

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

OLD BPSUSH INC., et al.,¹

Debtors,

Chapter 11

Case No. 16-12373 (KJC)

Jointly Administered

**PUBLICATION NOTICE OF PROPOSED SETTLEMENT OF
CLASS PROOF OF CLAIM AND SETTLEMENT HEARING**

TO: ALL PERSONS OR ENTITIES WHO PURCHASED OR OTHERWISE ACQUIRED PERFORMANCE SPORTS GROUP LTD. COMMON STOCK ON THE NEW YORK STOCK EXCHANGE DURING THE PERIOD FROM JANUARY 15, 2015 THROUGH MARCH 14, 2016, INCLUSIVE (THE “CLASS”).

PLEASE READ THIS NOTICE CAREFULLY. YOUR RIGHTS MAY BE AFFECTED BY A SETTLEMENT OF A CLASS PROOF OF CLAIM PENDING IN THE BANKRUPTCY COURT.

YOU ARE HEREBY NOTIFIED, pursuant to an Order of the United States Bankruptcy Court for the District of Delaware [Docket No. 1467], of a proposed settlement (as described more fully below and in the Plan, the “Settlement”) of the class proof of claim filed by the Plumbers and Pipefitters National Pension Fund as court-appointed lead plaintiff (“Lead Plaintiff”) in the pending class action entitled *Nieves v. Performance Sports Group Ltd., et al.*, Case No. 1:16-CV-3591-GHW (S.D.N.Y.) (the “Securities Litigation”). The Settlement will resolve all claims that have been or could be asserted against the above-captioned debtors (the “Debtors”) and their estates in the Securities Litigation (the “Settled Claims”) for the payment of \$1.15 million in cash and an additional 40% (not to exceed \$2.5 million) of the Cause of Action Net Proceeds, if any, received by the Reorganized Debtors through certain litigation subsequent to confirmation of the *First Amended Joint Plan of Liquidation of Old*

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Old BPSUSH Inc. (f/k/a BPS US Holdings Inc.) (8341); Old BH Inc. (f/k/a Bauer Hockey, Inc.) (3094); Old EBS Inc. (f/k/a Easton Baseball / Softball Inc.) (5670); Old BHR Inc. (f/k/a Bauer Hockey Retail Inc.) (6663); Old BPSU Inc. (f/k/a Bauer Performance Sports Uniforms Inc.) (1095); Old PLG Inc. (f/k/a Performance Lacrosse Group Inc.) (4200); Old BPSCI Inc. (f/k/a BPS Diamond Sports Inc.) (5909); Old PSGI Inc. (f/k/a PSG Innovation Inc.) (9408); Old BHR Wind-down Corp. (f/k/a Bauer Hockey Retail Corp.) (1899); Old EBS Wind-down Corp. (f/k/a Easton Baseball / Softball Corp.) (4068); Old PSGI Wind-down Corp. (f/k/a PSG Innovation Corp.) (2165); Old BPSDS Wind-down Corp. (f/k/a BPS Diamond Sports Corp.) (8049); Old BPSU Wind-down Corp. (f/k/a Bauer Performance Sports Uniforms Corp.) (2203); Old PLG Wind-down Corp. (f/k/a Performance Lacrosse Group Corp.) (1249); and Old PSG Wind-down Ltd. (f/k/a Performance Sports Group Ltd., and also representing the estates of the Debtors formerly known as KBAU Holdings Canada, Inc., Bauer Hockey Corp., and BPS Canada Intermediate Corp., respectively) (1514). The Debtors’ mailing address is 666 Burrard Street, Suite 1700, Vancouver, British Columbia, Canada, V6C 2X8.

BPSUSH Inc. and its Affiliated Debtors [Docket No. 1473] (as may be amended, the “Plan”).² In exchange, the Debtors will receive a release, discharge, and injunction in their favor with respect to the Settled Claims. The Settlement is conditioned upon approval by the Bankruptcy Court and confirmation of the Plan. A hearing will be held on December 20, 2017, at 10:00 a.m. (Eastern Time), before the Honorable Kevin J. Carey, at the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801, Fifth Floor, Courtroom #5, (a) to determine whether the proposed Settlement on the terms and conditions provided for in the Stipulation and Plan is fair, reasonable and adequate and should be approved by the Court; (b) to determine whether the Settlement Class should be certified with respect to the Class Proof of Claim for settlement purposes only; (c) to determine whether the release by the Settlement Class of the Debtors, as set forth in the Stipulation and Plan, should be ordered; (d) to consider confirmation of the Plan; and (e) to rule upon such other matters as the Court may deem appropriate.

