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 D.I. 72 & 76**

DEBTORS' MOTION FOR LEAVE TO FILE DEBTORS' REPLY IN SUPPORT OF MOTION FOR RECOGNITION OF FOREIGN PROCEEDING AND REQUEST FOR CERTAIN RELATED RELIEF

The Cannabist Company Holdings Inc. (the "**Parent Company**"), in its capacity as the duly-appointed foreign representative of the Parent Company and its debtor affiliate, The Cannabist Company Holdings (Canada) Inc. (collectively, the "**Debtors**"), file this motion for leave (this "**Motion for Leave**") for entry of an order substantially in the form attached hereto as **Exhibit A** (the "**Proposed Order**") authorizing the Debtors to file and serve its reply (the "**Reply**") to address the issues and arguments raised in the *Objection to Motion for Recognition of Foreign Proceeding and Request for Certain Related Relief* [D.I. 72] (the "**Objection**") filed by East West Bank ("**EWB**"). In support of the Motion for Leave, the Debtors, by and through their undersigned counsel, state as follows:

[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.

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RELIEF REQUESTED

1. By this Motion for Leave, the Debtors request entry of the Proposed Order, substantially in the form attached hereto as **Exhibit A**, authorizing the Debtors to file and serve the Reply, filed contemporaneously herewith, in response to the Objection beyond the deadline set forth in rule 9006-1(d) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "**Local Rules**").

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the District of Delaware (the "**Court**") has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. The Debtors properly commenced the Chapter 15 Cases pursuant to sections 1504 and 1509 of title 11 of the United States Code (the "**Bankruptcy Code**") by filing petitions for recognition of the Canadian Proceeding pursuant to section 1515 of the Bankruptcy Code.

3. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Pursuant to Local Rule 9013-1(f), the Debtors consent to the entry of a final order by the Court in connection with this Motion for Leave to the extent it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

4. Venue is proper before the Court pursuant to 28 U.S.C. § 1410, as the Debtors have assets in the United States located in Delaware.

BACKGROUND

5. On March 25, 2026, the Debtors filed the Chapter 15 Cases and the *Motion for Recognition of Foreign Proceeding and Request for Certain Related Relief* [D.I. 5] (the

"**Recognition Motion**") seeking, among other things, recognition by this Court of the Debtors' foreign representative, recognition of the Canadian Proceeding as a "foreign main proceeding" or, in the alternative, a "foreign non-main proceeding" under section 1517 of the Bankruptcy Code, and certain related relief. A final hearing on the Recognition Motion is scheduled for May 12, 2026, at 2:00 p.m. (prevailing Eastern Time) (the "**Recognition Hearing**").

6. On March 26, 2025, the Court entered the *Order (I) Scheduling Recognition Hearing, (II) Specifying Form and Manner of Service of Notice, and (III) Granting Related Relief* [D.I. 33] setting the deadline to file any objections to the relief requested in the Recognition Motion for April 27, 2026, at 5:00 p.m. (prevailing Eastern Time) (the "**Objection Deadline**").

7. The Debtors extended the Objection Deadline for EWB. On May 1, 2026, EWB filed the Objection to the Recognition Motion.

8. Additional information regarding the Debtors and the Chapter 15 Cases can be found in (a) the *Declaration of Curt Kroll in Support of Debtors' Motions for (I) Provisional Relief and (II) Recognition of Foreign Proceeding and Request for Certain Related Relief* [D.I. 6] (the "**CRO Declaration**") and (b) the *Declaration of Lee Nicholson as Canadian Counsel to the Debtors in Support of Debtors' Motions for (I) Provisional Relief and (II) Recognition of Foreign Proceeding and Request for Certain Related Relief* [D.I. 7] (the "**Nicholson Declaration**").[2]

BASIS FOR RELIEF REQUESTED

9. Pursuant to Local Rule 9006-1(d), "[r]eply papers . . . may be filed by 4:00 p.m. prevailing Eastern Time the day prior to the deadline for filing the agenda." *See* Del. Bankr. L.R. 9006-1(d). The agenda for the Recognition Hearing was due by 12:00 p.m. (prevailing Eastern

[2] Capitalized terms used in the Motion for Leave, but not defined herein, have the meanings ascribed to such terms in the CRO Declaration and the Nicholson Declaration, as applicable.

