

Jason S. Brookner (TX Bar No. 24033684)  
 Lydia R. Webb (TX Bar No. 24083758)  
 Sean R. Burns (TX Bar No. 24139177)  
**GRAY REED**  
 1601 Elm Street, Suite 4600  
 Dallas, Texas 75201  
 Telephone: (214) 954-4135  
 Facsimile: (469) 953-1332  
 Email: jbrookner@grayreed.com  
 lwebb@grayreed.com  
 sburns@grayreed.com

Robert A. Britton (*pro hac vice* pending)  
 Claudia R. Tobler (*pro hac vice* pending)  
 Xu Pang (*pro hac vice* pending)  
**PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP**  
 1285 Avenue of the Americas  
 New York, New York 10019  
 Telephone: (212) 373-3000  
 Facsimile: (212) 757-3990  
 Email: rbritton@paulweiss.com  
 ctobler@paulweiss.com  
 xpang@paulweiss.com

*Counsel to the Foreign Representative*

**IN THE UNITED STATES BANKRUPTCY COURT  
 FOR THE NORTHERN DISTRICT OF TEXAS  
 DALLAS DIVISION**

In re:	)	Chapter 15
SANDVINE CORPORATION, <i>et al.</i> , <sup>1</sup>	)	Case No. 24-33617 (SGJ)
Debtors in a Foreign Proceeding.	)	(Joint Administration Requested)

**NOTICE OF DESIGNATION AS COMPLEX BANKRUPTCY CASES**

On November 7, 2024, Sandvine Corporation (the “Foreign Representative”), in its capacity as the duly authorized foreign representative of the above-captioned debtors (collectively, the “Debtors”), filed voluntary petitions for relief under chapter 15 of title 11 of the United States Code on behalf of each of the Debtors and sought joint administration of these cases. The undersigned counsel for the Foreign Representative believe that these chapter 15 cases qualify as complex cases pursuant to this Court’s *Procedures for Complex Cases in the Northern District of Texas* for the following reasons:

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<sup>1</sup> The Debtors in these chapter 15 cases, along with the Debtors’ unique identifiers, are: Sandvine Corporation (Business No.: 885025916), New Procera GP Company (Company Registration No.: WC-7044), Sandvine Holdings UK Limited (Company No.: 10533653), Sandvine OP (UK) Ltd. (Company No.: 10791762), Procera Networks, Inc. (EIN: 33-0974674), and Procera Holding, Inc. (EIN: 47-4070338). The location of the Debtors’ service address for purposes of these chapter 15 cases is: 410 Albert St Suite 201, Waterloo, ON N2L 3V3, Canada. Copies of materials filed with the applicable court in the CCAA proceedings and these chapter 15 cases are available on the website of the CCAA monitor: <https://www.ksvadvisory.com/experience/case/sandvine>.

- The total liability of the Debtors, along with the total liabilities of the Debtors' non-filing affiliates, exceeds \$25 million;
- There are more than 100 parties-in-interest in this case;
- Any claims or interests in the Debtors are publicly traded.
- Other

A copy of the proposed order granting complex bankruptcy case treatment is attached hereto as **Exhibit A**.

*[Remainder of page intentionally left blank]*

Respectfully submitted this 7th day of November, 2024.

**GRAY REED**

By: /s/ Jason S. Brookner

Jason S. Brookner (TX Bar No. 24033684)

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-and-

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ctobler@paulweiss.com

xpang@paulweiss.com

*Counsel to the Foreign Representative*

**Certificate of Service**

I certify that on November 7, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

/s/ Jason S. Brookner

Jason S. Brookner

**Exhibit A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:	)	
	)	Chapter 15
SANDVINE CORPORATION, <i>et al.</i> , <sup>1</sup>	)	Case No. 24-33617 (SGJ)
Debtors in a Foreign Proceeding.	)	(Joint Administration Requested)

**ORDER GRANTING COMPLEX BANKRUPTCY CASE TREATMENT**

On November 7, 2024, Sandvine Corporation (the “Foreign Representative”) filed voluntary petitions for relief under chapter 15 of title 11 of the United States Code on behalf of each of the above-captioned debtors, commencing these chapter 15 cases (collectively, the “Cases”). Also on November 7, 2024, the Foreign Representative filed the *Notice of Designation as Complex Bankruptcy Cases*. After review of the initial pleadings filed

<sup>1</sup> The Debtors in these chapter 15 cases, along with the Debtors’ unique identifiers, are: Sandvine Corporation (Business No.: 885025916), New Procera GP Company (Company Registration No.: WC-7044), Sandvine Holdings UK Limited (Company No.: 10533653), Sandvine OP (UK) Ltd. (Company No.: 10791762), Procera Networks, Inc. (EIN: 33-0974674), Procera Holding, Inc. (EIN: 47-4070338). The location of the Debtors’ service address for purposes of these chapter 15 cases is: 410 Albert St Suite 201, Waterloo, ON N2L 3V3, Canada. Copies of materials filed with the applicable court in the CCAA proceedings and these chapter 15 cases are available on the website of the CCAA monitor: <https://www.ksvadvisory.com/experience/case/sandvine>.

in these Cases, the Court finds and concludes that these Cases are complex bankruptcy cases warranting application of the *Procedures for Complex Cases in the Northern District of Texas* (the “Complex Case Procedures”). Accordingly, IT IS HEREBY ORDERED THAT:

1. The Complex Case Procedures and the *Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas* (the “Local Rules”) shall apply to and govern these Cases. Compliance with the Complex Case Procedures is required for all hearing, notice, and objection procedures. The Complex Case Procedures can be found on the Court’s website at: <https://www.txnb.uscourts.gov/complex-case-procedures>. If a conflict exists between the Local Rules and the Complex Case Procedures, the Complex Case Procedures shall govern.

2. The Foreign Representative (or its noticing agent) shall give notice of this Order to all parties in interest within seven (7) days of entry of the Order. If any party in interest objects to the provisions of this Order, that party may file an appropriate motion articulating the objection and the relief requested within 14 days of service of the Order. After hearing the objection and any responses, the Court may reconsider any part of this Order and may grant relief, if appropriate.

### END OF ORDER ###

Submitted by:

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