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*Counsel to the
Foreign Representative*

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re:)	Chapter 15
)	
DYNAMIC TECHNOLOGIES GROUP)	Case No. 23-41416
INC., <i>et al.</i> , ¹)	
)	(Jointly Administered)
Debtors in a Foreign Proceeding.)	

**MOTION FOR ORDER SETTING AND REQUEST FOR EXPEDITED HEARING ON
MOTION FOR ENTRY OF AN ORDER (I) RECOGNIZING AND ENFORCING
THE CCAA VESTING ORDERS, (II) APPROVING THE SALE OF
SUBSTANTIALLY ALL OF THE DEBTORS' INTERESTS FREE
AND CLEAR OF LIENS, CLAIMS, AND ENCUMBRANCES,
AND (III) GRANTING RELATED RELIEF**

[Relating to ECF 49]

¹ The Debtors in these Chapter 15 cases, along with the last four digits of the Debtors' unique identifier are: DYNAMIC TECHNOLOGIES GROUP INC. (CA. BN 863055893); DYNAMIC ATTRACTIONS, INC. (EIN 98-1016243); DYNAMIC ATTRACTIONS LTD. (CA. BN 101632677); DYNAMIC ENTERTAINMENT GROUP LTD. (CA. BN 703755496 CR0001); DYNAMIC STRUCTURES LTD. (CA. BN 794519280 RC0001). Additional information regarding this case may be obtained on the Monitor's website for this case at <http://cfcanda.fticonsulting.com/dynamicgroup/>.

Dynamic Technologies Group Inc. (“DTG”) is the authorized foreign representative (“Foreign Representative”), as defined in section 101(24) of title 11 of the United States Code (the “Bankruptcy Code”), of the above-captioned debtors: (1) Dynamic Technologies Group Inc., (2) Dynamic Attractions, Inc., (3) Dynamic Attractions LTD, (4) Dynamic Entertainment Group LTD, and (5) Dynamic Structures LTD (collectively, the “Debtors”) in the proceeding pending in the Court of King’s Bench of Alberta Calgary, Judicial Centre of Calgary (the “Canadian Proceeding” and such court, the “Canadian Court”) and files this Motion (“Motion”) for Setting and Request for Expedited Hearing on the Motion for Entry of an Order (I) Recognizing and Enforcing the CCAA Vesting Orders. (II) Approving the Sale of Substantially all of the Debtors’ Interests Free and Clear of Liens, Claims, and Encumbrances, and (III) Granting Related Relief [Docket No.] (“Emergency Motion”).²

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(P).
2. Venue for this proceeding is proper before this Court pursuant to 28 U.S.C. § 1410.

RELIEF REQUESTED

3. By this Motion, the Foreign Representative respectfully seeks entry of an order, substantially in the form attached hereto as **Exhibit A**, setting a hearing on the Emergency Motion no later than July 21, 2023 and approving Debtors’ notice of sale recognition hearing (the “Sale Recognition Hearing Notice”), attached hereto as **Exhibit B**.

² Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Emergency Motion.

BACKGROUND AND BASIS FOR RELIEF

4. On May 17, 2023, the Foreign Representative commenced these Chapter 15 cases ancillary to the Canadian Proceedings by filing with this Court the Official Form 401 Petitions [Docket No. 1] (the “Form Petitions”) and the Verified Petition [Docket No. 2] (the “Verified Petition” and collectively with the Form Petitions, the “Petitions”), and various supporting documents.

5. On June 14, 2023, this Court entered (i) an order [Docket No. 43] (the “Recognition Order”) granting recognition of the Canadian Proceeding as a “foreign main proceeding” and granting comity and full force and effect to the Initial CCAA Orders in the United States, and (ii) an order granting the Motion for Comity [Docket No. 44].

6. As set forth in greater detail in the Emergency Motion, the Debtor engaged in successful bidding process for the sale of certain of Debtors’ rights, title, and interests outlined in certain transaction agreement. The Canadian Court issued the Sale Approval and Vesting Order and Approval and Reverse Vesting Order(collectively, the “CCAA Vesting Orders”).

7. The parties hope to close the transaction on or before July 28, 2023, the current end of the stay imposed by the Canadian Court. This Court’s approval and recognition of the CCAA Vesting Orders is a condition to closing. Accordingly, expeditiously consummating the Transaction, which is supported by the Debtors’ key stakeholders, including the DIP lender, PEL, is critical to preserving the going-concern value of the Debtors’ enterprise.

