

Court File No. CV-23-00707394-00CL

Tacora Resources Inc.

**ELEVENTH REPORT OF FTI CONSULTING CANADA INC.,
IN ITS CAPACITY AS COURT-APPOINTED MONITOR**

July 22, 2024

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**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
TACORA RESOURCES INC.**

(Applicant)

**ELEVENTH REPORT TO THE COURT
SUBMITTED BY FTI CONSULTING CANADA INC.,
IN ITS CAPACITY AS MONITOR**

INTRODUCTION

1. Pursuant to an Order (the “**Initial Order**”)¹ of the Ontario Superior Court of Justice (Commercial List) (the “**Court**”) dated October 10, 2023, Tacora Resources Inc. (“**Tacora**” or the “**Applicant**”) was granted protection under the *Companies' Creditors Arrangement Act*, R.S.C., c. C-36, as amended (the “**CCAA**” and in reference to the proceeding, the “**CCAA Proceeding**”) and FTI Consulting Canada Inc. was appointed monitor of the Applicant (in such capacity the “**Monitor**”).
2. The Initial Order, among other things (i) granted a stay of proceedings until October 20, 2023 (the “**Stay Period**”); (ii) approved a DIP Facility Term Sheet (the “**DIP Agreement**”) dated October 9, 2023, between the Applicant as borrower and Cargill, Incorporated as lender (the “**DIP Lender**”), pursuant to which the DIP Lender agreed to advance up to a maximum principal amount of \$75 million to the Applicant (the “**DIP Facility**”), subject to the terms and conditions of the DIP Agreement, with an initial loan amount of up to \$15.5 million (the “**Initial Advance**”)² being available prior to the comeback hearing; and (iii) granted a priority charge in favour of the DIP Lender to secure the obligations under the DIP Agreement in the principal amount of the Initial Advance and the Post-Filing Credit Extensions (as defined in the DIP Agreement) up to the maximum principal amount of \$20 million.

¹ The Initial Order was amended and restated on October 30, 2023 (the “**ARIO**”).

² On October 27, 2023, the amount available under the DIP Facility was increased from the Initial Advance amount of \$15.5 million to \$20 million pursuant to an Order of Justice Kimmel.

3. As described in the Monitor's Prior Reports³ to Court, pursuant to an Order granted on October 30, 2023, the Court approved a sale, investment and services solicitation process (the "**Solicitation Process**") following which, among other things: (i) the Applicant, with the assistance of its financial advisor and the Monitor, conducted a fulsome and extensive Solicitation Process; and (ii) a bid submitted by the Investors⁴ was selected as the "Successful Bid". As a result of a drop in iron ore prices, Tacora was unable to fulfill a net debt condition in the Successful Bid in the Solicitation Process. On April 9, 2024, the Investors advised Tacora that they were no longer able to proceed with the Successful Bid and, on April 11, 2024, Tacora and the Investors executed a mutual termination of the Successful Bid.
4. By Order of Justice Kimmel dated March 18, 2024, *inter alia*, (i) the Stay Period was extended until April 26, 2024;⁵ and (ii) the ARIO was amended to permit the Applicant to borrow on the terms in an Amended and Restated DIP Agreement.
5. On April 23, 2024, the Court granted an order (the "**Claims Procedure Order**"), approving a claims process (the "**Claims Procedure**") to solicit, identify, quantify and, if appropriate, resolve the Claims (as defined in the Claims Procedure Order) against the Applicant and their Directors and Officers (each as defined in the Claims Procedure Order).
6. On April 26, 2024, the Court granted an order, *inter alia*, (i) extending the Stay Period to June 24, 2024; and (ii) further amending the ARIO to permit the Applicant to borrow on the terms set out in a Second Amended and Restated DIP Facility Term Sheet dated April 21, 2024 between the Applicant and the DIP Lender (the "**Second Amended DIP Agreement**").
7. Following a hearing on June 5, 2024, among other things, the Court: (i) granted an Order (the "**Sale Process Order**"), among other things, approving a proposed second sale process (the "**Sale Process**"); (ii) granted an Order, among other things, extending the Stay Period to July 29, 2024;

³ The Monitor has filed the Pre-Filing Report of the Monitor dated October 9, 2023, the First Report of the Monitor dated October 20, 2023, the Second Report of the Monitor dated January 18, 2024, the Third Report of the Monitor dated March 13, 2024, the Fourth Report dated March 14, 2024 (the "**Fourth Report**"), the Supplement to the Fourth Report dated March 26, 2024, the Second Supplement to the Fourth Report dated April 10, 2024, the Fifth Report dated April 7, 2024, the Sixth Report dated April 9, 2024, the Seventh Report dated April 14, 2024, the Eighth Report of the Monitor dated April 21, 2024 (the "**Eighth Report**"), the Supplement to the Eighth Report dated April 24, 2024, the Ninth Report of the Monitor dated June 3, 2024 (the "**Ninth Report**") and the Tenth Report of the Monitor dated June 19, 2024 (the "**Tenth Report**" and collectively, the "**Prior Reports**").

⁴ The "Investors" refers to a consortium consisting of Brigade Capital Management, L.P. ("**Brigade**"), Millstreet Capital Management LLC ("**Millstreet**"), MSD Partners, L.P., O'Brien-Staley Partners and Snowcat Capital Management, Resource Capital Fund VII L.P. and Javelin Global Commodities (SG) Pte Ltd.

⁵ The Stay Period was previously extended including by Orders granted on October 13, 2023, October 27, 2023, January 24, 2024 and March 11, 2024.

and (iii) issued an endorsement, among other things, scheduling various motions brought by the Applicant and Cargill and Cargill International Trading PTE Ltd (together, “**Cargill**”) to be heard on June 26, 2024 (the “**June 26 Motions**”) and scheduling a motion to be brought by the Applicant seeking approval of the offer that is ultimately selected as the “Successful Bid” pursuant to the Sale Process on July 26, 2024.

8. On June 22, 2024, the Purchasers entered into a Support Agreement (the “**Support Agreement**”) under which the Purchasers agreed in principle on a series of transactions whereby the Purchasers proposed to acquire all of the equity of Tacora.⁶ The Applicant was not involved in the negotiations of the Support Agreement, but was subsequently informed about the Support Agreement following the Purchasers execution thereof. On June 26, 2024, the Applicant and other stakeholders appeared before Justice Kimmel to advise that the Support Agreement had been entered into and to request that Justice Kimmel adjourn the June 26 Motions. In connection with the adjournment, Cargill agreed to certain terms related to the DIP financing available to the Company. Justice Kimmel issued an endorsement following the hearing adjourning the June 26 Motions to July 22, 2024. A copy of the June 26 endorsement of Justice Kimmel is attached hereto as Appendix “A”.
9. On July 18, 2024, the parties agreed to withdraw the June 26 Motions without costs and the Applicant advised the parties on the Service List accordingly.
10. All references to monetary amounts in this Eleventh Report to Court of the Monitor (the “**Eleventh Report**”) are in United States dollars unless otherwise noted. Any capitalized terms not defined herein have the meanings given to them in the affidavit of Heng Vuong sworn July 21, 2024 (the “**Third Vuong Affidavit**”).
11. Further information regarding the CCAA Proceeding, including all materials publicly filed in connection with these proceedings, is available on the Monitor’s website at <http://cfcanada.fticonsulting.com/tacora> (the “**Monitor’s Website**”).

PURPOSE

12. The purpose of this Eleventh Report is to provide information to the Court with respect to:
 - (a) the status of the CCAA Proceeding, including the Sale Process and the Claims Procedure;

⁶ Pursuant to Joinder Agreements entered into as of July 6, 2024 and July 12, 2024, Brigade and MSD, LP, respectively, became parties to the Support Agreement.

- (b) the relief sought by the Applicant for an order (the “**Approval and Reverse Vesting Order**”), among other things, approving the Subscription Agreement between the Applicant and the Purchasers⁷ dated July 21, 2024 (the “**Subscription Agreement**”) and authorizing and directing Tacora to take such additional steps and execute such additional documents as may be necessary or desirable for the completion of the transaction contemplated by the Subscription Agreement (the “**Transactions**”).
- (c) the relief sought by the Applicant in its proposed Order (the “**Stay Extension, DIP, and Fees Approval Order**”), including:
 - (i) extending the Stay Period to October 7, 2024;
 - (ii) approving a third amended and restated DIP Agreement dated July 12, 2024 with the DIP Lender (the “**Third Amended DIP Agreement**”) and amending the ARIO accordingly;
 - (iii) approving this Eleventh Report, the Prior Reports and the actions, conduct and activities of the Monitor described therein; and
 - (iv) approving the fees and disbursements of the Monitor and its counsel, Cassels Brock & Blackwell LLP (“**Cassels**”), incurred in the CCAA Proceeding for the period from October 10, 2023 to July 7, 2024, as detailed in the Fee Affidavits (as defined below);
- (d) the Applicant’s actual cash receipts and disbursements for the 8-week period ending July 14, 2024;
- (e) the Applicant’s updated cash flow forecast for the period ending October 6, 2024 (the “**July 2024 Forecast**”), attached hereto as Appendix “B”;
- (f) the Monitor’s activities since the date of the Ninth Report; and
- (g) the Monitor’s recommendations in respect of the relief sought by the Applicant.

⁷ The “Purchasers” are comprised of Millstreet, as investment manager on behalf of multiple noteholders, OSP, LLC (on behalf of certain managed funds) and Cargill, subject to the addition of Other New Equity Investors (as defined in the Subscription Agreement) in accordance with the Subscription Agreement.

TERMS OF REFERENCE AND DISCLAIMER

13. In preparing this Eleventh Report, the Monitor has relied upon audited and unaudited financial information of Tacora's books and records, and discussions and correspondence with, among others, management of and advisors to Tacora as well as other stakeholders and their advisors ("**Information**").
14. Except as otherwise described in this Eleventh Report:
 - (a) the Monitor has not audited, reviewed, or otherwise attempted to verify the accuracy or completeness of the Information in a manner that would comply with Generally Accepted Auditing Standards pursuant to the Chartered Professional Accountants of Canada Handbook; and
 - (b) the Monitor has not examined or reviewed the financial forecasts or projections referred to in this Eleventh Report in a manner that would comply with the procedures described in the Chartered Professional Accountants of Canada Handbook.
15. Future-oriented financial information reported in or relied on in preparing this Eleventh Report is based on assumptions regarding future events. Actual results may vary from these forecasts, and such variations may be material.
16. The Monitor has prepared this Eleventh Report to provide information to the Court in connection with the relief requested by the Applicant. This Eleventh Report should not be relied on for any other purpose.

UPDATE ON THE CCAA PROCEEDING

Operational Update

17. On July 12, 2024, due to dangerous wildfires occurring in the region, the Government of Newfoundland and Labrador and the Town of Labrador City issued an evacuation order (the "**Evacuation Order**") for the Town of Labrador City and an evacuation alert for the Town of Wabush. Due to the Evacuation Order, Tacora immediately, and in an orderly manner, safely suspended operations at the Scully Mine until conditions warranted otherwise.
18. The Evacuation Order was lifted at noon on Monday, July 22, 2024, effective immediately. In anticipation of the Evacuation Order being lifted, and in accordance with government directions, essential workers who are residents of Labrador City or Wabush were called back to the Scully Mine over the weekend of July 20, 2024. It is expected that the employees and their families will

return to the Scully Mine by mid- to end of the week. Operations at the Scully Mine have resumed on a limited basis with employees who reside in the Town of Wabush. Tacora anticipates a gradual ramp-up of operations as employees return to the mining site and as Tacora determines it is safe to do so in accordance with applicable safety and regulatory requirements.

Sale Process⁸

19. The Monitor has reviewed the Third Vuong Affidavit and the Affidavit of Michael Nessim sworn July 19, 2024 (the “**Fourth Nessim Affidavit**”) and agrees with the description of the Sale Process set out therein.
20. As described in the Ninth Report, the Monitor was involved in the development of the Sale Procedures and is of the view that the Sale Process: (i) was consistent with the principles underlying the sale of assets in court-supervised proceedings; (ii) provided for an open, fair and transparent process with an appropriate level of independent oversight to encourage and facilitate bidding by interested parties; and (iii) was reasonable in the circumstances.
21. As contemplated in the Sale Procedures, the Sale Process was implemented by the Applicant, with the assistance of Greenhill, as financial advisor to the Applicant, and under the supervision of the Monitor.
22. Prior to the Sale Process, as described in the Prior Reports, the Affidavit of Michael Nessim sworn February 2, 2024 and the Fourth Nessim Affidavit, the Applicant and Greenhill undertook the Pre-Filing Strategic Process and, the Applicant, with the assistance of Greenhill and the Monitor, conducted the Solicitation Process in the course of this CCAA Proceeding.
23. During the Sale Process and in furtherance of the efforts during the Pre-Filing Strategic Process and the Solicitation Process, significant efforts were taken to solicit interest in the Opportunity from all potentially interested parties, including through the Monitor posting notice and pertinent information regarding the Sale Process on the Monitor’s Website and Greenhill contacting financial and strategic parties that it believed may be interested in exploring the Opportunity.
24. The Monitor was involved in supervising and monitoring the Sale Process, including:
 - (a) uploading a copy of the Sale Process and related information on the Sale Process to the Monitor’s Website;

⁸ Capitalized terms used herein but not otherwise defined have the meaning ascribed to them in the Sale Process Order.

- (b) consulting and engaging with Greenhill and the Applicant in connection with its solicitation efforts and outreach to financial and strategic parties, including interested parties identified in the prior Solicitation Process;
 - (c) together with Greenhill, assisting the Applicant in preparing a template subscription agreement and template asset purchase agreement for the VDR to be used by Bidders in submitting a Bid in the Sale Process;
 - (d) assisting and monitoring Greenhill and the Applicant's communication and engagement with potential Bidders in the Sale Process; and
 - (e) receiving and holding the cash deposit received in trust in connection with the Subscription Agreement (as described below).
25. On the Bid Deadline, Tacora received only one Bid, being the Bid submitted by the Purchasers in the form of a subscription agreement accompanied by, among other things, a deposit and the Support Agreement.
26. Following the Bid Deadline, Greenhill and counsel to the Applicant, in consultation with the Monitor and its counsel, reviewed and assessed the submitted subscription agreement. The Monitor and its counsel participated in several calls with the Applicant's counsel, Greenhill, the Applicant and the Purchasers to provide feedback with respect to their Bid, ask clarifying questions and negotiate certain terms, which discussions led to certain amendments to the Bid.
27. For the reasons discussed below, and following deliberations of the Board, the Subscription Agreement was executed by the parties thereto.

Claims Procedure⁹

28. The Claims Procedure included a negative notice process for all Known Claimants whereby the Monitor sent Notices of Known Claim based on the Applicant's books and records and any other Unknown Claimants were required to file Proofs of Claim.
29. As noted in the Tenth Report, in accordance with the Claims Procedure Order, the Monitor has recorded and categorized the Notices of Disputes and Proofs of Claim received to date.

⁹ Capitalized terms used and not defined in this subsection have the meanings ascribed thereto in the Claims Procedure Order.

30. The Monitor and the Applicant have worked to reconcile certain of the Claims, and an updated summary of the Claims filed to date by the Claims Bar Date by category is as follows:

Claim Type	Unsecured	Secured	Total (CAD)
Pre-Filing	\$ 85,137,053	\$ 506,239,684	\$ 591,376,737
Restructuring	\$ 679,626,749	\$ -	\$ 679,626,749
D&O	\$ -	\$ -	\$ -
Total	\$ 764,763,802	\$ 506,239,684	\$ 1,271,003,486

Claim Type	Unsecured	Secured	Total
Pre-Filing	239	12	251
Restructuring	3	-	3
D&O	-	-	-
Total	242	12	254

31. The Monitor continues to analyze the Notices of Disputes and Proofs of Claims and engage in discussions with stakeholders. The summary above remains subject to ongoing change as Claims continue to be reconciled and finalized as part of the Claims Procedure.
32. The Monitor received one Notice of Dispute after the applicable Claims Bar Date (the “**Late NOD**”). The Monitor is currently evaluating the Late NOD and will provide an update to this Court if and when relevant.

Aequor Motion

33. On July 11, 2024, the Applicant received notice of a motion (the “**Aequor Motion**”) filed in a proceeding commenced under chapter 11 of title 11 of the United States Code by Aequor Mgt, LLC and Aequor Holdings, LLC (“**Aequor Holdings**” and together, “**Aequor**”). Aequor Holdings is an indirect equity holder in Tacora through its holdings in Proterra M&M MGCA Cooperatief U.A. Pursuant to Bankruptcy Rule 2004 of the United States Code, the Aequor Motion sought to authorize Aequor to conduct an examination and compel document production by Tacora Resources LLC (“**Tacora U.S.**”), a U.S. subsidiary of the Applicant. The Aequor Motion does not directly seek any relief directly against the Applicant. However, the relief sought against Tacora U.S. (and a similar motion brought against Cargill Incorporated) is purported to be in furtherance of a potential claim against the Applicant, its management and potentially others. Further, as set out in the Third Vuong Affidavit, the Monitor understands that Tacora U.S. has no material assets or liabilities.
34. On July 16, 2024, counsel to the Applicant sent a letter to Aequor (the “**July 16 Letter**”), among other things, reiterating that any proceeding or enforcement process against or in respect of the Applicant is subject to the stay of proceedings in effect until July 29, 2024, subject to further

extension by the Court, and advising Aequor of the Court's issuance of the Claims Procedure Order and the related passing of the Claims Bar Date of May 31, 2024. A copy of the July 16 Letter is attached as Exhibit "D" to the Third Vuong Affidavit. As of the date of this report, the Monitor has not received a claim in the Claims Process from Aequor.

35. On July 17, 2024, counsel to Aequor responded to the July 16 Letter to counsel to the Applicant, confirming that: (i) the Aequor Motion solely sought relief in respect of Tacora US (which relief was not extended to Tacora); (ii) the relief sought in the Aequor Motion had been granted pursuant to an order of the United States Bankruptcy Court for the Eastern District of Texas, Tyler Division (the "**Tacora US Production Order**"); and (iii) Aequor intended to proceed in accordance with the relief granted in the Tacora US Production Order. A copy of the Tacora US Production Order is attached hereto as Appendix "C".

THE TRANSACTIONS¹⁰

36. The effect of the Transactions, if approved by the Court, is to permit the Purchasers to acquire Tacora's business and assets on a "free and clear basis" and for the Applicant and Cargill to enter into an amended Offtake Agreement (the "**Amended Offtake Agreement**") and iron ore onshore purchase agreement with Cargill (the "**Amended Cargill OPA**") as well as a new margin facility, each effective upon Closing of the Transactions. The Transactions contemplated by the Subscription Agreement have been structured as a "reverse vesting" transaction whereby:
- (a) the Purchasers will subscribe for and purchase various securities of Tacora with the Existing Equity of Tacora being cancelled and terminated. As a result, the Purchasers will become the sole shareholders of Tacora;
 - (b) all Excluded Assets, Excluded Contracts, Excluded Liabilities and Claims in respect of any Senior Priority Notes, Senior Secured Notes and the APF (other than those Claims satisfied pursuant to the terms of the Subscription Agreement) will be transferred and "vested out" of Tacora to a new corporation to be incorporated by Tacora in advance of the Closing Date ("**ResidualCo**"). Following closing of the Transactions, ResidualCo will become an Applicant in this CCAA Proceeding. As set out in the Subscription Agreement:
 - (i) such "Excluded Liabilities" include: (A) all Claims of or against the Applicant immediately prior to Closing Time, other than Assumed Liabilities; (B) pre-filing

¹⁰ Capitalized terms used herein but not otherwise defined have the meanings ascribed to them in the Subscription Agreement.

Claims; (C) Claims relating to any change of control provision that may arise in connection with the Transactions; (D) Claims relating to or under the Excluded Contracts and Excluded Assets; (E) and Liabilities for Employees whose employment with the Applicant or its Affiliates is terminated on or before Closing and all liabilities to or in respect of the Applicant's Affiliates; and

- (ii) such "Excluded Assets" are expected to include (i) all rights, covenants, obligations and benefits in favour of ResidualCo under the Subscription Agreement that survive Closing; and (ii) those Excluded Assets listed in Schedule "D" to the Subscription Agreement;
- (c) in connection with the Subscription Agreement, among other contracts, the Cargill Offtake Agreement and the Iron Ore Stockpile Purchase Agreement between the Applicant and Cargill (the "**Cargill OPA**") will be vested out to ResidualCo as an Excluded Contract and the Applicant and Cargill will enter into the Amended Offtake Agreement and Amended Cargill OPA, on similar terms as the Cargill Offtake Agreement and the Cargill OPA, respectively, each with certain amendments, as set out below.

37. A copy of the Subscription Agreement is attached as Exhibit "A" to the Third Vuong Affidavit.

The Subscription Agreement

38. The key commercial terms of the Subscription Agreement are as follows:

- (a) **Investors:** the "Purchasers" under the Subscription Agreement are comprised of Millstreet, OSP and Cargill. The Subscription Agreement also includes provisions to expand the Purchasers to include Other New Equity Investors upon execution of the Subscription Agreement, as described below.
- (b) **New Securities:** the Subscribed Shares, New Warrants and Unsecured Takeback Notes will be issued in accordance with the Closing Sequence on the Closing Date.
- (c) **Acquired Assets:** the Retained Assets, consisting of all of the assets owned by the Applicant as of the date of the Subscription Agreement and any assets acquired by the Applicant up to and including Closing, including the Mining Rights, Mineral Tenures, Owned Real Property, Retained Contracts, Permits and Licenses and Books and Records, which, for greater certainty, shall not include the Excluded Liabilities, Excluded Assets or

the Excluded Contracts, or the Claims in respect of the Senior Priority Notes or Senior Secured Notes, all of which shall be transferred to ResidualCo.

- (d) **Subscription Price:** the Total Transaction Value shall be an amount equal to the aggregate of: (i) Cash Consideration being the New Equity Offering Initial Cash Consideration¹¹ and the New Equity Offering Retained Cash Consideration,¹² which shall be paid and satisfied in consideration for the Subscribed Shares; and (ii) the assumption of Assumed Liabilities, being an amount equivalent to the Assumed Liabilities which the Purchasers shall cause the Applicant to retain, on the Closing Date and in accordance with the Closing Sequence.
- (e) **Deposit:** a Deposit totalling \$16 million was paid to the Monitor in trust on July 12, 2024 in accordance with the Sale Process.
- (f) **Other New Equity Investors:** up until the date that is five Business Days prior to the anticipated Closing Date, Other New Equity Investors, being any Person other than the Purchasers or a Cargill Designee may, subject to acceptance by the Purchasers, subscribe for New Common Shares.
- (g) **Target Closing Date and Outside Date:** the Target Closing Date and Outside Date are August 30, 2024 and October 10, 2024 respectively (or such other date as Tacora (with the consent of Monitor) and the Purchasers may agree in writing).
- (h) **Repayment Obligations:** the Subscription Agreement provides that the New Equity Offering Initial Cash Consideration shall be paid to the Monitor and shall be used by the Monitor to pay, on behalf of the Applicant, all (i) amounts owing to the Monitor and its legal counsel; (ii) the DIP Obligations; (iii) amounts owing pursuant to the Existing Cargill Margin Facility; (iv) the Applicant's applicable advisors' expenses (including financial advisor and legal counsel fees) solely to the extent that such expenses are subject to CCAA Charges that rank ahead of the DIP Charge, and expenses of the Purchasers (including the Purchasers' financial advisor and legal counsel fees) and any other exit costs and charges

¹¹ The New Equity Offering Initial Cash Consideration is an amount equal to (i) the DIP Obligations, (ii) amounts payable on closing under the Existing Cargill Margin Facility; (iii) the Cost Reimbursement Amount; to the extent not waived thereunder and (iv) all advisors' expenses of Tacora and the Monitor (including advisor and legal counsel fees) that are secured by CCAA Charges that rank ahead of the DIP Charge, and advisors' fees and expenses of each Eligible Equity Investor.

¹² The New Equity Offering Retained Cash Consideration is an amount equal to \$175,000,000 (or if the Purchasers determine that additional cash is required on Closing, such higher amount as determined by the Purchasers but not to exceed \$250,000,000) less the New Equity Offering Initial Cash Consideration, subject to adjustment under Section 2.4(b) of the Subscription Agreement, which amount shall become a Retained Asset of Tacora.

as directed by the Purchasers, all in accordance with the Closing Sequence and the Approval and Reverse Vesting Order. The payment to Cargill of the amounts owing under the Existing Cargill Margin Facility are being made in consideration for Cargill entering into the Subscription Agreement. The Purchasers may, in the alternative, determine that a payment in the same amount shall be made to Cargill not specifically in repayment of the Existing Cargill Margin Facility but otherwise as a payment to Cargill in connection with the Transactions and this Agreement.

- (i) **Employees:** following the Closing Date, the Applicant will continue to employ the Employees on the same terms and conditions as they currently enjoy (except in respect of change of control payments for senior management, which amounts shall be waived or shall be Excluded Liabilities). The Applicant will remain subject to any collective agreement and the Purchasers will inherit all obligations and liabilities associated with any collective agreement which applies to the Employees. All Claims relating to liabilities for employees whose employment with the Applicant or its Affiliates is terminated on or before Closing are an Excluded Liability under the Subscription Agreement.
- (j) **Assumed Liabilities:** under the Subscription Agreement, the Purchasers will cause the Applicant to retain (in accordance with the Closing Sequence): (i) certain Liabilities relating to grievances filed under the collective agreement between the Applicant and the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union (United Steel Workers) executed on January 11, 2023; (ii) substantially all Pre-Filing Trade Amounts and royalty obligations of the Applicant (iii) Post-Filing Trade Amounts on terms and amounts to be agreed by the Applicant, the Purchasers, and any applicable counterparties; (iv) Liabilities of the Applicant relating to the Retained Assets arising from and after the Closing Time; and (v) all Liabilities of the Applicant under the Retained Contracts and Permits and Licenses arising from and after the Closing Time.
- (k) **Schedules to the Subscription Agreement:** pursuant to the Subscription Agreement, the following Schedules to the Subscription Agreement are subject to further revision as follows:

Schedule	Date for Finalization
Schedule “B” - Assumed Liabilities	may be amended, supplemented or restated by the Purchasers up to two (2) Business Days prior to the Closing Date.
Schedule “C” - Encumbrances to be Discharged	may be amended, supplemented or restated by the Purchasers up to two (2) Business Days prior to the hearing of the motion for the Approval and Reverse Vesting Order, or such other date as may be agreed to by the Purchasers and Tacora
Schedule “D” - Excluded Assets	may be amended, supplemented or restated by the Purchasers up to two (2) Business Days prior to the Closing Date
Schedule “E” - Excluded Contracts	an amended list may be provided by the Purchasers up to two (2) Business Days prior to the Closing Date
Schedule “F” - Excluded Liabilities	may be amended, supplemented or restated by the Purchasers up to two (2) Business Days prior to the Closing Date
Schedule “K” - Permitted Encumbrances	an amended list may be agreed to by the Purchasers, Tacora and the Monitor prior to the granting of the Approval and Reverse Vesting Order
Schedule “L” - Pre-Filing Trade Amounts	may be amended, supplemented or restated by the Purchasers up to two (2) Business Days prior to the Closing Date, provided that such amendment may not result in the aggregate amounts exceeding a maximum amount to be agreed upon by the Purchasers, in consultation with Tacora and the Monitor
Schedule “M” - Retained Contracts	may be amended, supplemented or restated by the Purchasers up to the Closing Date

- (1) **Administrative Expense Reserve:** on Closing, the Monitor shall be directed to retain a portion of the New Equity Offering Initial Cash Consideration in trust in an amount to be agreed upon between the Purchasers, the Applicant and the Monitor on or before July 26, 2024 (or such other date as agreed to by the Purchasers, the Applicant and the Monitor), which amount shall be sufficient to satisfy, without duplication of the amounts relating to the Repayment Obligations noted above: (i) the reasonable and documented fees and costs of the Monitor and its professional advisors, and the professional advisors of ResidualCo, in each case for services performed prior to, on and after the Closing Date relating directly or indirectly to the CCAA Proceedings or the Subscription Agreement, including, without

limitation, costs required to wind down and/or dissolve and/or bankrupt ResidualCo and costs and expenses required to administer the Excluded Assets, Excluded Contracts, Excluded Liabilities and ResidualCo; (ii) amounts owing in respect of obligations secured by the CCAA Charges that rank ahead of the DIP Charge and are not paid or assumed on Closing, which amounts shall be paid exclusively from the Administrative Expense Reserve; and (iii) costs related to a premium for a run-off policy on such terms (including, for certainty, the amount of the premium), as agreed to by the Purchasers and the Applicant, each acting reasonably.

- (m) **Releases:** the Subscription Agreement provides for certain contractual releases between the Parties in favour of (i) the Applicant, and ResidualCo, and their respective present and former directors, officers, employees, legal counsel and advisors, (ii) the Monitor and its legal counsel, and their respective present and former directors, officers, partners, employees and advisors, (iii) the Trustee and their respective present and former directors, officers, partners, employees and advisors, and (iv) the Purchasers and any Other New Equity Investors, their affiliates and their respective present and former directors, officers, employees, legal counsel and advisors (collectively, the “**Released Parties**”), provided that the contractual releases contained in the Subscription Agreement do not provide releases for: (i) fraud or wilful misrepresentation; (ii) claims relating to any parties obligations pursuant to the Subscription Agreement, any Closing Deliverable or the Approval and Reverse Vesting Order; and (iii) only in the case of the Purchasers and Other New Equity Investors, any Released Claims against ResidualCo in respect of the Purchasers’ Senior Secured Notes and/or Senior Priority Notes. Additional requested releases are contained in the Approval and Reverse Vesting Order, as described further below.
- (n) **Revision of the Cargill Offtake Agreement:** as further described in the following section, the Subscription Agreement contemplates replacing the Cargill Offtake Agreement and the Cargill OPA with amended versions thereof.
- (o) **Pre-Closing Reorganizations:** the Subscription Agreement provides that, as close as reasonably practicable to the Closing Date and upon request of the Purchasers, and with consent of Tacora and the Monitor, Tacora shall amend the Senior Secured Notes and Senior Priority Notes to include a right for Senior Secured Noteholders and Senior Secured Priority Noteholders to convert their Senior Secured Notes and Senior Secured Priority Notes into Existing Common Shares and perform such reorganization of its corporate structure, capital structure, business, operations and assets or such other transactions as the

Purchasers' may request, in each case subject to Tacora being satisfied that any such amendment would not materially impair Tacora or the Purchasers' ability to consummate the Transactions, have adverse tax consequences or impose any liability on the Monitor or any director of the Applicant.

- (p) **Set Off on Closing:** the Closing Sequence contemplates that Cargill shall set-off a portion of the post-filing amounts owing by the Applicant under the APF between the Applicant and Cargill against the pre-filing amounts owing by Cargill to the Applicant under the Cargill Offtake Agreement in the approximate amount of \$12.5 million.
- (q) **Unanimous Shareholder Agreement:** the Subscription Agreement contemplates the entering into of the Unanimous Shareholder Agreement between the Applicant, the Purchasers and any holders of New Common Shares at the Closing Time.
- (r) **Key Conditions to Closing:** the Closing of the Transactions is conditional on, among other things: (i) Court approval of the Approval and Reverse Vesting Order which becomes a Final Order (the Subscription Agreement provides for an Outside Date of October 10, 2024 for the issuance and entering of the Approval and Reverse Vesting Order); (ii) receipt of each of the Transaction Regulatory Approvals; (iii) the Rail Agreement having been renegotiated on terms and conditions acceptable to the Purchasers, acting reasonably; and (iv) the Mining Rights Acknowledgement having been delivered by the Minister of Industry, Energy and Technology of Newfoundland and Labrador.
- (s) **Alternative Transaction Structures:** the Subscription Agreement contemplates that:
 - (i) the Purchasers and the Applicant shall have the option, in their reasonable discretion and subject to consultation with the Monitor, to proceed with implementing the Transactions pursuant to a CCAA plan of compromise or arrangement, instead of pursuant to an Approval and Reverse Vesting Order, in which case the Parties shall work together, in good faith, to amend the Subscription Agreement and negotiate such related agreements and documents as required, provided that such alternative implementation process shall not alter the economic terms of the Transactions or, in the view of the Purchasers and the Applicant acting reasonably and in consultation with the Applicant and the Monitor, be likely to result in an inability for the Parties to complete the Transactions by the Closing Date;

- (ii) to the extent the proposed Approval and Reverse Vesting Order is not granted by the Outside Date, the structure of the Transactions shall be converted to contemplate an asset purchase agreement and approval and vesting Order on terms consistent with the material terms of the Subscription Agreement, provided that:
 - (i) the transfer and assignment of the Mining Rights upon the Closing Date shall remain a condition to any transaction; and
 - (ii) the Purchasers and the Applicant will be required to negotiate, in good faith, a reduction in the consideration payable in the amount of the Pre-Filing Trade Amounts that form part of the Assumed Liabilities, to reflect any decrease in value arising from the adverse impact to the tax attributes that would be acquired pursuant to the amended structure of the Transactions or as a result of additional costs that may be incurred in connection with an asset purchase; and
 - (iii) if the conditions to Closing are not capable of being satisfied by the Outside Date and neither of the foregoing alternative structures are available or otherwise effected, Cargill, in its capacity as DIP Lender, shall subscribe for and purchase the Subscribed Shares in exchange for an amount equivalent to all outstanding obligations owing by the Applicant to the DIP Lender pursuant to the DIP Agreement at the applicable time, which shall be satisfied by the DIP Lender credit bidding such amounts as consideration for the Subscribed Shares.
 - (t) **Cost Reimbursement Amount:** the Subscription Agreement contemplates: (i) the Applicant reimbursing the Purchasers the Cost Reimbursement Amount up to the maximum aggregate amount of \$3 million in connection with their documented out-of-pocket third party expenses, payable upon the earlier of the Closing Date and termination of the Subscription Agreement in accordance with the terms thereof; and (ii) the inclusion of a provision in the Approval and Reverse Vesting Order granting the Purchasers a Court-ordered charge against the assets and property of the Applicant for the Cost Reimbursement Amount, ranking immediately behind the DIP Charge and in priority to all other security interests. The Cost Reimbursement Amount can be waived by the Purchasers.
39. On the Closing Date, certain steps (collectively, the “**Closing Sequence**”) are to be taken to effectuate the Transactions to proceed in an efficient and tax-efficient manner.

The Revised Offtake Agreement

40. The Support Agreement contemplates, upon Closing of the Transactions and the delivery of the Monitor's Certificate that (i) the Cargill Offtake Agreement and Cargill OPA will be vested out to ResidualCo; and (ii) Tacora will enter into the Amended Offtake Agreement and Amended Cargill OPA with Cargill. Tacora's obligations under the Amended Offtake Agreement and Amended Cargill OPA will be secured pursuant to an intercreditor agreement between the Applicant and Cargill.
41. The Monitor understands that the Amended Offtake Agreement and Amended Cargill OPA will be consistent with the Cargill Offtake Agreement and Cargill OPA with certain revised terms that are more favourable to Tacora.