Since Lead Plaintiff’s Individual and Class Proofs of Claim are the only Claims filed against the Debtors in the PSG Chapter 11 Case involving the Settled Claims, you will be precluded from obtaining any recovery individually against the Debtors in the Chapter 11 Cases other than through the proceeds of the Settlement, which proceeds will be allocated in the future pursuant to an order of the District Court where the Securities Litigation is pending or the Bankruptcy Court. The pending claims in the Securities Litigation against certain non-Debtor individual defendants are unaffected by this Settlement.

In the event the Settlement is approved and the Plan is confirmed by the Bankruptcy Court, you will likely have no remedy against the Debtors if you object to, or request exclusion from, the Settlement unless the order confirming the Plan is stayed pending any appeal. If you object to the Settlement and the Plan has been confirmed with no stay of the Plan’s effectiveness, then any such objection may be rendered moot and no remedy will be available in connection with an appeal of any order approving the Settlement.

IF YOU ARE A MEMBER OF THE SETTLEMENT CLASS DESCRIBED ABOVE, YOUR RIGHTS WILL BE AFFECTED BY THE PLAN AND THE SETTLEMENT.

If you are a member of the Settlement Class, in order to be potentially eligible to share in the proceeds of the Settlement, you need not do anything now, but you will be required to submit a claim form at a later date. Subsequent notice will issue with the claim form and instructions after resolution of the remaining claims against the non-Debtor defendants in the Securities Litigation.

You may object to the Settlement by filing a written objection to confirmation of the Plan stating with particularity the basis and nature of any objection, which must be filed, together with proof of service, with the Bankruptcy Court and served so that it is received no later than December 12, 2017 at 4:00 p.m. (ET) (the “Settlement Objection Deadline”) by the undersigned Lead Counsel and the following additional parties: (i) co-counsel to the Debtors, (1) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas

² Copies of the Plan and other documents referenced in this notice are available at <http://cases.primeclerk.com/PSG> in PDF format. Capitalized terms used but not defined in this notice have the meanings given thereto in the Plan.

New York, New York 10019 (Attn: Kelley A. Cornish and Alice Belisle Eaton), and (2) Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, Delaware 19801 (Attn: Pauline K. Morgan, Sean T. Greecher, and Justin H. Rucki); (ii) counsel to the Equity Committee, (1) Brown Rudnick LLP, Seven Times Square, New York, New York 10036 (Attn: Robert J. Stark and Andrew M. Carty), (2) Brown Rudnick LLP, One Financial Center, Boston, MA 02111 (Attn: Steven B. Levine), and (3) Montgomery McCracken Walker & Rhoads LLP, 1105 North Market Street, 15th Floor, Wilmington, Delaware 19801 (Attn: Mark A. Fink); (iii) counsel to the Creditors' Committee, (1) Blank Rome LLP, 1201 Market Street, Suite 800, Wilmington, Delaware 19801 (Attn: Stanley B. Tarr and Josef W. Mintz), and (2) Blank Rome LLP, The Chrysler Building, 405 Lexington Avenue, New York, New York 10174 (Attn: Michael B. Schaedle); (iv) the Office of the United States Trustee, 844 King Street, Suite 2207, Wilmington, Delaware 19801 (Attn: Mark S. Kenney); (v) counsel to the Monitor, Thornton Grout Finnigan LLP, 100 Wellington Street West, Suite 3200, Toronto, Ontario M5K 1K7 (Attn: Robert Thornton and Rachel Bengino); and (vi) bankruptcy counsel to Lead Plaintiff and the Putative Class, Lowenstein Sandler LLP, One Lowenstein Drive, Roseland, New Jersey 07068 (Attn: Michael S. Etkin and Andrew Behlmann).

PLEASE DO NOT CONTACT THE COURT OR THE CLERK'S OFFICE REGARDING THIS NOTICE. Inquiries may be made to Lead Counsel:

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By Order of the Court