

**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.
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**MOTION OF FOREIGN REPRESENTATIVE FOR ENTRY OF
ORDER SCHEDULING PROVISIONAL AND FINAL HEARINGS AND SPECIFYING
FORM AND MANNER OF SERVICE OF NOTICE PURSUANT TO SECTIONS 1515
AND 105(a) OF BANKRUPTCY CODE AND BANKRUPTCY RULES 2002 AND 9007**

TDB Restructuring Limited (“TDB Restructuring”) ¹ is the authorized foreign representative (the “Foreign Representative”) of the above-captioned debtor (“3Motion” or the “Debtor”), who has filed a Notice of Intention to Make a Proposal, dated September 3, 2025 (the “NOI”) under section 50.4 (1) of Canada’s Bankruptcy and Insolvency Act, R.S.C. 1985, c. B-3, as amended (the “BIA”), as confirmed by a Certificate of Filing issued by the Office of the Superintendent of Bankruptcy Canada, commencing a proceeding under the BIA (the “BIA Proceeding”), Court File No. BK-25-03267656-0032, pending in the Ontario Superior Court of Justice (Commercial List) (the “Canadian Court”). The Foreign Representative respectfully submits this motion (the “Scheduling and Notice Motion” or the “Motion”), seeking entry of an order substantially in the form attached hereto as Exhibit A (the “Proposed Order”) scheduling hearings and establishing the related form and manner of notice with respect to the *Motion of Foreign Representative for Entry of Provisional and Final Orders Relating to and Granting Recognition of Foreign Main Proceedings and Certain Related Relief Pursuant to Sections 362, 364(e), 365, 1517, 1519, 1520, 1521, and 105(a) of Bankruptcy Code* (the “Recognition and Relief

¹ All capitalized terms used by not otherwise defined herein shall have the meanings ascribed to them in the Memorandum of Law (defined below).

Motion” and, collectively with the Scheduling and Notice Motion, the “Motions”), filed contemporaneously herewith, and, more specifically, setting an emergency hearing on the provisional relief sought (the “Emergency Hearing”) on or before October 28, 2025, and a final hearing on the final relief sought (the “Final Hearing”) on November 20, 2025, November 21, 2025, November 24, 2025 or November 25, 2025 (collectively, the “Hearings”) or on such other date that the Court’s schedule will allow. In support of the relief requested herein, the Foreign Representative respectfully states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated as of February 29, 2012. This case has been properly commenced pursuant to 11 U.S.C. § 1504 by the Foreign Representative’s filing of a verified petition for recognition of the BIA Proceeding (the “Petition”) pursuant to 11 U.S.C. § 1515 of title 11 of the United States Code (the “Bankruptcy Code”).

2. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(P), and pursuant to Rule 9013-1(f) of the *Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware* (the “Local Rules”), the Foreign Representative consents to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

3. Venue is proper before this Court pursuant to 28 U.S.C. § 1410.

RELIEF REQUESTED

4. The Foreign Representative respectfully requests that this Court enter an Order, substantially in the form of the Proposed Order:

- (i) scheduling the Emergency Hearing and the Final Hearing on the Recognition and Relief Motion; and
- (ii) pursuant to sections 1515 and 105(a) of the Bankruptcy Code and Rules 2002 and 9007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), (a) approving the proposed notice, annexed to the proposed Order as Exhibit 1 (the “Hearing Notice”), of (i) the filing of the Petition and certain related pleadings, including the Recognition and Relief Motion, (ii) the Court’s entry of a provisional order (the “Provisional Order” or the “Emergency Order”) recognizing and enforcing in the United States, on an interim basis, the interim order issued on October 1, 2025 by the Canadian Court as to the imposition of a stay against all parties in interest and pending and prospective litigation (the “BIA Initial Order”), (iii) the deadline to object to the Petition and the Court’s entry of a final order (the “Final Order”) granting the relief sought in the Recognition and Relief Motion on a final basis (the “Recognition Objection Deadline”), and (iv) the Final Hearing for the Court to consider the Petition and the relief sought in the Recognition and Relief Motion on a final, basis; (b) approving the manner of service of the Hearing Notices; (c) approving the manner of service on the Notice Parties (as defined below) of any pleadings that the

Foreign Representative files in this chapter 15 case; and (d) granting certain related relief.