APPROVAL AND REVERSE VESTING ORDER

Overview

42. As noted above, the Subscription Agreement contemplates implementing the Transactions through a reverse vesting structure in accordance with the requested Approval and Reverse Vesting Order.
43. As described in the Fourth Report, in support of a proposed approval and reverse vesting order being sought at an earlier point in this CCAA Proceeding, the Monitor set out the reasons why an approval and reverse vesting order structure was necessary and appropriate in the circumstances of this CCAA Proceeding. Those reasons, and the underlying rationale in support thereof, remain equally applicable in the circumstances and include, in summary:
 - (a) the preservation of the Permits and Licenses (as defined in the Subscription Agreement) issued by various government authorities, which Permits and Licenses are collectively required for the Applicant, and any purchaser thereof, to perform exploration work on various parts of the Scully Mine and would impose significant delay and expense if required to be transferred otherwise; and
 - (b) the preservation of tax attributes in the approximate amount of \$665.1 million.
44. As described above, the Subscription Agreement provides for alternative structures through which the Transactions may be implemented if the Approval and Reverse Vesting Order is not granted or otherwise becomes unavailable in the circumstances. However, the Monitor is of the view that the implementation of the Transactions through the granting of the Approval and Reverse Vesting Order is the optimal structure as it will maximize the value available for Tacora's stakeholders

thereunder, namely through the preservation of Tacora's value for the reasons discussed directly above and previously discussed in the Fourth Report.

45. As described above, the Monitor has considered the potential impact on stakeholders that the Approval and Reverse Vesting Order structure may have. In the circumstances, the Monitor's view is that any potential prejudice to any stakeholder is outweighed by the benefits of the Transactions to stakeholders as a whole. These stakeholders include Cargill, the Senior Priority Noteholders, the Senior Secured Noteholders, the Employees, counterparties to Retained Contracts, holders of Pre-Filing Trade Amounts, holders of Post-Filing Trade Amounts and the Labrador West community.

Releases

46. The proposed Approval and Reverse Vesting Order includes releases in favour of the Released Parties.
47. The proposed Releases contemplate that the Released Parties are to be released from any and all present and future claims of any nature or kind whatsoever based in whole or in part on any act or omission, transaction or dealing or other occurrence existing or taking place on or prior to delivery of the Monitor's Certificate in connection with the Approval and Reverse Vesting Order, the CCAA Proceeding, the Subscription Agreement, the closing documents and/or the consummation of the Transactions (the "**Released Claims**"). Released Claims under the proposed Approval and Reverse Vesting Order do not include (i) any claim against ResidualCo that is in respect of the Purchasers' Senior Secured Notes and/or Senior Priority Notes, (ii) any claim that is not permitted to be released pursuant to section 5.1(2) of the CCAA, or (iii) any claim resulting from fraud or wilful misconduct.
48. The Monitor understands that the proposed Release provisions are essential to the Transactions and the Subscription Agreement. The Monitor also understands that the proposed Releases in favour of the Directors and Officers is necessary to allow for the release of the Directors' Charge, which in turn is necessary to allow the Transactions to close.
49. In the view of the Monitor, having considered the facts of the situation, each of the Released Parties contributed meaningfully and was necessary to Tacora's efforts to address its financial difficulties, the Sale Process, the CCAA Proceeding, and the Transactions and each of the Released Parties was a necessary part of the successful restructuring.
50. Accordingly, the Monitor is of the view that the proposed Releases are reasonable and not overly broad in the circumstances, and supports the relief requested by Tacora.

Summary

51. In considering the Applicant's request for approval of the Subscription Agreement and the Transactions and the terms of the requested Approval and Reverse Vesting Order, the Monitor has considered the factors set out in section 36(3) of the CCAA:

- (a) **The process leading to the Transactions was reasonable in the circumstances:** As described in the Ninth Report, the Monitor is of the view that the Sale Process is consistent with the principles of section 36 of the CCAA and provided for a broad, open, fair and transparent process with an appropriate level of independent oversight, that it encouraged and facilitated bidding by interested parties and, in light of the significant prior solicitation efforts of the Applicant, Greenhill and the Monitor, was reasonable in the circumstances. The Monitor has been involved in carrying out the Sale Process as contemplated by the Sale Process Order and to date, nothing has come to the Monitor's attention that causes the Monitor concern with the Sale Process.
- (b) **The Court and Monitor approved the Sale Process:** As described above, the Transactions are the culmination of substantial efforts by Tacora, Greenhill and the Monitor since March 2023 as part of the Pre-Filing Strategic Process, the Solicitation Process and the Sale Process. The Sale Process was approved by the Court and no party opposed the granting of the Sale Process Order or the substance of the Sale Process.
- (c) **The Transactions are, in the view of the Monitor, more beneficial to the creditors than a sale or disposition under a bankruptcy:** The Subscription Agreement includes limited conditions to Closing, including limited expected regulatory approvals, and a firm, irrevocable commitment to finance the Transactions. The Purchasers also paid a significant deposit. The Transactions, if approved and closed, will, among other things,
 - (i) preserve the ongoing employment of all of Tacora's approximately 463 employees and maintain critical relationships with all or virtually all of its suppliers of goods and services;
 - (ii) result in an improved capital structure for the Applicant by (A) deleveraging Tacora's capital structure such that there will be no pre-filing indebtedness owing post-Closing and Tacora will attempt to raise \$100 million of new money senior priority notes and (B) eliminating Tacora's debt service in respect of pre-filing indebtedness, which was \$21.2 million prior to the Filing Date;

- (iii) repay the amounts owing under the Existing Cargill Margin Facility and provide for a new Cargill Margin Facility, thereby providing working capital for necessary operating costs and capital expenditures;
- (iv) provide for a partial repayment (by way of set-off) of approximately \$12.5 million of Tacora's secured debt owing to Cargill under the APF;
- (v) provide for the assumption of, among other things, substantially all Pre-Filing Trade Amounts¹³ and royalty obligations of Tacora;
- (vi) provide for the establishment of a new offtake agreement and iron ore onshore purchase agreement with more favourable terms to Tacora; and
- (vii) if the conditions to Closing are not satisfied by the contemplated Outside Date, and subject to certain terms, provide terms for the DIP Lender to subscribe for and purchase shares of Tacora in exchange for the DIP Obligations at the applicable time.

Comparatively, a bankruptcy of Tacora would lead to significantly increased claims by, among others, employees, suppliers, regulators and contract counterparties. Along with substantially increased claims, the loss of value associated with a cessation of Tacora's business as a going concern would, in the Monitor's view, result in a significant reduction in recovery for creditors. A bankruptcy would also be expected to have a significant negative impact on Tacora's employees and the Labrador West community generally.

- (d) **The creditors were consulted:** As described above, stakeholders were consulted in the development of the Sale Process and no substantive objections to the terms of the Sale Process were raised.
- (e) **The effects of the Transactions on the creditors and other interested parties:** As noted above, the Monitor is of the view that the Transactions are of significant benefit to the Applicant and the vast majority of its stakeholders.
- (f) **The consideration is reasonable and fair, taking into account the Applicant's market value:** The Subscription Agreement was the sole Bid received in the Sale Process. The

¹³ As discussed above, the Pre-Filing Trade Amounts may be amended, supplemented or restated by the Purchasers up to two (2) Business Days prior to the Closing Date, provided that such amendment may not result in the aggregate amounts exceeding a maximum amount to be agreed upon by the Purchasers, in consultation with Tacora and the Monitor

Monitor has no evidence to suggest that the value provided under the Subscription Agreement is not fair and reasonable. The decrease in potential recovery for unsecured creditors as compared to the initial Successful Bid in the Solicitation Process is not unexpected considering the additional DIP financing required to date and to fund operations through to the Closing of the Transactions.

52. Accordingly, at this time and based on current information available to the Monitor, the Monitor supports the relief requested by the Applicant in approving the Subscription Agreement and the Transactions contemplated thereby as requested in the Approval and Reverse Vesting Order.

THIRD AMENDED DIP AGREEMENT¹⁴

53. As described in the Third Vuong Affidavit, Tacora requires additional DIP financing while it takes the necessary measures to implement the Transactions. The Monitor has reviewed the Third Vuong Affidavit and is of the view that additional DIP financing is necessary and appropriate in the circumstances.
54. The terms of the Third Amended DIP Agreement are consistent with the terms of the Second Amended DIP Agreement, as discussed in the Eighth Report, with the following additional material amendments:
- (a) the DIP Facility Limit is increased to \$160 million from the \$125 million currently available pursuant to the Second Amended DIP Agreement. Tacora and the DIP Lender, with the consent of the Monitor, may further agree to adjust the DIP Facility Limit and the Post-Filing Margin Advances Limit (as described below), provided the aggregate does not exceed \$180 million at any time;
 - (b) the incremental additional availability under the DIP Facility Limit pursuant to the Third Amended DIP Agreement will be funded by the Approved Participants, being Millstreet and OSP, on a 50/50 basis;
 - (c) the increase of the limit in the Onshore Agreement from 400,000DMT to 500,000DMT is further extended from June 24 2024 until September 30, 2024;
 - (d) the Post-Filing Margin Advances Limit is reduced to \$20 million in the aggregate (as such amount may be adjusted from time to time in accordance with the Third Amended DIP

¹⁴ Terms not otherwise defined in this section have the meanings ascribed to them in the Third Amended DIP Agreement.

Agreement) from the prior amount of \$25 million. Consistent with the Second Amended DIP Agreement, the Third Amended DIP Agreement still provides that any Margin Advances required to be paid by Tacora under the Cargill Offtake Agreement in excess of the Post-Filing Margin Advances Limit will, without further notice or action by Cargill or any other Person, continue to form part of the DIP Obligations and will be secured by the DIP Charge without any further notice or action by Cargill;

- (e) the Third Amended DIP Agreement requires the Applicant to reimburse each of the DIP Lender and Tacora's senior secured noteholders that are party to the Support Agreement for additional reasonable and documented out-of-pocket legal and financial advisory fees and expenses incurred in connection with the CCAA Proceeding from and after June 24, 2024; and
 - (f) in addition to the Initial Exit Fee and the Subsequent Exit Fee in the amounts of \$2.25 million and \$800,000, respectively, the Third Amended DIP Agreement contemplates an Incremental Exit Fee, in cash, in an amount of \$600,000, payable by the Applicant. The amount of the Incremental Exit Fee, in addition to the Subsequent Exit Fee, will remain fixed and will not be adjusted notwithstanding any funding of Excess Margin Amounts under the DIP Facility agreed to by Tacora, the DIP Lender and the Monitor. Interest will continue to be payable on each of the Initial Exit Fee and Subsequent Exit Fee, as well as the Incremental Exit Fee.
55. The above noted terms are set out in the Third Amended DIP Agreement for which the Applicant is seeking this Court's approval. A redline showing the differences between the Second Amended DIP Agreement and the Third Amended DIP Agreement is attached as Exhibit "F" to the Third Vuong Affidavit.
56. The Monitor is of the view that the exit fees are reasonable based on the circumstances of this CCAA Proceeding and consistent with the Second Amended DIP Agreement.
57. The Monitor notes that Tacora is in critical need of additional financing to continue operating while it effects the Transactions, if approved, and seeks to emerge from this CCAA Proceeding in a timely manner.
58. Based on the foregoing, the Monitor respectfully recommends that the Court grant the Applicant's request for approval of the Third Amended DIP Agreement.

RECEIPTS AND DISBURSEMENTS FOR THE 8-WEEK PERIOD ENDED JULY 14, 2024

59. Tacora’s actual negative net cash flow from operations for the 8-week period from May 20, 2024, to July 14, 2024, was approximately \$16.4 million, compared to a forecast negative net cash flow from operations of approximately \$31.3 million, as noted in the June 2024 Forecast attached to the Ninth Report as Appendix “C” thereto, representing a positive variance of approximately \$15.0 million as summarized below:

	Actual	Forecast	Variance
	\$000	\$000	\$000
Total Receipts	43,430	45,302	(1,872)
Operating Disbursements			
Employees	(10,438)	(10,503)	65
Mine, Mill and Site Costs	(8,733)	(13,337)	4,604
Plant Repairs and Maintenance	(17,309)	(19,108)	1,799
Logistics	(14,714)	(18,787)	4,072
Capital Expenditures	(6,833)	(12,397)	5,564
Other	(1,763)	(2,482)	719
Total Operating Disbursements	(59,791)	(76,615)	16,824
Net Cash from Operations	(16,360)	(31,312)	14,952
Restructuring Legal and Professional Costs	(3,974)	(6,543)	2,570
KERP	-	-	-
Net Cash Flow	(20,334)	(37,856)	17,522
Opening Cash Balance	27,155	27,155	-
Net Receipts/(Disbursements)	(20,334)	(37,856)	17,522
DIP Advances/(Repayments)	25,000	25,000	-
DIP Fees and Interest	-	-	-
Closing Cash Balance	31,821	14,299	17,522

60. Explanations for the key variances are as follows:

- (a) negative variance in Total Receipts of approximately \$1.9 million is permanent in nature and primarily relates to unforecast MTM cash settlements, lower than forecast trains pertaining to shutdowns resulting from certain compliance requirements and recent forest fires;
- (b) positive variance in Mine, Mill and Site Costs of approximately \$4.6 million is primarily due to lower than forecast outflows as Tacora proactively managed its disbursements during the period. It is expected that a portion of this variance may reverse in future weeks;
- (c) positive variance in Plant Repairs and Maintenance of approximately \$1.8 million is primarily due to lower than forecast outflows as Tacora proactively managed its

disbursements during the period. It is expected that a portion of this variance may reverse in future weeks;

- (d) positive variance in Logistics of approximately \$4.1 million is primarily due to lower than forecast outflows as Tacora proactively managed its disbursements during the period. It is expected that a portion of this variance may reverse in future weeks;
- (e) positive variance in Capital Expenditures of approximately \$5.6 million is primarily due to lower than forecast outflows as Tacora proactively managed its capital expenditures during the period. It is expected that a portion of this variance may reverse in future weeks; and
- (f) positive variance in Other of approximately \$0.7 million primarily relates to lower than forecast outflows as Tacora proactively managed its disbursements during the period. It is expected that a portion of this variance may reverse in future weeks.

STAY EXTENSION

61. The Stay Period will expire on July 29, 2024. The continuation of the stay of proceedings is necessary to allow time for Tacora to close the proposed Transactions. Accordingly, Tacora is seeking a further extension of the Stay Period to October 7, 2024.

62. As is demonstrated in the July 2024 Forecast attached to this Eleventh Report as Appendix “B”, Tacora is forecast to have sufficient liquidity to fund its obligations and the costs of the CCAA Proceeding through the end of the extended Stay Period. The July 2024 Forecast is summarized below:

	\$000
Total Receipts	51,696
Operating Disbursements	
Employees	(15,423)
Mine, Mill and Site Costs	(24,061)
Plant Repairs and Maintenance	(27,118)
Logistics	(24,966)
Capital Expenditures	(13,722)
Other	(2,578)
Total Operating Disbursements	(107,868)
Net Cash from Operations	(56,172)
Restructuring Legal and Professional Costs	(10,689)
KERP	-
Net Cash Flow	(66,861)
Opening Cash Balance	31,821
Net Receipts/(Disbursements)	(66,861)
DIP Advances/(Repayments)	40,000
DIP Fees and Interest	-
Closing Cash Balance	4,960

63. The Monitor supports extending the Stay Period to October 7, 2024 for the following reasons:
- (a) the Monitor is of the view that the proposed extension of the Stay Period is necessary to provide Tacora sufficient time to close the proposed Transactions;
 - (b) the July 2024 Forecast demonstrates that, subject to its underlying hypothetical and probable assumptions and together with the Third Amended DIP Agreement, if granted, Tacora is forecast to have sufficient liquidity to continue funding its operations during the CCAA Proceeding to October 7, 2024;
 - (c) based on the information presently available, the Monitor believes that creditors will not be materially prejudiced by the proposed extension to the Stay Period; and
 - (d) the Monitor believes that the Applicant has acted, and continues to act, in good faith and with due diligence and that circumstances exist that make an extension of the Stay Period appropriate.

APPROVAL OF THE FEES AND ACTIVITIES OF THE MONITOR AND COUNSEL

64. The proposed Stay Extension, DIP, and Fees Approval Order seeks approval of the actions, conduct and activities of the Monitor as set out in this Eleventh Report and the Prior Reports (together, the “**Reports**”). The proposed Stay Extension, DIP, and Fees Approval Order also seeks approval of the fees and disbursements of the Monitor and its counsel, Cassels.
65. As outlined in the Reports, the Monitor and its counsel have played, and continue to play, a significant role in the CCAA Proceeding. The Monitor respectfully submits that its actions, conduct, and activities in the CCAA Proceeding have been carried out in good faith and in accordance with the provisions of the Orders issued therein and should therefore be approved.
66. Pursuant to paragraphs 33 and 34 of the ARIO, the Monitor and its counsel shall: (i) be paid their reasonable fees and disbursements, in each case at their standard rates and charges, whether incurred prior to, on, or subsequent to the date of the Initial Order, by the Applicant as part of the costs of the CCAA Proceeding; and (ii) pass their accounts from time to time before this Court.
67. The total fees and disbursements of the Monitor since the commencement of the CCAA Proceeding to July 7, 2024, total \$4,844,088.77, including fees in the amount of \$4,064,501.00, disbursements in the amount of \$147,750.08, and Harmonized Sales Tax (“**HST**”) in the amount of \$631,837.69, as more particularly described in the Affidavit of Jodi Porepa sworn July 22, 2024 (the “**Porepa Affidavit**”), a copy of which is attached hereto as Appendix “D”.

68. The total fees and disbursements of Cassels, including HST, since the commencement of the CCAA Proceeding to July 7, 2024 total \$4,675,224.56, including fees in the amount of \$4,128,370.00, disbursements in the amount of \$9,058.18, and HST in the amount of \$537,796.38, as more particularly described in the Affidavit of Ryan Jacobs sworn July 19, 2024 (the “**Jacobs Affidavit**” and together with the Porepa Affidavit, the “**Fee Affidavits**”), a copy of which is attached hereto as Appendix “E”.
69. The Monitor respectfully submits that the fees and disbursements incurred by the Monitor and its counsel, as described in the Fee Affidavits, are reasonable in the circumstances and have been validly incurred in accordance with the provisions of the ARIO. Accordingly, the Monitor respectfully requests the approval of the fees and disbursements of the Monitor and its counsel as set out in the Fee Affidavits.

MONITOR'S ACTIVITIES

70. The Monitor last reported on its activities in the Ninth Report. In accordance with its duties set out in Orders granted by the Court in this CCAA Proceeding, as well as its prescribed rights and obligations under the CCAA, the activities of the Monitor since the Ninth Report have included the following:
- (a) those activities undertaken by the Monitor as described in the Tenth Report;
 - (b) participating in regular discussions with Tacora, its legal counsel and other advisors, including Greenhill, regarding, among other things, the Transactions, Sale Process, Claims Procedure and communications with stakeholders and business operations;
 - (c) assisting Tacora with communications to employees, suppliers, creditors and other stakeholders;
 - (d) monitoring the cash receipts and disbursements of Tacora;
 - (e) assisting Tacora with updating and extending its cash flow forecasts;
 - (f) assisting Tacora in preparing the regular reporting required under the DIP Agreement;
 - (g) attending meetings of the Board of Directors of Tacora;
 - (h) engaging in discussions with the Purchasers and their respective counsel and advisors;
 - (i) responding to stakeholder enquiries regarding the CCAA Proceeding generally;

- (j) participating in discussions in respect of and attending before the Court at the various case conferences, including on June 26, 2024;
- (k) maintaining and uploading documents to the Monitor's Website; and
- (l) preparing this Eleventh Report.

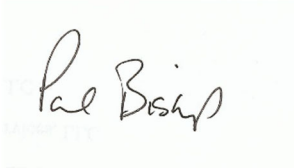
CONCLUSION

71. The Monitor is of the view that the relief requested by the Applicant is necessary, reasonable and justified in the circumstances and supports the requested Approval and Reverse Vesting Order and Stay Extension, DIP, and Fees Approval Order.

The Monitor respectfully submits to the Court this Eleventh Report dated this 22nd day of July, 2024.

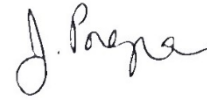
FTI Consulting Canada Inc.

in its capacity as Court-appointed Monitor of
Tacora Resources Inc. and not in its personal or
corporate capacity

A handwritten signature in black ink that reads "Paul Bishop". The signature is written in a cursive style and is placed on a light green rectangular background.

By: _____

Paul Bishop
Senior Managing Director

A handwritten signature in black ink that reads "J. Porepa". The signature is written in a cursive style.

Jodi Porepa
Senior Managing Director

Appendix “A”



ONTARIO SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

COUNSEL SLIP/ENDORSEMENT

COURT FILE NO.: CV-23-00707394-00CL DATE: 26 June 2024

NO. ON LIST: 1

TITLE OF PROCEEDING: **IN THE MATTER OF A PLAN OF COMPROMISE OR
ARRANGEMENT OF TACORA RESOURCES INC**

BEFORE JUSTICE: **KIMMEL**

PARTICIPANT INFORMATION

For Plaintiff, Applicant, Moving Party, Crown:

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For Defendant, Respondent, Responding Party, Defence:

Name of Person Appearing	Name of Party	Contact Info

For Other, Self-Represented:

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ENDORSEMENT OF JUSTICE KIMMEL:

1. The three motions returnable today are adjourned to July 22, 2024.



KIMMEL J.

Appendix “B”

Tacora Resources Inc.

Consolidated Cash Flow Projections

(\$USD in thousands)

Forecast Week Ending	21-Jul-24	28-Jul-24	04-Aug-24	11-Aug-24	18-Aug-24	25-Aug-24	01-Sep-24	08-Sep-24	15-Sep-24	22-Sep-24	29-Sep-24	06-Oct-24	Total	
Forecast Week	[1]	1	2	3	4	5	6	7	8	9	10	11	12	Total
Total Receipts	[2]	4,024	67	(500)	2,990	6,270	5,551	6,656	6,524	6,349	(56)	7,425	6,396	51,696
Operating Disbursements	[3]													
Employees		(2,358)	(486)	(2,155)	(231)	(2,155)	(231)	(2,235)	(231)	(2,155)	(697)	(2,180)	(311)	(15,423)
Mine, Mill and Site Costs		(728)	(6,435)	(1,643)	(1,292)	(2,306)	(1,262)	(3,781)	(962)	(1,600)	(912)	(2,375)	(764)	(24,061)
Plant Repairs and Maintenance		(1,603)	(963)	(1,927)	(2,527)	(2,927)	(3,041)	(2,777)	(3,005)	(2,205)	(2,205)	(2,055)	(1,881)	(27,118)
Logistics		-	-	(4,829)	(1,379)	(1,353)	(1,568)	(1,305)	(5,899)	(1,203)	(1,653)	(1,368)	(4,408)	(24,966)
Capital Expenditures		(312)	(424)	(951)	(1,140)	(1,200)	(1,200)	(1,407)	(1,500)	(1,630)	(1,250)	(1,250)	(1,457)	(13,722)
Other		(293)	(253)	(541)	(155)	(124)	(133)	(205)	(177)	(55)	(55)	(380)	(205)	(2,578)
Total Operating Disbursements		(5,293)	(8,560)	(12,047)	(6,725)	(10,066)	(7,436)	(11,711)	(11,774)	(8,849)	(6,773)	(9,608)	(9,026)	(107,868)
Net Cash from Operations		(1,269)	(8,493)	(12,547)	(3,735)	(3,796)	(1,886)	(5,056)	(5,250)	(2,500)	(6,829)	(2,183)	(2,630)	(56,172)
Restructuring Legal and Professional Costs	[4]	(126)	(1,497)	(506)	(1,871)	(573)	(1,000)	(1,015)	(1,318)	(275)	(275)	(275)	(1,958)	(10,689)
KERP	[5]	-	-	-	-	-	-	-	-	-	-	-	-	-
NET CASH FLOWS		(1,395)	(9,990)	(13,053)	(5,606)	(4,369)	(2,886)	(6,071)	(6,568)	(2,775)	(7,104)	(2,458)	(4,588)	(66,861)
Cash														
Beginning Cash Balance		31,821	30,426	20,436	12,383	16,777	12,408	19,523	13,452	16,884	14,109	12,005	9,548	31,821
Net Receipts/ (Disbursements)		(1,395)	(9,990)	(13,053)	(5,606)	(4,369)	(2,886)	(6,071)	(6,568)	(2,775)	(7,104)	(2,458)	(4,588)	(66,861)
DIP Advances/ (Repayments)	[6]	-	-	5,000	10,000	-	10,000	-	10,000	-	5,000	-	-	40,000
DIP Fees & Interest Payment	[7]	-	-	-	-	-	-	-	-	-	-	-	-	-
Ending Cash Balance		30,426	20,436	12,383	16,777	12,408	19,523	13,452	16,884	14,109	12,005	9,548	4,960	4,960

DIP Opening Balance		127,974	127,974	127,974	133,953	143,953	143,953	153,953	155,054	165,054	165,054	170,054	170,054	127,974
DIP Advances		-	-	5,000	10,000	-	10,000	-	10,000	-	5,000	-	-	40,000
PIK Interest		-	-	979	-	-	-	1,101	-	-	-	-	1,578	3,659
DIP Ending Balance		127,974	127,974	133,953	143,953	143,953	153,953	155,054	165,054	165,054	170,054	170,054	171,633	171,633
Opening Post-Filing Credit Extensions		6,766	6,766	6,766	6,766	6,766	6,766	6,766	6,766	6,766	6,766	6,766	6,766	6,766
Increase/ (Decreases) in Post-Filing Credit Extension		-	-	-	-	-	-	-	-	-	-	-	-	-
Ending Post-Filing Credit Extensions	[8]	6,766	6,766	6,766	6,766	6,766	6,766	6,766	6,766	6,766	6,766	6,766	6,766	6,766
Total DIP Facility Obligations		134,740	134,740	140,719	150,719	150,719	160,719	161,820	171,820	171,820	176,820	176,820	178,398	178,398

Tacora Resources Inc.

Consolidated Cash Flow Projections

Notes to the Consolidated Cash Flow Projections:

- [1] The purpose of the Cashflow Projections is to estimate the liquidity requirements of Tacora Resources Inc. (“Tacora”, or the “Company”) during the forecast period. The forecast above is presented in US Dollars. Any estimates in Canadian dollars have been translated at the average monthly forward fx rate as at July 17, 2024.
- [2] Forecast Total Receipts are based on management’s current expectations regarding productions and vessel shipments of iron ore concentrate (total tonnage) and price indices net of mark to market adjustments. Receipts from operations have been forecast based on current payment terms, historical trends in collections and expected vessel shipment schedules.
- [3] Operating disbursements include the following key categories:
- Forecast Employee Costs are based on historic payroll amounts and future forecast payments.
 - Forecast Mine, Mill and Site Costs primarily include site costs based on forecast activity levels and known commitments including, utilities, fuel, and supplies and consumables.
 - Forecast Plant Repairs and Maintenance costs relate to Scully Mine. Plant repairs and maintenance also includes contract labour at the Scully Mine.
 - Forecast Logistics costs primarily include rail transportation costs as well as port-related payments.
 - Forecast Capital Expenditures include costs related to mine, milling, and other logistics / infrastructure improvements.
 - Forecast Other costs include environmental costs, security and other costs at the Scully Mine and corporate.
- [4] Forecast Restructuring Legal and Professional Costs include legal and financial advisors associated with the CCAA proceedings and are based on estimates.
- [5] Forecast Key Employee Retention Plan (KERP) consistent with the Initial Affidavit.
- [6] Forecast DIP Advances/Repayments are based on funding requirements and maintaining a minimum cash balance throughout the period.
- [7] Accrued monthly interest forecast to be paid in kind (PIK).
- [8] Forecast Post-Filing Credit Extensions reflect Management estimates as at July 18, 2024.

Appendix “C”

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

In re:	§	Chapter 11
	§	
AEQUOR MGT, LLC, ¹	§	Case No. 23-60010
	§	
Debtors.	§	Jointly Administered
	§	

ORDER GRANTING DEBTORS’ MOTION FOR RULE 2004 EXAMINATION OF TACORA RESOURCES, LLC

CAME ON FOR CONSIDERATION the *Debtors’ Motion for Rule 2004 Examination of Tacora Resources, LLC* (the “Motion”), filed by Aequor Mgt, LLC (“MGT”) and Aequor Holdings, LLC (“Holdings” and, with MGT, each a “Debtor” and together, the “Debtors”), the debtors in the above styled and numbered jointly administered bankruptcy case (the “Bankruptcy Case”), whereby the Debtors seek to take an examination under Bankruptcy Rule 2004 (the “Examination”) of Tacora Resources, LLC, a Delaware entity (“Tacora”), consisting of: (i) document production pursuant to the requests attached to this Order as Exhibit “A” (the “Requests”); and (ii) at the election of the Debtors, a corporate deposition under Rule 30(b)(6) (the “Deposition”).

Finding that service and notice of the Motion was sufficient and appropriate and that cause to grant the Motion exists, based on the representations in the Motion and in the Bankruptcy Case, and that the Court has the subject matter jurisdiction to enter this Order and, with respect to personal jurisdiction over Tacora, to the extent of any issues regarding the same, that the issuance of a subpoena will ensure to confer such personal jurisdiction (without finding that the Court otherwise lacks such personal jurisdiction), it is hereby:

¹ The jointly-administered chapter 11 Debtors, along with the last four digits of each Debtor’s federal tax identification number are: Aequor Mgt, LLC (2916) and Aequor Holdings, LLC (0273).

ORDERED that the Motion is GRANTED; it is further

ORDERED that the Debtors may take the Examination, by serving the Requests substantially in the form attached hereto and, thereafter, noticing the Deposition, and that Tacora shall submit to the Examination, subject to all of its privileges; it is further

ORDERED that Tacora shall respond to the Requests, and provide responsive documents to the Requests, both as may be otherwise appropriate, no later than thirty (30) days after the proper service of the Requests by the Debtors, unless such deadline is extended by the Debtors; it is further

ORDERED that, at the election of the Debtors, Tacora shall sit for the Deposition upon proper and timely topics designated by the Debtors under Rule 30(b)(6), subject to its privileges and such objections as may be appropriate, and that the Debtors shall reasonably cooperate with Tacora as to the timing and location of said Deposition, and that this Court shall decide all disputes regarding the same; it is further

ORDERED that the Debtors may issue and serve a subpoena to enforce this Order and compel compliance with the Examination; it is further

ORDERED that, in order to properly serve the Requests and any notice of the Deposition, the Debtors shall serve the same, together with a copy of this Order and the subpoena, as is otherwise appropriate; it is further

ORDERED that the Court shall otherwise retain jurisdiction to the maximum extent possible to interpret and to enforce this Order, to grant relief from this Order, and over all privilege, objection, and other issues that may arise with respect to the Requests and the Deposition.

Signed on 07/16/2024



THE HONORABLE JOSHUA P. SEARCY
UNITED STATES BANKRUPTCY JUDGE

DEFINITIONS

A. The term “all” shall mean all and any.

B. The connectives “and” and “or” should be construed either disjunctively or conjunctively as necessary to bring within the scope of discovery all responses that might otherwise be construed as outside of its scope.

C. The term “Communication” shall mean the transmittal of information (in the form of facts, ideas, inquires or otherwise) by any means.

D. The term “Concerning” shall mean relating to, referring to, describing, evidencing, or constituting.

E. The term “Document” shall mean and include Documents and tangible things as defined herein in its broadest sense to include writings, letters, correspondence, e-mails, text messages, telegrams, telexes, memoranda, records, books of account, ledgers, balance sheets, diaries, calendars, journals, minutes, contracts, drafts of contracts, insurance policies, drawings, graphs, charts, photographs, memoranda or records of telephone or personal conversations or conferences, notes, interoffice Communications, microfilm, tape recordings, software, bulletins, circulars, schedules, guides, pamphlets, studies, surveys, notices, summaries, reports, analysis, work sheets, price sheets, catalogs, invoices, checks, vouchers, newspaper inserts, computer listings, charts, records, or summaries prepared or relating to any of the foregoing and writings of every kind or character that are in your possession, custody or control or subject thereto. If you have the right to secure the Document or a copy from any person or public or private entity having possession (including your attorney), it is considered within your control and should be produced, and includes emails, text messages and instant messages from company or personal accounts. A draft or non-identical copy is a separate Document within the meaning of this term.

F. The term “each” shall mean each and every.

G. The term “identify” with respect to Documents, shall mean to give, to the extent known, the: (i) type of Document; (ii) general subject matter; (iii) date of that Document; and (iv) author(s), addressee(s) and recipient(s).

H. The term “identify” with respect to a Person, shall mean to give, to the extent known, the (i) person’s full name; (ii) present or last known address; and when referring to a natural person, additionally, (iii) the present or last known place of employment. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery Requesting the identification of that person.

I. The term “including” shall mean including, but not limited to.

J. The term “person” shall mean any natural person or any legal entity, including, without limitation, any business, governmental entity or association.

K. The term “relate(s) to” or “relating to” or “ related to” shall mean to have any logical or natural association with; to compromise, mention, describe, contain, enumerate, involve, or in any way Concern, pertain to, refer to, be connected with, reflect upon, or result from, in whole or in part, directly or indirectly, the stated subject matter.

L. The use of the singular form of any word includes the plural and vice versa.

M. The term “Aequor Mgt” shall mean Aequor Mgt, LLC.

N. The term “Aequor Holdings” shall mean Aequor Holdings LLC.

O. The term “Bankruptcy Case” shall mean the jointly administered Chapter 11 case filed by Aequor Mgt and Aequor Holdings on January 5, 2023, in the United States Bankruptcy Court for the Eastern District of Texas, captioned *Aequor Mgt, LLC*, Case No. 23-60010.

P. The term “Petition Date” shall mean January 5, 2023.

Q. The term “CL V” shall mean CL V Funding, LLC.

R. The term “Proterra” shall mean Proterra M&M MGCA Cooperatief U.A.

S. The term “Black River A” shall mean Black River Capital Partners Fund (Metals and Mining A) LP.

T. The term “Black River B” shall mean Black River Capital Partners Fund (Metals and Mining B) LP

U. The term “Tacora” shall mean Tacora Resources Inc.

V. The term “Cargill” shall mean Cargill Incorporated.

W. The term “Proterra LP” shall mean Proterra Investment Partners LP.

X. The term “Credit Agreement” shall mean the credit agreement entered on November 7, 2018, between Aequor Mgt as Borrower and CL V as Lender wherein CL V made a single advance term loan to Aequor Mgt for \$22,000,000.

