

**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. Re: D.I. 11 & 25
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**ORDER SCHEDULING 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 [D.I. 11] (the “Motion”)¹ 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 a final hearing and specifying the form and manner of service of notice on the Recognition and Relief Motion and any pleadings that the Foreign Representative files in this case (the “Scheduling 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 (the “UST”); and an

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

emergency hearing (the “Hearing”) having been conducted on October 28, 2025 with ECF and email notice to the Notice Parties, as set forth in the Certificate of Service, dated October 28, 2025 [D.I. 22]; and it appearing that no other or further notice need be provided given the emergency nature of the Hearing; and upon the Tannenbaum Declaration, the Recognition and Relief Motion, and the 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, and by electronic mail, the Foreign Representative may fill in any missing dates and other information, correct any typographical errors, conform the provisions thereof to the provisions of this Order and make such other and further non-material, non-substantive changes to the Hearing Notice 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. A hearing for **final** relief on the Recognition and Relief Motion is scheduled for **November 24, 2025 at 3:00 p.m. (prevailing Eastern Time)**, or as soon thereafter as counsel

shall be heard, in Courtroom 7 of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware 19801.

7. 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), the Tannenbaum Declaration and the Memorandum of Law, by United States or Canadian mail, first-class postage-prepaid, and by electronic mail within three (3) calendar days of the later of (a) entry of this Order and (b) entry of the Provisional Order, or as soon thereafter as practicable.

8. 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 three (3) calendar 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).

9. 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, and by electronic mail.

10. 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 therefor. 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 17, 2025 at 4:00 p.m. (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.

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

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

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



Dated: October 29th, 2025
Wilmington, Delaware

CRAIG T. GOLDBLATT
UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

Notice of Recognition Hearing

**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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**RULE 2002 NOTICE OF (I) CHAPTER 15 PETITION, AND (II) MOTION OF
FOREIGN REPRESENTATIVE FOR ENTRY OF PROVISIONAL AND FINAL
ORDERS GRANTING RECOGNITION OF FOREIGN MAIN PROCEEDING AND
CERTAIN RELATED RELIEF**

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 recognition of the BIA Proceeding as a foreign main proceeding pursuant to section 1515 of the

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

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 28, 2025, the Bankruptcy Court entered that certain order granting provisional, injunctive, and related relief pursuant to, among others, sections 105(a), 362 and 1519 of the Bankruptcy Code [D.I. 25] (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, including the BIA Interim Order, from the date of entry of the Provisional Order through and including the date of the Recognition Hearing (as defined below). Copies of the Provisional Order and the BIA Interim Order are 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 a hearing for final relief on the Recognition and Relief Motion (the “Recognition Hearing”) is scheduled for November 24, 2025 at 3:00 p.m. (prevailing Eastern Time), or as soon thereafter as counsel shall be heard, in Courtroom 7 of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that, responses or objections to the *final* hearing on 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 therefor. 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 17, 2025 at 4:00 p.m. (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.

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

PLEASE TAKE FURTHER NOTICE that the 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 7, 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 29, 2025

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