**UNITED STATES BANKRUPTCY COURT**
**EASTERN DISTRICT OF MICHIGAN**

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| In re:<br><br>Invotek Group USA Inc.,<br><br>Debtor in a Foreign Proceeding. | Chapter 15<br><br>Case No. 26-45556<br><br>Hon. Maria L. Oxholm |

**ORDER GRANTING VERIFIED PETITION OF FOREIGN REPRESENTATIVE FOR (I) RECOGNITION OF CANADIAN PROCEEDING AS FOREIGN MAIN PROCEEDING, (II) RECOGNITION OF FOREIGN REPRESENTATIVE, AND (III) RELATED RELIEF UNDER CHAPTER 15 OF THE BANKRUPTCY CODE**

Upon consideration of the *Verified Petition of Foreign Representative for (I) Recognition of Canadian Proceeding as Foreign Main Proceeding, (II) Recognition of Foreign Representative, and (III) Related Relief under Chapter 15 of the Bankruptcy Code* (together with the concurrently filed form petitions, the "Verified Petition"), filed by KSV Restructuring Inc. ("KSV"), the court-appointed receiver and manager (the "Receiver") and authorized foreign representative (the "Foreign Representative") of the above-captioned debtor, together with Mara Technologies Inc., Invotek Group Inc., and Mara Technologies USA, Inc. (collectively, the "Debtors"); and upon the hearing on the Verified Petition and this Court's review and consideration of the Verified Petition, the Foreign Representative Declaration, and the Foreign Law Declaration;

**IT IS HEREBY FOUND AND DETERMINED THAT:**

1. This Court has jurisdiction over this matter under 28 U.S.C. §§ 157 and 1334. Venue is proper before this Court under 28 U.S.C. § 1410. This is a core proceeding under 28 U.S.C. § 157(b), and this Court may enter a final order consistent with Article III of the United States Constitution.

2. Appropriate notice of the filing of, and the Hearing on, the Verified Petition was given, which notice is deemed adequate for all purposes, and no other or further notice need be given.

3. No objections or other responses were filed that have not been overruled, withdrawn, or otherwise resolved.

4. These chapter 15 cases were properly commenced under sections 1504, 1509, and 1515 of the Bankruptcy Code.

5. The Debtors have a domicile, principal place of business, and/or property in the United States, and the Debtors are eligible to be debtors in these chapter 15 cases under, as applicable, 11 U.S.C. §§ 109 and 1501.

6. The Foreign Representative is a "person" under section 101(41) of the Bankruptcy Code and is the duly appointed "foreign representative" of the Debtors as such term is defined in section 101(24) of the Bankruptcy Code. The Foreign Representative has satisfied the requirements of section 1515 of the Bankruptcy Code and Bankruptcy Rule 1007(a)(4).

7. The Canadian Proceeding is entitled to recognition by this Court under section 1517 of the Bankruptcy Code.

8. The Canadian Proceeding is pending in Canada, where the Debtors have their "center of its main interests" as referred to in section 1517(b)(1) of the Bankruptcy Code. Accordingly, the Canadian Proceeding is a "foreign main proceeding" under section 1502(4) of the Bankruptcy Code and is entitled to recognition as a foreign main proceeding under section 1517(b)(1) of the Bankruptcy Code.

9. The Foreign Representative is entitled to relief under sections 1507, 1519, 1520, and 1521 of the Bankruptcy Code as provided herein, because those protections are necessary to effectuate the purposes of chapter 15 of the Bankruptcy Code and to protect the assets of the Debtors and the interests of the Debtors' creditors.

10. All creditors and other parties in interest, including the Debtors, are sufficiently protected by the grant of relief ordered hereby in accordance with section 1522(a) of the Bankruptcy Code.

11. The relief granted is necessary to effectuate the purposes and objectives of chapter 15 and to protect the Debtors and the interests of their creditors and other parties in interest, is in the interest of the public and international comity, is consistent with the public policy of the United States, and will not cause any hardship

to any party in interest that is not outweighed by the benefits of the relief granted. Absent the requested relief, the efforts of the Receiver in conducting the Canadian Proceeding may be frustrated by the actions of individual creditors, a result contrary to the purposes of chapter 15.