Y. The term “Loan” shall mean the single advance term loan from CL V to Aequor Mgt for \$22,000,000.

Z. The term “Durrett Pledge Agreement” shall mean the pledge agreement executed by David J. Durrett and Deborah M. Durrett (the “Durrett”) on November 7, 2018, wherein the Durrett granted CL V a security interest in the collateral as defined therein, which includes each of the Durrett membership interest in Aequor Mgt.

AA. The term “Original Forbearance Agreement” shall mean the forbearance agreement dated July 3, 2019, between Aequor Mgt and CL V, which was amended by a First Amended Forbearance Agreement between Aequor Mgt and CL V dated October 2, 2019.

BB. The term “Holdings Guaranty” shall mean the guaranty dated October 2, 2019, executed by Aequor Holdings as a condition to the extension granted to Aequor Mgt in the First Amended Forbearance Agreement.

CC. The term “Holdings Security Agreement” shall mean the security agreement dated October 2, 2019, executed by Aequor Holdings as a condition to the extension granted to Aequor Mgt in the First Amended Forbearance Agreement.

DD. The term “First Amended Credit Agreement” shall mean the amendment to the Original Credit Agreement dated October 7, 2020, entered by and among CL V as Lender, Aequor Mgt as Borrower, Aequor Holdings, and the Durrets.

EE. The term “Amended and Restated Holdings Security Agreement” shall mean the security agreement dated October 7, 2020, executed by Aequor Holdings, which removed the exclusion of the Aequor Holdings’ equity and other ownership interest in Proterra from the Holdings Security Agreement.

FF. The term “Consent to Security Agreement” shall mean the security agreement dated September 1, 2021, wherein Aequor Holdings, Black River A, Black River B, and Cargill Incorporated (the “Members”) granted CL V a security interest in all membership or other equity interest in Proterra that Aequor Holdings has or acquires.

GG. The term “Cooperative Security Agreement” shall mean the consent to security interest executed by the Members and Proterra on September 1, 2021.

HH. The term “Scully Mine” shall mean the iron ore concentrate producer located near Wabush, Newfoundland and Labrador, Canada currently owned and operated by Tacora Resources, Inc.

II. The term “Scully Mine Agreement” shall mean the Scully Mine Binding Co-Investment Memorandum of Agreement dated April 11, 2017.

JJ. The term “Tacora Resources Shareholders’ Agreement” shall mean the Proterra M&M MGCA B.V. and MagGlobal LLC and Tacora Resources Inc. Shareholders’ Agreement dated July 17, 2017.

KK. The term “Proterra Member Contribution Agreement”: shall mean the “Member and Contribution Agreement—Proterra M&M MGCA Cooperatief U.A. dated June 29, 2017 between Proterra, Black River A, Black River B and Aequor Holdings.

LL. The term “Vaststllingsovereenkomst ATR” shall mean the Document of the same name in the Dutch language dated June 6, 2019.

MM. The term “Amended and Restated Proterra Agreement” shall mean the Amended and Restated Member Agreement Proterra M&M MCGA Cooperatief U.A. Dated December 2022 between Proterra, Black River A, Black River B, Aequor Holdings and Cargill.

NN. The term “Strikeman Letter” refers to the letter from Strikeman Elliot to Proterra dated December 19, 2022 informing Proterra and its Board of Directors of Tacora’s purported financial distress and urging Proterra to adopt the Amended and Restated Proterra Agreement and the Tacora Advance Payments Facility.

OO. The term “Tacora Advance Payments Facility” refers to the proposal by Cargill, dated December 15, 2022, pursuant to which Cargill proposes to advance up to \$35 million to Tacora subject to certain conditions and consideration, including revision of Proterra’s management structure and the issuance to Cargill of penny warrants exercisable into Tacora common shares or other class of Tacora equity interests.

PP. The term “Houthoff Letter” refers to the letter dated January 5, 2023 from the Houthoff law firm to Proterra Concerning Aequor Holdings’ limited approval of the Amended and Restated Proterra Agreement.

QQ. The term “Tacora US” refers to Tacora US, Inc. a wholly-owned subsidiary of Tacora, incorporated pursuant to the laws of the State of Delaware with its principal place of business in Grand Rapids, Minnesota.

RR. The term “Offtake Agreement” will refer to the Restatement of the Iron Ore Sale and Purchase Agreement dated November 11, 2018 between Tacora and Cargill, as it Relates to the Scully Mines which is an iron ore concentrate producer near Wabash, Newfoundland and Labrador, Canada.

SS. The term “Stockpile Agreement” will refer to the Stockpile Agreement between Tacora and Cargill dated December 17, 2019.

TT. The term “Scully Mine Memorandum Agreement” will refer to the Scully Mine Binding Memorandum of Agreement, dated April 11, 2017, between and among Black River A, Black River, and David J. Durrett.

UU. The term “Ad Hoc Group of Senior Noteholders” will refer to a representative body of Tacora creditors holding approximately \$260 million in senior notes.

VV. The term “Partners in Performance” will refer to the consultant retained by Tacora commencing February 27, 2023 to initiate an operational stabilization and turnaround program at the Scully Mine.

WW. The term “Champion Iron” will refer to an entity that was involved in a proposed transaction to purchase Tacora or an interest in Tacora.

INSTRUCTIONS

A. The responses to these Requests shall include all Documents in your possession, custody, or control, including those held by your agents, employees, attorneys, representatives, or any other person over whom you have control.

B. If existing Documents are responsive to one or more Requests, but are not in your possession, custody, or control, please indicate in writing that the Documents exist and identify the person with current possession, custody, or control of the Documents.

C. If you cannot fully satisfy one or more of the Requests herein, you are instructed to produce the information that is responsive to that Request to the extent possible and specify, in writing, the reason why you are unable to produce further responsive information. Your explanation shall state what knowledge, information, or belief you have Relating to the Requests. If you object to any portion of any Request, you shall answer the remainder.

D. For any Document responsive to the Requests herein that is known to have been destroyed or lost, or is otherwise unavailable, identify each such Document by author, addressee, date, number of pages, and subject matter, and explain in detail the events leading to the destruction or loss, or the reason for the unavailability of such Document, including the location of such Document when last in your possession, custody, or control, and the date and manner of its disposition.

E. All Documents that respond, in whole or in part, to any part or clause of any paragraph of these Requests shall be produced in their entirety, including all attachments and enclosures. Documents that in their original condition were stapled, clipped, or otherwise fastened together shall be produced in such form.

F. For any Document withheld under a claim of privilege, please identify the Document by author, addressee, date, number of pages, and subject matter, specify the nature and basis of the claimed privilege and the paragraph number of the Request to which the Document is responsive, and identify each person to whom the Document or its contents, or any part thereof, has been disclosed.

G. If, in responding to a Request, you encounter a perceived ambiguity, either in the Request itself or in any applicable definition or instruction, answer the Request fully, and include in your answer an identification of the perceived ambiguity and the construction thereof used in your answer.

H. PRODUCTION OF ELECTRONIC DATA: Debtor Requests that electronically stored information be produced in the manner in which it is ordinarily maintained, and saved to CD-ROM, USB storage stick, or external hard drive for production, as may be applicable depending on the nature of the information being produced. For Documents: Documents should be produced in the format in which they were originally maintained, including PDFs, Word Documents, Word Perfect Documents, Excel files, or any other native format. For emails: Email should be produced in the format in which it was ordinarily maintained. Normally, this would consist of MS-PST File for Microsoft Outlook, MSG or PST files for Microsoft Exchange, NSF file for Lotus Notes, and GWT file for Novell GroupWise. If a different email program is utilized, then a comparable data file is to be produced. When producing electronically stored information:

- i. **The respondent must produce Documents as they are kept in the usual course of business or organize and label them to correspond to the categories in the Request;**
- ii. **The respondent, if unable to produce electronic data in the form specified by these instructions or Requests, must produce it in the form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.**

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: The original Offtake Agreement and all amendments thereto and any agreements between Tacora and Cargill that are or were intended to supersede the

Offtake Agreement, including but not limited to the amendment extending the Offtake Agreement to the life of the mine.

REQUEST FOR PRODUCTION NO. 2: All Communications between Cargill and any other party that refers to, Relates to, or Concerns the Offtake Agreement or any amendment to the Offtake Agreement, including but not limited to correspondence, emails, and texts.

REQUEST FOR PRODUCTION NO. 3: All internal Cargill Communications that refer to, Relate to, or Concern the Offtake Agreement or any amendment to the Offtake Agreement, including but not limit to memoranda, emails, and texts.

REQUEST FOR PRODUCTION NO. 4: All Documents that refer to, Relate to, or Concern that number of metric tons of ore produced per annum by the Scully Mine from January 1, 2018 to the present.

REQUEST FOR PRODUCTION NO. 5: All Documents that disclose the monthly production of ore by the Scully Mine from January 1, 2018 to the present.

REQUEST FOR PRODUCTION NO. 6: All Documents that refer to, Relate to, or Concern Cargill's loading, transportation, or purchase of iron ore from the Scully Mine, including but not limited to all bills of lading.

REQUEST FOR PRODUCTION NO. 7: All Documents that refer to, Relate to, or Concern payments by Cargill to any third party shipper for the shipment of ore from the Scully Mine, including wire transfers and checks.

REQUEST FOR PRODUCTION NO. 8: All Documents that refer to, Relate to, or Concern payments made by Tacora to Cargill, including but not limited to all wire transfers and checks.

REQUEST FOR PRODUCTION NO. 9: All invoices sent by Tacora to Cargill pursuant to the Offtake Amendment or any amendment to the Offtake Agreement.

REQUEST FOR PRODUCTION NO. 10: The original Stockpile Agreement and all amendments thereto and any agreements between Tacora and Cargill that are or were intended to supersede the Stockpile Agreement, including but not limited to any amendment extending the Stockpile Agreement to the life of the mine.

REQUEST FOR PRODUCTION NO. 11: All Communications between Cargill and any other party that refers to, Relates to, or Concerns the Stockpile Agreement or any amendment to the Stockpile Agreement, including but not limited to correspondence, emails, and texts.

REQUEST FOR PRODUCTION NO. 12: All internal Cargill internal Communications that refer to, Relate to, or Concern the Stockpile Agreement or any amendment to the Stockpile Agreement, including but not limited to memoranda, emails, and texts.

REQUEST FOR PRODUCTION NO. 13: All stockpile agreements between Cargill and any party other than Tacora from January 1, 2018 to the present.

REQUEST FOR PRODUCTION NO. 14: All Documents that refer to, Relate to, Concern, or constitute any contract or commercial arrangement between Tacora and Cargill from January 1, 2018 to the present.

REQUEST FOR PRODUCTION NO. 15: All Documents that refer to, Relate to, or Concern any payments from Tacora to Cargill pursuant to the Stockpile Agreement or any amendments to the Stockpile Agreement, including but not limited to wire transfers and checks.

REQUEST FOR PRODUCTION NO. 16: All Advance Payment Facility Agreements and amendments to Advance Facility Agreements between Tacora and Cargill.

REQUEST FOR PRODUCTION NO. 17: A copy of the Advance Payment Facility Agreement between Tacora and Cargill.

REQUEST FOR PRODUCTION NO. 18: A copy of the Second Advance Facility Agreement between Tacora and Cargill.

REQUEST FOR PRODUCTION NO. 19: All Communications between Cargill and any other party Concerning the Advance Payment Agreement and any amendments to the Advance Payment Agreement, including but not limited to correspondence, emails, and texts.

REQUEST FOR PRODUCTION NO. 20: All internal Cargill Communications that refer to, Relate to, or Concern the Advance Payment Agreement or any amendment to the Advance Payment Agreement, including but not limited to memoranda, emails, and texts.

REQUEST FOR PRODUCTION NO. 21: All Documents that refer to, Relate to, or Concern payments made by Tacora to Cargill under the Advance Payment Agreement or any amendment to the Advance Payment Agreement, including but not limited to wire transfers and checks.

REQUEST FOR PRODUCTION NO. 22: All Wet Concentrate Facility Agreements and any amendments to Wet Concentrate Facility Agreements between Tacora and Cargill.

REQUEST FOR PRODUCTION NO. 23: All Documents that refer to, Relate to, or Concern payments made by Tacora to Cargill under the Wet Concentrate Facility Agreement or any amendments to the Wet Concentrate Facility Agreement, including but not limited to wire transfers and checks.

REQUEST FOR PRODUCTION NO. 24: A copy of the MFC Royalty Agreement and any amendments to the MFC Royalty Agreement.

REQUEST FOR PRODUCTION NO. 25: All Documents that refer to, Relate to, or Concern payments made by Tacora to 0778539 B.C. Ltd. pursuant to the MFC Royalty Agreement and

amendments to the MFC Royalty Agreement, including but not limited to wire transfers and checks.

REQUEST FOR PRODUCTION NO. 26: All Documents that refer to Margin Payments made by Cargill to Tacora or by Tacora to Cargill under the Offtake Agreement or any amendments to the Offtake Agreement, including but not limited to wire transfers and checks.

REQUEST FOR PRODUCTION NO. 27: Copies of all rail agreements between Tacora and any rail carrier Relating to the Scully Mine.

REQUEST FOR PRODUCTION NO. 28: Copies of all port agreements entered into by Tacora Relating to the Scully Mine.

REQUEST FOR PRODUCTION NO. 29: All Documents that refer to, Relate to, or Concern funds paid by Tacora to Tacora US during the period from January 1, 2017 to the present, including but not limited to wire transfers and checks.

REQUEST FOR PRODUCTION NO. 30: All Documents that refer to, Relate to, or Concern funds paid by Tacora US to Tacora during the period from January 1, 2017 to the present, including but not limited to wire transfers and checks.

REQUEST FOR PRODUCTION NO. 31: All Communications between Tacora and Tacora US Relating to Aequor Mgt., including but not limited to memoranda, correspondence, emails, and texts.

REQUEST FOR PRODUCTION NO. 32: All Communications between Tacora and Tacora US Relating to Aequor Holdings, including but not limited to memoranda, correspondence, emails, and texts.

REQUEST FOR PRODUCTION NO. 33: All Documents that refer to, Relate to, or Concern Tacora's purchase of the Scully Mine on July 18, 2017 from Cliffs Natural Resources, including but not limited to any and all contracts Related to Tacora's purchase of the Scully Mine from Cliffs Natural Resources.

REQUEST FOR PRODUCTION NO. 34: Documents sufficient to identify all members of the Ad Hoc Group of Senior Noteholders.

REQUEST FOR PRODUCTION NO. 35: All Communications between Tacora and members of the Ad Hoc Group of Senior Noteholders, including but not limited to memoranda, correspondence, emails, and texts.

REQUEST FOR PRODUCTION NO. 36: All reports and memoranda describing Tacora's Cash Management System.

REQUEST FOR PRODUCTION NO. 37: All financial statements of Tacora produced or created between January 1, 2017 and the present, including but not limited to balance sheets and income statements.

REQUEST FOR PRODUCTION NO. 38: All minutes of the Tacora Board of Directors that reflect any vote by Leon Davies Relating to the Scully Mine.

REQUEST FOR PRODUCTION NO. 39: All minutes of the Tacora Board of Directors that reflect any vote by Matt Lehntinen Relating to the Scully Mine.

REQUEST FOR PRODUCTION NO. 40: All Communications between Cargill and Tacora US that refer to, Relate to, or Concern the Scully Mine, including but not limited to memoranda, correspondence, emails, and texts.

REQUEST FOR PRODUCTION NO. 41: All Communications between Proterra and Tacora US that refer to, Relate to, or Concern the Scully Mine, including but not limited to memoranda, correspondence, emails, and texts.

REQUEST FOR PRODUCTION NO. 42: All Documents that refer to, Relate to, or Concern the payment of \$3,954,171.43, or any part thereof, to Tacora in full and final satisfaction of all deferred amounts owing by Cargill to Tacora under the Wet Concentrate Agreement.

REQUEST FOR PRODUCTION NO. 43: Any and all contracts, term sheets, and letters of intent executed by Tacora Relating to any proposed sale of Tacora to any interested investor or investors.

REQUEST FOR PRODUCTION NO. 44: All Documents that refer to, Relate to, or Concern any offer to purchase Tacora or any interest in Tacora or any proposed sale of Tacora or any interest in Tacora from June 1, 2017 to the present, including but not limited to correspondence, emails, letters of intent, and contracts.

REQUEST FOR PRODUCTION NO. 45: All Communications that refer to, Relate to, or Concern any offer to purchase Tacora or any interest in Tacora or any proposed sale of Tacora or any interest in Tacora from June 1, 2017 to the present, including but not limited to memoranda, correspondence, emails, and texts.

REQUEST FOR PRODUCTION NO. 46: All Documents that refer to, Relate to, or Concern any offer to purchase Proterra or any interest in Proterra or any proposed sale of Proterra or any interest in Proterra from June 1, 2017 to the present, including but not limited to correspondence, emails, letters of intent, and contracts.

REQUEST FOR PRODUCTION NO. 47: All Communications that refer to, Relate to, or Concern any offer to purchase Proterra or any interest in Proterra or any proposed sale of Proterra or any interest in Proterra from June 1, 2017 to the present, including but not limited to memoranda, correspondence, emails, and texts.

REQUEST FOR PRODUCTION NO. 48: All Documents that refer to, Relate to, or Concern any offer to purchase the assets of Tacora or any interest in the assets of Tacora or any proposed sale of the assets of Tacora or any interest in the assets of Tacora from June 1, 2017 to the present, including but not limited to correspondence, emails, letters of intent, or contracts.

REQUEST FOR PRODUCTION NO. 49: All Communications that refer to, Relate to, or Concern any offer to purchase the assets of Tacora or any interest in the assets of Tacora or any proposed sale of the assets of Tacora from June 1, 2017 to the present, including but not limited to memoranda, correspondence, emails, and texts.

Appendix “D”

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
TACORA RESOURCES INC.

AFFIDAVIT OF JODI POREPA
Sworn July 22, 2024

I, **JODI POREPA**, of the City of Toronto, in the Province of Ontario, **MAKE OATH AND SAY AS FOLLOWS:**

1. I am a Senior Managing Director with FTI Consulting Canada Inc. ("**FTI**"), which was appointed as the monitor (the "**Monitor**") of Tacora Resources Inc. (the "**Applicant**") in these proceedings (the "**CCAA Proceedings**") and, as such, I have knowledge of the matters to which I hereinafter depose. Unless I indicate to the contrary, the facts herein are within my personal knowledge and are true. Where I have indicated that I have obtained facts from other sources, I believe those facts to be true.

2. Attached hereto as **Exhibit "A"** is a schedule summarizing each invoice in Exhibit "**C**", the total billable hours charged per invoice, the total fees charged per invoice and the average hourly rate charged per invoice. All amounts are stated in Canadian Dollars.

3. Attached hereto as **Exhibit "B"** is a schedule summarizing the billing rates and total amounts billed with respect to each representative of the Monitor that rendered services in connection with the CCAA Proceedings.

4. Attached hereto as **Exhibit "C"** are true copies of the invoices for fees and disbursements incurred by the Monitor in connection with the CCAA Proceedings for the period from October 10, 2023, to July 7, 2024. The total fees charged by FTI during that period were \$4,064,501.00, plus disbursements of \$147,750.08, plus Harmonized Sales Tax in the amount of \$631,837.69 for a total of \$4,844,088.77. Total hours invoiced in this period were 4,353.60 for an average hourly rate charged of \$933.60/hour. Certain of the invoices contain redactions to protect confidential and privileged information.

5. To the best of my knowledge, the rates charged by FTI throughout the course of this proceeding are comparable to the rates charged by other accounting firms in the Toronto market for the provision of similar services, and are comparable to the hourly rates charged by FTI for services rendered in relation to similar proceedings.

6. The hours spent on this matter involved monitoring the Applicant and addressing issues related to the CCAA Proceedings (as more particularly described in the Monitor's reports and the invoices attached in Exhibit "C") and I believe the total hours incurred by the Monitor are reasonable and appropriate in the circumstances.

7. The Monitor respectfully requests that the Court approve its invoices for the period from October 10, 2023, to July 7, 2024, for the amounts noted.

AFFIRMED BEFORE ME by
videoconference on July 22, 2024 in
accordance with O.Reg. 431/20:
Administering Oath or Declaration
Remotely. The deponent was located in
the City of Toronto in the Province of
Ontario and I was located in the City of
Toronto in the Province of Ontario



Commissioner for Taking Oaths

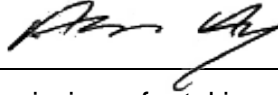
Commissioner: Alec Hoy
LSO# 85489K



JODI POREPA
Senior Managing Director

EXHIBIT "A"

This is Exhibit "A" referred to in the Affidavit of Jodi Porepa affirmed before me by videoconference on July 22, 2024 in accordance with O.Reg. 431/20: Administering Oath or Declaration Remotely. The deponent was located in the City of Toronto in the Province of Ontario and I was located in the City of Toronto in the Province of Ontario.



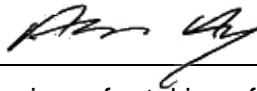
A Commissioner for taking affidavits:
Alec Hoy

LSO #85489K

Invoice No./Period	Invoice Date	Fees (\$)	Expenses (\$)	HST (\$)	Total Fees, Disbursements, and HST (\$)	Hours Billed	Average Billed Rate (\$)
102900000621 (October 10, 2023 - October 15, 2023)	10/17/2023	155,624.50	4,668.74	24,043.99	184,337.23	181.20	858.85
102900000632 (October 16, 2023 - October 22, 2023)	10/24/2023	195,287.50	6,716.94	30,300.67	232,305.11	225.50	866.02
102900000642 (October 23, 2023 - October 31, 2023)	10/31/2023	217,495.00	6,854.85	33,652.48	258,002.33	244.90	888.10
102900000691 (November 1 - November 12)	11/15/2023	192,324.50	6,024.11	29,752.29	228,100.90	218.00	882.22
102900000704 (November 13, 2023 - November 19, 2023)	11/24/2023	57,488.00	2,231.00	8,957.85	68,676.85	60.40	951.79
102900000707 (November 20, 2023 - November 26, 2023)	11/29/2023	62,419.50	1,872.59	9,643.81	73,935.90	63.80	978.36
102900000715 (November 27, 2023 - November 30, 2023)	11/30/2023	53,723.00	1,611.69	8,300.20	63,634.89	54.40	987.56
102900000768 (December 1, 2023 - December 10, 2023)	12/12/2023	90,012.00	2,700.36	13,906.85	106,619.21	96.30	934.70
102900000785 (December 11, 2023 - December 17, 2023)	12/20/2023	78,355.00	2,350.65	12,105.85	92,811.50	82.10	954.38
102900000805 (December 18, 2023 - December 31, 2023)	12/31/2023	85,524.50	2,565.74	13,213.54	101,303.78	84.60	1,010.93
102900000855 (January 1, 2024 - January 7, 2024)	1/7/2024	68,797.00	3,864.50	10,899.23	83,560.73	67.00	1,026.82
102900000865 (January 8, 2024 - January 14, 2024)	1/16/2024	114,328.00	3,429.84	17,663.68	135,421.52	109.50	1,044.09
102900000879 (January 15, 2024 - January 21, 2024)	1/25/2024	118,741.00	6,747.16	18,823.23	144,311.39	122.60	968.52
102900000887 (January 22, 2024 - January 28, 2024)	1/30/2024	108,238.00	6,222.58	17,169.09	131,629.67	106.70	1,014.41
102900000928 (January 29, 2024 - February 4, 2024)	2/7/2024	97,638.00	2,929.14	15,085.07	115,652.21	103.40	944.27
102900000950 (February 5, 2024 - February 11, 2024)	2/15/2024	91,966.50	7,406.88	14,906.01	114,279.39	90.20	1,019.58
102900000959 (February 12, 2024 - February 18, 2024)	2/21/2024	100,584.00	3,296.41	15,582.06	119,462.47	106.00	948.91
102900000976 (February 19, 2024 - February 25, 2024)	2/25/2024	89,574.00	2,687.22	13,839.18	106,100.40	96.70	926.31
102900001014 (February 26, 2024 - March 3, 2024)	3/7/2024	107,877.00	3,537.26	16,712.14	128,126.40	114.30	943.81
102900001029 (March 4, 2024 - March 10, 2024)	3/12/2024	103,309.50	3,099.29	15,961.32	122,370.11	106.80	967.32
102900001038 (March 11, 2024 - March 17, 2024)	3/19/2024	114,288.00	3,428.64	17,657.50	135,374.14	120.30	950.02
102900001057 (March 18, 2024 - March 24, 2024)	3/26/2024	103,020.00	3,090.60	15,916.59	122,027.19	103.00	1,000.19
102900001073 (March 25, 2024 - March 31, 2024)	3/31/2024	91,882.50	2,756.48	14,195.85	108,834.83	93.90	978.51
102900001118 (April 1, 2024 - April 7, 2024)	4/9/2024	104,875.50	3,146.27	16,203.27	124,225.04	111.10	943.97
102900001130 (April 8, 2024 - April 14, 2024)	4/16/2024	131,879.50	3,956.39	20,375.38	156,211.27	135.80	971.13
102900001147 (April 15, 2024 - April 21, 2024)	4/23/2024	137,233.00	4,116.99	21,202.50	162,552.49	148.40	924.75
102900001161 (April 22, 2024 - April 28, 2024)	4/30/2024	139,387.50	4,181.63	21,535.37	165,104.50	152.20	915.82
102900001210 (April 29, 2024 - May 5, 2024)	5/7/2024	137,959.50	4,138.79	21,314.74	163,413.03	159.00	867.67
102900001230 (May 6, 2024 - May 12, 2024)	5/14/2024	121,736.00	14,329.31	20,409.80	156,475.11	123.30	987.32
102900001237 (May 13, 2024 - May 19, 2024)	5/21/2024	128,523.50	3,855.71	19,856.88	152,236.09	132.80	967.80
102900001263 (May 20, 2024 - May 26, 2024)	5/30/2024	96,756.50	2,902.70	14,948.88	114,608.08	108.30	893.41
102900001273 (May 27, 2024 - May 31, 2024)	5/31/2024	127,703.50	3,831.11	19,730.19	151,264.80	144.40	884.37
102900001332 (June 1, 2024 - June 9, 2024)	6/12/2024	125,568.50	3,767.06	19,400.33	148,735.89	144.10	871.40
102900001338 (June 10, 2024 - June 16, 2024)	6/19/2024	78,014.00	2,340.42	12,053.16	92,407.58	85.80	909.25
102900001354 (June 17, 2024 - June 23, 2024)	6/25/2024	89,809.50	2,694.29	13,875.57	106,379.36	92.10	975.13
102900001374 (June 24, 2024 - June 30, 2024)	6/30/2024	86,778.50	2,603.36	13,407.28	102,789.14	97.30	891.87
102900001401 (July 1, 2024 - July 7, 2024)	7/10/2024	59,779.00	1,793.37	9,235.86	70,808.23	67.40	886.93
Total		4,064,501.00	147,750.08	631,837.69	4,844,088.77	4,353.60	933.60

EXHIBIT "B"

This is Exhibit "**B**" referred to in the Affidavit of Jodi Porepa affirmed before me by videoconference on July 22, 2024 in accordance with O.Reg. 431/20: Administering Oath or Declaration Remotely. The deponent was located in the City of Toronto in the Province of Ontario and I was located in the City of Toronto in the Province of Ontario.



A Commissioner for taking affidavits:
Alec Hoy

LSO #85489K

Post-Filing Totals				
Name	Title	Hourly Rate	Hours	Total Billed
Franck Risler	Senior Managing Director	2,030.00	21.40	43,442.00
Gregory Watson	Senior Managing Director	1,275.00	1.00	1,275.00
Nigel Meakin	Senior Managing Director	1,230.00	105.80	130,134.00
Dean Mullett	Senior Managing Director	1,230.00	1.10	1,353.00
Paul Bishop	Senior Managing Director	1,230.00	789.50	971,085.00
Jodi Porepa	Senior Managing Director	1,050.00	1,510.50	1,586,025.00
Ching Watson	Managing Director	1,420.00	3.80	5,396.00
Richard Kim	Managing Director	1,000.00	1.00	1,000.00
Margarita Glot	Senior Director	1,640.00	3.50	5,740.00
Graham McIntyre	Director	740.00	1,278.30	945,942.00
Jesse Salomons	Director	740.00	130.70	96,718.00
Hailey Liu	Director	690.00	40.40	27,876.00
Olivia Manarin	Senior Consultant	690.00	12.50	8,625.00
William Reid	Senior Consultant	690.00	2.60	1,794.00
Dean Perlman	Senior Consultant	650.00	63.90	41,535.00
Adsaran Vithiyananthan	Senior Consultant	590.00	45.30	26,727.00
Carter Wood	Senior Consultant	590.00	251.30	148,267.00
Tessa Chiricosta	Consultant	480.00	2.50	1,200.00
Zoe Lin	Consultant	420.00	24.30	10,206.00
Natalie St Pierre	Intern	215.00	2.00	430.00
Joshua Gelman	Intern	215.00	1.50	322.50
Caitlin Moreland	Receptionist	155.00	45.10	6,990.50
Kathleen Foster	Executive Assistant I	155.00	15.60	2,418.00
Total			4,353.60	4,064,501.00

EXHIBIT "C"

This is Exhibit "C" referred to in the Affidavit of Jodi Porepa affirmed before me by videoconference on July 22, 2024 in accordance with O.Reg. 431/20: Administering Oath or Declaration Remotely. The deponent was located in the City of Toronto in the Province of Ontario and I was located in the City of Toronto in the Province of Ontario.

A Commissioner for taking affidavits:
Alec Hoy

LSO #85489K



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

October 17, 2023
102900000621
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Amount Due Current Invoice

\$184,337.23

Bank Information

Please indicate our invoice number with your remittance

Account Name: FTI Consulting Canada Inc.
Bank Name: Bank of Nova Scotia
Bank Address: Scotia Plaza, 44 King Street West
Toronto, Ontario M5H 1H1
Canada

Bank Code: 002
Account Number: 0861715
Swift/BIC Code: NOSCCATT
Transit Code: 47696
Account Currency: CAD

Please remit cheque payments to: FTI Consulting Canada Inc.
C/O T10073
P.O. Box 10073
Postal Station A
Toronto, ON M5W 2B1
Canada

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No. **October 17, 2023**
Job No. **102900000621**
Terms **493044.0001**
Currency **Due Upon Receipt**
Tax Registration: **CAD**

RE: FTI Engagement

Name	Title	Rate	Hours	Total
Nigel Meakin	Senior Managing Director	\$1,230.00	33.90	\$41,697.00
Jodi Porepa	Senior Managing Director	\$1,050.00	44.10	\$46,305.00
Graham McIntyre	Director	\$740.00	52.40	\$38,776.00
Jesse Salomons	Director	\$740.00	32.60	\$24,124.00
Dean Perlman	Senior Consultant	\$650.00	2.20	\$1,430.00
Tessa Chiricosta	Consultant	\$480.00	2.50	\$1,200.00
Caitlin Moreland	Receptionist	\$155.00	7.50	\$1,162.50
Kathleen Foster	Executive Assistant II	\$155.00	6.00	\$930.00
Total Professional Services			181.20	\$155,624.50
Administrative Fee				\$4,668.74
Invoice Total				CAD Amount
				\$160,293.24
HST (15%)				\$24,043.99
Total Due				\$184,337.23

Tacora Resources Inc.
493044.0001 - October 15, 2023

Date	TK#	Name	Hours	Amount	Narrative
10/10/23	14797	Nigel Meakin	7.10	\$ 8,733.00	Discussions with counsel; correspondence; [REDACTED]; preparation for and attendance at Court; further calls and discussions regarding various matters; review and update Court report.
10/11/23	14797	Nigel Meakin	7.20	\$ 8,856.00	Numerous calls and discussions with suppliers, company, counsel and team; review and update Court report; [REDACTED]
10/12/23	14797	Nigel Meakin	6.80	\$ 8,364.00	[REDACTED] calls and correspondence with numerous parties; supplier calls; calls with counsel; review and update Court report.
10/13/23	14797	Nigel Meakin	7.90	\$ 9,717.00	Calls in preparation for court attendance; attendance in Court; calls and discussions regarding various matters; calls with suppliers; review and update Court report; calls with [REDACTED]; attendance at board meeting.
10/14/23	14797	Nigel Meakin	2.30	\$ 2,829.00	Review of Court materials; calls regarding various matters.
10/15/23	14797	Nigel Meakin	2.60	\$ 3,198.00	Calls regarding various matters; review of draft Court materials.
10/10/23	15532	Jodi Porepa	10.00	\$ 10,500.00	Vendor discussions; counsel discussions; call with management regarding vendors; review cash flow forecast and proposed disbursements; attend court hearing; internal status update.
10/11/23	15532	Jodi Porepa	10.20	\$ 10,710.00	Vendor discussions; counsel discussions; call with management regarding vendors; review cash flow forecast and proposed disbursements; attend court hearing; internal status update.
10/12/23	15532	Jodi Porepa	7.50	\$ 7,875.00	Vendor discussions; counsel discussions; call with management regarding vendors; review revised cash flow forecast; internal status update; discussions with management regarding cash flows; discussions regarding vendor negotiations; internal status update on discussions; update draft vendor letters.
10/13/23	15532	Jodi Porepa	10.90	\$ 11,445.00	Vendor discussions; counsel discussions; call with management regarding vendors; review cash flow forecast and proposed disbursements; attend court hearing; internal status update.
10/14/23	15532	Jodi Porepa	2.40	\$ 2,520.00	Review draft SISP and provide comments; review vendor management proposals and follow up as necessary; internal status update.
10/15/23	15532	Jodi Porepa	3.10	\$ 3,255.00	Review and provide comments on responses to third party enquiries; vendor management; review draft affidavits; internal status update; review draft materials being circulated and provide comments.
10/10/23	24354	Kathleen Foster	0.50	\$ 77.50	Website edits.
10/10/23	24354	Kathleen Foster	1.00	\$ 155.00	Website edits.
10/13/23	24354	Kathleen Foster	3.50	\$ 542.50	Prepare mailing distribution.
10/13/23	24354	Kathleen Foster	1.00	\$ 155.00	Website edits.
10/10/23	31365	Graham McIntyre	3.80	\$ 2,812.00	Review of equipment leases; finalizing statutory forms; open bank accounts.
10/10/23	31365	Graham McIntyre	4.20	\$ 3,108.00	Preparing descriptions for website uploads; updating preauthorized deposit and bank letters and appendices; updating critical supplier communications list for payables outstanding and internal notes; other pre-filing work.
10/11/23	31365	Graham McIntyre	10.30	\$ 7,622.00	Finalizing bank letters regarding preauthorized payments; posting documents on Monitor's website; finalizing vendor letters regarding pre-authorized payments; work on creditor listing; tracking status of vendor calls; vendor calls.
10/12/23	31365	Graham McIntyre	14.30	\$ 10,582.00	Vendor calls; updating vendor notes and calls; work on creditor listing; uploading documents to monitors website; vendor follow up; correspondence with debtor.
10/13/23	31365	Graham McIntyre	13.50	\$ 9,990.00	Vendor calls; finalizing creditor listing and notices to creditors; uploading documents to monitors website; follow up with vendors; tracking vendor status; correspondence with the debtor.