8. Thus, a prompt hearing and an order on Debtor’s Emergency Motion by July 21, 2023 are critical.

NOTICE OF MOTION AND NOTICE OF HEARING OF EMERGENCY MOTION

9. Notice of this Motion will be provided to the U.S. Trustee.

10. Upon entry of any order setting a hearing on the on the Emergency Motion, the Foreign Representative will serve the order with the Emergency Motion through the Court's electronic filing system and as how indicated on the Service List attached to hereto as **Exhibit C** (the "**Service List**"). The Service List is expanded from those previously to include several parties who may have warranty claims or other claims affected by the CCAA Vesting Orders that were not previously given service in these Chapter 15 Cases (they were given notice in the Canadian Proceeding for the approval of the CCAA Vesting Orders). The Service List also includes all counterparties to contracts affected by the CCAA Vesting Orders located in the United States.

11. Given the expedited nature of the transaction, as outlined in the Emergency Motion, Debtors respectfully request that the Court also approve service of the Sale Recognition Hearing Notice, which is attached hereto as **Exhibit B**.

12. The Debtors will serve the Emergency Motion, the CCAA Vesting Orders, as applicable, and the Sale Recognition Hearing Notice by electronic mail to the extent email addresses are available and otherwise by overnight United States mail or Canadian mail, as applicable, on the Monitor's designated website for this matter, within two (2) business days following the filing of the Emergency Motion, or as soon thereafter as is reasonably practicable.

NO PRIOR REQUEST

13. No previous request for the relief requested herein has been made to this or any other court.

WHEREFORE, the Foreign Representative respectfully requests that this Court enter an order, substantially in the form attached hereto as **Exhibit A**, granting the relief sought herein and

granting the Foreign Representative such other and further relief as the Court deems just and proper.

Dated: July 5, 2023.

Respectfully submitted,

AKERMAN LLP

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Counsel for the Foreign Representative

EXHIBIT A

Proposed Order Granting Motion for Setting and Request for Expedited Hearing on Motion for Entry of an Order (I) Recognizing and Enforcing the CCAA Vesting Orders, (II) Approving the Sale of Substantially All of Debtors' Interests Free and Clear of Liens, Claims, and Encumbrances, and (III) Granting Related Relief

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re:)	Chapter 15
)	
DYNAMIC TECHNOLOGIES GROUP INC., <i>et al.</i> , ¹)	Case No. 23-41416
)	
Debtors in a Foreign Proceeding.)	(Jointly Administered)

**ORDER GRANTING MOTION FOR SETTING AND REQUEST FOR EXPEDITED
HEARING ON MOTION FOR ENTRY OF AN ORDER (I) RECOGNIZING AND
ENFORCING THE CCAA VESTING ORDERS, (II) APPROVING THE SALE OF
SUBSTANTIALLY ALL OF THE DEBTORS' INTERESTS FREE
AND CLEAR OF LIENS, CLAIMS, AND ENCUMBRANCES,
AND (III) GRANTING RELATED RELIEF
[Related to ECF 49]**

1. Having considered the *Motion for Setting and Request for Expedited Hearing on Motion for Entry of an Order (I) Recognizing and Enforcing the CCAA Vesting Orders Approving*

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the Sale of Substantially all of the Debtors' Interest Free and Clear of Liens, Claims and Encumbrances and Related Relief (the "Emergency Motion"),² filed by the Foreign Representative, on behalf of the Debtors, it is hereby:

2. ORDERED that the Emergency Motion is GRANTED; it is
3. ORDERED that the hearing on the Motion for Entry of an Order (I) Recognizing and Enforcing the CCAA Vesting Orders Approving the Sale of Substantially all of the Debtors' Interest Free and Clear of Liens, Claims and Encumbrances, and shall take place on _____, at _____.m. (the "Hearing"), before the Honorable Edward L. Morris, United States Bankruptcy Judge for the Bankruptcy Court for the Northern District of Texas, Fort Worth Division, 501 West 10th Street, Fort Worth, Texas 76102. Counsel for the Foreign Representative shall promptly file and serve this Order; it is further
4. ORDERED that Debtor's Sale Recognition Hearing Notice attached as **Exhibit B** to the Motion, is hereby approved for immediate service according to the Service List attached as **Exhibit C** to the Motion.

