

ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST

THE HONOURABLE) THURSDAY, THE 13th
)
JUSTICE STEELE) DAY OF NOVEMBER, 2025

IN THE MATTER OF THE BANKRUPTCY AND INSOLVENCY ACT, R.S.C., 1985, C.
B-3, AS AMENDED

IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A
PROPOSAL OF 3MOTIONAI INC. FILED IN THE CITY OF
MISSISSAUGA, IN THE PROVINCE OF ONTARIO

ORDER
(STAY EXTENSION AND SEALING ORDER)

THIS MOTION, made by 3MotionAI Inc. (“**3Motion**”) pursuant to the *Bankruptcy and Insolvency Act* (the “**BIA**”), for an order approving, among other things, the sale transaction (the “**Transaction**”) contemplated by an agreement of purchase and sale (the “**APA**”) between 3Motion as vendor (the “**Vendor**”) and SimpleTherapy, Inc. as purchaser (the “**Purchaser**”) dated October 28, 2025, and vesting in the Purchaser the Vendor’s right, title, and interest in and to the assets described in the APA (the “**Purchased Assets**”), was heard this day by judicial videoconference via Zoom in Toronto, Ontario.

ON READING the Notice of Motion and Motion Record of 3Motion, including the Affidavit of Reed Hanoun sworn November 9, 2025, and on hearing the submissions of counsel to TDB Restructuring Limited in its capacity as proposal trustee (in such capacity, the “**Proposal**”

Trustee”), the Purchaser, and the other parties listed on the Participant Information Form, no one appearing for any other party to oppose the relief sought and although duly served as appears from the certificate of service of Saisha Mahil, sworn on November 9, 2025:

1. **THIS COURT ORDERS** that all Confidential Appendices to the Proposal Trustee’s Second Report be and are hereby sealed, confidential and not to form part of the public record, and shall not be available for public inspection or disclosure, except with leave of this Court or further Order.

2. **THIS COURT ORDERS** that pursuant to Section 50.4(9) of the BIA, the time for 3Motion to file a proposal, and the corresponding stay of proceedings provided for in section 69 of the BIA, be and is hereby extended until and including December 28, 2025.

3. **THIS COURT ORDERS** that the balance of 3Motion’s motions are adjourned to November 19, 2025 at 10:00 AM.

IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF 3MOTIONAI INC. FILED IN THE CITY OF MISSISSAUGA, IN THE PROVINCE OF ONTARIO

ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST

PROCEEDING COMMENCED AT
TORONTO

ORDER
(Stay Extension and Sealing Order)

GARDINER ROBERTS LLP

22 Adelaide Street W., #3600
Toronto, Ontario M5H 4E3

Chris Besant (24882O)

Tel: (416) 865-4022
CBesant@GRLLP.com

Saisha Mahil (80083T)

Tel: (416) 203-9547
SMahil@GRLLP.com

Lawyers for 3MotionAI Inc.