Tacora Resources Inc.
493044.0001 - October 15, 2023

Date	TK#	Name	Hours	Amount	Narrative
10/15/23	31365	Graham McIntyre	6.30	\$ 4,662.00	review bank letters and follow-up; review of vendor communications over the weekend and follow up with debtor.
10/11/23	33906	Tessa Chiricosta	2.50	\$ 1,200.00	Preparing bank letters and exhibits for distribution.
10/11/23	35443	Jesse Salomons	3.00	\$ 2,220.00	Prepare and update creditor listing for Monitor's website; monitor, address, and track hot line submissions from vendors; internal discussions regarding notices and website updates; internal discussions regarding vendor management.
10/12/23	35443	Jesse Salomons	10.80	\$ 7,992.00	Update creditor listing for Monitor's website and mail out notices; correspondence with vendors and review of Monitor's hotline; internal discussions regarding engagement matters; correspondence with Company management; addressing other post filing matters.
10/13/23	35443	Jesse Salomons	11.50	\$ 8,510.00	Updating creditor listing for Monitor's website; finalizing statutory notice mail out list; correspondence with vendors and review of Monitor's hotline; internal discussions regarding engagement matters; correspondence with Company management; addressing other post filing matters.
10/14/23	35443	Jesse Salomons	7.30	\$ 5,402.00	Correspondence with vendors; follow up on enquiries from the Monitor's hotline; track and Monitor vendor deposit information; internal discussions regarding engagement matters; addressing other post filing matters.
10/13/23	38706	Dean Perlman	0.70	\$ 455.00	Review of ongoing discussions with vendors; internal status update.
10/14/23	38706	Dean Perlman	0.70	\$ 455.00	Internal discussion on hotline management; review and respond to vendor enquiries.
10/15/23	38706	Dean Perlman	0.80	\$ 520.00	Review and respond to Monitor's hotline and inbox; update master consolidated list of creditors; emailing notice to creditors; internal discussions regarding same.
10/12/23	39589	Caitlin Moreland	2.00	\$ 310.00	Prepare notices for mailing.
10/13/23	39589	Caitlin Moreland	5.50	\$ 852.50	Web update and assisting with mailing.
TOTAL				\$ 155,624.50	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.	October 24, 2023
Job No.	102900000632
Terms	493044.0001
Currency	Due Upon Receipt
Tax Registration:	CAD

RE: FTI Engagement

Amount Due Current Invoice

\$232,305.11

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please remit cheque payments to:	FTI Consulting Canada Inc.
	C/O T10073
	P.O. Box 10073
	Postal Station A
	Toronto, ON M5W 2B1
	Canada



Invoice Summary

Tacora Resources Inc.
 1 Wabush Mines Road
 P.O. Box 3000
 Wabush, NL A0R 1B0
 Canada

Invoice No. **October 24, 2023**
 Job No. **102900000632**
 Terms **493044.0001**
 Currency **Due Upon Receipt**
 Tax Registration: **CAD**

RE: FTI Engagement

Name	Title	Rate	Hours	Total
Gregory Watson	Senior Managing Director	\$1,275.00	1.00	\$1,275.00
Dean Mullett	Senior Managing Director	\$1,230.00	0.60	\$738.00
Nigel Meakin	Senior Managing Director	\$1,230.00	38.30	\$47,109.00
Jodi Porepa	Senior Managing Director	\$1,050.00	43.90	\$46,095.00
Richard Kim	Managing Director	\$1,000.00	1.00	\$1,000.00
Graham McIntyre	Director	\$740.00	56.40	\$41,736.00
Jesse Salomons	Director	\$740.00	40.60	\$30,044.00
Olivia Manarin	Senior Consultant	\$690.00	10.50	\$7,245.00
Dean Perlman	Senior Consultant	\$650.00	30.10	\$19,565.00
Caitlin Moreland	Receptionist	\$155.00	1.80	\$279.00
Kathleen Foster	Executive Assistant II	\$155.00	1.30	\$201.50
Total Professional Services			225.50	\$195,287.50
Expenses				Total
Business Meals				\$198.58
Hotel & Lodging				\$526.83
Taxi				\$132.90
Total Expenses				\$858.31
Administrative Fee				\$5,858.63
Invoice Total				CAD Amount
				\$202,004.44
HST (15%)				\$30,300.67
Total Due				\$232,305.11

FTI Consulting Canada, Inc.
 TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
 Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com

Tacora Resources Inc.
493044.0001 - October 22, 2023

Date	TK#	Name	Hours	Amount	Narrative
10/16/23	14797	Nigel Meakin	11.20	\$ 13,776.00	Numerous calls and discussions with various parties regarding various matters; review of court materials; court report.
10/17/23	14797	Nigel Meakin	7.80	\$ 9,594.00	Court report; discussions with counsel; calls and discussions regarding various matters.
10/18/23	14797	Nigel Meakin	5.20	\$ 6,396.00	Calls and discussions regarding various matters; court report.
10/19/23	14797	Nigel Meakin	3.90	\$ 4,797.00	Calls and discussions regarding various matters; court report; [REDACTED]
10/20/23	14797	Nigel Meakin	6.20	\$ 7,626.00	Court report; numerous calls and discussions with various parties.
10/21/23	14797	Nigel Meakin	1.80	\$ 2,214.00	Calls and discussions regarding Solicitation Process and other matters.
10/22/23	14797	Nigel Meakin	2.20	\$ 2,706.00	Calls and discussions regarding various matters including Solicitation Process and [REDACTED] enquiries; review of factum.
10/20/23	14798	Gregory Watson	1.00	\$ 1,275.00	Internal discussions on status update of filing; review Monitor's Report and provide comments.
10/16/23	15532	Jodi Porepa	9.50	\$ 9,975.00	Calls with vendors; responding to enquiries; review legal materials; internal status update; review and provide comments on vendor management; review and provide comments on deposits.
10/17/23	15532	Jodi Porepa	7.10	\$ 7,455.00	Calls with vendors; responding to enquiries; review legal materials; internal status update; review and provide comments on vendor management; review and provide comments on deposits.
10/18/23	15532	Jodi Porepa	5.20	\$ 5,460.00	Calls with vendors; responding to enquiries; review legal materials; internal status update; review and provide comments on vendor management; review and provide comments on deposits.
10/19/23	15532	Jodi Porepa	5.30	\$ 5,565.00	Calls with vendors; responding to enquiries; review legal materials; internal status update; review and provide comments on vendor management; review and provide comments on deposits.
10/20/23	15532	Jodi Porepa	8.70	\$ 9,135.00	Calls with vendors; responding to enquiries; review legal materials; internal status update; review and provide comments on vendor management; review and provide comments on deposits.
10/21/23	15532	Jodi Porepa	3.50	\$ 3,675.00	Calls with vendors; responding to enquiries; review legal materials; internal status update; review and provide comments on vendor management; review and provide comments on deposits.
10/22/23	15532	Jodi Porepa	4.60	\$ 4,830.00	Internal status update; call with counsel to discuss SISP and cash flows; review SISP; review teaser; review cash flow forecast.
10/18/23	24354	Kathleen Foster	0.30	\$ 46.50	Web update.
10/20/23	24354	Kathleen Foster	1.00	\$ 155.00	Web update.
10/19/23	25541	Thomas Mullett	0.60	\$ 738.00	Review buyer list; various internal calls to discuss the same.
10/16/23	25798	Richard Kim	0.50	\$ 500.00	Review list of Interested Parties and provide a list of additional names.
10/17/23	25798	Richard Kim	0.50	\$ 500.00	Review list of Interested Parties and provide a list of additional names.
10/16/23	31365	Graham McIntyre	11.80	\$ 8,732.00	Respond to and organize vendor calls; follow up with vendors; follow up on preauthorized payments; finalizing opening of bank accounts; work on analysis for court report [REDACTED]; uploading documents to website; communication with debtor regarding post-filing activities.
10/17/23	31365	Graham McIntyre	13.30	\$ 9,842.00	Vendor calls and correspondence; review of voucher program; uploading documents to Monitor's website; correspondence with Company; internal discussions regarding engagement matters; [REDACTED]
10/18/23	31365	Graham McIntyre	12.50	\$ 9,250.00	[REDACTED] vendor calls and work with the Company to review payment terms and deposits; work on variance analysis; review of [REDACTED]
10/19/23	31365	Graham McIntyre	10.80	\$ 7,992.00	Vendor calls and subsequent correspondence; work on variance analysis; correspondence with Company; assisting with court report analysis; posting materials to the Monitor's website.
10/20/23	31365	Graham McIntyre	7.50	\$ 5,550.00	Vendor calls and follow up communications; follow up discussions with the company on strategy and upcoming vendor calls. disbursements review; posting materials to the Monitor's hotline; internal status updates.
10/21/23	31365	Graham McIntyre	0.50	\$ 370.00	Call with suppliers and follow up discussions in respect of same.

Tacora Resources Inc.
493044.0001 - October 22, 2023

Date	TK#	Name	Hours	Amount	Narrative
10/16/23	34418	Olivia Manarin	5.00	\$ 3,450.00	Prepared a list of additional parties for the buyers list; identify contact names and information for each party and provide same.
10/17/23	34418	Olivia Manarin	3.50	\$ 2,415.00	Prepared a list of additional parties for the buyers list; identify contact names and information for each party and provide same.
10/20/23	34418	Olivia Manarin	2.00	\$ 1,380.00	Prepared a list of additional parties for the buyers list; identify contact names and information for each party and provide same.
10/17/23	35443	Jesse Salomons	12.30	\$ 9,102.00	Review monitor's hotline; attend calls for vendors and prepare follow up correspondence, where necessary; prepare summaries to track agreed up on credit terms and deposits resulting from ongoing negotiations; internal discussions regarding engagement matters; correspondence with Company management; addressing other post filing matters.
10/18/23	35443	Jesse Salomons	11.30	\$ 8,362.00	Review and respond to enquiries from the Monitor's hotline; vendor and supplier correspondence; updating tracking workbooks on agreed upon post-filing credit terms and deposits; internal discussions regarding engagement matters; maintain list of notified creditors; addressing other post filing matters.
10/19/23	35443	Jesse Salomons	9.50	\$ 7,030.00	Review and respond to enquiries from the Monitor's hotline; vendor and supplier correspondence; internal FTI status updates; calls with Management to discuss vendor management and communication.
10/20/23	35443	Jesse Salomons	7.50	\$ 5,550.00	Review and respond to enquiries from Monitor's hotline; vendor and supplier calls and correspondence; ██████████ internal status updates; Company discussions regarding vendor management and variance analysis; discussions regarding other post filing matters.
10/16/23	38706	Dean Perlman	9.20	\$ 5,980.00	Review and respond to vendor enquiries; manage vendor enquiries; follow up on CCAA notices sent out; review and track Monitor hotline and inbox enquiries; review and update vendor deposit tracker; call with Company regarding vendor management; prepare financial analyses.
10/17/23	38706	Dean Perlman	9.30	\$ 6,045.00	Prepare template for weekly variance analysis and discuss same with the company; calls with vendors; discussions with the Company on outstanding notice to creditor emails; call with Company on cash flow and variance reporting; call with Company regarding vendor management; internal status update.
10/18/23	38706	Dean Perlman	7.10	\$ 4,615.00	Vendor calls to address post-filing credit terms; ongoing negotiations; status update call with company; review and respond to enquiries from the Monitor's hotline; review and update variance analysis; review variance analysis and provide comments on key explanations; internal discussion on variance analysis: internal status update.
10/19/23	38706	Dean Perlman	3.60	\$ 2,340.00	Internal discussions on vendor management; review variance analysis and provide comments; analyze key changes in actual disbursements compared to forecast; finalize variance analysis; update vendor discussions summaries; email communication with Company on outstanding vendor negotiations.
10/20/23	38706	Dean Perlman	0.90	\$ 585.00	Internal status update; monitor website updates.
10/16/23	39589	Caitlin Moreland	0.70	\$ 108.50	Web update.
10/17/23	39589	Caitlin Moreland	0.30	\$ 46.50	Web update.
10/19/23	39589	Caitlin Moreland	0.70	\$ 108.50	Web update.
10/20/23	39589	Caitlin Moreland	0.10	\$ 15.50	Web update.
TOTAL				\$ 195,287.50	



Invoice Summary

Tacora Resources Inc.
 1 Wabush Mines Road
 P.O. Box 3000
 Wabush, NL A0R 1B0
 Canada

Invoice No. 102900000642
Job No. 493044.0001
Terms Due Upon Receipt
Currency CAD
Tax Registration:

RE: FTI Engagement

Name	Title	Rate	Hours	Total
Dean Mullett	Senior Managing Director	\$1,230.00	0.50	\$615.00
Nigel Meakin	Senior Managing Director	\$1,230.00	30.70	\$37,761.00
Paul Bishop	Senior Managing Director	\$1,230.00	6.20	\$7,626.00
Jodi Porepa	Senior Managing Director	\$1,050.00	67.80	\$71,190.00
Graham McIntyre	Director	\$740.00	66.80	\$49,432.00
Jesse Salomons	Director	\$740.00	53.70	\$39,738.00
Hailey Liu	Director	\$690.00	3.80	\$2,622.00
Olivia Manarin	Senior Consultant	\$690.00	2.00	\$1,380.00
William Reid	Senior Consultant	\$690.00	2.60	\$1,794.00
Dean Perlman	Senior Consultant	\$650.00	7.40	\$4,810.00
Caitlin Moreland	Receptionist	\$155.00	2.40	\$372.00
Kathleen Foster	Executive Assistant II	\$155.00	1.00	\$155.00
Total Professional Services			244.90	\$217,495.00
Expenses				Total
Hotel & Lodging				\$330.00
Total Expenses				\$330.00
Administrative Fee				\$6,524.85
Invoice Total				CAD Amount
				\$224,349.85
HST (15%)				\$33,652.48
Total Due				\$258,002.33

FTI Consulting Canada, Inc.
 TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
 Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com

Tacora Resources Inc.
493044.0001 - October 31, 2023

Date	TK#	Name	Hours	Amount	Narrative
10/23/23	14797	Nigel Meakin	4.30	\$ 5,289.00	Review court materials and provide comments; call with counsel in preparation for hearing; review of Solicitation Process materials; correspondence; discussions regarding [REDACTED]; daily status call; internal discussions.
10/24/23	14797	Nigel Meakin	8.10	\$ 9,963.00	Preparation for and attendance in court; calls and discussions regarding various issues; [REDACTED]
10/25/23	14797	Nigel Meakin	3.20	\$ 3,936.00	[REDACTED] call with [REDACTED]; call with Greenhill regarding Solicitation Process and VDR; daily update call; correspondence; calls and discussions regarding various matters; review of variance analysis; [REDACTED]
10/26/23	14797	Nigel Meakin	5.20	\$ 6,396.00	Numerous calls and discussions regarding various issues; cash flow matters; [REDACTED]
10/27/23	14797	Nigel Meakin	6.10	\$ 7,503.00	Call with counsel; preparation for and attendance at case conference; calls with counsel; calls with company; call with Greenhill; correspondence in respect of same; cash flow matters; [REDACTED] numerous other calls and discussions.
10/30/23	14797	Nigel Meakin	2.10	\$ 2,583.00	Call with company and [REDACTED]; daily update call; review of court decision; calls and discussions regarding various issues.
10/31/23	14797	Nigel Meakin	1.70	\$ 2,091.00	Review of [REDACTED]; daily update call; calls and discussions regarding same.
10/31/23	14800	Paul Bishop	6.20	\$ 7,626.00	Calls with Monitor counsel; [REDACTED] review of CIM; review of forecasts; review of ARIO decision; call with Greenhill; call with Company; further call with counsel, Greenhill and company regarding SISP.
10/23/23	15532	Jodi Porepa	7.90	\$ 8,295.00	Participate in vendor calls; [REDACTED] review status of vendor discussions and provide comments; calls with counsel; call with the [REDACTED]; review motion materials.
10/24/23	15532	Jodi Porepa	9.90	\$ 10,395.00	Court attendance; [REDACTED] review cash flow forecast; review and respond to vendor enquiries and demands for funds; internal status update; call with professionals; review and respond to vendor negotiations; review cash flow forecast and provide comments.
10/25/23	15532	Jodi Porepa	9.20	\$ 9,660.00	Participate in vendor calls; [REDACTED] internal status update; attend court hearing; update call with professionals; review and respond to vendor negotiations; review cash flow forecast and provide comments.
10/26/23	15532	Jodi Porepa	10.00	\$ 10,500.00	Attend [REDACTED]; participate in vendor calls; [REDACTED] internal status update; attend court hearing; update call with professionals; review and respond to vendor negotiations; review revised cash flow forecast and provide comments.
10/27/23	15532	Jodi Porepa	9.20	\$ 9,660.00	Attend case conference; participate in vendor calls; review proposed credit terms and provide comments; internal status update; review cash flow forecasts; review updated assumptions for the forecast.
10/28/23	15532	Jodi Porepa	1.70	\$ 1,785.00	[REDACTED] review certain vendor enquiries and revisions to deposit letters; update as necessary and provide comments.
10/30/23	15532	Jodi Porepa	11.20	\$ 11,760.00	Attend professionals call; review of disbursements; review CFF; internal status update; review order; review SISP; review and respond to expense enquiries.
10/31/23	15532	Jodi Porepa	8.70	\$ 9,135.00	Attend professionals call; review of disbursements; review CFF; internal status update; review order; review SISP; review and respond to expense enquiries.
10/30/23	24354	Kathleen Foster	1.00	\$ 155.00	Web update.
10/31/23	25541	Thomas Mullett	0.50	\$ 615.00	Updated buyer's list and various emails regarding the same.
10/23/23	31365	Graham McIntyre	8.80	\$ 6,512.00	Draft and update supplier deposit letters; communication with suppliers; assisting Company with proposed payment terms and deposits; updating Monitor's website; internal discussions regarding same.

Tacora Resources Inc.
493044.0001 - October 31, 2023

Date	TK#	Name	Hours	Amount	Narrative
10/24/23	31365	Graham McIntyre	11.80	\$ 8,732.00	Discussions with suppliers; review of proposed payment terms and deposits for suppliers; update draft vendor negotiation letters; upload documents to Monitor's site; internal discussions regarding same.
10/25/23	31365	Graham McIntyre	6.80	\$ 5,032.00	Discussions regarding engagement matters; assisting the Company with supplier deposit process; communications with suppliers; review of disbursements; review of cash flow variance analysis and provide comments.
10/26/23	31365	Graham McIntyre	12.80	\$ 9,472.00	Review updated cash flows; finalize variance analysis and discussions regarding the same; calls with suppliers; review proposed payment terms and deposits with debtor and suppliers compared to CFF.
10/27/23	31365	Graham McIntyre	9.50	\$ 7,030.00	Review revised cash flow for alternative DIPs; review financial analyze comparing different versions of the cash flow forecast; update court report cash flow; discussions with management regarding cash flow; communication with suppliers; correspondence with Management.
10/30/23	31365	Graham McIntyre	9.80	\$ 7,252.00	Calls with suppliers; discussions with management regarding cash flows; discussions with management regarding vendor management; internal discussions regarding suppliers; review of court documents.
10/31/23	31365	Graham McIntyre	7.30	\$ 5,402.00	Review cash flows; internal discussions regarding engagement matters; discussions with suppliers; review and update deposit letters.
10/31/23	32475	Hailey Liu	3.80	\$ 2,622.00	Internal status update; attend vendor meetings and draft vendor communication; review call log; summarize SISP and ARIO order.
10/31/23	34418	Olivia Manarin	2.00	\$ 1,380.00	Provide additional contact information for buyers list.
10/23/23	35443	Jesse Salomons	5.50	\$ 4,070.00	Review and maintain Monitor's hotline; vendor and supplier correspondence; update Monitor's website; internal discussions regarding vendor management; company discussions regarding vendor management; address other post filing matters.
10/24/23	35443	Jesse Salomons	5.80	\$ 4,292.00	Review and respond to enquiries on Monitor's hotline; update Monitor's website; engage in vendor correspondence and negotiations; track post-filing credit terms and deposits through vendor negotiations; internal discussions regarding vendor management.
10/25/23	35443	Jesse Salomons	6.50	\$ 4,810.00	Review and maintain Monitor's hotline; vendor correspondence including tracking updated terms and deposits through all vendor negotiations; internal discussions regarding engagement matters; addressing other post filing matters.
10/26/23	35443	Jesse Salomons	8.50	\$ 6,290.00	Review and respond to enquiries on Monitor's hotline; vendor and supplier meetings and correspondence; track, upload, and maintain Monitor's website; internal status update discussions; Company discussions regarding vendor management.
10/27/23	35443	Jesse Salomons	8.30	\$ 6,142.00	Review and respond to enquiries on the Monitor's hotline; vendor and supplier correspondence; update summary of vendor negotiated agreed upon post-filing terms; review cash flow forecasts and provide comments; internal discussions regarding vendor management; correspondence with Company management; addressing other post filing matters.
10/30/23	35443	Jesse Salomons	10.30	\$ 7,622.00	Review and respond to enquiries on Monitor's hotline; vendor meetings and additional correspondence regarding post-filing terms; update draft vendor letters and discuss the same with the company; update Monitor's website management; internal FTI discussions regarding vendor management and other engagement matters.
10/31/23	35443	Jesse Salomons	8.80	\$ 6,512.00	Review and respond to enquiries on Monitor's hotline; attend vendor meetings and prepare correspondence to memorialize negotiated post-filing terms; track terms and deposits through vendor negotiations; update summary of the same; discussions with Stikeman over [REDACTED]; internal discussions regarding ongoing negotiations and vendor management; correspondence with Company management.
10/31/23	35531	William Reid	2.60	\$ 1,794.00	Update contact information; update Tacora Resources SISP contact log.

Tacora Resources Inc.
493044.0001 - October 31, 2023

Date	TK#	Name	Hours	Amount	Narrative
10/24/23	38706	Dean Perlman	0.80	\$ 520.00	Review updated variance analysis and provide comments; internal status update.
10/25/23	38706	Dean Perlman	2.20	\$ 1,430.00	Internal discussion on vendor management; email correspondence with the Company on outstanding vendor enquiries; update variance analysis; review variance analysis and key explanations; internal discussion on variance analysis.
10/26/23	38706	Dean Perlman	1.10	\$ 715.00	Discuss variance analysis [REDACTED]; finalize variance analysis; internal status update.
10/27/23	38706	Dean Perlman	0.40	\$ 260.00	Website updates.
10/30/23	38706	Dean Perlman	1.40	\$ 910.00	Email correspondence with the company regarding outstanding vendor invoices; [REDACTED] call with company regarding vendor communications.
10/31/23	38706	Dean Perlman	1.50	\$ 975.00	Review variance analysis and provide comments; review revised CFF and provide comments; [REDACTED] email correspondence with the Company on consultant reports and cash flow forecasting; provide comments in respect of the same.
10/23/23	39589	Caitlin Moreland	1.00	\$ 155.00	Web update.
10/24/23	39589	Caitlin Moreland	0.40	\$ 62.00	Web update.
10/27/23	39589	Caitlin Moreland	0.70	\$ 108.50	Web update.
10/31/23	39589	Caitlin Moreland	0.30	\$ 46.50	Web update.
TOTAL				\$ 217,495.00	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

November 15, 2023
102900000691
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Amount Due Current Invoice

\$228,100.90

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please remit cheque payments to:	FTI Consulting Canada Inc.
	C/O T10073
	P.O. Box 10073
	Postal Station A
	Toronto, ON M5W 2B1
	Canada

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No. **November 15, 2023**
Job No. **10290000691**
Terms **493044.0001**
Currency **Due Upon Receipt**
Tax Registration: **CAD**

RE: FTI Engagement

Name	Title	Rate	Hours	Total
Nigel Meakin	Senior Managing Director	\$1,230.00	2.90	\$3,567.00
Paul Bishop	Senior Managing Director	\$1,230.00	31.30	\$38,499.00
Jodi Porepa	Senior Managing Director	\$1,050.00	60.70	\$63,735.00
Graham McIntyre	Director	\$740.00	68.20	\$50,468.00
Jesse Salomons	Director	\$740.00	3.80	\$2,812.00
Hailey Liu	Director	\$690.00	36.60	\$25,254.00
Dean Perlman	Senior Consultant	\$650.00	11.60	\$7,540.00
Caitlin Moreland	Receptionist	\$155.00	2.90	\$449.50
Total Professional Services			218.00	\$192,324.50
Expenses				Total
Business Meals				\$86.36
Taxi				\$168.01
Total Expenses				\$254.37
Administrative Fee				\$5,769.74
Invoice Total				CAD Amount
				\$198,348.61
HST (15%)				\$29,752.29
Total Due				\$228,100.90

Tacora Resources Inc.
493044.0001 - November 12, 2023

Date	TK#	Name	Hours	Amount	Narrative
11/01/23	14797	Nigel Meakin	1.10	\$ 1,353.00	Call with company counsel regarding various issues; call with certain noteholders.
11/02/23	14797	Nigel Meakin	1.10	\$ 1,353.00	Preparation for board meeting and attendance of same.
11/03/23	14797	Nigel Meakin	0.70	\$ 861.00	Review of Confidential Information Memorandum and provide comments.
11/01/23	14800	Paul Bishop	3.70	\$ 4,551.00	Call with Monitor's counsel; call with ██████████; call with Company counsel; business update call with multiple parties; debrief call with FTI team; review of multiple emails.
11/02/23	14800	Paul Bishop	3.10	\$ 3,813.00	Board of Directors call; review of draft documents including, notices of solicitation, SISP and other materials.
11/03/23	14800	Paul Bishop	3.50	\$ 4,305.00	Call with Monitor's counsel; ██████████ update call with Company, counsel and Greenhill, call with FTI and Monitor's counsel; update call with Monitor's and Company's counsel; all hands call to discuss Confidential Information Memorandum; review of multiple drafts documents.
11/05/23	14800	Paul Bishop	0.80	\$ 984.00	Call with Greenhill, Stikemans and Monitor's counsel regarding SISP; call with Stikemans, Monitor's counsel, and Blakes.
11/06/23	14800	Paul Bishop	2.60	\$ 3,198.00	Review of Confidential Information Memorandum; review of deposits email; correspondence with counsel; daily update call; review of correspondence regarding certain vendors.
11/07/23	14800	Paul Bishop	3.90	\$ 4,797.00	Call with Monitor's counsel regarding various matters; review of Confidential Information Memorandum; review of correspondence regarding certain vendors; review of correspondence regarding lease; daily update call; correspondence with Monitor's counsel.
11/08/23	14800	Paul Bishop	4.50	\$ 5,535.00	Call with Monitor's counsel regarding various matters; call with Monitor's counsel, company counsel, and Greenhill regarding various matters; daily update call; review of comments on marketing material; review of correspondence regarding insurance; review of ██████████
11/09/23	14800	Paul Bishop	4.50	\$ 5,535.00	Board call; call with Monitor's counsel regarding various matters; call with FTI and company regarding cashflow; daily update call; review of response regarding DIP edits; review of SISP activity; review of cash flow variances; review of emails.
11/10/23	14800	Paul Bishop	4.70	\$ 5,781.00	Daily update call; call to review investor and debt list; review DIP response and edits of the same; correspondence with Monitor's counsel regarding various matters; review of payments and approvals; review of correspondence regarding the port and other matters; review of correspondence from Stikemans; review of various emails regarding payments and cash flow.
11/01/23	15532	Jodi Porepa	7.70	\$ 8,085.00	Attend calls with professionals; review and respond to third party vendors; discussions regarding Confidential Information Memorandum; review Confidential Information Memorandum and provide comments; discussions regarding confidentiality agreements; review variance analysis and provide comments; review deposit letters; discussions with Stikemans regarding tax queries; follow up on certain vendor enquiries.
11/02/23	15532	Jodi Porepa	7.30	\$ 7,665.00	Attend calls with professionals; review and respond to third party vendors; discussions regarding Confidential Information Memorandum; review Confidential Information Memorandum and provide comments; discussions regarding confidentiality agreements; review variance analysis and provide comments; review deposit letters; discussions with Stikemans regarding tax queries; follow up on certain vendor enquiries.
11/03/23	15532	Jodi Porepa	8.10	\$ 8,505.00	Attend calls with professionals; review and respond to third party vendors; discussions regarding Confidential Information Memorandum; review Confidential Information Memorandum and provide comments; discussions regarding confidentiality agreements; review variance analysis and provide comments; review deposit letters; discussions with Stikemans regarding tax queries; follow up on certain vendor enquiries.

Tacora Resources Inc.
493044.0001 - November 12, 2023

Date	TK#	Name	Hours	Amount	Narrative
11/05/23	15532	Jodi Porepa	1.00	\$ 1,050.00	Attend calls with professionals; review and respond to third party vendors; discussions regarding Confidential Information Memorandum; review Confidential Information Memorandum and provide comments; discussions regarding confidentiality agreements; review variance analysis and provide comments; review deposit letters; discussions with Stikemans regarding tax queries; follow up on certain vendor enquiries.
11/06/23	15532	Jodi Porepa	8.60	\$ 9,030.00	Review and respond to vendor enquiries; call with CFO to discuss unsecured claims and significant vendors; call with counsel to discuss sales tax implications; call with company to discuss certain vendor issues; internal status update.
11/07/23	15532	Jodi Porepa	8.10	\$ 8,505.00	Calls with certain vendor; internal status update; call with Tacora to discuss certain proposed payments; call with counsel to discuss certain vendor issues; call with counsel to discuss sales tax implications.
11/08/23	15532	Jodi Porepa	6.00	\$ 6,300.00	Review and respond to vendor enquiries; call with CFO to discuss unsecured claims and significant vendors; call with counsel to discuss sales tax implications; call with company to discuss certain vendor issues; internal status update.
11/09/23	15532	Jodi Porepa	7.70	\$ 8,085.00	Review variance analysis and provide comments; review cash flow forecast and provide comments; review and respond to vendors; review draft Stikemans letter and provide comments; review certain vendor issues and provide comments; call with Company; internal status update; weekly calls with key stakeholders.
11/10/23	15532	Jodi Porepa	6.20	\$ 6,510.00	Follow up on updated cash flow assumptions; internal status update; review and respond to vendor enquiries; call with CFO to discuss DIP requirements; call with accounting team to discuss proposed payments to vendors.
11/01/23	31365	Graham McIntyre	10.30	\$ 7,622.00	Discussions with suppliers including payment terms and deposit amounts; review of variance analysis; internal discussions regarding engagement matters; responding to the Monitor's hotline; review of cash flow forecast; review of draft deposit letters.
11/02/23	31365	Graham McIntyre	9.50	\$ 7,030.00	Finalizing variance analysis report; discussions with suppliers; finalizing deposit letters; review of █████ interest calculation.
11/03/23	31365	Graham McIntyre	9.80	\$ 7,252.00	Discussions with suppliers; review of proposed supplier payment terms and supplier deposits; internal discussions regarding engagement matters; review and discussions regarding cash flow forecast.
11/06/23	31365	Graham McIntyre	5.80	\$ 4,292.00	Discussions with suppliers; review and revisions to draft deposit letters; internal discussions regarding engagement matters.
11/07/23	31365	Graham McIntyre	6.00	\$ 4,440.00	Discussions with suppliers; internal discussions regarding suppliers and payment terms; review of draft deposit letters; opening new bank accounts for SISP.
11/08/23	31365	Graham McIntyre	8.50	\$ 6,290.00	Updating variance analysis; discussions with suppliers and reviewing payment terms and deposits; internal discussions regarding engagement matters.
11/09/23	31365	Graham McIntyre	10.50	\$ 7,770.00	Review and finalize variance analysis; preliminary review of cash flow forecast; discussions with suppliers.
11/10/23	31365	Graham McIntyre	7.80	\$ 5,772.00	Review of revised cash flow forecast; discussion with suppliers; internal discussions regarding engagement matters.
11/01/23	32475	Hailey Liu	6.70	\$ 4,623.00	Correspondence with suppliers; review Monitor's hotline; maintain Monitor's hotline log; summarize SISP order obligations of each party and update milestone calendar; review preauthorized debits.
11/02/23	32475	Hailey Liu	6.30	\$ 4,347.00	Correspondence with suppliers; review Monitor's hotline; maintain Monitor's hotline log; summarize SISP order obligations of each party and update milestone calendar; review preauthorized debits.
11/03/23	32475	Hailey Liu	6.10	\$ 4,209.00	Correspondence with suppliers; review Monitor's hotline; maintain Monitor's hotline log; summarize SISP order obligations of each party and update milestone calendar; review preauthorized debits.