5. In support of this Motion, the Foreign Representative refers the Court to (a) *Declaration of Bryan A. Tannenbaum in Support of (I) Verified Chapter 15 Petition; (II) Foreign Representative's Motion for Orders Granting Provisional and Final Relief in Aid of Foreign Main Proceeding; and (III) Certain Related Relief* (the "Tannenbaum Declaration") [D.I. 3], (b) Recognition and Relief Motion [D.I. 8] and (c) *Memorandum of Law of Foreign Representative in Support of (I) Verified Chapter 15 Petition and (II) Motion of Foreign Representative for Orders Granting Provisional and Final Relief in Aid of Foreign Main Proceeding* (the "Memorandum of Law") [D.I. 10], which were filed contemporaneously herewith and are incorporated herein by reference.

BACKGROUND²

3Motion's Business and Events Leading to BIA Proceeding and Chapter 15 Case

6. 3Motion is a privately held corporation, incorporated pursuant to the laws of Ontario with its headquarters located in Oakville, Ontario. 3Motion operates as a technology and artificial intelligence company in the health rehabilitation and sports training sectors.

7. Reed Hanoun, 3Motion's founder, former CEO, shareholder and consultant, sworn to on September 29, 2025 (the "Hanoun Affidavit") and attached to 3Motion's motion papers in the BIA Proceeding³ and to the Tannebaum Declaration, affirms that 3Motion has no bank debt and, instead, was financed by 66 investors through a mix of share subscriptions and investments

² All factual assertions in the Motion are supported by the Tannenbaum Declaration.

³ The pleadings filed in the BIA Proceeding can be found on TDB Restructuring's website at <https://tdbadvisory.ca/insolvency-case/3motionai-inc/> (the "TDB/3Motion Website").

via Simple Agreements for Future Equity (“SAFEs,” a hybrid debt/equity investment concept developed in Silicon Valley for investment in start up technology companies).

8. 3Motion is insolvent and on the date of the filing of the BIA Proceeding had no secured creditors but approximately CAD \$4.3 million in unsecured debt, and, in addition, is being sued in two actions: (i) for an amount in excess of USD \$5 million in pending litigation in the Delaware Court of Chancery, entitled *VelocityEHS Holdings, Inc. v. 3MotionAI, Inc.*, C.A. No. 2024-0957-MTZ (the “Velocity Action”), and (ii) for an amount in excess of CAD \$380,000 in an arbitration in the Province of Ontario brought by Accentiko Inc.

9. 3Motion has developed 6 separate technology applications aimed at medical and workplace injury rehabilitation and sports training markets, and has commercialized them, with customers, revenue and accounts receivable in the U.S. and Canada.

10. 3Motion’s technology applications are based on intellectual property in the form of a U.S. patent, as well as trademarks, copyrights, trade secrets, and know-how.

11. Between the demands of the Velocity Action and a downturn in the new adoptions of its software, 3Motion’s cash and cash flow have declined to the point where it is necessary to restructure. To accomplish that restructuring, 3Motion is proposing, in the BIA Proceeding, to have its assets and business sold as a going concern through a Sale and Investment Solicitation Process (the “SISP”), and then to implement a process for the distribution of the proceeds to its creditors, all conducted and overseen by the Foreign Representative as the Proposal Trustee.

BIA Proceeding

12. As noted, on September 3, 2025, 3Motion filed the NOI. TDB Restructuring, through Mr. Tannenbaum, a Licensed Insolvency Trustee in Canada, was appointed as Proposal Trustee of 3Motion’s proposal process in the BIA Proceeding.

13. The Canadian Court issued the BAI Initial Order on October 1, 2025 granting certain provisional relief in connection with the BIA Proceeding.⁴

14. Subsequently, on October 23, 2025 (the “Petition Date”), the Foreign Representative commenced this chapter 15 case by filing, among other things, the Petition seeking recognition by the Court of the BIA Proceeding as a foreign main proceeding under chapter 15 of the Bankruptcy Code.

