

#### Relation with Cole Kepro International LLC ("Cole")

29. Cole is a manufacturer of electronic gaming machines ("EGMs") and since approximately June 2014 has been Bluberi's sole supplier of EGMs.
30. In order to facilitate operations Cole had access to Bluberi's Las Vegas warehouse. The Monitor has been informed that on or around November 4, 2015, namely before the issuance of the Initial Order, representatives of Cole, without notifying Bluberi, entered the Las Vegas warehouse and removed all of the new EGM cabinets it had sold to Bluberi to a warehouse under its own control. This latter warehouse appears to be located across the street from Bluberi's warehouse. We understand that management of Bluberi only became aware of the incident on or around November 27, 2015.
31. Notwithstanding the foregoing, during the past week Cole released the machines and inventory required to complete an installation and has undertaken to release further machines and inventory to fulfil additional installations.
32. For future transactions, Cole has requested payment of pre-filing amounts. The parties are presently endeavouring to settle this matter through negotiation. Management, together with the CRO to be appointed, with the assistance of the Monitor and in consultation of Callidus, will consider the appropriate course of action, which could include the filing of Chapter 15 proceedings in the U.S.