

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

In re:

NEXII BUILDING SOLUTIONS INC., et al.,<sup>1</sup>

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 24-10026 (JKS)

(Jointly Administered)

**Re: Docket No. 48**

**Objection Deadline: July 11, 2024 at 4:00 p.m. (ET)**

**Hearing Date: July 18, 2024 at 1:00 p.m. (ET)**

**NOTICE OF FOREIGN REPRESENTATIVE’S MOTION PURSUANT TO SECTIONS  
105(A), 363, 365, 1501, 1507, 1520, AND 1521 OF THE BANKRUPTCY CODE AND  
BANKRUPTCY RULES 2002, 6004, 6006, AND 9014, FOR ENTRY OF AN ORDER (I)  
RECOGNIZING AND ENFORCING THE APPROVAL AND VESTING ORDER, (II)  
APPROVING THE SALE OF SUBSTANTIALLY ALL OF THE DEBTORS’ ASSETS  
FREE AND CLEAR OF LIENS, CLAIMS, AND ENCUMBRANCES, AND (III)  
GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that on July 1, 2024, Nexii Building Solutions Inc., as the authorized foreign representative (the “Foreign Representative”) of the above-captioned debtors (collectively, the “Debtors”), which are the subject of jointly-administered proceedings (the “CCAA Proceedings”) under the *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36 (as amended, the “CCAA”) in the Supreme Court of British Columbia (the “Canadian Court”), filed a *Foreign Representative’s Motion Pursuant to Sections 105(a), 363, 365, 1501, 1507, and 1521 of the Bankruptcy Code and Bankruptcy Rules 2002, 6004, 6006, and 9014, for Entry of an Order (I) Recognizing and Enforcing the Approval and Vesting Order, (II) Approving the Sale of Substantially all of the Debtors’ Assets Free and Clear of Liens, Claims, and Encumbrances, and (III) Granting Related Relief* (the “Motion”) pursuant to sections 105(a) 363, 365, 1501, 1507,

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<sup>1</sup> The Debtors in these chapter 15 cases (the “Chapter 15 Cases”), along with the last four digits of each Debtor’s unique identifier, are Nexii Building Solutions Inc. (0911), Nexii Construction Inc. (1333), NBS IP Inc. (9930), and Nexii Holdings Inc. (5873). The Debtors’ service address for purposes of these Chapter 15 Cases is 1455 West Georgia Street, #200, Vancouver, British Columbia V6G 2T3.

1520, and 1521 of title 11 of the United States Code (the “Bankruptcy Code”), Rules 2002, 6004, 6006, and 9014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 6004-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”).

**PLEASE TAKE FURTHER NOTICE** any response or objection to entry of an order with respect to the relief sought in the Motion must be filed with the Bankruptcy Court and served upon and received by the undersigned counsel on or before on **July 11, 2024, at 4:00 p.m. (Prevailing Eastern Time)**. (i) be in writing; (ii) detail the factual and legal basis for the response or objection; (iii) comply with the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”); and (iv) be filed with the Office of the Clerk of the Court, 824 N. Market Street, Third Floor, Wilmington, Delaware 19801, and served upon the following counsel for the Foreign Representative (a) Barack Ferrazzano Kirschbaum & Nagelberg LLP, 200 West Madison Street, Suite 3900 Chicago, Illinois 60606, Attn: Nathan Rugg; and (b) Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17<sup>th</sup> Floor, Wilmington, Delaware 19801, Attn: Steven Golden and Colin R. Robinson.

**PLEASE TAKE FURTHER NOTICE** that a hearing to consider the relief requested in the Motion will be held before the Honorable J. Kate Stickles at the United States Bankruptcy Court for the District of Delaware (the “Court”), located at 824 North Market Street, 3<sup>rd</sup> Floor, Courtroom No. 6, Wilmington, Delaware 19801, on **July 18, 2024 at 1:00 p.m. (Eastern time)**.

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Dated: July 1, 2024

**PACHULSKI STANG ZIEHL & JONES LLP**

*/s/ Steven W. Golden*

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