Tacora Resources Inc.
493044.0001 - November 12, 2023

Date	TK#	Name	Hours	Amount	Narrative
11/06/23	32475	Hailey Liu	4.50	\$ 3,105.00	Correspondence with suppliers; review Monitor's hotline; maintain Monitor's hotline log; review vendor agreements; track and log vendor and monitor held supplier deposits.
11/07/23	32475	Hailey Liu	5.70	\$ 3,933.00	Correspondence with suppliers; review Monitor's hotline; maintain Monitor's hotline log; review vendor agreements; track and log vendor and monitor held supplier deposits.
11/08/23	32475	Hailey Liu	3.60	\$ 2,484.00	Correspondence with suppliers; review Monitor's hotline; maintain Monitor's hotline log; review vendor agreements; track and log vendor and monitor held supplier deposits.
11/09/23	32475	Hailey Liu	2.80	\$ 1,932.00	Correspondence with suppliers; review Monitor's hotline; maintain Monitor's hotline log; review vendor agreements; track and log vendor and monitor held supplier deposits.
11/10/23	32475	Hailey Liu	0.90	\$ 621.00	Correspondence with suppliers; review Monitor's hotline; maintain Monitor's hotline log; review vendor agreements; track and log vendor and monitor held supplier deposits.
11/01/23	35443	Jesse Salomons	3.80	\$ 2,812.00	Review Monitor's hotline; vendor meetings and follow up correspondence; discussions and review of contract terms; internal discussions regarding engagement matters.
11/01/23	38706	Dean Perlman	2.20	\$ 1,430.00	Internal discussion on consultant report invoices; update variance analysis for revised cash flow forecast; review variance analysis and key explanations.
11/02/23	38706	Dean Perlman	1.30	\$ 845.00	Review of variance analysis and discussions regarding the same.
11/03/23	38706	Dean Perlman	3.50	\$ 2,275.00	Review and comparison of updated outstanding invoices; internal discussion regarding suppliers; vendor communications call with the Company.
11/06/23	38706	Dean Perlman	2.70	\$ 1,755.00	Correspondence with Company regarding suppliers; review of certain supplier accounts; updating variance analysis workbook.
11/07/23	38706	Dean Perlman	0.40	\$ 260.00	Internal discussion on vendor invoices outstanding; call with Company on payment processing timelines for vendors.
11/08/23	38706	Dean Perlman	1.10	\$ 715.00	Update variance analysis workbook; internal discussion on variance.
11/09/23	38706	Dean Perlman	0.40	\$ 260.00	Review and finalize variance analysis for DIP lender.
11/02/23	39589	Caitlin Moreland	1.40	\$ 217.00	Update Monitor's website.
11/03/23	39589	Caitlin Moreland	0.50	\$ 77.50	Update Monitor's website.
11/04/23	39589	Caitlin Moreland	0.50	\$ 77.50	Update Monitor's website.
11/07/23	39589	Caitlin Moreland	0.50	\$ 77.50	Update Monitor's website.
TOTAL				\$ 192,324.50	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

November 24, 2023
102900000704
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Amount Due Current Invoice

\$68,676.85

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please remit cheque payments to:	FTI Consulting Canada Inc.
	C/O T10073
	P.O. Box 10073
	Postal Station A
	Toronto, ON M5W 2B1
	Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No. **November 24, 2023**
Job No. **10290000704**
Terms **493044.0001**
Currency **Due Upon Receipt**
Tax Registration: **CAD**

RE: FTI Engagement

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	24.70	\$30,381.00
Jodi Porepa	Senior Managing Director	\$1,050.00	2.60	\$2,730.00
Graham McIntyre	Director	\$740.00	32.90	\$24,346.00
Caitlin Moreland	Receptionist	\$155.00	0.20	\$31.00
Total Professional Services			60.40	\$57,488.00
Expenses				Total
Business Meals				\$506.36
Total Expenses				\$506.36
Administrative Fee				\$1,724.64
Invoice Total				CAD Amount
				\$59,719.00
HST (15%)				\$8,957.85
Total Due				\$68,676.85

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com

Tacora Resources Inc.
493044.0001 - November 19, 2023

Date	TK#	Name	Hours	Amount	Narrative
11/13/23	14800	Paul Bishop	3.30	\$ 4,059.00	Multiple emails; correspondence with Monitor's counsel on various matters; daily update call; review of cash flow items and proposed payments; review of correspondence regarding proposed payments terms; review correspondence [REDACTED]
11/14/23	14800	Paul Bishop	5.20	\$ 6,396.00	Call with Monitor's counsel [REDACTED]; call with Monitor's counsel; call with Company and various counsel; follow up call with company and counsel; daily update call; review of draft materials; call with Monitor's counsel; multiple emails; review of payments.
11/15/23	14800	Paul Bishop	4.50	\$ 5,535.00	[REDACTED] call with Monitor's counsel, Stikeman Elliott and company; review of draft documents; review of cash flow; review of payments; call with Monitor's counsel and [REDACTED]; multiple emails; review of drafts; [REDACTED]
11/16/23	14800	Paul Bishop	5.20	\$ 6,396.00	Call with company, Greenhill [REDACTED]; call with Monitor's counsel regarding various matters; meeting with Confidential party and counsel; further call with [REDACTED] Company and Greenhill; payment approvals; multiple emails.
11/17/23	14800	Paul Bishop	6.50	\$ 7,995.00	[REDACTED] call with Greenhill; call to review cash flow forecast; review of cash flow forecast and updated key assumptions; review of correspondence; internal status update call; daily update call; review of multiple emails and respond.
11/14/23	15532	Jodi Porepa	2.60	\$ 2,730.00	Attend [REDACTED] call; post-call debrief; call with Cassels Brock and Stikeman regarding [REDACTED]
11/13/23	31365	Graham McIntyre	4.80	\$ 3,552.00	Discussions regarding updated cash flow forecast; review updated variance and provide comments; communication with suppliers; review of proposed wire payments.
11/14/23	31365	Graham McIntyre	8.30	\$ 6,142.00	Discussions and review of revised cash flow forecast; discussions with suppliers; review of pre-filing creditors; responding to hotline enquiries; finalize deposits.
11/15/23	31365	Graham McIntyre	6.50	\$ 4,810.00	Discussions with suppliers; discussions with the Company regarding vendor management; review of payments; review updated cash flow forecast.
11/16/23	31365	Graham McIntyre	7.50	\$ 5,550.00	Disbursements review; cash flow review; update financial analyses; review updated variance analysis and provide comments; discussions with suppliers; draft deposit letter; internal discussions regarding engagement matters.
11/17/23	31365	Graham McIntyre	5.80	\$ 4,292.00	Review variance analysis and provide comments; review of updated DIP Budget; discussions with management regarding DIP budget; discussions and correspondence with suppliers; review of Monitor's hotline and respond to enquiries.
11/16/23	39589	Caitlin Moreland	0.20	\$ 31.00	Web update.
TOTAL				\$ 57,488.00	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

November 29, 2023
102900000707
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Amount Due Current Invoice

\$73,935.90

Bank Information

Please indicate our invoice number with your remittance

Account Name: FTI Consulting Canada Inc.
Bank Name: Bank of Nova Scotia
Bank Address: Scotia Plaza, 44 King Street West
Toronto, Ontario M5H 1H1
Canada

Bank Code: 002
Account Number: 0861715
Swift/BIC Code: NOSCCATT
Transit Code: 47696
Account Currency: CAD

Please remit cheque payments to: FTI Consulting Canada Inc.
C/O T10073
P.O. Box 10073
Postal Station A
Toronto, ON M5W 2B1
Canada

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

November 29, 2023
Invoice No. 10290000707
Job No. 493044.0001
Terms Due Upon Receipt
Currency CAD
Tax Registration:

RE: FTI Engagement

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	14.60	\$17,958.00
Jodi Porepa	Senior Managing Director	\$1,050.00	27.30	\$28,665.00
Graham McIntyre	Director	\$740.00	21.20	\$15,688.00
Caitlin Moreland	Receptionist	\$155.00	0.70	\$108.50
Total Professional Services			63.80	\$62,419.50
Administrative Fee				\$1,872.59
Invoice Total				CAD Amount
				\$64,292.09
HST (15%)				\$9,643.81
Total Due				\$73,935.90

Tacora Resources Inc.
493044.0001 - November 26, 2023

Date	TK#	Name	Hours	Amount	Narrative
11/20/23	14800	Paul Bishop	2.90	\$ 3,567.00	Call with Company, █████ and Greenhill; internal calls; daily update call with company, advisors, Greenhill and counsel; review multiple emails and respond accordingly.
11/21/23	14800	Paul Bishop	4.20	\$ 5,166.00	Call with company regarding mark to market impacts to cash flow forecast; call with Monitor's counsel regarding various matters; daily update call; multiple emails; █████ review of █████; review of lease issues; review of insurance motion materials.
11/22/23	14800	Paul Bishop	3.20	\$ 3,936.00	Call with Monitor's counsel; attend Board call; call with █████
11/23/23	14800	Paul Bishop	2.40	\$ 2,952.00	Call with Monitor's counsel; review of cash flow and payments; review of variance analysis; review of process letter.
11/24/23	14800	Paul Bishop	1.90	\$ 2,337.00	Call with █████ and Monitor's counsel; review of final variance report; review of correspondence regarding █████; review of process letter edits.
11/20/23	15532	Jodi Porepa	7.10	\$ 7,455.00	Review disbursements requests; review and respond to vendors; review updated cash flow forecast; attend daily calls with professionals; internal status update; review motion materials in advance of next hearing.
11/21/23	15532	Jodi Porepa	6.80	\$ 7,140.00	Review and respond to vendor enquiries; review updated vendor communication; review updated cash flow forecast and provide comments; review updated financial analyses; review changes to key assumptions and assess reasonableness; attend daily calls with professionals; internal status update; review motion materials in advance of next hearing.
11/22/23	15532	Jodi Porepa	4.40	\$ 4,620.00	Internal status updates; review and respond to third party enquiries; review status of vendor management; review updated cash flow forecast and provide comments; attend daily calls with professionals; internal status update; review motion materials in advance of next hearing.
11/23/23	15532	Jodi Porepa	4.60	\$ 4,830.00	Review and finalize variance analysis; internal status update; review updated cash flow forecast and █████; provide comments in respect of the same; review tax follow up questions; review tax guidance; internal status update; attend court.
11/24/23	15532	Jodi Porepa	4.40	\$ 4,620.00	Weekly call with professionals; review response to lien analysis; review response to property analysis; internal discussion regarding same; review █████
11/20/23	31365	Graham McIntyre	2.80	\$ 2,072.00	Review Monitor's hotline and respond to third party enquiries; review proposed disbursements and provide comments; correspondence with suppliers; internal discussions regarding engagement matters.
11/21/23	31365	Graham McIntyre	2.30	\$ 1,702.00	Review proposed disbursements and discuss same with the company; correspondence with suppliers; updated draft communication for vendors; review and respond to Monitor's hotline and third party enquiries.
11/22/23	31365	Graham McIntyre	8.50	\$ 6,290.00	Review variance analysis and provide comments; prepare variance reporting schedules for DIP lender; review proposed disbursements; review internal cash flow forecast and provide comments; correspondence with suppliers.
11/23/23	31365	Graham McIntyre	4.30	\$ 3,182.00	Finalize variance analysis; review Monitor's hotline and respond to vendor enquiries; upload documents to Monitor's website; correspondence with suppliers; discussions with management in respect of same.
11/24/23	31365	Graham McIntyre	3.30	\$ 2,442.00	Discussions with suppliers regarding deposits; update financial summaries; review Monitor's hotline and respond to third party enquiries; review of █████ against forecast and follow up with the company in respect of same.
11/21/23	39589	Caitlin Moreland	0.20	\$ 31.00	Web update.
11/23/23	39589	Caitlin Moreland	0.50	\$ 77.50	Web update.
TOTAL				\$ 62,419.50	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

November 30, 2023
102900000715
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Amount Due Current Invoice

\$63,634.89

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please remit cheque payments to:	FTI Consulting Canada Inc.
	C/O T10073
	P.O. Box 10073
	Postal Station A
	Toronto, ON M5W 2B1
	Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

November 30, 2023
Invoice No. 102900000715
Job No. 493044.0001
Terms Due Upon Receipt
Currency CAD
Tax Registration:

RE: FTI Engagement

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	14.50	\$17,835.00
Jodi Porepa	Senior Managing Director	\$1,050.00	20.90	\$21,945.00
Graham McIntyre	Director	\$740.00	18.80	\$13,912.00
Caitlin Moreland	Receptionist	\$155.00	0.20	\$31.00
Total Professional Services			54.40	\$53,723.00
Administrative Fee				\$1,611.69
Invoice Total				CAD Amount
				\$55,334.69
HST (15%)				\$8,300.20
Total Due				\$63,634.89

Tacora Resources Inc.
493044.0001 - November 30, 2023

Date	TK#	Name	Hours	Amount	Narrative
11/27/23	14800	Paul Bishop	6.20	\$ 7,626.00	██████████ update call with Monitor's counsel and company counsel; call with ██████████; call with ██████; call with ██████████ company and Greenhill; daily update call with company, Greenhill and Company counsel.
11/28/23	14800	Paul Bishop	2.70	\$ 3,321.00	Review ██████████ review draft correspondence; review SISP update; daily update call; review of multiple emails; call with Monitor's counsel regarding various matters.
11/29/23	14800	Paul Bishop	2.40	\$ 2,952.00	Daily update call; correspondence regarding ██████████; review of correspondence regarding lease and other matters; review of SISP procedures and correspondence.
11/30/23	14800	Paul Bishop	3.20	\$ 3,936.00	Board call; call with Monitor's counsel; review of documents ██████████; daily update call; review of updated CFF and ██████████
11/27/23	15532	Jodi Porepa	5.70	\$ 5,985.00	Call with professionals to discuss sales process; daily professionals call; call with Stikemans; call with management to discuss ██████████; discussion on certain deposit letters; internal status update.
11/28/23	15532	Jodi Porepa	6.20	\$ 6,510.00	Call with professionals to discuss sales process; daily professionals call; review updated cash flow forecast and changes to key assumptions; discussions with the Company in respect of same; call with management to discuss vendor management; discussion on certain deposit letters; internal status update.
11/29/23	15532	Jodi Porepa	4.40	\$ 4,620.00	Weekly call ██████████; daily call with professionals; call with company to discuss follow up items; call with Cassels to discuss ██████████ review ██████████; review ██████████; review preliminary ██████████; internal status update.
11/30/23	15532	Jodi Porepa	4.60	\$ 4,830.00	Follow up on outstanding items; call with counsel; call with ██████ to discuss outstanding items; review proposed disbursements; internal status update; review proposed disbursements and provide comments; review deposit letters and provide comments.
11/28/23	31365	Graham McIntyre	4.80	\$ 3,552.00	Update draft supplier deposit agreements; post documents to Monitor's website; review and respond to Monitor's hotline; review of DIP interest calculation.
11/29/23	31365	Graham McIntyre	6.50	\$ 4,810.00	Review deposit letter agreements and provide comments; update financial summaries; discussions with suppliers; review of ██████████; review of ██████████; review and response to Monitor's hotline; update draft ██████████ estimates.
11/30/23	31365	Graham McIntyre	7.50	\$ 5,550.00	Prepare analysis estimating ██████████; review of disbursements and provide comments; review deposit letter agreements and provide comments; review of variance analysis; discussions with suppliers and respond to third party enquiries on the Monitor's hotline.
11/28/23	39589	Caitlin Moreland	0.20	\$ 31.00	Web update.
TOTAL				\$ 53,723.00	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

December 12, 2023
102900000768
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through December 10, 2023

Amount Due Current Invoice **\$106,619.21**

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please remit cheque payments to:	FTI Consulting Canada Inc.
	C/O T10073
	P.O. Box 10073
	Postal Station A
	Toronto, ON M5W 2B1
	Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

December 12, 2023
Invoice No. 10290000768
Job No. 493044.0001
Terms Due Upon Receipt
Currency CAD
Tax Registration:

RE: FTI Engagement

Current Invoice Period: Charges posted through December 10, 2023

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	23.60	\$29,028.00
Jodi Porepa	Senior Managing Director	\$1,050.00	26.20	\$27,510.00
Graham McIntyre	Director	\$740.00	44.90	\$33,226.00
Caitlin Moreland	Receptionist	\$155.00	1.60	\$248.00
Total Professional Services			96.30	\$90,012.00
Administrative Fee				\$2,700.36
Invoice Total				CAD Amount
				\$92,712.36
HST (15%)				\$13,906.85
Total Due				\$106,619.21

Tacora Resources Inc.
493044.0001 - December 10, 2023

Date	TK#	Name	Hours	Amount	Narrative
12/01/23	14800	Paul Bishop	5.20	\$ 6,396.00	Call with company, Monitor's counsel, Greenhill and Company Counsel; review of first round bids; call with Monitor's counsel and [REDACTED]
12/04/23	14800	Paul Bishop	3.90	\$ 4,797.00	Call with Monitor's counsel and Company counsel; call with Monitor's counsel, Company Counsel, Company and Greenhill and follow-up call with same group; review of Phase 1 bids.
12/05/23	14800	Paul Bishop	3.10	\$ 3,813.00	Attend Board meeting; review of bids and provide comments; call with Monitor's counsel regarding various matters; review of [REDACTED]; review of tax attributes memo.
12/06/23	14800	Paul Bishop	4.40	\$ 5,412.00	Call with [REDACTED]; call with Company, Greenhill and counsel to discuss next steps; call with [REDACTED] and Monitor's counsel; call with [REDACTED] and Counsel, Greenhill, Monitor's counsel and Company's counsel; review of payments; review of correspondence regarding various matters; update call with FTI.
12/07/23	14800	Paul Bishop	3.40	\$ 4,182.00	Calls with company; Greenhill and counsel to discuss various SISP matters; daily update call; review of revised cashflow; multiple emails.
12/08/23	14800	Paul Bishop	3.60	\$ 4,428.00	Calls with Greenhill, company and counsel to discuss SISP related matters; daily update call; review of drafts and correspondence; review of DIP budget; review of Phase 2 process items.
12/01/23	15532	Jodi Porepa	3.60	\$ 3,780.00	Weekly update call; review bids; review variance analysis.
12/04/23	15532	Jodi Porepa	5.30	\$ 5,565.00	Call with Cassels Brock and Stikemans; daily professionals call; discuss SISP and overview of bids; internal status update; review updated deposit letter; review proposed disbursements and provide comments; review draft responses to third party enquiries; review draft [REDACTED] and provide comments; review draft [REDACTED]
12/05/23	15532	Jodi Porepa	5.30	\$ 5,565.00	Call with counsel to discuss outstanding items; court hearing regarding insurance premiums; attend Board call; daily professionals call; internal status update; review deposit letters and provide comments; review proposed payments.
12/06/23	15532	Jodi Porepa	4.20	\$ 4,410.00	Call with counsel to discuss outstanding items; court hearing regarding insurance premiums; attend Board call; daily professionals call; internal status update; review deposit letters and provide comments; review proposed payments.
12/07/23	15532	Jodi Porepa	4.40	\$ 4,620.00	Call to discuss next steps for phase II; review variance analysis and provide comments; discuss disbursements; review disbursements and provide comments; daily call to discuss next steps; review updated cash flow forecast and provide comments; review issues [REDACTED]; review and respond to third party enquiries.
12/08/23	15532	Jodi Porepa	3.40	\$ 3,570.00	Review disbursements and provide comments; internal status update; review [REDACTED]; review summary of deposits and provide comments; review status of certain vendor discussions and provide comments; call with Cassels Brock to discuss the same.
12/01/23	31365	Graham McIntyre	8.30	\$ 6,142.00	Finalize variance analysis; update [REDACTED] estimates; review of post-filing AP; internal discussions regarding engagement matters.
12/04/23	31365	Graham McIntyre	4.30	\$ 3,182.00	Internal discussions regarding engagement matters; review draft deposit letter and provide comments; review of updated [REDACTED]; and discuss with management; upload documents to Monitor's website; review of hotline; [REDACTED] review of proposed disbursements.
12/05/23	31365	Graham McIntyre	5.50	\$ 4,070.00	Discussions with suppliers; update Monitor's website; review of Monitor's hotline; internal discussions regarding engagement matters; review of proposed deposit letter; review of proposed disbursements; work on estimates [REDACTED].

Tacora Resources Inc.
493044.0001 - December 10, 2023

Date	TK#	Name	Hours	Amount	Narrative
12/06/23	31365	Graham McIntyre	7.80	\$ 5,772.00	Review variance analysis and provide comments; review of proposed weekly disbursements; work on ██████ analysis; review of Monitor's hotline; finalizing deposit letter; internal discussions regarding engagement matters; update Monitor's website.
12/07/23	31365	Graham McIntyre	10.50	\$ 7,770.00	Review updated variance analysis and provide comments; review updated DIP budget and provide comments; update financial analyses on changes to the CFF; finalize DIP budget; update Monitor's website; finalize updated ██████ analysis; correspondence with suppliers.
12/08/23	31365	Graham McIntyre	8.50	\$ 6,290.00	Review of revised DIP budget and provide comments; refresh financial analyses on cash flow; prepare a summary of deposits; update summary with ██████ finalizing deposit letters; work on ██████ analysis; discuss the same with the company.
12/01/23	39589	Caitlin Moreland	0.20	\$ 31.00	Web update.
12/04/23	39589	Caitlin Moreland	0.30	\$ 46.50	Web update.
12/05/23	39589	Caitlin Moreland	0.50	\$ 77.50	Web update.
12/06/23	39589	Caitlin Moreland	0.20	\$ 31.00	Web update.
12/07/23	39589	Caitlin Moreland	0.20	\$ 31.00	Web update.
12/08/23	39589	Caitlin Moreland	0.20	\$ 31.00	Web update.
TOTAL				\$ 90,012.00	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

December 20, 2023
102900000785
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through December 17, 2023

Amount Due Current Invoice **\$92,811.50**

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please remit cheque payments to:	FTI Consulting Canada Inc.
	C/O T10073
	P.O. Box 10073
	Postal Station A
	Toronto, ON M5W 2B1
	Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

December 20, 2023
Invoice No. 102900000785
Job No. 493044.0001
Terms Due Upon Receipt
Currency CAD
Tax Registration:

RE: FTI Engagement

Current Invoice Period: Charges posted through December 17, 2023

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	16.80	\$20,664.00
Jodi Porepa	Senior Managing Director	\$1,050.00	30.60	\$32,130.00
Graham McIntyre	Director	\$740.00	34.50	\$25,530.00
Caitlin Moreland	Receptionist	\$155.00	0.20	\$31.00
Total Professional Services			82.10	\$78,355.00
Administrative Fee				\$2,350.65
Invoice Total				CAD Amount
				\$80,705.65
HST (15%)				\$12,105.85
Total Due				\$92,811.50

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com

Tacora Resources Inc.
493044.0001 - December 17, 2023

Date	TK#	Name	Hours	Amount	Narrative
12/11/23	14800	Paul Bishop	2.10	\$ 2,583.00	Call with counsel and company counsel regarding various matters; call with company counsel and Greenhill regarding various matters; review of correspondence; [REDACTED]
12/12/23	14800	Paul Bishop	4.40	\$ 5,412.00	Call with Monitor's counsel regarding various matters; [REDACTED] and review of information regarding same; daily update call; call with Monitor's and Company Counsel regarding various matters; review of forecasts.
12/13/23	14800	Paul Bishop	4.70	\$ 5,781.00	Weekly call with company and [REDACTED]; call with [REDACTED] company and Greenhill; daily update call with company and counsel; review of financial information; multiple emails.
12/14/23	14800	Paul Bishop	2.90	\$ 3,567.00	Attend Board meeting; [REDACTED] review of disbursements; call with Monitor's counsel regarding various matters.
12/15/23	14800	Paul Bishop	2.70	\$ 3,321.00	Attend management presentation as part of the SISP; review of cash flow and disbursements and provide comments; review of [REDACTED]; multiple emails.
12/11/23	15532	Jodi Porepa	3.40	\$ 3,570.00	Weekly call with counsel; daily call with all professionals; internal status update; review financial analyses and provide comments.
12/12/23	15532	Jodi Porepa	5.40	\$ 5,670.00	Weekly call with counsel; daily call with all professionals; discussions regarding cash flow forecast; discussions regarding vendor enquiries; discussion regarding certain steps taken by certain third party vendors; update call with counsel.
12/13/23	15532	Jodi Porepa	6.70	\$ 7,035.00	Attend daily call with all professionals; discussions with the Company regarding cash flow forecast; review and provide comments on financial analyses on the CFF; discuss status vendor management; discussion regarding certain steps taken by certain third party vendors; update call with counsel.
12/14/23	15532	Jodi Porepa	7.50	\$ 7,875.00	Weekly call with counsel; daily call with all professionals; discussions regarding cash flow forecast; discussions regarding vendor enquiries; discussion regarding certain steps taken by certain third party vendors; update call with counsel.
12/15/23	15532	Jodi Porepa	6.60	\$ 6,930.00	Weekly call with counsel; daily call with all professionals; discussions regarding cash flow forecast; discussions regarding vendor enquiries; discussion regarding certain steps taken by certain third party vendors; update call with counsel.
12/17/23	15532	Jodi Porepa	1.00	\$ 1,050.00	Daily call with all professionals; discussions regarding cash flow forecast; provide comments to the Company in respect of the same; discussions regarding vendor enquiries; discussion regarding certain steps taken by certain third party vendors; update call with counsel.
12/11/23	31365	Graham McIntyre	5.50	\$ 4,070.00	Review of contract listing for [REDACTED] estimates; review and update professional fee summary and forecast; discussions regarding engagement matters; updates to deposit summary; [REDACTED]
12/12/23	31365	Graham McIntyre	6.30	\$ 4,662.00	Review of contract listing and follow up with the Company on [REDACTED] estimates; correspondence with suppliers; preparing AP summaries; discussions regarding engagement matters; review of hotline; uploading documents to Monitor's website.
12/13/23	31365	Graham McIntyre	5.80	\$ 4,292.00	Finalize [REDACTED] estimates; discussions with suppliers regarding post-filing deposits and credit terms going forward; review of historical professional fees and forecasting fees for revised cash flow forecast; internal discussions regarding engagement matters.
12/14/23	31365	Graham McIntyre	5.20	\$ 3,848.00	Review of extended cash flow forecast; variance analysis; review of proposed disbursements; discussions regarding engagement matters; review of Monitor's hotline.
12/15/23	31365	Graham McIntyre	7.50	\$ 5,550.00	Finalizing variance analysis; review of cure cost estimates; correspondence with suppliers; review of agreements in data room.
12/17/23	31365	Graham McIntyre	4.20	\$ 3,108.00	Update [REDACTED] estimate analysis; review of extended cash flow forecast and assess scenarios; provide comments in respect of the same.
12/13/23	39589	Caitlin Moreland	0.20	\$ 31.00	Web update.
TOTAL				\$ 78,355.00	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

December 31, 2023
102900000805
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through December 31, 2023

Amount Due Current Invoice **\$101,303.78**

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please remit cheque payments to:	FTI Consulting Canada Inc.
	C/O T10073
	P.O. Box 10073
	Postal Station A
	Toronto, ON M5W 2B1
	Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

December 31, 2023
Invoice No. 102900000805
Job No. 493044.0001
Terms Due Upon Receipt
Currency CAD
Tax Registration:

RE: FTI Engagement

Current Invoice Period: Charges posted through December 31, 2023

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	21.40	\$26,322.00
Jodi Porepa	Senior Managing Director	\$1,050.00	40.30	\$42,315.00
Graham McIntyre	Director	\$740.00	22.80	\$16,872.00
Caitlin Moreland	Receptionist	\$155.00	0.10	\$15.50
Total Professional Services			84.60	\$85,524.50
Administrative Fee				\$2,565.74
Invoice Total				CAD Amount
				\$88,090.24
HST (15%)				\$13,213.54
Total Due				\$101,303.78

Tacora Resources Inc.
493044.0001 - December 31, 2023

Date	TK#	Name	Hours	Amount	Narrative
12/18/23	14800	Paul Bishop	3.70	\$ 4,551.00	Call with Monitor's counsel and ██████ regarding various matters; review of draft document; review of timetables; call to review cash flow; call with Greenhill regarding various matters.
12/19/23	14800	Paul Bishop	2.30	\$ 2,829.00	Call with Monitor's counsel regarding various matters; review of draft documents; review of correspondence.
12/20/23	14800	Paul Bishop	3.90	\$ 4,797.00	Review correspondence regarding ██████; review of documents ██████ ██████ daily update call; review of correspondence regarding ██████; review and respond to multiple emails.
12/21/23	14800	Paul Bishop	4.30	\$ 5,289.00	Attend Board meeting; call with Monitor's counsel regarding various matters; call with Monitor's counsel and Company counsel regarding various matters; review of correspondence; review of ██████ review of correspondence regarding ██████; review of DIP forecast; review of post closing preparation; review of ██████ review of correspondence regarding variances.
12/22/23	14800	Paul Bishop	0.50	\$ 615.00	Call regarding ██████.
12/27/23	14800	Paul Bishop	1.70	\$ 2,091.00	Weekly call ██████ review of correspondence; internal status update call.
12/28/23	14800	Paul Bishop	2.90	\$ 3,567.00	Review of correspondence from ██████ multiple emails; related review of credit bid.
12/29/23	14800	Paul Bishop	2.10	\$ 2,583.00	Review of draft budget presentation; review of correspondence; correspondence with third parties.
12/18/23	15532	Jodi Porepa	4.30	\$ 4,515.00	Weekly call with professionals; review cash flow forecast and provide comments; internal status update; review ██████; review ██████
12/19/23	15532	Jodi Porepa	8.00	\$ 8,400.00	Site visit; follow up on email correspondence; review and respond to enquiries; review ██████; review ██████ respond to third party enquiries; review and respond to stakeholder requests.
12/20/23	15532	Jodi Porepa	8.00	\$ 8,400.00	Site visit; follow up on email correspondence; review and respond to enquiries; attend meetings with ██████; plant site tour; review ██████; review ██████; respond to third party enquiries; review and respond to ██████
12/21/23	15532	Jodi Porepa	6.20	\$ 6,510.00	Attend ██████ call with counsel to discuss SISP and additional preparation; review and respond to enquiries; discuss response to ██████ review ██████; review ██████ and provide comments; weekly call ██████.
12/22/23	15532	Jodi Porepa	5.10	\$ 5,355.00	Follow up on email correspondence; review and respond to enquiries; review ██████; review ██████; review cash flow forecast; review variance analysis; call ██████; internal call with counsel; review changes to revised and extended CFF; call to discuss ██████.
12/27/23	15532	Jodi Porepa	2.70	\$ 2,835.00	Review ██████ and provide comments; review variance analysis and provide comments; review updated and revised cash flow; review capital expenditures compared to forecast.
12/28/23	15532	Jodi Porepa	2.60	\$ 2,730.00	Internal status update; review follow up from SISP call regarding ██████ and provide comments; review ██████; review ██████; call to discuss ██████
12/29/23	15532	Jodi Porepa	3.40	\$ 3,570.00	Review proposed budget and Board presentation; review and provide comments on certain vendor agreements; review and respond to proposed disbursements.
12/18/23	31365	Graham McIntyre	5.30	\$ 3,922.00	Review extended cash flow forecast and provide comments; correspondence with suppliers; update milestones calendar; internal status update regarding same; review of data room; update Monitor's website; request documents be uploaded; review of third party enquiries on the Monitor's hotline and response; review of Company's ██████
12/19/23	31365	Graham McIntyre	2.50	\$ 1,850.00	Addressing supplier-related matters; addressing Monitor's hotline and responding to queries; discussions regarding engagement matters.

Tacora Resources Inc.
493044.0001 - December 31, 2023

Date	TK#	Name	Hours	Amount	Narrative
12/20/23	31365	Graham McIntyre	4.80	\$ 3,552.00	Review and update variance analysis and provide comments; review and respond to third party enquiries from the Monitor's hotline; addressing supplier-related matters; discussions regarding engagement matters.
12/21/23	31365	Graham McIntyre	3.20	\$ 2,368.00	Finalizing variance analysis; review of [REDACTED] and walkthrough of revised cash flow forecast; communication with suppliers.
12/22/23	31365	Graham McIntyre	4.50	\$ 3,330.00	Review of revised CFF and bridging differences; discussions with prospective buyers regarding [REDACTED]; discussions with suppliers; internal discussions regarding engagement matters.
12/28/23	31365	Graham McIntyre	2.50	\$ 1,850.00	Review of [REDACTED]; review of DIP interest; communication with Company.
12/19/23	39589	Caitlin Moreland	0.10	\$ 15.50	Web update.
TOTAL				\$ 85,524.50	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

January 09, 2024
102900000855
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through January 07, 2024

Amount Due Current Invoice **\$83,560.73**

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please remit cheque payments to:	FTI Consulting Canada Inc.
	C/O T10073
	P.O. Box 10073
	Postal Station A
	Toronto, ON M5W 2B1
	Canada



Invoice Summary

Tacora Resources Inc.
 1 Wabush Mines Road
 P.O. Box 3000
 Wabush, NL A0R 1B0
 Canada

Invoice No. **January 09, 2024**
 Job No. **102900000855**
 Terms **493044.0001**
 Currency **Due Upon Receipt**
 Tax Registration: **CAD**

RE: FTI Engagement

Current Invoice Period: Charges posted through January 07, 2024

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	27.50	\$33,825.00
Jodi Porepa	Senior Managing Director	\$1,050.00	18.90	\$19,845.00
Graham McIntyre	Director	\$740.00	20.40	\$15,096.00
Caitlin Moreland	Receptionist	\$155.00	0.20	\$31.00
Total Professional Services			67.00	\$68,797.00
Expenses				Total
Air Travel				\$1,201.48
Business Meals				\$45.01
Hotel & Lodging				\$489.10
Taxi				\$65.00
Total Expenses				\$1,800.59
Administrative Fee				\$2,063.91
Invoice Total				CAD Amount
				\$72,661.50
HST (15%)				\$10,899.23
Total Due				\$83,560.73

Tacora Resources Inc.
493044.0001 - January 7, 2024

Date	TK#	Name	Hours	Amount	Narrative
01/02/24	14800	Paul Bishop	4.20	\$ 5,166.00	Call with counsel [REDACTED]; update call with monitor's counsel; daily update call with company, Greenhill and counsel; review of documents.
01/03/24	14800	Paul Bishop	3.80	\$ 4,674.00	Review of correspondence; review of drafts documents; review of board deck; attend daily call; attend call [REDACTED]
01/04/24	14800	Paul Bishop	5.30	\$ 6,519.00	Board meeting; call with Monitor's counsel; call with advisors [REDACTED]; daily update call; call with company and advisors.
01/05/24	14800	Paul Bishop	2.50	\$ 3,075.00	Daily update call; review of documents and correspondence.
01/06/24	14800	Paul Bishop	2.50	\$ 3,075.00	Travel to YUL.
01/07/24	14800	Paul Bishop	9.20	\$ 11,316.00	Travel to Wabush; site visit with interested party.
01/02/24	15532	Jodi Porepa	3.50	\$ 3,675.00	Daily call; call with counsel to discuss ongoing issues; call [REDACTED] review Board deck and provide comments.
01/03/24	15532	Jodi Porepa	4.10	\$ 4,305.00	Daily call; call with [REDACTED]; review Board deck and provide comments; review cash flow forecast comparison to budget and provide comments; follow up [REDACTED]; review certain bid documents.
01/04/24	15532	Jodi Porepa	4.50	\$ 4,725.00	Daily call with professionals; Board call; review CFF comparison and provide comments; call [REDACTED]; internal status update call; call with counsel to discuss next steps; review cash flow analysis.
01/05/24	15532	Jodi Porepa	4.60	\$ 4,830.00	Daily call; call with [REDACTED]; review Board deck and provide comments; review cash flow forecast comparison to budget and provide comments; follow up [REDACTED]; review certain bid documents.
01/07/24	15532	Jodi Porepa	2.20	\$ 2,310.00	Review draft Order for [REDACTED] and provide comments; review SISP notice and provide comments; review draft slides for [REDACTED]; review [REDACTED]; review budget; review [REDACTED] and provide comments.
01/05/24	39589	Caitlin Moreland	0.20	\$ 31.00	Web update.
01/02/24	31365	Graham McIntyre	4.80	\$ 3,552.00	Discussions with investment bank and company; review of [REDACTED]; discussions with Company regarding outstanding payables; prepare financial analysis of cash flows; internal discussions regarding same.
01/04/24	31365	Graham McIntyre	4.80	\$ 3,552.00	Update [REDACTED]; review variance analysis and follow up in respect of same; review of proposed disbursements and discussions regarding the same.
01/05/24	31365	Graham McIntyre	6.00	\$ 4,440.00	Review of CFF; review key assumptions underlying the CFF; internal discussions regarding board deck; review of [REDACTED]; finalizing variance analysis.
01/06/24	31365	Graham McIntyre	3.00	\$ 2,220.00	Prepare [REDACTED] meeting.
01/07/24	31365	Graham McIntyre	1.80	\$ 1,332.00	Financial analysis of updated cash flows; follow up in respect of same.
TOTAL				\$ 68,797.00	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

January 16, 2024
102900000865
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through January 14, 2024