**BASED ON THE FOREGOING FINDINGS OF FACT AND AFTER DUE DELIBERATION AND SUFFICIENT CAUSE APPEARING THEREFORE, IT IS HEREBY ORDERED THAT:**

12. The Verified Petition is granted as set forth in this Order.

13. The Canadian Proceeding is recognized as a foreign main proceeding under section 1517 of the Bankruptcy Code and is entitled to the protections of 11 U.S.C. § 1520(a), including, without limitation, the application of the protection afforded by the automatic stay under 11 U.S.C. § 362 to the Debtors and to the Debtors' property that is within the territorial jurisdiction of the United States.

14. KSV, in its capacity as Receiver, is the duly appointed foreign representative of the Debtors within the meaning of 11 U.S.C. § 101(24), is authorized to act on behalf of the Debtors in these chapter 15 cases, and is established as the exclusive representative of the Debtors in the United States.

15. The Appointment Order, including any nonmaterial amendments and/or supplements authorized by the Canadian Court, is hereby given full force and effect, on a final basis, with respect to the Debtors and the Debtors' property that now or in the future is located within the territorial jurisdiction of the United States,

including, without limitation, staying the commencement or continuation of any actions against the Debtors or their assets (except as otherwise expressly provided herein or therein).

16. All objections, if any, to the Verified Petition or the relief requested therein that have not been withdrawn, waived, or settled by stipulation filed with the Court, and all reservations of rights included therein, are hereby overruled on the merits.

17. Upon entry of this Order, the Canadian Proceeding and all prior orders of the Canadian Court shall be and hereby are granted comity and given full force and effect in the United States and, among other things:

1. the protections of sections 362 and 365(e) of the Bankruptcy Code apply to the Debtors;

2. all persons and entities are enjoined from taking any actions inconsistent with the Canadian Proceeding, and from seizing, attaching, and enforcing or executing liens or judgments against the Debtors' assets in the United States or from transferring, encumbering or otherwise disposing of or interfering with the Debtors' assets or agreements in the United States in each case, without the express consent of the Foreign Representative or further order of this Court;

3. all persons and entities are enjoined from commencing or continuing, including the issuance or employment of process of, any judicial, administrative or any other action or proceeding against the Debtors, or their assets or proceeds thereof, or to recover a claim or enforce any judicial, quasi-judicial, regulatory, administrative, or other judgment, assessment, order, lien or arbitration award against the Debtors or their assets or proceeds thereof; *provided, however,* that nothing in this Order shall stay or enjoin the continuation of the arbitration captioned *Invotek Group USA Inc. v. ATX Networks (San*

*Diego) Corp.,* Case No. 01-26-0000-0578 (the "Invotek/ATX Arbitration"), pending before the American Arbitration Association, including, without limitation, any claims asserted by the Debtors therein and any counterclaims, cross-claims, or defenses asserted by any party in the Invotek/ATX Arbitration; *provided further, however*, that the parties to the Invotek/ATX Arbitration have agreed to stay the Invotek/ATX Arbitration until August 31, 2026;

4. pursuant to sections 1509 and 1524 of the Bankruptcy Code, the Foreign Representative may intervene in any proceeding in a state or federal court or arbitration proceeding in the United States (including, the Invotek/ATX Arbitration) in which the Debtor is a party and shall, pursuant to the Appointment Order, have the right to prosecute, continue, defend, settle, or compromise, any such proceeding in the name of any Debtor;

5. all persons and entities are enjoined from commencing any suit, action, or proceeding against the Debtors or the Foreign Representative, in respect of any claim or cause of action, in law or in equity, arising out of or relating to any action taken or omitted to be taken in connection with these chapter 15 cases and the Canadian Proceeding; and

6. all persons and entities are enjoined from terminating or modifying an executory contract or unexpired lease at any time after the commencement of these chapter 15 cases solely because of a provision in such contract or lease that is conditioned upon the commencement of the Canadian Proceeding or a case under the Bankruptcy Code, or the insolvency or financial condition of the Debtors.