15. Additional information about the BIA Proceeding and the relief set forth in the BIA Initial Order can be found in the Tannenbaum Declaration, the Recognition and Relief Motion, the Memorandum of Law, and court filings pertaining to same and are posted pursuant to the BIA Initial Order on the TDB/3Motion Website: <https://tdbadvisory.ca/insolvency-case/3motionai-inc/>.

Notice for Final Hearing on Recognition and Relief Motion

16. Pursuant to Bankruptcy Rule 2002(q), the Foreign Representative proposes to serve the Hearing Notice, the Recognition and Relief Motion (including the proposed Final Order), the Memorandum of Law, the Provisional Order, and the BIA Initial Order, by U.S. or Canadian mail, first class postage prepaid and by electronic mail if the Canadian mail service is not completely operational due to the strike, within five (5) business days of the later of (a) entry of this Order and (b) entry of the Provisional Order, or as soon thereafter as practicable, on the following parties, or their counsel, if known (collectively, the “Notice Parties”): (i) all persons or bodies authorized to administer foreign proceedings of the Debtor; (ii) all entities against whom provisional relief is being sought pursuant to section 1519 of the Bankruptcy Code, including, but not limited to, all known creditors of the Debtor; (iii) all parties to litigation pending in the U.S. to which the Debtor

⁴ A copy of the BIA Initial Order is annexed to the Tannenbaum Declaration.

is a party at the time of the filing of the Petition; (iv) the Office of the United States Trustee for the District of Delaware; (v) the DIP Lender; (vi) the Debtor's 66 investors; (vii) principal parties that have appeared in the BIA Proceeding as of the date of service of the relevant pleading; and (viii) any party that has requested notice pursuant to Bankruptcy Rule 2002.⁵

17. The Hearing Notice will: (a) notify the Notice Parties of the filing of the Petition and certain related pleadings pursuant to chapter 15 of the Bankruptcy Code; and (b) set forth the Recognition Objection Deadline and the date and time of the Final Hearing.

Notice of Appearance

18. In the event any party files a notice of appearance in this chapter 15 case subsequent to the Foreign Representative's initial service of the Hearing Notice as provided for above, but prior to the Final Hearing, the Foreign Representative will serve the Hearing Notice on such party within five (5) business days of the filing of such notice of appearance to the extent the Foreign Representative has not already done so.

RELIEF REQUESTED SHOULD BE GRANTED

19. Pursuant to Bankruptcy Rule 9006(c)(1), for cause shown, this Court is authorized to reduce notice periods for motions. *See* Fed. R. Bankr. P. 9006(c)(1) ("[W]hen an act is required or allowed to be done at or within a specified time by these rules or by a notice given thereunder or by order of the court, the court for cause shown may in its discretion with or without motion or notice order the period reduced.").

20. Section 1519 of the Bankruptcy Code authorizes the foreign representative of a foreign debtor to move for the imposition of immediate provisional relief. *See* 11 U.S.C. § 1519.

⁵ A copy of the Hearing Notice in substantially final form is attached as Exhibit 1 to the Proposed Order, Exhibit A hereto.

The Bankruptcy Rules and Local Rules, however, do not explicitly provide procedures for obtaining emergency provisional relief under section 1519 of the Bankruptcy Code. Accordingly, the Foreign Representative requests that this Court invoke its authority, consistent with section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9029(b), granting the Foreign Representative's requested procedures set forth in this Scheduling and Notice Motion, as such procedures are necessary for the relief contemplated by chapter 15 of the Bankruptcy Code.

21. The Foreign Representative respectfully submits that this Court's consideration of the Recognition and Relief Motion at the Emergency Hearing is akin to the hearing of "first day motions" in a case under chapter 11 of the Bankruptcy Code.

22. The relief requested in the Scheduling and Notice Motion is procedural in nature and will not prejudice any party if granted.

23. Bankruptcy Rule 2002(m) provides that "the court may from time to time enter orders designating the matters in respect to which, the entity to whom, and the form and manner in which notices shall be sent except as otherwise provided by [the Bankruptcy Rules]." Fed. R. Bankr. P. 2002(m).