Amount Due Current Invoice **\$135,421.52**

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please remit cheque payments to:	FTI Consulting Canada Inc.
	C/O T10073
	P.O. Box 10073
	Postal Station A
	Toronto, ON M5W 2B1
	Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No. **January 16, 2024**
Job No. **102900000865**
Terms **493044.0001**
Currency **Due Upon Receipt**
Tax Registration: **CAD**

RE: FTI Engagement

Current Invoice Period: Charges posted through January 14, 2024

Name	Title	Rate	Hours	Total
Franck Risler	Senior Managing Director	\$2,030.00	5.00	\$10,150.00
Ching Watson	Managing Director	\$1,420.00	1.60	\$2,272.00
Paul Bishop	Senior Managing Director	\$1,230.00	31.50	\$38,745.00
Jodi Porepa	Senior Managing Director	\$1,050.00	39.50	\$41,475.00
Graham McIntyre	Director	\$740.00	25.90	\$19,166.00
Zoe Lin	Consultant	\$420.00	6.00	\$2,520.00
Total Professional Services			109.50	\$114,328.00
Administrative Fee				\$3,429.84
Invoice Total				CAD Amount
				\$117,757.84
HST (15%)				\$17,663.68
Total Due				\$135,421.52

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com

Tacora Resources Inc.
493044.0001 - January 14, 2024

Date	TK#	Name	Hours	Amount	Narrative
01/09/24	7571	Franck Risler	1.30	\$ 2,639.00	Call with counsel and FTI team regarding [REDACTED]; follow-up in respect of same.
01/09/24	7571	Franck Risler	0.30	\$ 609.00	Preliminary review of [REDACTED]
01/12/24	7571	Franck Risler	0.50	\$ 1,015.00	Review of Tacora [REDACTED]
01/12/24	7571	Franck Risler	0.50	\$ 1,015.00	Review and analysis of [REDACTED]
01/12/24	7571	Franck Risler	2.40	\$ 4,872.00	Analyze and [REDACTED]
01/08/24	14800	Paul Bishop	12.00	\$ 14,760.00	Site visit.
01/09/24	14800	Paul Bishop	6.20	\$ 7,626.00	Travel from Montreal; board of directors call, review of [REDACTED]; review of 2024 budget; review of [REDACTED]; review [REDACTED] and call regarding the same.
01/10/24	14800	Paul Bishop	4.30	\$ 5,289.00	Call regarding [REDACTED] and outstanding payables; call [REDACTED] and advisors; daily update call; review of diligence requests; review of [REDACTED]; daily update call; review of [REDACTED]
01/11/24	14800	Paul Bishop	5.10	\$ 6,273.00	Call with Monitor's counsel regarding various matters; due diligence call regarding [REDACTED] with counsel and advisors; call with counsel, advisors and counsel regarding financial diligence; daily update call; review of correspondence.
01/12/24	14800	Paul Bishop	3.90	\$ 4,797.00	Due diligence call [REDACTED]; prepare for same; daily update call; call with [REDACTED]; review of affidavit; review of issues list.
01/08/24	15532	Jodi Porepa	5.40	\$ 5,670.00	Weekly call with counsel; follow up [REDACTED]; review and provide comments on [REDACTED]; follow up on [REDACTED] review [REDACTED]; follow up on [REDACTED] analysis.
01/09/24	15532	Jodi Porepa	7.00	\$ 7,350.00	Weekly call with counsel; [REDACTED] review and provide comments on forecast [REDACTED]; review of cash flow forecast compared to budget; internal status update; internal call to discuss [REDACTED]; review documents for [REDACTED]
01/10/24	15532	Jodi Porepa	7.30	\$ 7,665.00	Weekly call with [REDACTED]; weekly call [REDACTED]; call to review [REDACTED]; review reconciliation of payable information; review email enquiries and respond; call with Stikemans; call with Cassels; review [REDACTED]; review [REDACTED] email communication; discuss court report with Cassels and provide comments.
01/11/24	15532	Jodi Porepa	8.50	\$ 8,925.00	Weekly call with counsel; [REDACTED] review and provide comments on [REDACTED]; follow up on correspondence [REDACTED]; follow up on [REDACTED] analysis; review and approve disbursements; review updated cash flow forecast; review reconciliation of payables; review updated [REDACTED] and provide comments; attend due diligence calls; attend daily call; prepare responses to vendor enquiries; call with Tacora to discuss same.
01/12/24	15532	Jodi Porepa	6.50	\$ 6,825.00	Weekly call with counsel; follow up [REDACTED]; review and provide comments on [REDACTED] slides; follow up on [REDACTED]; review [REDACTED]; follow up on [REDACTED] analysis.
01/14/24	15532	Jodi Porepa	4.80	\$ 5,040.00	Review and update CFF; review variance analysis; prepare preliminary [REDACTED]; review email correspondence; review liabilities [REDACTED]
01/08/24	31365	Graham McIntyre	3.30	\$ 2,442.00	Updates to [REDACTED] deck; internal discussions regarding engagement matters.
01/09/24	31365	Graham McIntyre	2.00	\$ 1,480.00	Internal discussions regarding engagement matters; updates [REDACTED] presentation.
01/10/24	31365	Graham McIntyre	3.50	\$ 2,590.00	Preparing [REDACTED] cost and outstanding reconciliation; correspondence with prospective bidders regarding [REDACTED] analysis; internal discussions regarding engagement matters.
01/11/24	31365	Graham McIntyre	7.80	\$ 5,772.00	[REDACTED] and outstanding reconciliation for prospective bidder; correspondence with Company counsel; updating [REDACTED] workbook; review of [REDACTED]; review of CFF.

Tacora Resources Inc.
493044.0001 - January 14, 2024

Date	TK#	Name	Hours	Amount	Narrative
01/12/24	31365	Graham McIntyre	5.50	\$ 4,070.00	Prepare financial analysis; updating [REDACTED] analysis; communication with suppliers; review of draft deposit letters; review and update variance analysis.
01/14/24	31365	Graham McIntyre	3.80	\$ 2,812.00	Update financial analysis on cash flows; update supporting lease schedule in [REDACTED] analysis estimate workbook.
01/12/24	37016	Zoe Lin	6.00	\$ 2,520.00	Review and prepare summary of documents underlying the [REDACTED]; open new bank accounts for SISF; draft [REDACTED] letters.
01/12/24	39772	Ching Watson	1.60	\$ 2,272.00	Review [REDACTED]
TOTAL				\$ 114,328.00	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

January 25, 2024
102900000879
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through January 21, 2024

Amount Due Current Invoice **\$144,311.39**

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please remit cheque payments to:	FTI Consulting Canada Inc.
	C/O T10073
	P.O. Box 10073
	Postal Station A
	Toronto, ON M5W 2B1
	Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No. **January 25, 2024**
Job No. **102900000879**
Terms **493044.0001**
Currency **Due Upon Receipt**
Tax Registration: **CAD**

RE: FTI Engagement

Current Invoice Period: Charges posted through January 21, 2024

Name	Title	Rate	Hours	Total
Franck Risler	Senior Managing Director	\$2,030.00	3.50	\$7,105.00
Ching Watson	Managing Director	\$1,420.00	2.20	\$3,124.00
Paul Bishop	Senior Managing Director	\$1,230.00	24.20	\$29,766.00
Jodi Porepa	Senior Managing Director	\$1,050.00	48.90	\$51,345.00
Graham McIntyre	Director	\$740.00	28.00	\$20,720.00
Adsaran Vithiyananthan	Senior Consultant	\$590.00	1.20	\$708.00
Zoe Lin	Consultant	\$420.00	14.00	\$5,880.00
Caitlin Moreland	Receptionist	\$155.00	0.60	\$93.00
Total Professional Services			122.60	\$118,741.00
Expenses				Total
Air Travel				\$2,083.12
Business Meals				\$157.20
Hotel & Lodging				\$796.96
Taxi				\$147.65
Total Expenses				\$3,184.93
Administrative Fee				\$3,562.23
Invoice Total				CAD Amount
				\$125,488.16
HST (15%)				\$18,823.23
Total Due				\$144,311.39

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com

Tacora Resources Inc.
493044.0001 - January 21, 2024

Date	TK#	Name	Hours	Amount	Narrative
01/15/24	7571	Franck Risler	0.90	\$ 1,827.00	Meet with counsel and FTI to [REDACTED]
01/15/24	7571	Franck Risler	1.40	\$ 2,842.00	Review [REDACTED]
01/15/24	7571	Franck Risler	1.20	\$ 2,436.00	Analyze [REDACTED]
01/15/24	14800	Paul Bishop	7.90	\$ 9,717.00	Call regarding [REDACTED]; call regarding issues; call regarding admin reserve; call with Stikemans and Monitor's counsel; call regarding [REDACTED]; call regarding cashflow; call regarding technical due diligence; review of draft report; review of correspondence.
01/16/24	14800	Paul Bishop	3.80	\$ 4,674.00	Call with counsel; review of board materials; review of cashflow forecast; review of due diligence requests; daily update call with company and Greenhill; review of Monitor's report and provide comments.
01/17/24	14800	Paul Bishop	4.20	\$ 5,166.00	Call to review cashflow; call [REDACTED] and advisors; call with company and advisors; daily update call; call regarding tax issues; review and finalize cashflow; review and finalize court report.
01/18/24	14800	Paul Bishop	3.60	\$ 4,428.00	Board call; call with Monitor's counsel; review further edits to Monitor's report; daily update call.
01/19/24	14800	Paul Bishop	4.70	\$ 5,781.00	Initial read and review bids received; call with counsel regarding bids; call with Greenhill and counsel regarding bids; update call with Greenhill, Company and counsel regarding bids.
01/15/24	15532	Jodi Porepa	9.40	\$ 9,870.00	Attend due diligence calls; calls with counsel; internal discussions; updated preliminary Admin Reserve; daily update call with all professionals; review CFF and provide comments; review draft Monitor's Report.
01/16/24	15532	Jodi Porepa	9.50	\$ 9,975.00	Attend due diligence calls; calls with counsel; internal discussions; updated preliminary Admin Reserve; daily update call with all professionals; review CFF and provide comments; review draft Monitor's Report.
01/17/24	15532	Jodi Porepa	10.60	\$ 11,130.00	Attend due diligence calls; calls with counsel; internal discussions; updated preliminary Admin Reserve; daily update call with all professionals; review CFF and provide comments; review draft Report.
01/18/24	15532	Jodi Porepa	10.40	\$ 10,920.00	Internal status update; deal with wires; respond to enquiries regarding SISP; update draft Admin Charge; call with counsel; update and finalize court report; update and finalize cash flow forecast; call with management; review and update communication documents.
01/19/24	15532	Jodi Porepa	8.00	\$ 8,400.00	Update on status of wires; calls regarding tracing wires; review and finalize variance analysis; review bids submitted; internal status update; review and provide comments on draft auction procedures.
01/21/24	15532	Jodi Porepa	1.00	\$ 1,050.00	Review and respond to third party enquiries; review bids.
01/15/24	31365	Graham McIntyre	4.30	\$ 3,182.00	Review of latest CFF and discussions regarding the same; correspondence with bidders regarding bid deposit wires; work on professional fee forecast; finalizing variance analysis.
01/16/24	31365	Graham McIntyre	5.50	\$ 4,070.00	Updating court report variance analysis and cash flow section; updating [REDACTED] slides; review and update assumptions for cash flow; update on supplier deposit letter; correspondence with bidders regarding deposits for the SISP.
01/17/24	31365	Graham McIntyre	7.50	\$ 5,550.00	Update board slides; review and update Monitor's Report; review and update cash flow forecast; analyze differences.
01/18/24	31365	Graham McIntyre	6.50	\$ 4,810.00	Review updated variance analysis; finalizing court cash flow; communication with bidders regarding deposits for the SISP.
01/19/24	31365	Graham McIntyre	4.20	\$ 3,108.00	Communication with bidders regarding wires; respond to supplier enquiries; update Monitor's website with new documents filed.
01/15/24	37016	Zoe Lin	3.00	\$ 1,260.00	Setting up SISP deposit accounts and tracking bid deposits; updating financial summaries and analyses.
01/16/24	37016	Zoe Lin	2.00	\$ 840.00	Setting up SISP deposit accounts and tracking bid deposits; updating financial summaries and analyses.
01/17/24	37016	Zoe Lin	1.00	\$ 420.00	Setting up SISP deposit accounts and tracking bid deposits; updating financial summaries and analyses.

Tacora Resources Inc.
493044.0001 - January 21, 2024

Date	TK#	Name	Hours	Amount	Narrative
01/18/24	37016	Zoe Lin	4.00	\$ 1,680.00	Setting up SISP deposit accounts and tracking bid deposits; updating financial summaries and analyses.
01/19/24	37016	Zoe Lin	4.00	\$ 1,680.00	Setting up SISP deposit accounts and tracking bid deposits; updating financial summaries and analyses.
01/18/24	39280	Adsaran Vithyananthan	1.20	\$ 708.00	Discussions regarding international wire transfers; assistance in tracking incoming wire payments from various SISP bidders.
01/19/24	39589	Caitlin Moreland	0.60	\$ 93.00	Update Monitor's website for new documents and/or updates.
01/15/24	39772	Ching Watson	2.20	\$ 3,124.00	Prepare and participate in call with counsel regarding [REDACTED]
TOTAL				\$ 118,741.00	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

January 30, 2024
102900000887
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through January 28, 2024

Amount Due Current Invoice **\$131,629.67**

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please remit cheque payments to:	FTI Consulting Canada Inc.
	C/O T10073
	P.O. Box 10073
	Postal Station A
	Toronto, ON M5W 2B1
	Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

January 30, 2024
Invoice No. 102900000887
Job No. 493044.0001
Terms Due Upon Receipt
Currency CAD
Tax Registration:

RE: FTI Engagement

Current Invoice Period: Charges posted through January 28, 2024

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	30.60	\$37,638.00
Jodi Porepa	Senior Managing Director	\$1,050.00	46.80	\$49,140.00
Graham McIntyre	Director	\$740.00	28.40	\$21,016.00
Adsaran Vithiyanthan	Senior Consultant	\$590.00	0.70	\$413.00
Caitlin Moreland	Receptionist	\$155.00	0.20	\$31.00
Total Professional Services			106.70	\$108,238.00
Expenses				Total
Newspaper Ads				\$2,975.44
Total Expenses				\$2,975.44
Administrative Fee				\$3,247.14
Invoice Total				CAD Amount
HST (15%)				\$114,460.58
Total Due				\$17,169.09
				\$131,629.67

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com

Tacora Resources Inc.
493044.0001 - January 28, 2024

Date	TK#	Name	Hours	Amount	Narrative
01/22/24	14800	Paul Bishop	3.50	\$ 4,305.00	Daily update call; call with Greenhill, company and counsel; review of Phase 2 bids.
01/23/24	14800	Paul Bishop	4.20	\$ 5,166.00	Call with counsel regarding SISP; review of proposals; call with Monitor's counsel; review of correspondence; further review of bids and discussion regarding same; preparation for meeting with company, Greenhill and Counsel.
01/24/24	14800	Paul Bishop	8.20	\$ 10,086.00	Review of [REDACTED] materials; call with counsel in advance of meeting; Board meeting to review [REDACTED]; review of correspondence regarding [REDACTED]; discussions with Monitor's counsel.
01/25/24	14800	Paul Bishop	5.70	\$ 7,011.00	Call with Monitor's counsel regarding [REDACTED] and other matters; call to review revised cashflow; call regarding [REDACTED] requirements; daily update call; review of Admin Reserve; review of correspondence with interested parties; review of DIP budget; review of multiple correspondence.
01/26/24	14800	Paul Bishop	5.60	\$ 6,888.00	Meetings and calls with counsel; review of documents and correspondence; daily update call; review bids; review multiple email correspondence.
01/27/24	14800	Paul Bishop	1.60	\$ 1,968.00	Review of correspondence; review of drafts [REDACTED] slides.
01/28/24	14800	Paul Bishop	1.80	\$ 2,214.00	Call with board; review of [REDACTED]; review of draft correspondence.
01/22/24	15532	Jodi Porepa	9.10	\$ 9,555.00	Attend call with [REDACTED]; review bids; internal status update; review financial reconciliation; review draft analysis of bids; review draft letter for [REDACTED]; internal discussions on SISP and bids submitted.
01/23/24	15532	Jodi Porepa	8.60	\$ 9,030.00	Review draft issues list; calls with counsel; internal status update; review bids; update preliminary Admin Reserve; attend [REDACTED]
01/24/24	15532	Jodi Porepa	8.60	\$ 9,030.00	Prepare for Board meeting; attend board meeting; review and update Admin Reserve; review [REDACTED]; review financial cash flow bridges; internal status update call; call with counsel; review bid documents and provide comments; review updated draft [REDACTED] workbook.
01/25/24	15532	Jodi Porepa	8.90	\$ 9,345.00	Review proposed disbursements and provide comments; review revised cash flow forecast and [REDACTED]; call with Tacora to discuss [REDACTED]; call with key stakeholders to discuss variance analysis and revised cash flows; internal call to prepare for cash flow bridge call; review cash flow bridge and provide comments.
01/26/24	15532	Jodi Porepa	7.90	\$ 8,295.00	Attend weekly calls with [REDACTED]; attend weekly calls with [REDACTED]; review deal documents; review and respond to [REDACTED]; attend daily update calls; review [REDACTED]; review next steps in the SISP.
01/28/24	15532	Jodi Porepa	3.70	\$ 3,885.00	Attend Board call; review draft affidavits and provide comments; review [REDACTED] and provide comments; review [REDACTED]; review cash flow forecast and provide comments; review [REDACTED] and provide comments.
01/22/24	31365	Graham McIntyre	2.50	\$ 1,850.00	Review correspondence regarding [REDACTED] and prepare a reconciliation; internal discussions regarding cash flow forecast; internal discussions regarding bids. engagement matters.
01/23/24	31365	Graham McIntyre	2.80	\$ 2,072.00	Updating financial analysis; prepare and update financial reconciliations; review [REDACTED].
01/23/24	31365	Graham McIntyre	2.50	\$ 1,850.00	Bridging cash flows; updating summary of SISP [REDACTED] and tracking of wires; internal discussions regarding SISP and cash flows.
01/24/24	31365	Graham McIntyre	4.80	\$ 3,552.00	Reconciliation of various cash flow forecasts for prospective bidder; review and approval of proposed disbursements; internal discussions regarding engagement matters.
01/25/24	31365	Graham McIntyre	7.30	\$ 5,402.00	Call [REDACTED]; follow up discussions with [REDACTED] to discuss same; review of cash flow variances; prepare for cash flow call; review of proposed disbursements and internal cash flow; provide comments in respect of same; discussions regarding [REDACTED]; [REDACTED]

Tacora Resources Inc.
493044.0001 - January 28, 2024

Date	TK#	Name	Hours	Amount	Narrative
01/26/24	31365	Graham McIntyre	4.50	\$ 3,330.00	Preparing analyses in response to ██████████; internal discussions regarding same; review and approval ██████████.
01/27/24	31365	Graham McIntyre	2.50	\$ 1,850.00	Update financial analysis in response to third party enquiries; update variance analysis.
01/28/24	31365	Graham McIntyre	1.50	\$ 1,110.00	Updating financial analyses and financial bridges; review cash flow forecast and changes to assumptions; internal discussions regarding SISP procedures.
01/22/24	39280	Adsaran Vithyananthan	0.70	\$ 413.00	Internal discussion on status update; follow up on third party enquiries; review updated cash flow forecast and changes to key assumptions; review and respond to enquiries on Monitor's hotline.
01/26/24	39589	Caitlin Moreland	0.20	\$ 31.00	Web update.
TOTAL				\$ 108,238.00	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

February 07, 2024
102900000928
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through February 04, 2024

Amount Due Current Invoice **\$115,652.21**

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please remit cheque payments to:	FTI Consulting Canada Inc.
	C/O T10073
	P.O. Box 10073
	Postal Station A
	Toronto, ON M5W 2B1
	Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

February 07, 2024
Invoice No. 102900000928
Job No. 493044.0001
Terms Due Upon Receipt
Currency CAD
Tax Registration:

RE: FTI Engagement

Current Invoice Period: Charges posted through February 04, 2024

Name	Title	Rate	Hours	Total
Franck Risler	Senior Managing Director	\$2,030.00	2.50	\$5,075.00
Paul Bishop	Senior Managing Director	\$1,230.00	26.40	\$32,472.00
Jodi Porepa	Senior Managing Director	\$1,050.00	30.90	\$32,445.00
Graham McIntyre	Director	\$740.00	18.60	\$13,764.00
Adsaran Vithiyananthan	Senior Consultant	\$590.00	22.70	\$13,393.00
Zoe Lin	Consultant	\$420.00	0.50	\$210.00
Caitlin Moreland	Administrative Professional	\$155.00	1.80	\$279.00
Total Professional Services			103.40	\$97,638.00
Administrative Fee				\$2,929.14
Invoice Total				CAD Amount
				\$100,567.14
HST (15%)				\$15,085.07
Total Due				\$115,652.21

Tacora Resources Inc.
493044.0001 - February 4, 2024

Date	TK#	Name	Hours	Amount	Narrative
01/14/24	7571	Franck Risler	0.30	\$ 609.00	Review [REDACTED]
01/14/24	7571	Franck Risler	0.30	\$ 609.00	Review [REDACTED]
01/31/24	7571	Franck Risler	1.40	\$ 2,842.00	Review [REDACTED]
02/01/24	7571	Franck Risler	0.50	\$ 1,015.00	Review [REDACTED]
01/29/24	14800	Paul Bishop	6.70	\$ 8,241.00	Call with counsel; review SISP materials; meeting with Monitor's counsel and [REDACTED]; daily update call; meeting with board, Greenhill and all counsel to consider SISP offers.
01/30/24	14800	Paul Bishop	4.70	\$ 5,781.00	Attend case conference; cash flow discussion and review; review of affidavits and drafts; various calls; attend daily update call.
01/31/24	14800	Paul Bishop	4.60	\$ 5,658.00	Call with Monitor's counsel; review of drafts and affidavits; operations call with [REDACTED]; operations call with [REDACTED]; daily update call; [REDACTED]
02/01/24	14800	Paul Bishop	4.80	\$ 5,904.00	Board meeting; call with Monitor's counsel; review of draft affidavits; review of [REDACTED]; review draft financial schedules and analyses; review [REDACTED]; review disbursements; review of variance analysis; multiple emails.
02/02/24	14800	Paul Bishop	3.70	\$ 4,551.00	Review of [REDACTED]; daily update call; continued review of affidavits and drafts; multiple emails.
02/03/24	14800	Paul Bishop	0.60	\$ 738.00	Review of correspondence; correspondence with counsel.
02/04/24	14800	Paul Bishop	1.30	\$ 1,599.00	Call with Monitor's counsel and Stikemans; call with Monitor's counsel.
01/29/24	15532	Jodi Porepa	8.30	\$ 8,715.00	Attend meeting with [REDACTED]; internal discussions with counsel; daily call with the company; attend Board call; review enquiries; review updated cash flow and key changes in assumptions.
01/30/24	15532	Jodi Porepa	8.00	\$ 8,400.00	Attend case conference; review revised assumptions to cash flow; review financial analyses; call with Greenhill and Stikemans to review [REDACTED]; daily call with professionals and management; review and respond to proposed disbursements.
01/31/24	15532	Jodi Porepa	6.60	\$ 6,930.00	Call with key stakeholders to discuss operations and cash flows; call with Cassels to discuss next steps; review proposed disbursements; internal status update call; review [REDACTED] information; review and respond to enquiries.
02/01/24	15532	Jodi Porepa	4.60	\$ 4,830.00	Review updated cash flow assumptions; review variance analysis and provide comments; review proposed disbursements and provide comments; daily professionals call; call with counsel.
02/02/24	15532	Jodi Porepa	2.40	\$ 2,520.00	Review updated cash flow assumptions; review variance analysis and provide comments; review proposed disbursements and provide comments; daily professionals call; call with counsel.
02/04/24	15532	Jodi Porepa	1.00	\$ 1,050.00	Review updated cash flow assumptions and changes to key assumptions; review variance analysis and provide comments; review proposed disbursements and provide comments; daily professionals call; call with counsel.
01/29/24	31365	Graham McIntyre	2.50	\$ 1,850.00	Opening new bank accounts; bridging updated cash flow forecast to prior versions; internal status update on same.
01/29/24	31365	Graham McIntyre	3.00	\$ 2,220.00	Review and provide comments on variance analysis; review cash flow; discussions with the Company regarding same; internal discussions regarding engagement matters; review affidavit materials.
01/30/24	31365	Graham McIntyre	5.30	\$ 3,922.00	Finalizing variance analysis; uploading documents to Monitor's website; correspondence with Company; walk through cash flow bridge with the Company and advisors; review and discussions regarding proposed disbursements; discussion regarding [REDACTED]; internal discussions regarding same; [REDACTED]
01/31/24	31365	Graham McIntyre	4.30	\$ 3,182.00	Review updated cash flow and changes to key assumptions; review updated variance analysis; internal discussions regarding same.
02/01/24	31365	Graham McIntyre	3.50	\$ 2,590.00	Discussions regarding [REDACTED]; review draft affidavit; review cash flow forecast and prepare financial bridges [REDACTED]; [REDACTED]; internal discussions regarding same.

Tacora Resources Inc.
493044.0001 - February 4, 2024

Date	TK#	Name	Hours	Amount	Narrative
01/29/24	37016	Zoe Lin	0.50	\$ 210.00	Prepare new bank account forms for new accounts set up to received SISF deposits.
01/29/24	39280	Adsaran Vithiyananthan	2.20	\$ 1,298.00	Reviewing Monitor's hotline and responding to enquiries; review actual performance compared to forecast cash flow for week ending January 21, 2024; review variance analysis; email correspondence regarding cash flow forecast; internal discussions on outstanding items.
01/30/24	39280	Adsaran Vithiyananthan	4.50	\$ 2,655.00	Internal discussions on cash flow forecast; review revisions for potential DIP resizing; call with financial advisors on cash flow forecast and revisions [REDACTED]; preparing financial analyses; review SISF requirement for return of bid deposits; update new cash flow forecast extended to June 30; prepare financial analysis for updated cash flow forecast; daily update call.
01/31/24	39280	Adsaran Vithiyananthan	6.90	\$ 4,071.00	Internal discussions on cash flow forecast and revisions for potential DIP resizing; prepare financial analyses; review updated cash flow forecasts and key assumptions; daily update call; work on cape forecast; update [REDACTED] analyses; set up new bank accounts for funds to be paid upon close; Monitor's website updates; reviewing Monitor's hotline; bridging cash flow forecast received to latest court report cash flow and preceding cash flow forecast from previous versions.
02/01/24	39280	Adsaran Vithiyananthan	5.40	\$ 3,186.00	Review variance analysis; internal discussions regarding same; reviewing Monitor's hotline and responding to enquiries; prepare new account summaries; set up new bank accounts; review and discuss Board slides; review and update financial analyses; attend weekly disbursements call with management; review [REDACTED] and provide comments.
02/02/24	39280	Adsaran Vithiyananthan	3.70	\$ 2,183.00	Internal discussions regarding updated assumptions underlying cash flow forecast; reviewing new updated cash flow forecast; call with Greenhill and company management on cash flow forecast and next steps; review and assess DIP obligations; daily call with counsel, management and Greenhill; reviewing Monitor's hotline; responding to third party enquiries; follow-up with SISF parties on returning wires.
01/29/24	39589	Caitlin Moreland	0.30	\$ 46.50	Web update.
01/31/24	39589	Caitlin Moreland	0.50	\$ 77.50	Web update.
02/01/24	39589	Caitlin Moreland	0.20	\$ 31.00	Web update.
02/02/24	39589	Caitlin Moreland	0.80	\$ 124.00	Web update.
TOTAL				\$ 97,638.00	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

February 15, 2024
102900000950
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through February 11, 2024

Amount Due Current Invoice **\$114,279.39**

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please remit cheque payments to:	FTI Consulting Canada Inc.
	C/O T10073
	P.O. Box 10073
	Postal Station A
	Toronto, ON M5W 2B1
	Canada



Invoice Summary

Tacora Resources Inc.
 1 Wabush Mines Road
 P.O. Box 3000
 Wabush, NL A0R 1B0
 Canada

February 15, 2024
Invoice No. 102900000950
Job No. 493044.0001
Terms Due Upon Receipt
Currency CAD
Tax Registration:

RE: FTI Engagement

Current Invoice Period: Charges posted through February 11, 2024

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	37.10	\$45,633.00
Jodi Porepa	Senior Managing Director	\$1,050.00	34.90	\$36,645.00
Adsaran Vithiyananthan	Senior Consultant	\$590.00	15.30	\$9,027.00
Zoe Lin	Consultant	\$420.00	0.80	\$336.00
Caitlin Moreland	Administrative Professional	\$155.00	2.10	\$325.50
Total Professional Services			90.20	\$91,966.50
Expenses				Total
Air Travel				\$3,632.30
Business Meals				\$71.28
Car Rental				\$354.00
Gasoline				\$17.17
Hotel & Lodging				\$460.49
Taxi				\$112.64
Total Expenses				\$4,647.88
Administrative Fee				\$2,759.00
Invoice Total				CAD Amount
				\$99,373.38
HST (15%)				\$14,906.01
Total Due				\$114,279.39

FTI Consulting Canada, Inc.
 TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
 Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com

Tacora Resources Inc.
493044.0001 - February 11, 2024

Date	TK#	Name	Hours	Amount	Narrative
02/05/24	14800	Paul Bishop	3.70	\$ 4,551.00	Daily update call; review of drafts; multiple correspondence preparation for case conference.
02/06/24	14800	Paul Bishop	8.20	\$ 10,086.00	Call with Monitor's counsel; attend case conference; further calls with counsel; travel to site.
02/07/24	14800	Paul Bishop	11.50	\$ 14,145.00	Site visit; meetings with company; internal discussions; attend board call.
02/08/24	14800	Paul Bishop	9.50	\$ 11,685.00	Site visit; travel to Port; meeting regarding [REDACTED]; travel to Toronto.
02/09/24	14800	Paul Bishop	4.20	\$ 5,166.00	Call with Monitor's counsel; Call [REDACTED]; attend case conference; daily update call; review of aide memoires; review of correspondence.
02/05/24	15532	Jodi Porepa	8.20	\$ 8,610.00	Call with Stikemans and Cassels to discuss case conference; review proposed disbursements; review [REDACTED]; review [REDACTED]; review materials served; internal status update; review proposed [REDACTED] disbursements; attend daily call with professionals; status update with Cassels.
02/06/24	15532	Jodi Porepa	8.10	\$ 8,505.00	Review Aide Memoires; review motion materials; call with Cassels; attend case conference; debrief call; review [REDACTED]; review [REDACTED] summaries; review and respond [REDACTED]; call with Stikemans; attend daily professionals call; review and respond to third party enquiries.
02/07/24	15532	Jodi Porepa	6.20	\$ 6,510.00	Review Aide Memoires; review motion materials; call with Cassels; attend case conference; debrief call; review proposed disbursements; review [REDACTED] summaries; review and respond [REDACTED]; call with Stikemans; attend daily professionals call; review and respond to third party enquiries.
02/08/24	15532	Jodi Porepa	7.10	\$ 7,455.00	Review and respond to third party enquiries; follow up on tax enquiries; call with Company finance team to discuss cash flow forecast revised assumptions; review and respond to third party enquiries; review changes to [REDACTED]; review materials in advance of case conference; call with Stikemans to touch base.
02/09/24	15532	Jodi Porepa	5.30	\$ 5,565.00	Call with [REDACTED] and Cassels to discuss [REDACTED]; review [REDACTED]; review materials served; internal status update; review proposed [REDACTED] disbursements; attend daily call with professionals; status update with Cassels.
02/06/24	37016	Zoe Lin	0.50	\$ 210.00	Updating financial analyses.
02/09/24	37016	Zoe Lin	0.30	\$ 126.00	Updating financial analyses.
02/05/24	39280	Adsaran Vithyananthan	4.30	\$ 2,537.00	Internal discussions; daily update call with Company, counsel, and financial advisors; review [REDACTED]; update workbook for [REDACTED]; discussions with company; review correspondence on [REDACTED]; review correspondence on [REDACTED]; review Monitor's hotline; website updates; preparation for upcoming court hearing.
02/06/24	39280	Adsaran Vithyananthan	4.10	\$ 2,419.00	Internal discussions; daily update call with Company, counsel, and financial advisors; discussions with Company on [REDACTED]; review Monitor's hotline; website updates; preparation for upcoming court hearing.
02/07/24	39280	Adsaran Vithyananthan	0.50	\$ 295.00	Prepare correspondence with Greenhill regarding [REDACTED]; discussions with Company; various email correspondence; review Monitor's hotline.
02/08/24	39280	Adsaran Vithyananthan	3.90	\$ 2,301.00	Internal discussions on pre-filing accounts payable; reviewing Monitor's hotline and responding to enquiries; daily update call with counsel and advisors; review of disbursements and call with management regarding the same; review of revised cash flow forecast and bridge to court report cash flow; preparing materials for upcoming court hearing.
02/09/24	39280	Adsaran Vithyananthan	2.50	\$ 1,475.00	Review and provide comments regarding variance analysis; follow-up discussions regarding the same; daily call with counsel and Greenhill on status of proceedings; updating financial analyses; Monitor website updates; preparation for Court; follow-up on outstanding items.