18. The Foreign Representative and the Debtors shall be entitled to the full protections and rights enumerated under section 1521(a)(4) and (5) of the Bankruptcy Code, including but not limited to the protections limiting the jurisdiction of U.S. courts over the Foreign Representative in accordance with sections 306 and 1510 of the Bankruptcy Code, and accordingly, the Foreign

Representative:

1. is entrusted with the administration or realization of all or part of the Debtors' assets located in the United States; and

2. has the right and power to examine witnesses, take evidence or deliver information concerning the Debtors' assets, affairs, rights, obligations, or liabilities.

19. Any process for the submission of claims against the Debtors will be administered by the Canadian Court in the Canadian Proceeding; *provided, however,* that nothing in this paragraph shall affect the continuation of the Invotek/ATX Arbitration.

20. Nothing in this Order shall affect any entity's right under section 1522 of the Bankruptcy Code.

21. Under section 1521(a)(6) of the Bankruptcy Code, all prior relief granted to the Debtor and the Foreign Representative by this Court under section 1519(a) of the Bankruptcy Code shall be extended, and that certain *Order Granting Provisional Relief Under Section 1519 of the Bankruptcy Code* [D.I. 32] (the "Provisional Relief Order") shall remain in full force and effect, on a final basis. To the extent there is any inconsistency between this Order and the Provisional Relief Order, the language in this Order shall control.

22. The Foreign Representative is hereby established as the representative of the Debtors with full authority to administer the Debtors' assets and affairs in the United States, including, without limitation, making payments on account of the

Debtors' prepetition and postpetition obligations, settling claims, exercising setoff and recoupment rights, and granting or obtaining releases, if necessary; *provided, however*, that the exercise of any setoff or recoupment rights by any entity other than the Foreign Representative shall require the written consent of the Foreign Representative or further order of this Court.

23. The Foreign Representative and its agents are authorized to serve or provide any notices required under the Bankruptcy Rules or Local Rules of this Court.

24. No action taken by the Foreign Representative, the Debtors, or their respective successors, agents, representatives, advisors, or counsel in preparing, disseminating, applying for, implementing, or otherwise acting in furtherance of or in connection with the Canadian Proceeding, this Order, these chapter 15 cases, or any adversary proceeding herein, or contested matters in connection therewith, will be deemed to constitute a waiver of any immunity afforded the Foreign Representative, including without limitation under sections 306 or 1510 of the Bankruptcy Code.

25. Under paragraph 13 of the Appointment Order, the Receiver is entitled to continue to utilize the Cash Management System (as defined in the Appointment Order) and any present or future bank providing the Cash Management System shall not be under any obligation whatsoever to inquire into the propriety, validity or

legality of any transfer, payment, collection or other action taken under the Cash Management System, or as to the use or application by the Receiver of funds transferred, paid, collected or otherwise dealt with in the Cash Management System, and shall be entitled to provide the Cash Management System without any liability in respect thereof to any person other than the Receiver, under the terms of the documentation applicable to the cash management system.

26. The Foreign Representative is authorized to take all actions necessary to effectuate the relief granted under this Order.

27. This Order is without prejudice to the Foreign Representative requesting any additional relief in these chapter 15 cases, including seeking recognition and enforcement by this Court of any further orders issued in the Canadian Proceeding.

28. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

29. A copy of this Order shall be served within five business days of entry of this order, by electronic mail to the extent email addresses are available and otherwise by U.S. mail, overnight or first-class postage prepaid, upon the Core Notice Parties (as defined in the *Motion for Order Scheduling Recognition Hearing and Specifying Form and Manner of Service of Notice*) and such other entities as the Court may direct. Such service shall be good and sufficient service and adequate

notice for all purposes.

30. This Court shall retain jurisdiction with respect to the enforcement, amendment, or modification of this Order, any requests for additional relief or any adversary proceeding brought in and through these chapter 15 cases, and any request by an entity for relief from the provisions of this Order, for cause shown as to any of the foregoing, that is properly commenced and within the jurisdiction of this Court.

31. Notwithstanding any applicability of any Bankruptcy Rules, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry and shall constitute a final order within the meaning of 28 U.S.C. § 158(a).

32. This Order applies to all parties in interest in these chapter 15 cases and all of their agents, employees, and representatives, and all those who act in concert with them who receive notice of this Order.

**Signed on June 18, 2026**

**/s/ Maria L. Oxholm**

**Maria L. Oxholm**
**United States Bankruptcy Judge**