

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

**IN THE MATTER OF THE COMPANIES' CREDITORS
ARRANGEMENT ACT, R.S.C. 1985, c.C-36, AS AMENDED
AND IN THE MATTER OF A PLAN OF COMPROMISE OR
ARRANGEMENT OF 1001270243 ONTARIO INC.**

Applicant

**AIDE MEMOIRE
OF SYNAPTIVE MEDICAL INC.**

(Case Conference, to be held May 5, 2026, at 10:00 a.m.)

1. Synaptive Medical Inc. submits this aide memoire to propose a schedule for its within motion for relief in respect of the Wage Earner Protection Program (the "**WEPP Motion**"). Synaptive understands that Richter Inc., the monitor in this CCAA proceeding (in such capacity, the "**Monitor**"), supports the course of action proposed herein.
2. The WEPP Motion was originally scheduled to be heard during a full-day hearing on May 5, 2026. However, on April 28, 2026, Justice J. Dietrich granted a consent receivership order that, among other things, appointed Richter Inc. as the receiver and manager of all of Synaptive's assets, undertakings and properties.
3. During the hearing for that receivership order, counsel to certain of Synaptive's former employees (the "**Former Employees**") indicated their position that the receivership order created new legal issues and/or materially affects the existing legal issues in the WEPP Motion. The Attorney General of Canada, counsel to Employment and Social Development Canada, indicated its intention to respond to any such new and/or affected legal issues.
4. The parties should be provided with an opportunity to brief these issues, and such issues should be heard along with the existing legal issues related to the WEPP Motion at a single hearing, with as little delay as possible in the circumstances. A scheduled settlement conference will permit the parties to meet and confer prior to the WEPP Motion and will provide a meaningful opportunity to achieve a settlement, if one is possible.

5. In light of these developments, Synaptive proposes that the WEPP Motion proceed in accordance with the following schedule. Synaptive understands that the schedule below is acceptable to Koskie Minsky LLP and the Attorney General.

Event	Date / Deadline
Supplemental Record(s) and Factum(s) of Synaptive and/or the Former Employees, if any	T minus 28 days
Responding Supplemental Record and Factum of the Attorney General, if any	T minus 14 days
Reply Factum(s) of Synaptive, the Monitor and/or the Former Employees, if any	T minus 8 days
Settlement Conference	T minus 7 days
Hearing for WEPP Motion	“T”

**IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C.
1985, c. C-36, AS AMENDED**

Court File No. CV-25-00739279-00CL

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF
1001270243 ONTARIO INC.**

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Proceeding commenced at TORONTO.

**AIDE MEMOIRE
OF SYNAPTIVE MEDICAL INC.
(Case Conference, to be held May 5, 2026, at 10:00 a.m.)**

TORYS LLP
79 Wellington St. W., Suite 3000
Box 270, TD Centre
Toronto, ON M5K 1N2

Adam Slavens (LSO#: 54433J)
416.865.7333 | aslavens@torys.com

Mike Noel (LSO#: 80130F)
416.865.7378 | mnoel@torys.com

Lawyers for Synaptive Medical Inc.