24. Bankruptcy Rule 9007 provides that "[w]hen notice is to be given under these rules, the court shall designate, if not otherwise specified herein, the time within which, the entities to whom, and the form and manner in which the notice shall be given." Fed. R. Bankr. P. 9007. Further, section 105(a) of the Bankruptcy Code provides the Court with the power to grant the relief requested herein by the Foreign Representative.

25. Under the facts and circumstances of 3Motion's chapter 15 case, the Foreign Representative submits that service of the Hearing Notice in the manner proposed herein will provide the Notice Parties with due and sufficient notice of the relief requested in the Recognition

and Relief Motion and associated objection deadline and hearing dates. The Notice Parties will include all parties contained on the list compiled by the Foreign Representative in accordance with and pursuant to Bankruptcy Rule 1007(a)(4), which list shall be filed with the Court.

26. The requested date for the Hearings herein, which would schedule the Emergency Hearing within a few days of the Petition Date and leave intact the time frame for the Final Hearing, will not prejudice creditors because it will preserve the status quo and protect 3Motion's assets, thereby facilitating the SISP and a distribution to creditors pending recognition of the BIA Proceeding as a foreign main proceeding.

27. Service by the Foreign Representative of all pleadings that it files in this chapter 15 case by U.S. or Canadian mail, first class postage prepaid, and by electronic mail if the Canadian mail service is not completely operational due to the strike, on the Notice Parties is an efficient and effective way to provide notice to such key parties in these cases and the BIA Proceeding. At the same time, it will not overburden the Foreign Representative with the significant costs associated with copying and mailing all the various documents filed in these cases to the entire matrix of putative creditors and other parties.

28. Accordingly, the Foreign Representative requests that the Court declare that service to the Notice Parties of the Hearing Notice, the Recognition and Relief Motion (including the proposed Final Order), the Memorandum of Law, the Provisional Order and the BIA Initial Order, as proposed herein, is due and sufficient notice and constitutes adequate service on all interested parties of the filing of the Petition, the Recognition and Relief Motion, and the proposed Final Order.

29. Bankruptcy Rule 1012(b) provides, among other things, that a party objecting to a petition for recognition of a foreign proceeding under chapter 15 of the Bankruptcy Code has until

7 days before the recognition hearing to respond thereto. Fed. R. Bankr. P. 1012(b). The Foreign Representative submits that such deadline will be honored in the relief sought in the Motion.

30. Finally, section 1514 of the Bankruptcy Code contains certain provisions regarding notification to foreign creditors. It is not clear, however, that section 1514 of the Bankruptcy Code has any application in the context of an ancillary case under chapter 15 of the Bankruptcy Code. According to Collier, section 1514 of the Bankruptcy Code is the “last in a series of sections dealing with the international aspects of cases under chapters other than chapter 15.” 8 COLLIER ON BANKRUPTCY ¶ 1514.01 (Alan N. Resnick, *et al.*, 16th ed. rev. 2009). Indeed, the requirements for notification set forth in section 1514 are at variance with those requirements set forth under Bankruptcy Rule 2002(q) which clearly apply to a case under chapter 15 and with which the Foreign Representative shall comply. For these reasons, the Foreign Representative does not believe that the requirements set forth in section 1514 apply to this case; however, out of an abundance of caution, the Foreign Representative respectfully requests that, to the extent applicable, the notice requirements of section 1514 of the Bankruptcy Code be waived in this chapter 15 case.

31. The Court has granted requests for similar relief under section 1514(c) in other chapter 15 cases. *See e.g., In re Bench Accounting, Inc., et al.*, No. 25-10463 (LSS) (Bankr. D. Del. Mar. 18, 2025) [D.I. 20]; *In re DAVIDsTEA Inc.*, No. 20-11802 (JTD) (Bankr. D. Del. July 9, 2020) [D.I. 21]; *In re Energy Coal S.P.A.*, No. 25-12048 (LSS) (Bankr. D. Del. Oct. 8, 2015) [D.I. 25] (order stating that all notice requirements specified in section 1514(c) are waived or otherwise deemed inapplicable to the chapter 15 cases); *In re Zodiac Pool Solutions SAS*, No. 14-11818 (KJC) (Bankr. D. Del. Aug. 1, 2014) [D.I. 19] (order stating that all notice requirements specified in section 1514(c) of the Bankruptcy Code are waived); *In re Essar Steel Algoma Inc.*,

No. 14-11730 (BLS) (Bankr. D. Del. July 17, 2014) [D.I. 30] (order stating that all notice requirements specified in section 1514(c) are waived or otherwise deemed inapplicable to the chapter 15 cases).

