

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

In re:	§	
	§	Case No. 19-10653-R
INNOVA GLOBAL LTD., <i>et al.</i> , <sup>1</sup>	§	
	§	Jointly Administered
Debtors in a foreign proceeding.	§	
	§	Chapter 15
	§	

**NOTICE OF HEARING AND OF OBJECTION DEADLINE ON SECOND  
MOTION TO SELL CERTAIN PROPERTY OUTSIDE THE ORDINARY  
COURSE OF BUSINESS, FREE AND CLEAR OF LIENS**

PLEASE TAKE NOTICE that:

1. Motion to Sell. PricewaterhouseCoopers Inc., LIT, (“PWC”), solely in its capacity as court-appointed receiver (the “Receiver”) of the Debtors in these jointly administered cases based upon the Receivership Order that the Court of Queen’s Bench of Alberta in the Judicial Centre of Calgary, Canada, entered on April 1, 2019, in Court File No. 1901-04589 and as the Debtors’ Chapter 15 recognized foreign representative has filed a motion (the “Motion”) that seeks an order from the Court that (a) authorizes it to sell certain tangible assets (the “Assets”) of the Debtor Braden Manufacturing, L.L.C. (“Braden”) that are located on or within the premises of the Braden facility at 17 St. Mark Street, Auburn, Massachusetts (the “Premises”), free and clear of liens, for the sum of \$632,317 USD and other valuable consideration and (b) waives any stay of the immediate effectiveness of that order, including the

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<sup>1</sup> The Debtors are: 1) Innova Global Ltd., (2) Innova Global Operating Ltd., (3) Innova Global Limited Partnership, (4) 1938247 Alberta Ltd., (5) Innova Global Holdings Limited Partnership, (6) Innova Global Inc. (formerly AEM Emissions Management Inc., formerly ATCO Emissions Management Inc.), (7) Innova Global LLC (formerly AEM Noise Management LLC, formerly ATCO Noise Management LLC), and (8) Braden Manufacturing, L.L.C.

14-day stay of Bankruptcy Rule 6004(h). A copy of the Motion, which more fully describes the assets to be sold and the terms and conditions of the sale, is attached as Exhibit 1.

2. Sales Process. As Section 7 of the Motion reflects, the Receiver intends to sell the Assets to the buyer that the Motion identifies or to another party that timely submits a superior proposal pursuant to the sales process that the receiver has created. If you wish to submit a bid for the Assets, contact Liam Murphy of PwC, [liam.d.murphy@pwc.com](mailto:liam.d.murphy@pwc.com), for information.

3. The Court will hold a hearing to consider the Motion on July \_\_\_\_, 2019, at \_\_\_\_\_.m., in Courtroom No. 1 of the United States Bankruptcy Court, 224 South Boulder, Tulsa, Oklahoma.

4. Objections. Objections to the proposed sale and the Motion must be filed with the Court at least 48 hours before the time set for the hearing. If no objection is timely filed or served, the Court may grant the relief that the Motion seeks without further notice or a hearing.

Respectfully submitted,

**ROSENSTEIN, FIST & RINGOLD**

/s/ John E. Howland

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FOREIGN REPRESENTATIVE**