IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	:	**Chapter 15**
THE CANNABIST COMPANY HOLDINGS INC., *et al*.,	:	**Case No. 26– 10426 (BLS)**
Debtors in a Foreign Proceeding.[1]	:	**(Jointly Administered)**
	:	**Re: Docket No. 5**

SUPPLEMENTAL DECLARATION OF
CURT KROLL IN SUPPORT OF MOTION FOR RECOGNITION OF
FOREIGN PROCEEDING AND REQUEST FOR CERTAIN RELATED RELIEF

I, Curt Kroll, pursuant to section 1746 of title 28 of the United States Code, hereby declare under penalty of perjury under the laws of the United States that the following is true to the best of my knowledge, information, and belief:

1. I am a partner of Sierra Constellation Partners LLC ("**SCP**"), the Chief Restructuring Officer of The Cannabist Company Holdings Inc. (the "**Parent Company**"), in the Parent Company's capacity as the duly-appointed foreign representative of the Parent Company and its debtor affiliate The Cannabist Company Holdings (Canada) Inc. (together with the Parent Company, the "**Debtors**"), which are the subject of a proceeding (the "**Canadian Proceeding**") currently pending in the Ontario Superior Court of Justice (Commercial List) (the "**Canadian Court**") and initiated pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36 (as amended, the "**CCAA**").

[1] The Debtors in the Chapter 15 Cases, together with the last four digits of their federal tax identification number or Canadian business number, as applicable, are: (i) The Cannabist Company Holdings Inc. (8978) and (ii) The Cannabist Company Holdings (Canada) Inc. (9428). The location of the Parent Company's registered office and the Debtors' service address is: 666 Burrard St #1700, Vancouver, British Columbia V6C 2X8, Canada. Additional information may be obtained on the website of the Debtors' information agent at https://www.veritaglobal.net/CCGroup.

2. I am authorized to submit this declaration (this "**Declaration**") on behalf of the Debtors in support of the (i) *Motion for Recognition of Foreign Proceeding and Request for Certain Related Relief* [D.I. 5] (the "**Recognition Motion**," and together with each of the Debtors' *Voluntary Chapter 15 Petition* (the "**Chapter 15 Petitions**"), the "**Verified Petitions**") and (ii) *Debtors' Reply in Support of Motion for Recognition of Foreign Proceeding and Request for Certain Related Relief* (the "**Reply**"), filed contemporaneously herewith.[2]

3. I have previously submitted a declaration in support of the Verified Petitions. *See Declaration of Curt Kroll in Support of Motions for (I) Provisional Relief and (II) Recognition of Foreign Proceeding and Request for Certain Related Relief* [D.I. 6].

4. Except as otherwise disclosed herein, all statements in this Declaration are based upon my personal knowledge, my review of relevant documents, information provided to me by employees of or advisors to the CC Group, or my opinion based upon my experience, knowledge, and information concerning the CC Group's operations. I am over the age of 18 and, if called upon to testify, I could testify competently to the facts set forth in this Declaration.

I. CC Group and EWB's Relationship

5. The CC Group holds over 20 accounts (the "**EWB Accounts**") with East West Bank ("**EWB**") that the CC Group relies on to pay certain of their employees, regulatory fees, and vendors. The continued access to and use of the EWB Accounts is critical to the ongoing operation of the CC Group's business and the CC Group's sale process, which is necessary to maximize value for the Debtors' creditors, including its senior secured noteholders, EWB, and others.

[2] Capitalized terms used but not defined herein shall have the meaning assigned to such terms in the Recognition Motion or the Reply (as applicable).

6. If EWB was allowed to take enforcement action that disrupted the CC Group's cash management system, such as freezing the accounts (which they have done before) or sweeping cash from the EWB Accounts, this could grind the CC Group's operations to a halt and impair the value of the CC Group's assets.

7. EWB is also the mortgagee for the following three properties that are owned by CC Group entities (together, the "**Properties**"):

- 51 West Park Avenue, Vineland, NJ 08360;
- 5784 Sound Avenue, Jamesport, NY 11901; and
- 6797 Bowmans Crossing, Frederick, MD 21703.

8. The CC Group operates a cultivation facility at each of the Properties which produces inventory for sale in the CC Group's stores in the respective states in which the cultivation facilities are located. Each of the Properties is owned by a different CC Group Subsidiary. The Debtor Parent Company guarantees the mortgages of the Properties.

9. Three of the EWB Accounts are reserve accounts which serve as collateral for payment of principal and interest of the mortgaged Properties (the "**Reserve Accounts**"). The last four digits of the Reserve Account numbers and their respective approximate balances as of May 1, 2026 are: (i) 7448—$825,465; (ii) 0210—$700,000; and (iii) 2927—$355,000. These amounts represent four-to-six months' worth of principal and interest payments on the corresponding property's mortgage.

II. Service of EWB and EWB's Post-CCAA Commencement Date Enforcement Efforts

10. EWB has twice exercised remedies against the EWB Accounts since the CCAA Commencement Date by freezing such accounts notwithstanding being on notice of the Stay provided in the Initial Order and the Provisional Relief Order.

11. *First*, on March 26, 2026, following the granting of the Initial Order, EWB froze all EWB Accounts. Upon learning of the account freezes, I promptly held discussions with EWB regarding the account freezes. Following this discussion, the EWB Accounts were ultimately unfrozen later the same day.

12. *Second*, on April 17, 2026, EWB informed the CC Group that it was temporarily freezing four of the EWB Accounts and was seeking to draw funds to pay amounts owing under the mortgages of the Properties. Following discussions with EWB, EWB agreed to unfreeze such accounts, while reserving rights to assert any interest in such accounts.

13. EWB has indicated that it desires to commence foreclosure proceedings for each of the Properties and further exercise remedies with respect to the EWB Accounts.

14. Access to the EWB Accounts is critical to the ongoing operation of the CC Group's businesses, including making payroll and paying general accounts payable. The smooth and uninterrupted operation of the CC Group's businesses is critical to preserving the value of the CC Group's businesses and sale process that will deliver recoveries to the Debtors' creditors, both with respect to purchase and sale agreements that have been signed and are yet to close, and sales that the CC Group is actively negotiating and expects to finalize and announce in the near term.

III. Sale Process

15. Prior to the CCAA Commencement Date, the CC Group signed a memorandum of understanding with a potential buyer for its Maryland and New Jersey markets as a part of a broader transaction which would also include the CC Group's Colorado, Illinois, Massachusetts, and West Virginia markets. The CC Group remains in active negotiations regarding the terms of a purchase of its Maryland and New Jersey assets.

16. While the sales process for the Maryland and New Jersey markets remains ongoing, it is crucial that the CC Group preserves the value and maintains the operations of these markets, including the ongoing operation of the Maryland and New Jersey Properties. The cultivation sites at the Maryland and New Jersey Properties supply the CC Group's stores in these respective markets. Disruption to the operation of these cultivation sites could result in damage to the CC Group's Maryland and New Jersey businesses as a whole, causing a reduction in value for creditors of the Debtors, and a loss of jobs in those markets. Further, the potential purchasers may wish to include the Maryland and/or New Jersey cultivation sites as part of their acquisition of the CC Group's assets in those markets. Accordingly, it is critical that the CC Group maintains the Maryland and New Jersey Properties and its ongoing operations in Maryland and New Jersey in order to consummate value-maximizing transactions, the proceeds of which will be used to repay creditors of the Debtors, including EWB.

Conclusion

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this 8th day of May, 2026.

St. Louis, Missouri

/s/ Curt Kroll

Curt Kroll