32. To the extent that there are orders issued by the Canadian Court concerning claims procedures in the BIA Proceeding, the Foreign Representative will comply with any relevant orders issued by the Canadian Court with respect to providing notice to the Notice Parties of any applicable deadlines or procedures for the filing of claims.

33. Accordingly, in light of the foregoing, cause exists for the Court to hear the Motions on an urgent basis at the Emergency Hearing as such relief is required to protect the Debtor's assets within the territorial jurisdiction of the United States and to protect the interests of the Debtor's stakeholders by facilitating a centralized proceeding – the BIA Proceeding - pending its as a foreign main proceeding.

NOTICE

34. Notice of this Motion shall be given to the Notice Parties by United States or Canadian first class mail, postage prepaid, and by electronic mail if the Canadian mail service is not completely operational due to the strike. In light of the nature of the relief requested, the Foreign Representative submits that no further notice is required.

NO PRIOR REQUEST

35. No previous request for the relief sought herein has been made to this or any other court.

36. WHEREFORE, the Foreign Representative respectfully requests that the Court grant the relief requested herein and such other and further relief as it deems just and proper.

Dated: October 24, 2025
Wilmington, Delaware

THE ROSNER LAW GROUP LLC

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*Counsel to TDB Restructuring Limited, the Foreign
Representative*

EXHIBIT A

Proposed Order

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

-----X
In re:

Chapter 15

3MotionAI Inc.,

Case No. 25-11864 (CTG)

Debtor in a foreign proceeding.
-----X

**ORDER SCHEDULING EMERGENCY AND FINAL HEARING AND SPECIFYING
FORM AND MANNER OF SERVICE OF NOTICE PURSUANT TO SECTIONS 1515
AND 105(a) OF BANKRUPTCY CODE AND BANKRUPTCY RULES 2002 AND 9007**

Upon the motion, dated October 24, 2025 (the “Motion”)² of TDB Restructuring Limited (“TDB Restructuring”), the foreign representative (the “Foreign Representative”) of the above-captioned debtor (“3Motion” or the “Debtor”), for entry of an order pursuant to sections 1515 and 105(a) of title 11 of the United States Code (the “Bankruptcy Code”) and Rules 2002 and 9007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), scheduling emergency and final hearings and specifying the form and manner of service of notice (the “Order”), all as more fully described in the Motion; and this Court having jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated as of February 29, 2012; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(P); and the Foreign Representative having consented to the Court’s authority to enter a final order consistent with Article III of the United States Constitution; and venue being proper before this Court pursuant to 28 U.S.C. § 1410; and due and proper notice of the Motion having been provided to the Office of the United States Trustee; and it appearing that no other or further notice need be provided given the emergency nature of the Emergency Hearing; and upon the Tannenbaum Declaration, the Recognition and Relief Motion, and Memorandum of Law, filed

contemporaneously with the Motion, and all of the proceedings had before the Court; and it appearing that the relief requested by the Motion is in the best interest of the Debtor, its estate, its creditors, and other parties in interest; and after due deliberation and sufficient cause appearing therefor; it is hereby ORDERED that:

1. The Motion is granted as set forth herein.
2. The Hearing Notice, substantially in the form attached hereto as Exhibit 1, is hereby approved.
3. Service of the Hearing Notice in accordance with this Order is hereby approved as adequate and sufficient notice and service on all interested parties.
4. Prior to mailing the Hearing Notice by United States or Canadian mail, first-class postage-prepaid, or by electronic mail if the Canadian mail service is not completely operational due to the strike, the Foreign Representative may fill in any missing dates and other information, correct any typographical errors, conform the provisions thereof to the provision of this Order and make such other and further non-material, non-substantive changes as the Foreign Representative deems necessary or appropriate.
5. All notice requirements specified in section 1514 of the Bankruptcy Code are hereby waived or otherwise deemed inapplicable to this case.
6. An emergency hearing for **provisional** relief on the Recognition and Relief Motion is scheduled for **October [__], 2025 at [_____] (prevailing Eastern Time)**, or as soon thereafter as counsel shall be heard, in Courtroom __ of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware 19801.
7. A hearing for **final** relief on the Recognition and Relief Motion is scheduled for **[November [__], 2025 at [_____] (prevailing Eastern Time)**, or as soon thereafter as counsel

shall be heard, in Courtroom [] of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware 19801.

