

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: )
STRUCTURLAM MASS TIMBER U.S., INC., et al.,1 )
Debtors. )
Chapter 11
Case No. 23-10497 (CTG)
(Jointly Administered)
Hearing Date: May 8, 2023 at 3:30 p.m. (ET)
Objection Deadline: May 5, 2023 at 5:00 p.m. (ET), Committee deadline at the Hearing

NOTICE OF MOTION AND HEARING REGARDING DEBTORS' MOTION SEEKING ENTRY OF AN ORDER (A)(I) APPROVING BIDDING PROCEDURES, (II) APPROVING STALKING HORSE PROTECTIONS AND DEBTORS' ENTRY INTO STALKING HORSE PURCHASE AGREEMENT (III) SCHEDULING THE BID DEADLINE AND THE AUCTION, (IV) SCHEDULING HEARINGS AND OBJECTION DEADLINES WITH RESPECT TO THE SALE, (V) APPROVING THE FORM AND MANNER OF THE NOTICE THEREOF, (VI) APPROVING CONTRACT ASSUMPTION AND ASSIGNMENT PROCEDURES, AND (VII) GRANTING RELATED RELIEF AND (B)(I) APPROVING THE SALE OF THE ASSETS FREE AND CLEAR OF ALL LIENS, CLAIMS, INTERESTS, AND ENCUMBRANCES, (II) APPROVING ASSUMPTION AND ASSIGNMENT OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES, AND (III) GRANTING RELATED RELIEF

PLEASE TAKE NOTICE that on April 24, 2023, the above-captioned debtors and debtors-in-possession (the "Debtors") filed the Debtors' Motion Seeking Entry of an Order (A)(I) Approving Bidding Procedures, (II) Approving Stalking Horse Protections and Debtors' Entry into Stalking Horse Purchase Agreement (III) Scheduling the Bid Deadline and the Auction, (IV) Scheduling Hearings and Objection Deadlines with Respect to the Sale, (V) Approving the Form and Manner of the Notice Thereof, (VI) Approving Contract Assumption and Assignment Procedures, and (VII) Granting Related Relief and (B)(I) Approving the Sale of the Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances, (II) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [Docket No. 16] (the "Motion") and the Debtors' Motion for Entry of an Order Shortening Notice and Limiting the Notice with Respect to the Debtors' Bidding Procedures Motion [Docket No. 18] (the "Motion to Shorten") with the United States Bankruptcy Court for the District of Delaware (the "Court").

1 The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number or Canadian business number, as applicable, include: Structurlam Mass Timber U.S., Inc. (6287); Natural Outcomes, LLC (n/a); Structurlam Mass Timber Corporation (5050); and SLP Holdings Ltd. (3114). The location of the Debtors' headquarters is: 2176 Government Street, Penticton, British Columbia, Canada V2A 8B5. The address of the registered agent for Structurlam Mass Timber U.S. Inc. is: 8 The Green, Suite A, Dover Delaware 19901.



**PLEASE TAKE FURTHER NOTICE** that on April 26, 2023, the Court entered the *Order Shortening and Limiting the Notice with Respect to the Debtors' Bidding Procedures Motion* [Docket No. 41], scheduling a hearing on the Motion for May 8, 2023 at 3:30 p.m. (ET) (the "**Hearing**").

**PLEASE TAKE FURTHER NOTICE** that responses, if any, to the Motion, must be filed on or before **May 5, 2023 at 5:00 p.m. (ET)** (the "**Objection Deadline**") with the Court, 824 North Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801. Notwithstanding the Objection Deadline, if an Official Committee of Unsecured Creditors (the "**Committee**") is appointed in these cases, any responses or objections from the Committee will be due at the Hearing.

**PLEASE TAKE FURTHER NOTICE** that at the same time, you must serve a copy of the response on (i) proposed counsel to the Debtors, Chipman Brown Cicero & Cole, LLP, Hercules Plaza, 1313 North Market Street, Suite 5400, Wilmington, Delaware 19801, Attn: William E. Chipman, Jr. (chipman@chipmanbrown.com); Robert A. Weber (weber@chipmanbrown.com); Mark L. Desgrosseilliers (desgross@chipmanbrown.com); and Mark D. Olivere (olivere@chipmanbrown.com); (ii) counsel to any Committee appointed in these Chapter 11 Cases; (iii) counsel to the Prepetition Lender and the DIP Lender, (a) Blake, Cassels & Graydon LLP, 855 - 2nd Street S.W., Suite 3500, Bankers Hall East Tower, Calgary, Alberta, T2P 4J8, Attn: Kelly Bourassa (kelly.bourassa@blakes.com), Christopher Keliher (christopher.keliher@blakes.com), Erik Fleming (erik.fleming@blakes.com), and Austin Beck (Austin.Beck@blakes.com), (b) Chapman and Cutler LLP, 320 South Canal Street, Chicago, Illinois 60606, Attn: Stephen R. Tetro II and James P. Sullivan, (stetro@chapman.com) and (jsulliva@chapman.com), and (c) Womble Bond Dickinson (US) LLP, 1313 North Market Street, Suite 1200, Wilmington, Delaware 19801, Attn: Matthew P. Ward, (matthew.ward@wbd-us.com); and (iv) the Office of the United States Trustee for the District of Delaware, 855 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn: Benjamin A. Hackman (Benjamin.a.hackman@usdoj.gov), so as to be received on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE** that a Hearing on the Motion will be held on **May 8, 2023 at 3:30 p.m. (ET)** before the Honorable Craig T. Goldblatt, in the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3<sup>rd</sup> Floor, Courtroom 7, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.**

Dated: April 26, 2023  
Wilmington, Delaware

**CHIPMAN BROWN CICERO & COLE, LLP**

/s/ William E. Chipman, Jr.

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*Proposed Counsel to Debtors and Debtors in  
Possession*