Tacora Resources Inc.
493044.0001 - February 11, 2024

Date	TK#	Name	Hours	Amount	Narrative
02/05/24	39589	Caitlin Moreland	0.80	\$ 124.00	Web update.
02/06/24	39589	Caitlin Moreland	0.30	\$ 46.50	Web update.
02/08/24	39589	Caitlin Moreland	0.50	\$ 77.50	Web update.
02/09/24	39589	Caitlin Moreland	0.50	\$ 77.50	Web update.
TOTAL				\$ 91,966.50	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

February 21, 2024
102900000959
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through February 18, 2024

Amount Due Current Invoice **\$119,462.47**

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please remit cheque payments to:	FTI Consulting Canada Inc.
	C/O T10073
	P.O. Box 10073
	Postal Station A
	Toronto, ON M5W 2B1
	Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

February 21, 2024
Invoice No. 102900000959
Job No. 493044.0001
Terms Due Upon Receipt
Currency CAD
Tax Registration:

RE: FTI Engagement

Current Invoice Period: Charges posted through February 18, 2024

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	20.20	\$24,846.00
Jodi Porepa	Senior Managing Director	\$1,050.00	41.10	\$43,155.00
Graham McIntyre	Director	\$740.00	41.40	\$30,636.00
Adsaran Vithiyanthan	Senior Consultant	\$590.00	3.30	\$1,947.00
Total Professional Services			106.00	\$100,584.00
Expenses				Total
Car Rental				\$278.89
Total Expenses				\$278.89
Administrative Fee				\$3,017.52
Invoice Total				CAD Amount
				\$103,880.41
HST (15%)				\$15,582.06
Total Due				\$119,462.47

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com

Tacora Resources Inc.
493044.0001 - February 18, 2024

Date	TK#	Name	Hours	Amount	Narrative
02/12/24	14800	Paul Bishop	3.90	\$ 4,797.00	Review updated cashflow; [REDACTED]; review of correspondence regarding tax issues; multiple emails; call with Monitor and Company counsel; daily update call.
02/13/24	14800	Paul Bishop	4.10	\$ 5,043.00	Review [REDACTED] plans; call with Monitor's counsel regarding various matters; daily update call, review of draft DIP budget; review of notices of examination.
02/14/24	14800	Paul Bishop	4.90	\$ 6,027.00	Call with Monitor's counsel and Stikemans regarding various matters; weekly call with [REDACTED]; weekly call with [REDACTED]; call with Company and Greenhill regarding [REDACTED]; daily update call; review of correspondence.
02/15/24	14800	Paul Bishop	4.10	\$ 5,043.00	Attend Board meeting; review of board meeting materials; call with Monitor's counsel; daily update call; review of correspondence [REDACTED]; review and [REDACTED].
02/16/24	14800	Paul Bishop	3.20	\$ 3,936.00	Call with Monitor's counsel; review of cash flow forecast variances; review of draft cash flow; review of correspondence regarding [REDACTED]; review [REDACTED] and correspondence.
02/12/24	15532	Jodi Porepa	7.10	\$ 7,455.00	Attend daily professionals call; review cash flow forecast and provide comments; review proposed [REDACTED] and provide comments; call to discuss [REDACTED].
02/13/24	15532	Jodi Porepa	6.70	\$ 7,035.00	Attend daily professionals call; review cash flow forecast and provide comments; review proposed [REDACTED]s and provide comments; call to discuss [REDACTED].
02/14/24	15532	Jodi Porepa	8.00	\$ 8,400.00	Attend daily professionals call; review cash flow forecast and provide comments; review proposed [REDACTED] and provide comments; call to discuss [REDACTED].
02/15/24	15532	Jodi Porepa	8.30	\$ 8,715.00	Review [REDACTED] and provide comments; review [REDACTED] detail and provide comments; review variance analysis and provide comments; review updated cash flow forecast and provide comments; review third party enquiries and respond; attend daily professionals call; [REDACTED]; internal status update; review updated list of [REDACTED] and any changes; call with counsel.
02/16/24	15532	Jodi Porepa	6.50	\$ 6,825.00	Call with counsel to discuss outstanding items; review recent legal correspondence; follow up on variance analysis; attend daily professionals call; review updated cash flow forecast and provide comments; review financial analysis and provide comments.
02/17/24	15532	Jodi Porepa	3.10	\$ 3,255.00	Review updated cash flow forecast; review [REDACTED]; review financial analyses and provide comments; review correspondence with third parties.
02/18/24	15532	Jodi Porepa	1.40	\$ 1,470.00	Review updated cash flow forecast; review updated [REDACTED]; review slides for the Board; review third party correspondence.
02/12/24	31365	Graham McIntyre	4.50	\$ 3,330.00	Review updated cash flow forecasts; review variance analysis and provide comments; communication with suppliers; review updated draft [REDACTED] workbook; review cash flow and prepare financial analyses in respect of same.
02/13/24	31365	Graham McIntyre	8.30	\$ 6,142.00	Review updated cash flow forecasts; discussions with Company regarding cash flows; review [REDACTED] and bridge of initial and revised [REDACTED] plan; review and provide comments on variance analysis; finalize DIP reporting requirements.
02/14/24	31365	Graham McIntyre	7.50	\$ 5,550.00	Prepare summary of [REDACTED]; update [REDACTED] tracker and follow up in respect of same; update financial analyses; updating [REDACTED] workbook and follow up with the company in respect of same.
02/15/24	31365	Graham McIntyre	8.50	\$ 6,290.00	Review variance analysis; review of cash flows; discussions regarding [REDACTED]; review of proposed disbursements; finalize [REDACTED] and master list of contracts; [REDACTED] and analysis related [REDACTED].
02/16/24	31365	Graham McIntyre	6.80	\$ 5,032.00	Review detailed variance analysis; review of various cash flow scenarios; and finalizing master contract workbook.

Tacora Resources Inc.
493044.0001 - February 18, 2024

Date	TK#	Name	Hours	Amount	Narrative
02/17/24	31365	Graham McIntyre	4.00	\$ 2,960.00	Review various cash flow forecast scenarios and assess key assumptions.
02/18/24	31365	Graham McIntyre	1.80	\$ 1,332.00	Prepare financial analysis for certain expense line items.
02/12/24	39280	Adsaran Vithyananthan	2.60	\$ 1,534.00	Updating variance analysis; follow-up regarding the same; updating financial analyses; internal discussions on status of outstanding items; discussion with Company counsel and Monitor's counsel on [REDACTED]; prepare for call [REDACTED]; reviewing correspondence; discussions with management.
02/13/24	39280	Adsaran Vithyananthan	0.70	\$ 413.00	Internal discussions on cash flow forecast and variance analysis; update [REDACTED] forecast for actual [REDACTED]; update sales tax summaries and analyses.
TOTAL				\$ 100,584.00	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

February 27, 2024
102900000976
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through February 25, 2024

Amount Due Current Invoice **\$106,100.40**

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please remit cheque payments to:	FTI Consulting Canada Inc.
	C/O T10073
	P.O. Box 10073
	Postal Station A
	Toronto, ON M5W 2B1
	Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

February 27, 2024
Invoice No. 10290000976
Job No. 493044.0001
Terms Due Upon Receipt
Currency CAD
Tax Registration:

RE: FTI Engagement

Current Invoice Period: Charges posted through February 25, 2024

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	13.10	\$16,113.00
Jodi Porepa	Senior Managing Director	\$1,050.00	38.60	\$40,530.00
Graham McIntyre	Director	\$740.00	40.90	\$30,266.00
Dean Perlman	Senior Consultant	\$650.00	4.10	\$2,665.00
Total Professional Services			96.70	\$89,574.00
Administrative Fee				\$2,687.22
Invoice Total				CAD Amount
				\$92,261.22
HST (15%)				\$13,839.18
Total Due				\$106,100.40

Tacora Resources Inc.
493044.0001 - February 25, 2024

Date	TK#	Name	Hours	Amount	Narrative
02/19/24	14800	Paul Bishop	1.00	\$ 1,230.00	Daily update call.
02/20/24	14800	Paul Bishop	4.70	\$ 5,781.00	Board meeting and prep for same; review of ██████ deck; call with Monitor's counsel and Stikeman Elliott; daily update call; review of and call regarding ██████; review of variance report.
02/22/24	14800	Paul Bishop	3.60	\$ 4,428.00	Board meeting; internal call to ██████; daily update call; multiple email correspondence; review of payments; review of cash flow bridge.
02/23/24	14800	Paul Bishop	3.10	\$ 3,813.00	Call with monitor's counsel and Stikeman Elliott; review ██████; call regarding the same; daily update call; review of cash flow correspondence.
02/24/24	14800	Paul Bishop	0.70	\$ 861.00	Review of ██████ and correspondence.
02/19/24	15532	Jodi Porepa	1.40	\$ 1,470.00	Review ██████ and provide comments; review ██████; review draft ██████.
02/20/24	15532	Jodi Porepa	9.60	\$ 10,080.00	Review updated cash flow forecast; review changes in key assumptions; discussions with management to discuss same; review ██████ and comparison to cash flow forecast; call with company to discuss the same; internal status update; review and respond to ██████; review variance analysis and provide comments; review ██████.
02/21/24	15532	Jodi Porepa	8.30	\$ 8,715.00	Call with counsel to discuss ██████ and other CCAA-related matters; review updated variance analysis and provide comments; review updated cash flow forecast and provide comments; review financial analysis and changes to key assumptions and provide comments; call with Company to walk through variance analysis; call with Company to walk through CFF.
02/22/24	15532	Jodi Porepa	8.00	\$ 8,400.00	Call with ██████; call with counsel to discuss next steps; daily professionals call; review proposed disbursements and provide comments; review updated cash flow and changes to key assumptions; attend Board call; call with counsel to discuss enquiries related to the SISP; discussion on ██████.
02/23/24	15532	Jodi Porepa	8.70	\$ 9,135.00	Call ██████ to discuss cash flow forecast; review follow up enquiries; review proposed disbursements; review variance analysis and provide comments; call with ██████ to discuss ██████; call with counsel to discuss ██████ review ██████ and provide comments.
02/25/24	15532	Jodi Porepa	2.60	\$ 2,730.00	Review updated ██████ workbook; internal discussion regarding the same; review ██████; review draft notices to third party vendors with ██████ and provide comments.
02/20/24	31365	Graham McIntyre	9.80	\$ 7,252.00	Updating DIP budgets for various scenarios; discussions with management and professionals regarding DIP budgets; bridging cash flows to previous DIP budgets; review of updated ██████.
02/21/24	31365	Graham McIntyre	8.50	\$ 6,290.00	Review of ██████ tracker; bridging updated cash flows; communication with counsel related to contracts and ██████; review of proposed disbursements.
02/22/24	31365	Graham McIntyre	6.30	\$ 4,662.00	Updating cash flow scenarios and bridging to prior cash flows; review of proposed disbursements; prior week variance analysis.
02/23/24	31365	Graham McIntyre	9.50	\$ 7,030.00	Bridging cash flow forecast; updating ██████; walkthrough of cash flows for revised DIP with potential DIP lender.
02/25/24	31365	Graham McIntyre	6.80	\$ 5,032.00	Work on updating the ██████ analysis; review of ██████ communication; and review of contract letters related to ██████.
02/25/24	38706	Dean Perlman	4.10	\$ 2,665.00	Internal call to discuss ██████ and leases; review and update ██████ workbook and lease details.
TOTAL				\$ 89,574.00	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

March 07, 2024
102900001014
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through March 03, 2024

Amount Due Current Invoice **\$128,126.40**

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please remit cheque payments to:	FTI Consulting Canada Inc.
	C/O T10073
	P.O. Box 10073
	Postal Station A
	Toronto, ON M5W 2B1
	Canada



Invoice Summary

Tacora Resources Inc.
 1 Wabush Mines Road
 P.O. Box 3000
 Wabush, NL A0R 1B0
 Canada

Invoice No. **March 07, 2024**
 Job No. **102900001014**
 Terms **493044.0001**
 Currency **Due Upon Receipt**
 Tax Registration: **CAD**

RE: FTI Engagement

Current Invoice Period: Charges posted through March 03, 2024

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	21.60	\$26,568.00
Jodi Porepa	Senior Managing Director	\$1,050.00	44.40	\$46,620.00
Graham McIntyre	Director	\$740.00	38.90	\$28,786.00
Dean Perlman	Senior Consultant	\$650.00	8.50	\$5,525.00
Zoe Lin	Consultant	\$420.00	0.90	\$378.00
Total Professional Services			114.30	\$107,877.00
Expenses				Total
Business Meals				\$52.35
Miscellaneous Expense				\$248.60
Total Expenses				\$300.95
Administrative Fee				\$3,236.31
Invoice Total				CAD Amount
				\$111,414.26
HST (15%)				\$16,712.14
Total Due				\$128,126.40

Tacora Resources Inc.
493044.0001 - March 3, 2024

Date	TK#	Name	Hours	Amount	Narrative
02/21/24	14800	Paul Bishop	4.10	\$ 5,043.00	Call with counsel regarding variances; weekly call with ██████ regarding operations; weekly call with counsel; Daily update call; review of CF bridge; review of DIP forecasts; multiple email correspondence.
02/26/24	14800	Paul Bishop	3.90	\$ 4,797.00	Call with Monitor's counsel and Stikeman; daily update call; review of forecasts and dip requirements; call with Monitor's counsel; call with GLC.
02/27/24	14800	Paul Bishop	4.20	\$ 5,166.00	Call with Monitor's counsel; call from with third parties; call to review DIP request; review of cash flow materials; call with Company and advisors regarding DIP.
02/28/24	14800	Paul Bishop	2.90	\$ 3,567.00	Operations call with ██████; operations call with ██████; review of correspondence regarding DIP; call with Company; counsel and advisors regarding DIP.
02/29/24	14800	Paul Bishop	2.10	\$ 2,583.00	Call with third parties; correspondence regarding DIP; daily update call with Company, counsel and advisors.
03/01/24	14800	Paul Bishop	3.30	\$ 4,059.00	Call regarding meeting request; call with Company regarding ██████ request; review of correspondence regarding confidential motion.
03/02/24	14800	Paul Bishop	1.10	\$ 1,353.00	Call regarding meeting request regarding view of correspondence.
02/26/24	15532	Jodi Porepa	10.30	\$ 10,815.00	Call with Stikemans and Cassels to discuss ██████; discussion regarding ██████ planning; review updated cash flow forecast and provide comments; review updated assumptions; discussions regarding same with Management; discussions regarding updated DIP need with Stikemans, Greenhill and Tacora; review financial analyses and financial bridges; review differences between updated CFFs and court report CFFs.
02/27/24	15532	Jodi Porepa	9.00	\$ 9,450.00	Call with Stikemans and Cassels to discuss ██████; discussion regarding ██████ planning; review updated cash flow forecast and provide comments; review updated assumptions; discussions regarding same with Management; discussions regarding updated DIP need with Stikemans, Greenhill and Tacora; review financial analyses and financial bridges; review differences between updated CFFs and court report CFFs.
02/28/24	15532	Jodi Porepa	7.10	\$ 7,455.00	Call with Stikemans and Cassels to discuss upcoming litigation; discussion regarding ██████ planning; review updated cash flow forecast and provide comments; review updated assumptions; discussions regarding same with Management; discussions regarding updated DIP need with Stikemans, Greenhill and Tacora; review financial analyses and financial bridges; review differences between updated CFFs and court report CFFs.
02/29/24	15532	Jodi Porepa	6.80	\$ 7,140.00	Call with Stikemans and Cassels to discuss ██████; discussion regarding ██████ planning; review updated cash flow forecast and provide comments; review updated assumptions; discussions regarding same with Management; discussions regarding updated DIP need with Stikemans, Greenhill and Tacora; review financial analyses and financial bridges; review differences between updated CFFs and court report CFFs.
03/01/24	15532	Jodi Porepa	6.90	\$ 7,245.00	Call to discuss ██████; review updated analysis and provide comments; daily call with professionals; call with ██████ and ██████ and vendor relationships; review variance analysis and provide comments.
03/02/24	15532	Jodi Porepa	1.10	\$ 1,155.00	Review court materials and provide comments for upcoming court hearing; review motion materials circulated.
03/03/24	15532	Jodi Porepa	3.20	\$ 3,360.00	Review court materials and provide comments for upcoming court hearing; review motion materials circulated.
02/26/24	31365	Graham McIntyre	11.50	\$ 8,510.00	Work on updating ██████ analysis including review of leases and accounts payable; communication with certain suppliers; review of proposed disbursements; updating and review of cash flow scenarios; discussions with management regarding cash flows; bridging cash flows to prior versions circulated; review of mark-to-market and hedging analysis.

Tacora Resources Inc.
493044.0001 - March 3, 2024

Date	TK#	Name	Hours	Amount	Narrative
02/27/24	31365	Graham McIntyre	6.30	\$ 4,662.00	Finalizing cash flow scenarios and bridge workbooks; updating fee affidavits; discussions regarding engagement matters; calls with Greenhill and Company.
02/28/24	31365	Graham McIntyre	7.50	\$ 5,550.00	Work on updating [REDACTED]; review of proposed disbursements; review of DIP interest calculation; and review of proposed DIP fees.
02/29/24	31365	Graham McIntyre	12.80	\$ 9,472.00	Work on updating [REDACTED], and discussions regarding the same; variance analysis; review of DIP proposals; discussions regarding the same.
03/03/24	31365	Graham McIntyre	0.80	\$ 592.00	Work on updating [REDACTED] tracker and review of same.
02/26/24	37016	Zoe Lin	0.40	\$ 168.00	Trust account banking matters.
02/28/24	37016	Zoe Lin	0.50	\$ 210.00	Trust account banking matters.
02/26/24	38706	Dean Perlman	8.00	\$ 5,200.00	Review of scheduled lease payments related to [REDACTED]; internal discussions; reviewing new updated cash flow forecast and financial analyses; call with Financial Advisor, Company Management and Counsel on cash flow forecast and next steps.
02/29/24	38706	Dean Perlman	0.50	\$ 325.00	Review and update [REDACTED] workbook and lease details.
TOTAL				\$ 107,877.00	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

March 12, 2024
102900001029
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through March 10, 2024

Amount Due Current Invoice **\$122,370.11**

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please remit cheque payments to:	FTI Consulting Canada Inc.
	C/O T10073
	P.O. Box 10073
	Postal Station A
	Toronto, ON M5W 2B1
	Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No. **March 12, 2024**
Job No. **102900001029**
Terms **493044.0001**
Currency **Due Upon Receipt**
Tax Registration: **CAD**

RE: FTI Engagement

Current Invoice Period: Charges posted through March 10, 2024

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	24.00	\$29,520.00
Jodi Porepa	Senior Managing Director	\$1,050.00	41.70	\$43,785.00
Graham McIntyre	Director	\$740.00	40.40	\$29,896.00
Caitlin Moreland	Administrative Professional	\$155.00	0.70	\$108.50
Total Professional Services			106.80	\$103,309.50
Administrative Fee				\$3,099.29
Invoice Total				CAD Amount
				\$106,408.79
HST (15%)				\$15,961.32
Total Due				\$122,370.11

Tacora Resources Inc.
493044.0001 - March 10, 2024

Date	TK#	Name	Hours	Amount	Narrative
03/04/24	14800	Paul Bishop	3.70	\$ 4,551.00	Call with Monitor's counsel; daily update call; review of ██████████; review of DIP budgets; review of DIP agreements; review of court materials.
03/05/24	14800	Paul Bishop	4.90	\$ 6,027.00	Call with Monitor's counsel and ██████████; call with Monitor's counsel regarding DIP; daily update call; call with Board; Review of DIP materials; correspondence with Monitor's counsel; review of DIP analyses.
03/06/24	14800	Paul Bishop	5.10	\$ 6,273.00	Call with company; counsel and GLC; call with Monitor's counsel; calls regarding DIP; review of proposals and correspondence daily update call; call with counsel and regarding DIP; review of correspondence regarding tax refunds.
03/07/24	14800	Paul Bishop	4.30	\$ 5,289.00	Call with Monitor's counsel; call with Monitor's counsel and Company counsel; review of documents and drafts; review of board deck; review of cash flow forecasts; call with third parties.
03/08/24	14800	Paul Bishop	3.30	\$ 4,059.00	Call with GLC; review of drafts; review of cash flows regarding DIP; daily update call.
03/09/24	14800	Paul Bishop	1.60	\$ 1,968.00	Review of report and affidavit; review of correspondence.
03/10/24	14800	Paul Bishop	1.10	\$ 1,353.00	Review and edit report; multiple correspondence.
03/04/24	15532	Jodi Porepa	6.50	\$ 6,825.00	Review changes to DIP proposals; attend call with Stikemans and Cassels to discuss next steps; review operational plan; review proposed disbursements and provide comments; review updated cash flow forecasts; review motion materials.
03/05/24	15532	Jodi Porepa	9.00	\$ 9,450.00	Review changes to DIP proposals; attend call with Stikemans and Cassels to discuss next steps; review operational plan; review proposed disbursements and provide comments; review updated cash flow forecasts; review motion materials.
03/06/24	15532	Jodi Porepa	5.10	\$ 5,355.00	Professionals call; review of DIPs; review strategy for court report; call with ██████████ to discuss next steps; daily professionals call; review cash flow forecast; review Board slides and provide comments; call with Company; internal discussions; review vendor enquires.
03/07/24	15532	Jodi Porepa	7.30	\$ 7,665.00	Call with Cassels; call with Stikemans; attend Board call; review proposed disbursements; review updated DIP term sheets; review cash flow forecast; review third party enquiries; review ██████████.
03/08/24	15532	Jodi Porepa	5.30	\$ 5,565.00	Professionals call; review of DIPs; review updated cash flow forecast; follow up on key changes in cash flow assumptions; discussion with management; review litigation materials; review motion materials.
03/09/24	15532	Jodi Porepa	4.20	\$ 4,410.00	Review CFF and provide comments; finalize CFF; review financial analyses regarding key changes; review affidavit and provide comments; review Monitor's Third Court Report and update; review ██████████.
03/10/24	15532	Jodi Porepa	4.30	\$ 4,515.00	Review Monitor's Fourth Report and provide comments; review changes to the CFF and provide comments; review financial analyses; call with CFO; internal call to discuss changes to the cash flow forecast; review DIP term sheet.
03/04/24	31365	Graham McIntyre	6.30	\$ 4,662.00	Review of source and uses analysis and discussions regarding the same; review of DIP proposals; review of proposed disbursements; correspondence with suppliers; uploading documents to Monitor's website; review of capital expenditures and discussions regarding the same.
03/05/24	31365	Graham McIntyre	5.50	\$ 4,070.00	Work on updating court cash flow output; review of proposed disbursements; review of fee affidavit and ██████████; posting documents to Monitor's website; updating listing of ██████████ per contract; review revised DIP proposals; discussions regarding engagement matters.
03/06/24	31365	Graham McIntyre	5.80	\$ 4,292.00	Supplier correspondence; updating fee affidavit; updating court report receipts and disbursements section; discussions regarding insurance matters and impact on cash flow; review of proposed disbursements; internal discussions regarding engagement matters; call with professionals and company.

Tacora Resources Inc.
493044.0001 - March 10, 2024

Date	TK#	Name	Hours	Amount	Narrative
03/07/24	31365	Graham McIntyre	4.80	\$ 3,552.00	Supplier correspondence; review of proposed DIP term sheets; updating fee affidavit; internal discussions regarding engagement matters; review of proposed disbursements.
03/08/24	31365	Graham McIntyre	4.50	\$ 3,330.00	Review of cash flow forecast for replacement DIP; review of professional fees for cash flow forecast; supplier correspondence; review of cash flow forecast for replacement DIP; internal discussions regarding engagement matters.
03/09/24	31365	Graham McIntyre	9.00	\$ 6,660.00	Updating cash flow forecast; preparing financial analyses on cash flow forecasts; review of prior week variance analysis; correspondence regarding the same.
03/10/24	31365	Graham McIntyre	4.50	\$ 3,330.00	Updates to cash flow forecast; updating court report; correspondence regarding the same; finalize variance analysis.
03/05/24	39589	Caitlin Moreland	0.70	\$ 108.50	Update Monitor's website.
TOTAL				\$ 103,309.50	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

March 19, 2024
102900001038
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through March 17, 2024

Amount Due Current Invoice **\$135,374.14**

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please remit cheque payments to:	FTI Consulting Canada Inc.
	C/O T10073
	P.O. Box 10073
	Postal Station A
	Toronto, ON M5W 2B1
	Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No. **March 19, 2024**
Job No. **102900001038**
Terms **493044.0001**
Currency **Due Upon Receipt**
Tax Registration: **CAD**

RE: FTI Engagement

Current Invoice Period: Charges posted through March 17, 2024

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	27.50	\$33,825.00
Jodi Porepa	Senior Managing Director	\$1,050.00	43.70	\$45,885.00
Graham McIntyre	Director	\$740.00	45.60	\$33,744.00
Zoe Lin	Consultant	\$420.00	1.10	\$462.00
Caitlin Moreland	Administrative Professional	\$155.00	2.40	\$372.00
Total Professional Services			120.30	\$114,288.00
Administrative Fee				\$3,428.64
Invoice Total				CAD Amount
				\$117,716.64
HST (15%)				\$17,657.50
Total Due				\$135,374.14

Tacora Resources Inc.
493044.0001 - March 17, 2024

Date	TK#	Name	Hours	Amount	Narrative
03/11/24	14800	Paul Bishop	4.40	\$ 5,412.00	Call with Counsel to discuss reports; DIP materials and various matters; daily update call; review of third report; review of Monitor's Fourth report; review of correspondence regarding ██████; review of cash flows; review impact on cash flow forecast regarding price changes.
03/12/24	14800	Paul Bishop	4.20	\$ 5,166.00	Call with counsel and Stikemans; review and edit third report; review and edit Monitor's Fourth Report; daily update call; review of cash flows; review of exhibits for report; review of correspondence.
03/13/24	14800	Paul Bishop	3.90	\$ 4,797.00	Review and edit Monitor's Third report; review and edit Monitor's Fourth report; daily update call; review of draft materials; review of cash flows.
03/14/24	14800	Paul Bishop	5.60	\$ 6,888.00	Board call; call with counsel; call with counsel and Stikemans; review and finalize Monitor's Fourth Report; call with counsel regarding offtake; daily update call; review responding materials.
03/15/24	14800	Paul Bishop	4.80	\$ 5,904.00	Call with Monitor's counsel; call with Monitor's counsel and Stikemans; daily update call; review of drafts; review of cash flow; review multiple email correspondence.
03/16/24	14800	Paul Bishop	1.40	\$ 1,722.00	Review of correspondence and cash flow forecasts.
03/17/24	14800	Paul Bishop	3.20	\$ 3,936.00	Call with Monitor's counsel; review of motion materials; call with Monitor's counsel and Stikemans; review of ██████ Aide Memoire; Board call.
03/11/24	15532	Jodi Porepa	9.00	\$ 9,450.00	Review and provide comments on Monitor's Third Report; review and provide comments on Monitor's Fourth Report; internal status update on DIP analysis; review financial analyses and provide comments; review and respond to vendor enquiries; call with vendor to discuss transition; attend daily professionals call; review ██████.
03/12/24	15532	Jodi Porepa	5.70	\$ 5,985.00	Review and provide comments on Monitor's Third Report; review and provide comments on Monitor's Fourth Report; internal status update on DIP analysis; review financial analyses and provide comments; review and respond to vendor enquiries; call with vendor to discuss transition; attend daily professionals call; review ██████.
03/13/24	15532	Jodi Porepa	6.50	\$ 6,825.00	Attend weekly calls with ██████ and ██████; review motion materials; review responding affidavits; finalize court reports; review appendix for report and provide comments; review communication on ██████ and provide comments; review updated affidavits for Joe Broking and Michael Nessim; review Monitor's Fourth Report and provide comments; internal follow up on certain creditor enquiries; follow up on certain other vendor enquiries; follow up on ██████ Report.
03/14/24	15532	Jodi Porepa	8.10	\$ 8,505.00	Review and finalize Monitor's Fourth Report; attend calls with ██████, Company and Greenhill; call with professionals; call with Cassels; review updated financial analyses; review proposed disbursements and provide comments; review Cargill Motion materials.
03/15/24	15532	Jodi Porepa	5.40	\$ 5,670.00	Attend daily professionals call; review updated cash flow forecast and changes to key assumptions; review impact to near term liquidity; review impact to overall DIP need; review materials filed in advance of March 18 hearing, internal discussions around liquidity and next steps.
03/16/24	15532	Jodi Porepa	3.10	\$ 3,255.00	Call with Greenhill and Tacora to review cash flow forecast; review financial analyses on cash flow forecast; internal discussion regarding same; review additional financial analyses regarding liquidity situation and forecast DIP draws; review DIP comparisons.
03/17/24	15532	Jodi Porepa	5.90	\$ 6,195.00	Call with Stikemans and Cassels Brock to prepare for Board call and ██████; attend Board call; review ██████ materials; call with Stikemans to discuss comparison; internal call to discuss financial analyses; review and provide comments on Greenhill analysis; call with Cassels Brock to discuss ██████; various correspondence.

Tacora Resources Inc.
493044.0001 - March 17, 2024

Date	TK#	Name	Hours	Amount	Narrative
03/11/24	31365	Graham McIntyre	8.50	\$ 6,290.00	Updating cash flow analyses; discussions with Company regarding cash flow forecast; posting documents to website; updating cash flow and variance sections of Monitor's Court Report; review of Monitor's Court Report; finalizing DIP budget.
03/12/24	31365	Graham McIntyre	7.80	\$ 5,772.00	Review of court report; analysis for court report; correspondence with suppliers; inquiries related to banking matters; correspondence related to [REDACTED]; updating cash flow analyses.
03/13/24	31365	Graham McIntyre	6.50	\$ 4,810.00	Review of Monitor's Fourth Report; cash flow bridge analysis; correspondence with suppliers; responding to Monitor's hotline enquiries; correspondence with Company counsel regarding [REDACTED].
03/14/24	31365	Graham McIntyre	7.00	\$ 5,180.00	Review of variance analysis and drafting variance report; review of proposed disbursements and call regarding the same; calls with [REDACTED] and Company; correspondence with suppliers; responding to Monitor hotline enquiries.
03/15/24	31365	Graham McIntyre	4.50	\$ 3,330.00	Bridging cash flows; walkthrough of variance analysis [REDACTED]; attending meetings [REDACTED], investment bankers and the Company; review of updated cash flow; review of motion materials; posting materials to website.
03/15/24	31365	Graham McIntyre	1.50	\$ 1,110.00	Bridging updated cash flow scenarios to prior cash flows; financial analyses regarding same.
03/16/24	31365	Graham McIntyre	4.00	\$ 2,960.00	Review of proposed DIP term sheets and analysis of the same; discussions with Company and investment bank regarding cash flows and upcoming Board meeting.
03/17/24	31365	Graham McIntyre	5.80	\$ 4,292.00	Preparing for Board meeting; review of DIP fees; review of confidential appendix in advance of court hearing; preparing cash flow analyses regarding request of current DIP lender.
03/12/24	37016	Zoe Lin	0.60	\$ 252.00	Trust account banking matters.
03/13/24	37016	Zoe Lin	0.50	\$ 210.00	Trust account banking matters.
03/11/24	39589	Caitlin Moreland	0.30	\$ 46.50	Update Monitor's website.
03/14/24	39589	Caitlin Moreland	0.80	\$ 124.00	Update Monitor's website.
03/15/24	39589	Caitlin Moreland	1.30	\$ 201.50	Update Monitor's website.
TOTAL				\$ 114,288.00	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

March 26, 2024
102900001057
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through March 24, 2024

Amount Due Current Invoice

\$122,027.19

Bank Information

Please indicate our invoice number with your remittance

Account Name: FTI Consulting Canada Inc.
Bank Name: Bank of Nova Scotia
Bank Address: Scotia Plaza, 44 King Street West
Toronto, Ontario M5H 1H1
Canada

Bank Code: 002
Account Number: 0861715
Swift/BIC Code: NOSCCATT
Transit Code: 47696
Account Currency: CAD

Please remit cheque payments to: FTI Consulting Canada Inc.
C/O T10073
P.O. Box 10073
Postal Station A
Toronto, ON M5W 2B1
Canada

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

March 26, 2024
Invoice No. 102900001057
Job No. 493044.0001
Terms Due Upon Receipt
Currency CAD
Tax Registration:

RE: FTI Engagement

Current Invoice Period: Charges posted through March 24, 2024

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	25.30	\$31,119.00
Jodi Porepa	Senior Managing Director	\$1,050.00	47.70	\$50,085.00
Graham McIntyre	Director	\$740.00	28.60	\$21,164.00
Adsaran Vithiyanthan	Senior Consultant	\$590.00	1.00	\$590.00
Caitlin Moreland	Administrative Professional	\$155.00	0.40	\$62.00
Total Professional Services			103.00	\$103,020.00
Administrative Fee				\$3,090.60
Invoice Total				CAD Amount
				\$106,110.60
HST (15%)				\$15,916.59
Total Due				\$122,027.19

Tacora Resources Inc.
493044.0001 - March 24, 2024

Date	TK#	Name	Hours	Amount	Narrative
03/18/24	14800	Paul Bishop	4.50	\$ 5,535.00	Attend court; review of amended CFF and budget; review of correspondence.
03/19/24	14800	Paul Bishop	3.80	\$ 4,674.00	Call with Monitor's counsel and Stikemans; review of multiple correspondence; review of CFFs.
03/20/24	14800	Paul Bishop	3.70	\$ 4,551.00	Call with Monitor's counsel and Stikemans regarding [REDACTED] review of [REDACTED]; call with [REDACTED]; daily update call.
03/21/24	14800	Paul Bishop	5.20	\$ 6,396.00	Review of transcripts; Board meeting; call with Monitor's counsel; call with Monitor's counsel and Stikemans; daily update call; review of draft DIP and stay; multiple correspondence review.
03/22/24	14800	Paul Bishop	5.60	\$ 6,888.00	Review transcripts; call with [REDACTED] and advisors; operational update call with [REDACTED]; operational update call with [REDACTED] daily update call.
03/23/24	14800	Paul Bishop	2.50	\$ 3,075.00	Review transcripts; review and edit draft report.
03/18/24	15532	Jodi Porepa	10.50	\$ 11,025.00	Call with Stikemans to discuss DIP comparison; review of updated DIP comparison and provide comments; call with Greenhill to discuss same; attend court hearing; review updated CFFs; discuss updated CFFs; review key assumptions underlying the [REDACTED] scenarios; review updated financial analyses; review and approve disbursements; internal discussions regarding same; call with Greenhill and Stikemans to discuss liquidity and [REDACTED] ask; attend daily professionals call.
03/19/24	15532	Jodi Porepa	8.00	\$ 8,400.00	Attend daily call; review proposed disbursements and provide comments; review motion materials; review updated cash flow and key assumptions; internal discussions regarding same; review financial analyses; attend call with Stikemans to discuss next steps; call with Company and Greenhill regarding updated cash flows; call with Tacora and Stikemans regarding DIP request.
03/20/24	15532	Jodi Porepa	8.10	\$ 8,505.00	Review correspondence with [REDACTED] and respond on liquidity; attend daily update call; attend certain examinations; review transcripts, where available; internal discussion on cash flows; review and respond to proposed disbursements; internal discussions regarding certain vendor enquiries.
03/21/24	15532	Jodi Porepa	9.60	\$ 10,080.00	Review proposed disbursements and provide feedback; attend certain cross examinations; review updated cash flows and provide comments; follow up on variance analysis; attend Tacora Board meeting; attend call with Cassels and Stikemans [REDACTED].
03/22/24	15532	Jodi Porepa	7.30	\$ 7,665.00	Attend standing call with advisors; attend certain cross-examinations; review transcripts; attend separate weekly operational update calls with [REDACTED] review motion materials; internal discussions regarding cash flows; call with Tacora to address cash flows; follow up with Tacora regarding certain vendor enquiries.
03/23/24	15532	Jodi Porepa	2.70	\$ 2,835.00	Review Supplementary Report and provide comments; review [REDACTED].
03/24/24	15532	Jodi Porepa	1.50	\$ 1,575.00	Review and update draft report; call with Cassels to discuss [REDACTED].
03/18/24	31365	Graham McIntyre	12.50	\$ 9,250.00	Cash flow bridge analysis for board; preparing revised cash flows for DIP lender; preparing financial analyses on cash flows; correspondence with suppliers; internal discussions regarding engagement matters; review of cash flows with Company and investment bankers.
03/19/24	31365	Graham McIntyre	5.30	\$ 3,922.00	Correspondence with suppliers; updating cash flow forecast for DIP extension and discussions with Management investment bankers regarding the same; internal discussions regarding engagement matters; updating cash flow workbook for the board.
03/20/24	31365	Graham McIntyre	4.00	\$ 2,960.00	Communication with suppliers; review Monitor's hotline and respond accordingly; internal discussions regarding engagement matters; updating cash flow analyses; prepare analysis for Board; review forecast receipts.