8. The Foreign Representative shall serve, or cause to be served, copies of the Hearing Notice and all exhibits thereto, which includes the Provisional Order, the BIA Initial Order, the Recognition and Relief Motion (including the proposed Final Order), and the Memorandum of Law, by United States or Canadian mail, first-class postage-prepaid, or by electronic mail if the Canadian mail service is not completely operational due to the strike, on the Notice Parties within five (5) business days of the later of (a) entry of this Order and (b) entry of the Provisional Order, or as soon thereafter as practicable.

9. The Foreign Representative shall serve, or cause to be served, the Hearing Notice and any subsequent notices upon any party that files a notice of appearance in this chapter 15 case, within five (5) business days of the filing of such notice of appearance, or as soon thereafter as practicable, if such documents have not already been served on such party (or its counsel).

10. The Foreign Representative shall serve, or cause to be served, all pleadings filed by the Foreign Representative in this chapter 15 case on the Notice Parties, including any party requesting to be added thereto, by United States or Canadian mail, first-class postage-prepaid, or by electronic mail if the Canadian mail service is not completely operational due to the strike.

11. Responses or objections to the Petition and the **final** granting of the Recognition and Relief Motion and the relief requested therein must be made pursuant to the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules in writing and setting forth the basis therefore. Such responses must be filed with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware 19801, and served upon counsel for the Foreign Representative so as to be **actually received no later than November [], 2025 at []**

(prevailing Eastern Time). Notices to counsel for the Foreign Representative should be addressed to The Rosner Law Group LLC, 824 North Market Street, Suite 810, Wilmington, Delaware 19801, Attn: Frederick B. Rosner, Esq and Zhao (Ruby) Liu, Esq., and Barclay Damon LLP, 1270 Avenue of the Americas, Suite 2310, New York, New York 10020, Attn: Janice B. Grubin, Esq. and Ilan Markus, Esq.

12. Notwithstanding any applicability of any Bankruptcy Rules, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

13. The Foreign Representative is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.

14. This Court shall retain exclusive jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and/or enforcement of this Order.

Exhibit 1

Notice of Recognition Hearing

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

-----X
In re:

Chapter 15

3MotionAI Inc.,

Case No. 25-11864 (CTG)

Debtor in a foreign proceeding.
-----X

**RULE 2002 NOTICE OF (I) CHAPTER 15 PETITION, (II) MOTION OF
FOREIGN REPRESENTATIVE FOR ENTRY OF PROVISIONAL AND FINAL
ORDERS GRANTING RECOGNITION OF FOREIGN MAIN PROCEEDING AND
CERTAIN RELATED RELIEF AND (III) COURT’S INTENTION TO
COMMUNICATE WITH FOREIGN COURT AND FOREIGN REPRESENTATIVE**

PLEASE TAKE NOTICE that on October 23, 2025, TDB Restructuring Limited (“TDB Restructuring”)¹, the authorized foreign representative (the “Foreign Representative”) of the above-captioned debtor (“3Motion” or the “Debtor”), who has filed a Notice of Intention to Make a Proposal, dated September 3, 2025 (the “NOI”) under section 50.4 (1) of Canada’s Bankruptcy and Insolvency Act, R.S.C. 1985, c. B-3, as amended (the “BIA”), as confirmed by a Certificate of Filing issued by the Office of the Superintendent of Bankruptcy Canada thereby commencing a proceeding under the BIA (the “BIA Proceeding”), Court File No. BK-25-03267656-0032, pending in the Ontario Superior Court of Justice (Commercial List) (the “Canadian Court”), filed a verified petition for relief (the “Petition”) under chapter 15 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), and on October 24, 2025 filed the *Motion of Foreign Representative for Entry of Provisional and Final Orders Granting Recognition of Foreign Main Proceeding and Certain Related Relief Pursuant to Sections 362, 364(e), 1517, 1519, 1520, 1521, and 105(a) of Bankruptcy Code* (the “Recognition and Relief Motion”), seeking