Time) on May 8, 2026. Accordingly, pursuant to Local Rule 9006-1(d), the deadline to file the Reply was 4:00 p.m. (prevailing Eastern Time) on May 7, 2026 (the "**Reply Deadline**").

10. The Debtors submit that cause exists to grant the relief requested by the Motion for Leave and approve an extension of the time by which to file the Reply under Local Rule 9006-1(d). The Objection raises complex legal and factual issues, and the Debtors require a modest amount of additional time to draft a comprehensive Reply that appropriately addresses such issues. Precluding the Debtors from filing the Reply simply because they were unable to do so by the Reply Deadline would be inequitable. Additionally, the Debtors believe that the Reply will provide the Court with critical information, background, and arguments to consider in connection with the Recognition Motion and the Objection, and that the Court's consideration of the Reply will streamline argument at the Recognition Hearing and otherwise assist the Court in deciding the merits of the Recognition Motion. Further, the Debtors have focused their efforts on potentially resolving the Objection and, as a result, extended the Objection Deadline for EWB and delayed filing the Reply. However, despite those efforts, as of the filing of this Motion for Leave, the Objection is not resolved. Accordingly, the Debtors believe it is prudent to file the Reply now. The Debtors should not be prejudiced for delaying to file the Reply in an attempt to resolve the Objection. Finally, permitting the Debtors to file the Reply after the Reply Deadline will not prejudice any parties in interest, as parties will have sufficient time to review the Reply in advance of the Recognition Hearing.

NOTICE

11. Notice of this Motion for Leave has been provided to the Office of the United States Trustee for the District of Delaware, EWB, and parties in interest who have requested notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in view of the facts and circumstances, such notice is sufficient and no other or further notice need be provided.

NO PRIOR REQUEST

12. No previous request for the relief sought herein has been made by the Debtors to this Court or any other court.

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CONCLUSION

WHEREFORE, for the reasons set forth herein, the Debtors respectfully request that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit A**, and grant such other and further relief as is just and proper.

Dated: May 8, 2026

/s/ Zachary J. Javorsky

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EXHIBIT A

Proposed Order

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 D.I. __**

ORDER GRANTING DEBTORS' MOTION FOR LEAVE TO FILE DEBTORS' REPLY IN SUPPORT OF MOTION FOR RECOGNITION OF FOREIGN PROCEEDING AND REQUEST FOR CERTAIN RELATED RELIEF

Upon the motion (the "**Motion for Leave**")[2] for an order (this "**Order**"), authorizing the Debtors to file and serve its Reply beyond the deadline set forth in Local Rule 9006-1(d), all as more fully set forth in the Motion for Leave; and the Court having jurisdiction to consider the Motion for Leave and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012; and consideration of the Motion for Leave and the relief requested therein being a core proceeding under 28 U.S.C. § 157(b)(2); and the Court having authority to enter a final order consistent with Article III of the United States Constitution; and venue being proper before this Court under 28 U.S.C. §§ 1408 and 1409; and it appearing that

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[2] Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion for Leave.

proper and adequate notice of the Motion for Leave has been given and that no other or further notice is necessary; and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion for Leave is granted as set forth herein.

2. The Debtors are granted leave and permission to file the Reply, and the Court will consider the Reply at the Recognition Hearing.

3. The Debtors are authorized to take all actions necessary or appropriate to effectuate the relief granted in this Order.

4. This Court retains jurisdiction with respect to all matters arising from or related to the enforcement of this Order.