End of Order

² Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Emergency Motion.

Order Submitted by:

Akerman LLP

/s/ R. Adam Swick

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Counsel for the Foreign Representative

EXHIBIT B

Notice of Sale Recognition Hearing

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re:)	Chapter 15
)	
DYNAMIC TECHNOLOGIES GROUP)	Case No. 23-41416
INC., <i>et al.</i> , ¹)	
)	(Jointly Administered)
Debtors in a Foreign Proceeding.)	

NOTICE OF SALE RECOGNITION HEARING

PLEASE TAKE NOTICE that, on July 5, 2023, Dynamic Technologies Group Inc. (“DTG”) as the authorized foreign representative (“Foreign Representative”) of the above-captioned debtors: (1) Dynamic Technologies Group Inc., (2) Dynamic Attractions, Inc., (3) Dynamic Attractions Ltd., (4) Dynamic Entertainment Group Ltd., and (5) Dynamic Structures Ltd. (collectively, the “Debtors”), which are the subject of proceedings under the Companies’ Creditors Arrangement Act, R.S.C. 1985, c. C-36 (the “CCAA”) in the Court of King’s Bench of Alberta Calgary, Judicial Centre of Calgary (the “Canadian Proceedings,” and such court, the “Canadian Court”), filed the *Motion for Entry of an Order (i) Recognizing and Enforcing the CCAA Vesting Orders, (ii) Approving the Sale of Substantially all of the Debtors’ Interests Free and Clear of Liens, Claims, and Encumbrances, and (iii) Granting Related Relief* [Docket No. 49] (the “Sale Recognition Motion”),² requesting entry of an order (the “Order”): (a) recognizing and enforcing the Canadian Court’s *Approval and Vesting Order* (the “ARVO”); recognizing and

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² Capitalized terms used and not defined herein shall have the meaning ascribed to such terms in the Sale Recognition Motion.

enforcing the Canadian Court's Sale Approval and Vesting Order (the "SAVO," and with the ARVO, the "CCAA Vesting Orders") attached to the Order as Exhibit A;³ (b) approving, under section 363 of the Bankruptcy Code, the sale of the Debtors' rights, title, and interests in and to the purchased assets to the Purchaser pursuant to the definitive purchase agreement (as amended, and which may further be amended in accordance with the terms of the CCAA Vesting Orders), attached to the Sale Recognition Motion as **Exhibit B**, free and clear of all liens, claims, encumbrances, and other interests (other than the Permitted Encumbrances); and (c) granting related relief.

PLEASE TAKE FURTHER NOTICE that a hearing on the Sale Recognition Motion (the "Sale Recognition Hearing") is currently scheduled to take place on **July __, 2023, at __ __.m. (prevailing Central Time)**, before Judge Edward L. Morris of the United States Bankruptcy Court for the Northern District of Texas. The Recognition Hearing will be conducted at the Eldon B. Mahon Courthouse, 501 W 10th St. Fort Worth, TX 76102-3643. The hearing will be held in person and via WebEx. Parties may attend the hearing via the Court's WebEx link : <https://uscourts.webex.com/meet/morris>. For WebEx telephonic only participation/attendance: Dial-In: 1.650.479.3207 Meeting ID: 473 581 124.

The WebEx Hearing Instructions may be obtained from Judge Morris's hearing/calendar link on the Bankruptcy Court's website at: Judge Morris' Hearing dates | Northern District of Texas | United States Bankruptcy Court (uscourts.gov).

PLEASE TAKE FURTHER NOTICE that any objections or responses to the Sale Recognition Motion, and the relief requested therein, must be filed on or before **July __, 2023** (the "Objection Deadline").

³ The Canadian Court entered the CCAA Vesting Order in the Canadian Proceedings on November 3, 2022.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTION OR RESPONSE TO THE SALE RECOGNITION MOTION, OR THE RELIEF REQUESTED THEREIN, IS FILED BY THE OBJECTION DEADLINE, THE COURT MAY ENTER AN ORDER GRANTING THE SALE RECOGNITION MOTION WITHOUT HOLDING A HEARING.

PLEASE TAKE FURTHER NOTICE that the Recognition Hearing may be adjourned from time to time without further notice other than an announcement in open court at such hearings of the adjourned date or dates or any adjourned hearing.