¹ All capitalized terms used by not otherwise defined herein shall have the meanings ascribe to them in the Memorandum of Law (defined below).

recognition of the BIA Proceeding as a foreign main proceeding pursuant to section 1515 of the Bankruptcy Code and other related relief, in the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”). Parties can obtain a copy of all documents filed electronically with the Court in this case and relevant documents filed with the Canadian Court in the BIA Proceeding, and find important dates and deadlines free of charge by visiting the Court website <https://www.deb.uscourts.gov> and TDB Restructuring’s website <https://tdbadvisory.ca/insolvency-case/3motionai-inc/>. Copies of the Recognition and Relief Motion and the *Memorandum of Law of Foreign Representative in Support of (I) Verified Chapter 15 Petition and (II) Motion of Foreign Representative for Orders Granting Provisional and Final Relief in Aid of Foreign Main Proceeding* (the “Memorandum of Law”) are enclosed herein.

PLEASE TAKE FURTHER NOTICE that, on October [___], 2025, the Bankruptcy Court entered that certain order granting provisional, injunctive, and related relief pursuant to, among others, sections 105(a) and 1519 of the Bankruptcy Code [D.I. ___] (the “Provisional Order”). The Provisional Order, among other things, enjoins actions in the United States in contravention of orders of the Canadian Court in the BIA Proceeding from the entry of such Provisional Order through and including the date of the Recognition Hearing (as defined below). A copy of the Provisional Order is enclosed herein.

PLEASE TAKE FURTHER NOTICE that it is anticipated that the Bankruptcy Court will communicate directly with, or to request information or assistance and cooperation directly from, the Canadian Court and Foreign Representative pursuant to section 1525 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that among other things, the Petition seeks the entry of an order granting recognition of the BIA Proceeding.

PLEASE TAKE FURTHER NOTICE that, responses or objections to the Petition or the *final* granting of the Recognition and Relief Motion and the relief requested therein must be made pursuant to the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules in writing and setting forth the basis therefore. Such responses must be filed with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware 19801, and served upon counsel for the Foreign Representative so as to be **actually received no later than November [], 2025 at [] (prevailing Eastern Time)**. Notices to counsel for the Foreign Representative should be addressed to The Rosner Law Group LLC, 824 North Market Street, Suite 810, Wilmington, Delaware 19801, Attn: Frederick B. Rosner, Esq and Zhao (Ruby) Liu, Esq., and Barclay Damon LLP, 1270 Avenue of the Americas, Suite 2310, New York, New York 10020, Attn: Janice B. Grubin, Esq. and Ilan Markus, Esq. A copy of the BIA Initial Order is enclosed herein.

PLEASE TAKE FURTHER NOTICE that a hearing for **final** relief on the Recognition and Relief Motion (the “Final Recognition Hearing”) is scheduled for [], 2025 at [] (**prevailing Eastern Time**), or as soon thereafter as counsel shall be heard, in Courtroom [] of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that all parties in interest opposed and wishing to object to the Petition or the relief requested by the Foreign Representative in the Recognition and Relief Motion must appear at the Final Recognition Hearing at the time and place set forth herein.

PLEASE TAKE FURTHER NOTICE that the Final Recognition Hearing may be adjourned from time to time without further notice other than a notice on the docket in this case or an announcement in open court of the adjourned date or dates of any adjourned hearing.

PLEASE TAKE FURTHER NOTICE that hearings in this matter, including the Recognition Hearing, shall take place at the United States Bankruptcy Court of the District of Delaware, Courtroom [____], 824 North Market Street, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that, if no response or objection is timely filed and served as provided above, the Bankruptcy Court may grant the relief requested by the Foreign Representative without further notice or hearing.

Dated: October __, 2025

THE ROSNER LAW GROUP LLC

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