



ONTARIO SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

COUNSEL/ENDORSEMENT SLIP

COURT FILE NO.: BK-25-03298880-0031

DATE: January 28, 2026

NO. ON LIST: 3

TITLE OF PROCEEDING: MORRIS MARKETING GROUP INC.

BEFORE: JUSTICE CONWAY

PARTICIPANT INFORMATION

For Plaintiff, Applicant, Moving Party:

Name of Person Appearing	Name of Party	Contact Info
Natasha Rambaran	Counsel for Dodick Landau Inc. in its capacity as the Proposal Trustee of Morris Marketing Group Inc.	nrambaran@reconllp.com
Michael S. Shakra	Counsel for the Applicant, Morris Marketing Group Inc.	shakram@bennettjones.com
Shawn Kirkman		kirkmans@bennettjones.com
Rahn Dodick	Proposal Trustee of the Applicant, Morris Marketing Group Inc.	rahn.dodick@dodick.ca

For Defendant, Respondent, Responding Party:

Name of Person Appearing	Name of Party	Contact Info

For Other, Self-Represented:

Name of Person Appearing	Name of Party	Contact Info
Kenneth Kraft	Counsel to Elm Street Technology, LLC	kenneth.kraft@dentons.com

ENDORSEMENT OF JUSTICE CONWAY:

- [1] All defined terms used in this Endorsement shall, unless otherwise defined, have the meanings ascribed to them in the Factum of the Proposal Trustee dated January 26, 2026. All factual references are from the First Report of the Proposal Trustee dated January 18, 2026.
- [2] The Proposal Trustee brings this motion for an order (a) approving the Amended Proposal to Creditors dated December 16, 2025; (b) declaring that the Company's former employees are eligible to receive payments pursuant to WEPPA; (c) approving the Proposal Report dated December 23, 2025 and the First Report, and the activities of the Proposal Trustee described therein; and (d) approving the fees and disbursements of the Proposal Trustee and its counsel.
- [3] The motion is unopposed.
- [4] The Amended Proposal was unanimously approved by Affected Creditors at the Reconvened Creditors' Meeting on January 9, 2026. According to the Proposal Trustee, the Amended Proposal will result in greater recovery and certainty for the Affected Creditors than they would receive in a liquidation or bankruptcy of the Company. Its view is that the terms of the Amended Proposal are reasonable, generally benefit the Creditors, is made in good faith and complies with the requirements for proposals in the BIA.
- [5] The background of the Company's financial difficulties leading to the filing is set out in detail in the record. Since the filing, the Company's operational restructuring efforts have included, among other things: (a) ceasing the operations of the unprofitable Print Operations; (b) terminating the employment of all employees of the Company; (c) liquidating the contents of the Premises, which it anticipates completing by no later than January 31, 2026; (d) vacating the Premises by January 31, 2026; and (e) transferring IXACT Contact to a cloud-based datacenter in order for the CRM Operations to continue under the control of Elm Street (its parent company).
- [6] The terms of the Amended Proposal are also described in the record. As noted, it was unanimously approved by Affected Creditors. It has met the double majority threshold required under the BIA.
- [7] I accept the Proposal Trustee's recommendation and approve the Amended Proposal. I am satisfied that it is reasonable, calculated to benefit the general body of creditors, and was made in good faith. It addresses priority claims in accordance with the BIA.
- [8] The releases in the Amended Proposal are approved. The Released Parties (in particular Elm Street) are necessary for the restructuring of the Company. The claims being released are rationally related to the purpose of the Amended Proposal and necessary for it. They are an integral part of the Amended Proposal. Nothing in the Amended Proposal releases a

claim against a Director that cannot be compromised pursuant to subsection 50(14) of the BIA.

- [9] I grant a declaration that pursuant to paragraph 5(1)(b)(iv) and 5(5) of the WEPPA, the Company meets the criteria prescribed by s. 3.2 of the WEPP Regulations. As set out in paragraph 32 of the First Report, the Print Operations ceased operating in December 2025 and all but two of the Company's 30 employees were terminated. The remaining two employees will be terminated following the wind down of the Print Operations, expected to occur by January 31, 2026. Mr. Dodick confirmed in court that those two employees were retained to wind down the Company's business operations.
- [10] I am therefore satisfied that for purposes of s. 5(5) of the WEPPA, the Company meets the criteria prescribed by the WEPP Regulations.
- [11] I approve the Proposal Report, the First Report, and the activities of the Proposal Trustee described therein. I am satisfied that those activities were necessary and for the benefit of stakeholders.
- [12] The fees and disbursements of the Proposal Trustee and its counsel are reasonable and approved.
- [13] Order to go as signed by me and attached to this Endorsement. This order is effective from today's date and is enforceable without the need for entry and filing.

A handwritten signature in blue ink, appearing to read "Conway J.", is located at the bottom left of the page.