclaydamon.com) and Ilan Markus, Esq. (imarkus@barclaydamon.com), The Rosner Law Group LLC, 824 North Market Street, Suite 810, Wilmington, DE 19801, Attn: Frederick B. Rosner, Esq. (rosner@teamrosner.com) and Zhao (Ruby) Liu, Esq. (liu@teamrosner.com), and Cassels Brock & Blackwell LLP, 40 Temperance Street, Suite 3200, Toronto, ON M5H 0B4, Canada, Attn: Monique Sassi, Esq. (msassi@cassels.com) and Eva Hyderman, Esq. (ehyderman@cassels.com); (c) counsel to the Debtor, Gardiner Roberts, 3600 – 22 Adelaide Street West, Toronto, ON M5H 4E3, Canada, Attn: Christopher Besant, Esq. (cbesant@grllp.com); and (d) counsel to the Purchaser, Cozen O'Connor, 1201 North Market Street, Suite 1001, Wilmington, DE 19801, Attn: Marla Benedek, Esq. (mbenedek@cozen.com).

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTION OR RESPONSE TO THE ENFORCEMENT AND SALE MOTION, OR THE RELIEF REQUESTED THEREIN, IS FILED BY THE OBJECTION DEADLINE, THE COURT MAY ENTER THE ORDER GRANTING THE ENFORCEMENT AND SALE MOTION WITHOUT HOLDING A HEARING.

PLEASE TAKE FURTHER NOTICE that copies of all documents filed in this chapter 15 case may be obtained by visiting the Court's website at <http://ecf.deb.uscourts.gov> (a PACER login and password are required to retrieve a document), or free of charge at the website of the Foreign Representative and Proposal Trustee in the BIA Proceeding: <https://tdbadvisory.ca/insolvency-case/3motionai-inc/>.

PLEASE TAKE FURTHER NOTICE that your rights may be affected, and you should read the Enforcement and Sale Motion carefully and discuss it with your attorney if you have one in connection with this chapter 15 case. If you do not have an attorney, you may wish to consult one.

PLEASE TAKE FURTHER NOTICE that if you do not want the Court to grant the relief requested by the Foreign Representative, or if you want the Court to consider your views on any matter requested by the Enforcement and Sale Motion, then you or your attorney must file and serve an objection in accordance with the procedures set forth herein. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought by the Foreign Representative and may enter the Order granting the relief requested.

[Signature page follows]

Dated: November 24, 2025

THE ROSNER LAW GROUP LLC

/s/ Zhao Liu

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