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*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.	)	(Jointly Administered)

**NOTICE OF RECOGNITION  
HEARING ON FOREIGN PROCEEDINGS**

**PLEASE TAKE NOTICE** that, on November 7, 2024, Sandvine Corporation as the duly authorized foreign representative (the “Foreign Representative”) of the above-captioned debtors (collectively, the “Debtors”), subject to proceedings commenced under the Companies’ Creditors Arrangement Act, R.S.C. 1985, c. C-36 in the Ontario Superior Court of Justice (Commercial List) (the “CCAA Proceedings”) filed the *Verified Petition for Entry of an Order (I) Recognizing Foreign Main Proceedings, or in the Alternative, Foreign Nonmain Proceedings, (II) Recognizing*

<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 Foreign Representative, and (III) Granting Related Relief* (the “Verified Petition”) pursuant to 11 U.S.C. §§ 1504, 1515, and 1517, with the United States Bankruptcy Court for the Northern District of Texas (Dallas Division) (the “Court”), commencing cases under chapter 15 of title 11 of the United States Code (the “Bankruptcy Code”).

**PLEASE TAKE FURTHER NOTICE** that in addition to the Verified Petition, the Foreign Representative filed, among other things, the *Declaration of Jeffrey A. Kupp in Support of (A) Verified Petition for Entry of an Order (I) Recognizing Foreign Main Proceedings, or in the Alternative, Foreign Nonmain Proceedings, (II) Recognizing the Foreign Representative, and (III) Granting Related Relief, and (B) Debtors’ Emergency Motion for Provisional Relief Under Section 1519 of the Bankruptcy Code.*

**PLEASE TAKE FURTHER NOTICE** that, among other things, the Foreign Representative seeks entry of an order recognizing the CCAA Proceedings as foreign main proceedings, or in the alternative, foreign nonmain proceedings pursuant to section 1517 of the Bankruptcy Code and granting certain additional relief pursuant to sections 105(a), 1504, 1507, 1510, 1515, 1520, 1521, and 1522 of the Bankruptcy Code.

**PLEASE TAKE FURTHER NOTICE** that the Court has scheduled a hearing with respect to the Verified Petition for 9:30 a.m. (prevailing Central Time) on December 4, 2024 (the “Recognition Hearing”).

**PLEASE TAKE FURTHER NOTICE** that any party in interest wishing to submit a response, answer, or objection to the Verified Petition must do so by 4:00 p.m. (prevailing Central Time) on November 27, 2024 (the “Objection Deadline”), **so as to be actually received by no later than the Objection Deadline**, and such response, answer, or objection must (a) be in writing, (b) state the name and address of the responding party and nature of the claim or interest

of such party, (c) set forth in detail the factual and legal bases therefor, (d) conform with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and the Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas (the “Local Rules”), and (e) be served on the Foreign Representative’s counsel Paul, Weiss, Rifkind, Wharton & Garrison LLP, Attn: Robert A. Britton, Claudia R. Tobler, and Xu Pang, 1285 Avenue of the Americas, New York, NY 10019; and Gray Reed, Attn: Jason S. Brookner, Lydia R. Webb, and Sean R. Burns, 1601 Elm Street, Suite 4600, Dallas, TX 75201.

**PLEASE TAKE FURTHER NOTICE** that any reply to an objection or response to the Verified Petition shall be filed and served on or before 4:00 p.m. (prevailing Central Time), November 29, 2024 (the date that is three business days before the Recognition Hearing).

**PLEASE TAKE FURTHER NOTICE** that copies of the Verified Petition and all other documents filed in the Court are available (a) for a fee on the Court’s electronic case filing system, which can be accessed from the Court’s website at <http://www.txnb.uscourts.gov/> (a PACER login and password are required to retrieve the documents), (b) free of charge at the website of the monitor appointed in the Debtors’ CCAA proceedings at: <https://www.ksvadvisory.com/experience/case/sandvine>, or (c) upon written request to the Foreign Representative’s counsel addressed to (i) Paul, Weiss, Rifkind, Wharton & Garrison LLP, Attn: Robert A. Britton, Claudia R. Tobler, and Xu Pang, 1285 Avenue of the Americas, New York, NY 10019; and (ii) Gray Reed, Attn: Jason S. Brookner, Lydia R. Webb, and Sean R. Burns, 1601 Elm Street, Suite 4600, Dallas, TX 75201.

**PLEASE TAKE FURTHER NOTICE** that hearings in this matter, including the Recognition Hearing, shall be held before the Honorable Stacey G.C. Jernigan of the United States Bankruptcy Court for the Northern District of Texas and will be conducted at the Earle Cabell Federal Building, 1100 Commerce St., 14th Floor, Courtroom 1, Dallas, Texas 75242-1496.

**PLEASE TAKE FURTHER NOTICE** that any parties who wish to participate in the hearings may do so in person or virtually. Video communication will be via WebEx. Parties may connect via WebEx by visiting the WebEx hearing link on the Court's Hearing Dates and Calendar webpage or by using the following link: <https://us-courts.webex.com/meet/jerniga>. Audio communication will be by use of the Court's dial-in facility. Parties may access the facility at 1-650-479-3207, using 2304 154 2638 as the access code.

**PLEASE TAKE FURTHER NOTICE** that the Recognition Hearing may be adjourned from time to time without further notice except for an in-court announcement at the Recognition Hearing or a filing on the docket of this case of the date and time to which the Recognition Hearing has been adjourned.

**PLEASE TAKE FURTHER NOTICE** that all parties in interest opposed to the relief sought in the Verified Petition or any other relief requested by the Foreign Representative or who wish to have the Court consider their views on any matter requested at the Recognition Hearing, must appear at the Recognition Hearing.

**PLEASE TAKE FURTHER NOTICE** that if no response is timely filed and served as provided above, the Court may recognize the CCAA Proceedings as foreign main proceedings, or in the alternative, foreign nonmain proceedings and grant the related relief requested in the Verified Petition without further notice or hearing.

*[Remainder of page intentionally left blank]*

Respectfully submitted this 7th day of November, 2024.

**GRAY REED**

By: /s/ Jason S. Brookner

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*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