Tacora Resources Inc.
493044.0001 - March 24, 2024

Date	TK#	Name	Hours	Amount	Narrative
03/21/24	31365	Graham McIntyre	3.30	\$ 2,442.00	Review of proposed disbursements; updating variance analysis workbook; correspondence with suppliers; internal discussions regarding engagement matters; calls with Company, counsel, and investment bankers.
03/22/24	31365	Graham McIntyre	3.50	\$ 2,590.00	Bridging updated cash flow forecast and updating analyses; review of [REDACTED] and corresponding insurance; internal discussions regarding engagement matters; communication with suppliers.
03/18/24	39280	Adsaran Vithiyananthan	1.00	\$ 590.00	Review financial analyses for Board comparing various cash flow forecasts submitted to Court.
03/18/24	39589	Caitlin Moreland	0.40	\$ 62.00	Update Monitor's website.
TOTAL				\$ 103,020.00	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

March 31, 2024
102900001073
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through March 31, 2024

Amount Due Current Invoice **\$108,834.83**

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please remit cheque payments to:	FTI Consulting Canada Inc.
	C/O T10073
	P.O. Box 10073
	Postal Station A
	Toronto, ON M5W 2B1
	Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

March 31, 2024
Invoice No. 102900001073
Job No. 493044.0001
Terms Due Upon Receipt
Currency CAD
Tax Registration:

RE: FTI Engagement

Current Invoice Period: Charges posted through March 31, 2024

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	17.20	\$21,156.00
Jodi Porepa	Senior Managing Director	\$1,050.00	47.00	\$49,350.00
Graham McIntyre	Director	\$740.00	28.30	\$20,942.00
Adsaran Vithiyanthan	Senior Consultant	\$590.00	0.50	\$295.00
Caitlin Moreland	Administrative Professional	\$155.00	0.90	\$139.50
Total Professional Services			93.90	\$91,882.50
Administrative Fee				\$2,756.48
Invoice Total				CAD Amount
				\$94,638.98
HST (15%)				\$14,195.85
Total Due				\$108,834.83

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com

Tacora Resources Inc.
493044.0001 - March 31, 2024

Date	TK#	Name	Hours	Amount	Narrative
03/25/24	14800	Paul Bishop	5.20	\$ 6,396.00	Call with Monitor's counsel; call with Monitor's counsel [REDACTED] call with Monitor's counsel, advisors, [REDACTED]; call with Monitor's counsel regarding report; daily update call; further calls with Monitor's counsel regarding Monitor's Report; review and edit report; multiple email correspondence.
03/26/24	14800	Paul Bishop	3.90	\$ 4,797.00	Call with Monitor's counsel; review and edit report; daily update call; further review; edit and finalize Monitor's Report.
03/27/24	14800	Paul Bishop	4.20	\$ 5,166.00	Operations update calls with [REDACTED] and [REDACTED], call with [REDACTED] [REDACTED], daily update call; review of payments and cash flow.
03/28/24	14800	Paul Bishop	3.90	\$ 4,797.00	Board meeting; call with Monitor's counsel; call with Monitor's counsel and Stikemans; [REDACTED] daily update call; [REDACTED].
03/25/24	15532	Jodi Porepa	10.40	\$ 10,920.00	Review transcripts; review and finalize Supplementary Report; review financial analyses; review variance analysis and provide comments; review [REDACTED]; attend call with Stikemans and Cassels to discuss open issues; attend call with [REDACTED]; internal discussions regarding cash flows; review updated sources and uses; internal discussions on stayed lease costs; review and update supplementary report; call with Cassels Brock to discuss same; call with [REDACTED].
03/26/24	15532	Jodi Porepa	9.00	\$ 9,450.00	Review and finalize Supplemental Report; review updated cash flow forecast; review updated sources and uses; respond to [REDACTED]; attend daily professionals calls; review proposed disbursements; review motion material filed; review undertakings from cross examination; internal status update; review variance analysis and provide comments.
03/27/24	15532	Jodi Porepa	9.20	\$ 9,660.00	Daily operational update calls; review proposed disbursements; review and respond to third party enquiries; call with Tacora and Greenhill regarding cash flow scenarios; internal status update on cash flows and other CCAA issues; follow up on third party enquiries; review financial analyses; review materials filed with the court; finalize Monitor's Court Report; call to discuss changes to Monitor's report; call with Cassels.
03/28/24	15532	Jodi Porepa	8.60	\$ 9,030.00	Review [REDACTED]; review and respond to email enquiries; attend daily professionals call; attend call with the [REDACTED]; call with [REDACTED]; follow up on outstanding enquiries; review variance analysis; review financial analyses; call with Stikemans and Cassels regarding key issues.
03/29/24	15532	Jodi Porepa	1.90	\$ 1,995.00	Call with counsel to discuss certain vendors and responding to proposed negotiated terms; call with Stikemans regarding cash flow forecast and other liquidity concerns.
03/30/24	15532	Jodi Porepa	4.60	\$ 4,830.00	Review motion materials filed in preparation for hearing; review and respond to email enquiries.
03/31/24	15532	Jodi Porepa	3.30	\$ 3,465.00	Review materials filed with court; review sources and uses; review and respond to third party enquiries; review transition plan.
03/25/24	31365	Graham McIntyre	8.50	\$ 6,290.00	Updating lease [REDACTED] analysis; review of government contracts and licenses; review of sources and uses analysis; financial analysis for latest cash flow forecast; review of tax attributes to respond to [REDACTED] tax inquiries; posting documents to the Monitor's website; review of proposed disbursements; call with Company to discuss [REDACTED]; internal discussions regarding engagement matters.
03/26/24	31365	Graham McIntyre	5.00	\$ 3,700.00	Variance analysis; review draft sources and uses analysis and provide comments; review tax attributes and respond to tax attribute enquiries from [REDACTED]; updating cash flow financial analysis for [REDACTED]; review of government contracts and licenses; posting documents to Monitor's website; walkthrough of updated lease [REDACTED] workbook with Company; internal discussions regarding engagement matters.

Tacora Resources Inc.
493044.0001 - March 31, 2024

Date	TK#	Name	Hours	Amount	Narrative
03/27/24	31365	Graham McIntyre	5.30	\$ 3,922.00	Discussions with Company and investment bankers regarding cash flow forecasts; updating cash flow financial analyses for Board; discussions regarding government contracts and licenses; internal discussions regarding engagement matters; review of proposed disbursements; weekly proposed disbursements call with Company; daily call with Company and investment bankers.
03/28/24	31365	Graham McIntyre	7.50	\$ 5,550.00	Variance analysis; review of government contracts and discussions regarding the same; internal discussions regarding engagement matters; discussions with supplier to discuss payment terms; posting documents to Monitor's website; review of DIP interest calculation and discussion regarding the same.
03/29/24	31365	Graham McIntyre	2.00	\$ 1,480.00	Work on finalizing variance analysis; review of supplier [REDACTED] and supplier contract.
03/27/24	39280	Adsaran Vithiyananthan	0.50	\$ 295.00	Call with Financial Advisor and Company on regarding cash flow forecast model.
03/25/24	39589	Caitlin Moreland	0.30	\$ 46.50	Update Monitor's website.
03/26/24	39589	Caitlin Moreland	0.30	\$ 46.50	Update Monitor's website.
03/28/24	39589	Caitlin Moreland	0.30	\$ 46.50	Update Monitor's website.
TOTAL				\$ 91,882.50	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No. April 09, 2024
Job No. 102900001118
Terms 493044.0001
Currency Due Upon Receipt
Tax Registration: CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through April 07, 2024

Amount Due Current Invoice \$124,225.04

Bank Information

Please indicate our invoice number with your remittance

Account Name: FTI Consulting Canada Inc. Bank Code: 002
Bank Name: Bank of Nova Scotia Account Number: 0861715
Bank Address: Scotia Plaza, 44 King Street West Swift/BIC Code: NOSCCATT
Toronto, Ontario M5H 1H1 Transit Code: 47696
Canada Account Currency: CAD

Please remit cheque payments to: FTI Consulting Canada Inc.
C/O T10073
P.O. Box 10073
Postal Station A
Toronto, ON M5W 2B1
Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No. **April 09, 2024**
Job No. **102900001118**
Terms **493044.0001**
Currency **Due Upon Receipt**
Tax Registration: **CAD**

RE: FTI Engagement

Current Invoice Period: Charges posted through April 07, 2024

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	25.60	\$31,488.00
Jodi Porepa	Senior Managing Director	\$1,050.00	48.20	\$50,610.00
Graham McIntyre	Director	\$740.00	28.60	\$21,164.00
Zoe Lin	Consultant	\$420.00	1.00	\$420.00
Caitlin Moreland	Administrative Professional	\$155.00	2.70	\$418.50
Kathleen Foster	Executive Assistant II	\$155.00	5.00	\$775.00
Total Professional Services			111.10	\$104,875.50
Administrative Fee				\$3,146.27
Invoice Total				CAD Amount
				\$108,021.77
HST (15%)				\$16,203.27
Total Due				\$124,225.04

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com

Tacora Resources Inc.
493044.0001 - April 7, 2024

Date	TK#	Name	Hours	Amount	Narrative
04/01/24	14800	Paul Bishop	3.10	\$ 3,813.00	Review of ██████; review of payments; review of correspondence regarding certain vendors; review of correspondence; daily update call.
04/02/24	14800	Paul Bishop	3.70	\$ 4,551.00	Review of ██████; review of ██████; daily update call; review of cash flow and payments.
04/03/24	14800	Paul Bishop	4.80	\$ 5,904.00	██████████ review of cash flows; review of correspondence daily update call.
04/04/24	14800	Paul Bishop	3.90	\$ 4,797.00	Call with Monitor's counsel; call with Monitor's counsel, Greenhill, and Stikemans; call with Monitor's counsel, ██████; call with counsel and Greenhill; review of ██████ and draft reports.
04/05/24	14800	Paul Bishop	4.90	\$ 6,027.00	Weekly operations call; daily update call; review of ██████; review of ██████; review of draft reports; multiple correspondence regarding same.
04/06/24	14800	Paul Bishop	2.80	\$ 3,444.00	Review of reports and ██████; review of litigation schedule; multiple correspondence.
04/07/24	14800	Paul Bishop	1.30	\$ 1,599.00	Review of report and ██████.
04/07/24	14800	Paul Bishop	1.10	\$ 1,353.00	Call with counsel regarding scheduling.
04/01/24	15532	Jodi Porepa	9.20	\$ 9,660.00	Call with Tacora and Greenhill to discuss updated CFF; daily update call; call with counsel to certain vendors to discuss ██████ and next steps; call with Cassels Brock and Stikemans to discuss ██████; review ██████; internal discussions regarding same; internal discussions regarding sources and uses and other financial analyses; review ██████.
04/02/24	15532	Jodi Porepa	9.10	\$ 9,555.00	Review ██████; review financial summaries; review proposed disbursements and provide comments; attend call with Cassels Brock and ██████; call with counsel; internal status update call; review and respond to third party enquiries.
04/03/24	15532	Jodi Porepa	9.30	\$ 9,765.00	Review Monitor's Sixth Report and provide comments; review ██████; call with Greenhill and Company to discuss cash flow scenarios; call with ██████ to discuss scenario assumptions; call with Stikemans to discuss CCAA considerations for scenarios; call with Cassels Brock regarding SISP motion; call with ██████, Stikemans and Cassels Brock ██████; internal discussions regarding status update; review and discuss responses to third party enquiries.
04/04/24	15532	Jodi Porepa	9.00	\$ 9,450.00	Review Monitor's Sixth Report and provide comments; review ██████ and provide comments; review proposed disbursements and provide comments; call with ██████; call with Cassels Brock ██████; call with Stikemans and Cassels Brock; call with Company to discuss appendix to Broking affidavit; review Broking affidavit and ██████ for report; internal status updates.
04/05/24	15532	Jodi Porepa	5.10	\$ 5,355.00	Review ██████; review financial summaries review and respond to third party enquiries; call with counsel; call with Tacora to ██████.
04/06/24	15532	Jodi Porepa	2.80	\$ 2,940.00	Review Facta; review Monitor's Court Report and provide comments; review transcripts; call with Cassels Brock; provide comments on Monitor's Report and finalize.
04/07/24	15532	Jodi Porepa	3.70	\$ 3,885.00	Review Facta; review cash flow forecast summary; review and respond to ██████ enquiry; call with counsel to discuss upcoming motion.
04/02/24	24354	Kathleen Foster	3.00	\$ 465.00	Trust bank account matters.
04/03/24	24354	Kathleen Foster	2.00	\$ 310.00	Trust bank account matters.
04/01/24	31365	Graham McIntyre	4.50	\$ 3,330.00	Internal discussions regarding engagement matters; review of proposed disbursements; discussions regarding ██████ with Company; draft correspondence in preparation for closing wires; post documents to Monitor's website.
04/02/24	31365	Graham McIntyre	4.00	\$ 2,960.00	Review of professional fee forecast and historical professional fee run rates; review of ██████; correspondence regarding ██████; calls with Company, investment bankers, and Stikemans and Cassels Brock.

Tacora Resources Inc.
493044.0001 - April 7, 2024

Date	TK#	Name	Hours	Amount	Narrative
04/03/24	31365	Graham McIntyre	5.50	\$ 4,070.00	Review [REDACTED]; review proposed disbursements; internal discussions regarding engagement matters; review of Monitor's inbox and follow-up correspondence; uploading documents to Monitor's website.
04/04/24	31365	Graham McIntyre	5.80	\$ 4,292.00	Variance analysis; review of proposed disbursements; review of Monitor hotline; uploading documents to Monitor's hotline; review latest cash flow forecast.
04/05/24	31365	Graham McIntyre	5.30	\$ 3,922.00	Finalizing variance analysis; discussions regarding cash flow scenarios; review and respond to Monitor's hotline; review cash flow forecast and underlying assumptions.
04/07/24	31365	Graham McIntyre	3.50	\$ 2,590.00	Review of cash flow forecast scenario analysis.
04/04/24	37016	Zoe Lin	1.00	\$ 420.00	Updating professional fee workbook; updating fee affidavit materials; review of invoice narratives.
04/01/24	39589	Caitlin Moreland	0.50	\$ 77.50	Update Monitor's website.
04/02/24	39589	Caitlin Moreland	0.50	\$ 77.50	Update Monitor's website.
04/03/24	39589	Caitlin Moreland	0.20	\$ 31.00	Update Monitor's website.
04/04/24	39589	Caitlin Moreland	0.50	\$ 77.50	Update Monitor's website.
04/05/24	39589	Caitlin Moreland	0.50	\$ 77.50	Update Monitor's website.
04/07/24	39589	Caitlin Moreland	0.50	\$ 77.50	Update Monitor's website.
TOTAL				\$ 104,875.50	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No. April 16, 2024
Job No. 102900001130
Terms 493044.0001
Currency Due Upon Receipt
Tax Registration: CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through April 14, 2024

Amount Due Current Invoice \$156,211.27

Bank Information

Please indicate our invoice number with your remittance

Account Name: FTI Consulting Canada Inc. Bank Code: 002
Bank Name: Bank of Nova Scotia Account Number: 0861715
Bank Address: Scotia Plaza, 44 King Street West Swift/BIC Code: NOSCCATT
Toronto, Ontario M5H 1H1 Transit Code: 47696
Canada Account Currency: CAD

Please remit cheque payments to: FTI Consulting Canada Inc.
C/O T10073
P.O. Box 10073
Postal Station A
Toronto, ON M5W 2B1
Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No. **April 16, 2024**
Job No. **102900001130**
Terms **493044.0001**
Currency **Due Upon Receipt**
Tax Registration: **CAD**

RE: FTI Engagement

Current Invoice Period: Charges posted through April 14, 2024

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	35.00	\$43,050.00
Jodi Porepa	Senior Managing Director	\$1,050.00	51.40	\$53,970.00
Graham McIntyre	Director	\$740.00	46.50	\$34,410.00
Caitlin Moreland	Administrative Professional	\$155.00	2.90	\$449.50
Total Professional Services			135.80	\$131,879.50
Administrative Fee				\$3,956.39
Invoice Total				CAD Amount
				\$135,835.89
HST (15%)				\$20,375.38
Total Due				\$156,211.27

Tacora Resources Inc.
493044.0001 - April 14, 2024

Date	TK#	Name	Hours	Amount	Narrative
04/08/24	14800	Paul Bishop	6.20	\$ 7,626.00	Call with Monitor's counsel and Stikemans; weekly call with ██████████; standing call with ██████████; call with Monitor's counsel and Stikemans; daily update call; further call with Monitor's counsel; review facta.
04/09/24	14800	Paul Bishop	11.50	\$ 14,145.00	Call with Monitor's counsel; call with Monitor's counsel and ██████████; further call with monitor's counsel; status call with Monitor's counsel and Stikemans; Board meeting; call with Monitor's counsel to discuss court communication; review of drafts; further calls with Monitor's counsel; review and finalize report; multiple emails.
04/10/24	14800	Paul Bishop	5.80	\$ 7,134.00	Board call; attend court; calls and meetings with Monitor's counsel; discussions with ██████████; call with Monitor's counsel and Company counsel; call with ██████████, Company counsel and Monitor's counsel; review of cash flow forecasts; review of correspondence with ██████████.
04/11/24	14800	Paul Bishop	5.60	\$ 6,888.00	Call with Monitor's counsel; call with Monitor's counsel and Stikemans; further call with Monitor's counsel; ██████████; review of communication with Company employees; review of multiple emails; review of correspondence from Counsel to equipment provider; review of correspondence regarding data room; review of CFF; multiple correspondence.
04/12/24	14800	Paul Bishop	4.70	\$ 5,781.00	Board call; call with Monitor's counsel and Stikemans; review of issues list; call with Monitor's counsel, ██████████; review of CFF; daily update call with Company, advisors and counsel; execute document regarding subscription agreement; multiple emails.
04/13/24	14800	Paul Bishop	1.20	\$ 1,476.00	Review and edit reports; review correspondence.
04/08/24	15532	Jodi Porepa	10.10	\$ 10,605.00	Review updated financial scenarios; review financial analyses; call with Cassels; call with Stikemans; call with counsel to discuss ██████████; call with ██████████; call with Management to discuss next steps; review and respond to proposed disbursements.
04/09/24	15532	Jodi Porepa	11.00	\$ 11,550.00	Call with Greenhill and Company to discuss cash flow forecast scenarios; call with Cassels to discuss strategic alternatives; call with counsel to ██████████; call with Stikemans and Cassels to discuss strategic objectives; review financial analyses; review financial scenarios; review and finalize Monitor's Sixth Report; review and provide comments on Second Supplement to Monitor's Sixth Report; review subscription agreement and proposed amendments; call with Stikemans to discuss same; call with CFO to discuss strategic alternatives; review updated sources and uses analyses; discussions in respect of same.
04/10/24	15532	Jodi Porepa	9.20	\$ 9,660.00	Court attendance; Board call; call with Cassels to discuss alternatives; call with Stikemans and Cassels to discuss ██████████ request; review updated cash flow forecast and provide comments; call with Management to discuss cash flow forecast; review motion materials.
04/11/24	15532	Jodi Porepa	8.10	\$ 8,505.00	Call with counsel and management to discuss strategic alternatives; call with Cassels to discuss options; call with Cassels and Stikemans to discuss options; review updated cash flows and key assumptions; review additional financial analyses and provide comments; finalize DIP CFF and provide comments.
04/12/24	15532	Jodi Porepa	8.80	\$ 9,240.00	Court attendance; Board call; call with Company to review revised and extended cash flow forecast; call with Stikemans and Greenhill to discuss process going forward; call with ██████████; call with Stikemans/Cassels Brock; review and finalize revised and extended cash flow forecast; internal status update; review and respond to third party enquiries; review executed termination agreement.
04/13/24	15532	Jodi Porepa	1.80	\$ 1,890.00	Review Monitor's Seventh Report and provide comments; review of the Monitor's Eighth Report and provide comments; review Claims Procedure Order.
04/14/24	15532	Jodi Porepa	2.40	\$ 2,520.00	Review Tacora's Motion materials and provide comments; review Claims Procedure Order and provide comments; plan for upcoming Claims Procedure.

Tacora Resources Inc.
493044.0001 - April 14, 2024

Date	TK#	Name	Hours	Amount	Narrative
04/08/24	31365	Graham McIntyre	6.80	\$ 5,032.00	Review and analyze comparison of liquidity scenarios and discussions regarding the same; uploading documents to Monitor's website; internal discussions regarding engagement matters.
04/09/24	31365	Graham McIntyre	10.80	\$ 7,992.00	Review cash flow liquidity scenarios and discussions regarding the same; review sources and uses analysis and provide comments; discussions regarding subscription agreement and upcoming court hearing; review of subscription agreement and grounds for termination and discussions regarding the same; posting documents to Monitor's website; █████ analysis in preparation for upcoming court hearing; communication with Company counsel regarding pre-filing payables.
04/10/24	31365	Graham McIntyre	8.50	\$ 6,290.00	Review latest cash flow forecast; financial analyses regarding comparing forecast to last DIP budget and discussions regarding the same; uploading documents to Monitor's website; internal discussions regarding engagement matters.
04/11/24	31365	Graham McIntyre	8.30	\$ 6,142.00	Variance analysis; updating cash flow for DIP financing; financial analyses on cash flow; review of proposed disbursements; internal discussions regarding engagement matters; call with management, counsel, and investment bankers; updating sections of Monitor's Court Report.
04/12/24	31365	Graham McIntyre	9.30	\$ 6,882.00	Finance lease analysis; updating cash flow forecast for DIP financing; calls with Management, counsel, and investment bankers; preparing creditor listing for claims procedure; uploading documents to Monitor's website.
04/14/24	31365	Graham McIntyre	2.80	\$ 2,072.00	Review and updating Court Report; discussions regarding capital expenditures.
04/08/24	39589	Caitlin Moreland	0.60	\$ 93.00	Update Monitor's website.
04/09/24	39589	Caitlin Moreland	0.40	\$ 62.00	Update Monitor's website.
04/10/24	39589	Caitlin Moreland	0.60	\$ 93.00	Update Monitor's website.
04/11/24	39589	Caitlin Moreland	0.20	\$ 31.00	Update Monitor's website.
04/12/24	39589	Caitlin Moreland	0.40	\$ 62.00	Update Monitor's website.
04/14/24	39589	Caitlin Moreland	0.70	\$ 108.50	Update Monitor's website.
TOTAL				\$ 131,879.50	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No. April 23, 2024
Job No. 102900001147
Terms 493044.0001
Currency Due Upon Receipt
Tax Registration: CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through April 21, 2024

Amount Due Current Invoice \$162,552.49

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please remit cheque payments to: FTI Consulting Canada Inc.
C/O T10073
P.O. Box 10073
Postal Station A
Toronto, ON M5W 2B1
Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No. **April 23, 2024**
Job No. **102900001147**
Terms **493044.0001**
Currency **Due Upon Receipt**
Tax Registration: **CAD**

RE: FTI Engagement

Current Invoice Period: Charges posted through April 21, 2024

Total

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	30.80	\$37,884.00
Jodi Porepa	Senior Managing Director	\$1,050.00	49.60	\$52,080.00
Graham McIntyre	Director	\$740.00	49.40	\$36,556.00
Adsaran Vithiyananthan	Senior Consultant	\$590.00	0.60	\$354.00
Carter Wood	Senior Consultant	\$590.00	17.40	\$10,266.00
Caitlin Moreland	Administrative Professional	\$155.00	0.60	\$93.00

Total Professional Services **148.40** **\$137,233.00**

Administrative Fee \$4,116.99

Invoice Total	CAD Amount
	\$141,349.99
HST (15%)	\$21,202.50
Total Due	\$162,552.49

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com

Tacora Resources Inc.
493044.0001 - April 21, 2024

Date	TK#	Name	Hours	Amount	Narrative
04/15/24	14800	Paul Bishop	4.60	\$ 5,658.00	Call with Monitor's counsel and Stikemans; daily update call; review draft Claims Procedure Order schedules; review draft report; review of payments; review of draft report; review of facts; review of DIP proposals.
04/16/24	14800	Paul Bishop	3.40	\$ 4,182.00	Call with Monitor's counsel, daily update call; review of DIP options; review of term sheets; multiple correspondence review; review of cash flow forecasts.
04/17/24	14800	Paul Bishop	5.40	\$ 6,642.00	Call with Monitor's counsel and Stikemans [REDACTED]; call with Monitor's counsel, [REDACTED]; daily update call; follow up call regarding [REDACTED]; review of draft documents and mark ups.
04/18/24	14800	Paul Bishop	5.20	\$ 6,396.00	Call with CEO; call with Monitor's counsel; call with Monitor's counsel and Stikemans; review of documents; review of revised DIP terms, call with Monitor's counsel.
04/19/24	14800	Paul Bishop	6.30	\$ 7,749.00	Board call; review of Greenhill deck; multiple calls and emails with Monitor's counsel and Company counsel; daily update call; review of correspondence; calls with CEO; call with Greenhill; call with GLC.
04/20/24	14800	Paul Bishop	3.70	\$ 4,551.00	Board call regarding [REDACTED]; calls with counsel; review of affidavit; review and edit Monitor's Eighth Report.
04/21/24	14800	Paul Bishop	2.20	\$ 2,706.00	Call with [REDACTED]; edit and finalize report.
04/15/24	15532	Jodi Porepa	7.10	\$ 7,455.00	Review the Claims Procedure Order and provide comments; review schedules and provide comments; internal discussion on planning for the Claims Procedure.
04/16/24	15532	Jodi Porepa	6.70	\$ 7,035.00	Review updated cash flow forecast and underlying assumptions; provide comments in respect of same; review financial analyses; review [REDACTED] [REDACTED] provide comments; internal discussions on cash flow; review [REDACTED] plan and provide comments; call with accounting team to discuss [REDACTED]; call with CFO to discuss [REDACTED]; review proposed disbursements and provide comments; call with Cassels Brock to discuss [REDACTED]; daily call with professionals.
04/16/24	15532	Jodi Porepa	1.40	\$ 1,470.00	Review Claims Procedure Order and schedules and provide comments; internal discussions regarding same; review draft list of Known Creditors and discuss missing information and next steps.
04/17/24	15532	Jodi Porepa	8.20	\$ 8,610.00	Review updated cash flow forecast and underlying assumptions; provide comments in respect of same; review financial analyses; review [REDACTED] and provide comments; internal discussions on cash flow; review [REDACTED] plan and provide comments; call with accounting team to discuss [REDACTED]; call with CFO to discuss [REDACTED]; review proposed disbursements and provide comments; call with Cassels Brock to discuss [REDACTED]; daily call with professionals.
04/17/24	15532	Jodi Porepa	1.30	\$ 1,365.00	Review updates to Claims Schedules and provide comments; review draft newspaper ad for Claims Process and provide comments; review updated Claims Procedure Order.
04/18/24	15532	Jodi Porepa	9.30	\$ 9,765.00	Review financial analyses; follow up discussions regarding same; review [REDACTED] plan and provide comments; calls with Stikemans and Cassels; internal discussions regarding strategic options.
04/19/24	15532	Jodi Porepa	8.70	\$ 9,135.00	Review updated CFFs; review financial analyses; call with CFO; call with Greenhill; call with Stikemans and Cassels; discussions with Cassels regarding strategic options; review proposed disbursements and provide comments; attend Board call.
04/19/24	15532	Jodi Porepa	2.20	\$ 2,310.00	Finalize CFF; call with counsel to discuss same; correspondence with [REDACTED]; review and finalize court report; review [REDACTED].
04/19/24	15532	Jodi Porepa	0.50	\$ 525.00	Review and finalize Claims Procedure Order and schedules.
04/20/24	15532	Jodi Porepa	4.20	\$ 4,410.00	Board call; review Board presentation; review [REDACTED]; review and finalize Monitor's Court Report; review updated Motion Materials for court.

Tacora Resources Inc.
493044.0001 - April 21, 2024

Date	TK#	Name	Hours	Amount	Narrative
04/15/24	31365	Graham McIntyre	6.50	\$ 4,810.00	Updating known creditor listing; review of cash flows; review of Monitor's hotline and respond where applicable; discussions regarding Claims Procedure Order; calls with Company, counsel, and investment bankers; posting documents to Monitor's website; discussions regarding [REDACTED].
04/16/24	31365	Graham McIntyre	7.30	\$ 5,402.00	Review of Monitor's hotline and respond where applicable; calls with Company, counsel, and investment bankers; review of cash flows and [REDACTED]; updating Known Creditors listing.
04/17/24	31365	Graham McIntyre	9.30	\$ 6,882.00	Updating cash flow forecast and preparing financial analyses of cash flow forecast to prior forecast; updating Known Creditor listing; reconciling creditor listing to prior list; calls with Company, counsel, and investment bankers; review of Monitor's hotline and respond accordingly.
04/18/24	31365	Graham McIntyre	9.50	\$ 7,030.00	Variance analysis; preparing known creditor listing and discussions regarding the same; correspondence with Company and counsel regarding government pre-filing invoices; internal discussions regarding engagement matters; calls with Company, counsel, and investment bankers, review of Claims Procedure Order documents; correspondence with suppliers; posting documents to Monitor's website; discussions regarding cash flow forecasts.
04/19/24	31365	Graham McIntyre	8.30	\$ 6,142.00	Review of cash flow forecasts; finalizing listing of known creditors; internal discussions regarding engagement matters; review of [REDACTED]; calls with Company, counsel, and investment bankers.
04/20/24	31365	Graham McIntyre	6.50	\$ 4,810.00	Finalizing cash flows for [REDACTED] and court report.
04/21/24	31365	Graham McIntyre	2.00	\$ 1,480.00	Review of professional fees; revisions to final cash flows and updating court report.
04/15/24	39256	Carter Wood	3.10	\$ 1,829.00	Internal discussions; review Company motion materials; review creditor listing and creating summary tables of top creditors; internal status update.
04/16/24	39256	Carter Wood	2.60	\$ 1,534.00	Internal discussions; review [REDACTED] forecast to understand variances.
04/16/24	39256	Carter Wood	1.00	\$ 590.00	Reviewing draft Claims Procedure Order; internal status update.
04/17/24	39256	Carter Wood	3.50	\$ 2,065.00	Reviewing latest draft of the Claims Procedure Order; reviewing newspaper notice for claims; internal discussions regarding Claims Procedure.
04/18/24	39256	Carter Wood	4.20	\$ 2,478.00	Internal discussion; updating claims task tracking; preparing and reviewing mail merging for claims; drafting language for claims related emails; internal status update.
04/19/24	39256	Carter Wood	3.00	\$ 1,770.00	Redacting newspaper notice prior to providing draft to the Globe and Mail; emails regarding data room setup; reviewing mail merging for claims; drafting language for claims section of the monitor website; internal discussion.
04/17/24	39280	Adsaran Vithyananthan	0.60	\$ 354.00	Walk through Claims Procedure set up and templates.
04/15/24	39589	Caitlin Moreland	0.30	\$ 46.50	Update Monitor's website.
04/18/24	39589	Caitlin Moreland	0.30	\$ 46.50	Update Monitor's website.
TOTAL				\$ 137,233.00	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.	April 30, 2024
Job No.	102900001161
Terms	493044.0001
Currency	Due Upon Receipt
Tax Registration:	CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through April 28, 2024

Amount Due Current Invoice **\$165,104.50**

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please remit cheque payments to:	FTI Consulting Canada Inc. C/O T10073 P.O. Box 10073 Postal Station A Toronto, ON M5W 2B1 Canada
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Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No. April 30, 2024
Job No. 102900001161
Terms 493044.0001
Currency Due Upon Receipt
Tax Registration: CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through April 28, 2024

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	34.60	\$42,558.00
Jodi Porepa	Senior Managing Director	\$1,050.00	48.30	\$50,715.00
Graham McIntyre	Director	\$740.00	45.00	\$33,300.00
Carter Wood	Senior Consultant	\$590.00	20.80	\$12,272.00
Caitlin Moreland	Administrative Professional	\$155.00	3.50	\$542.50
Total Professional Services			152.20	\$139,387.50
Administrative Fee				\$4,181.63
Invoice Total				CAD Amount
				\$143,569.13
HST (15%)				\$21,535.37
Total Due				\$165,104.50

Tacora Resources Inc.
493044.0001 - April 28, 2024

Date	TK#	Name	Hours	Amount	Narrative
04/22/24	14800	Paul Bishop	3.40	\$ 4,182.00	Call with Monitor's counsel and Stikemans; daily update call; review of CFF; review of [REDACTED]; multiple email correspondence.
04/23/24	14800	Paul Bishop	11.30	\$ 13,899.00	Call with counsel; attend court hearing; call with counsel after court; call with CEO; daily update call; call with Company, Greenhill, Monitor's counsel and Stikemans; further calls to review [REDACTED].
04/24/24	14800	Paul Bishop	9.40	\$ 11,562.00	Board meeting; weekly operations call with [REDACTED]; weekly operations call with [REDACTED]; review of [REDACTED]; review of [REDACTED]; call with Monitor's counsel to discuss same; daily update call; discussion regarding [REDACTED]; call with Monitor's counsel regarding court attendance and monitor's report; call with Stikemans regarding Monitor's Report.
04/25/24	14800	Paul Bishop	6.40	\$ 7,872.00	Call with [REDACTED]; call with Monitor's counsel in advance of court; attend court; call with counsel after court; daily update call; review of correspondence.
04/26/24	14800	Paul Bishop	4.10	\$ 5,043.00	Call with Board, advisors, counsel and [REDACTED]; follow up call with Board; call with Monitor's counsel; daily update call; review order and endorsements.
04/22/24	15532	Jodi Porepa	7.60	\$ 7,980.00	Review court materials; daily professionals call; call with Stikemans and Cassels Brock; review proposed disbursements and provide comments; respond to vendor enquiries; review financial analyses and provide comments; review and finalize court documents.
04/23/24	15532	Jodi Porepa	6.90	\$ 7,245.00	Court hearing; call with Cassels in advance of court; review and respond to [REDACTED]; review financial analysis and provide comments; prepare responses to [REDACTED]; daily professionals call; call with Stikemans and Cassels Brock; review proposed disbursements and provide comments; respond to vendor enquiries; review financial analyses and provide comments; review and finalize court documents.
04/24/24	15532	Jodi Porepa	7.00	\$ 7,350.00	Review responding materials [REDACTED]; review financial analysis; review Monitor's Report and provide comments; daily professionals call; call with Stikemans and Cassels Brock; review proposed disbursements and provide comments; respond to vendor enquiries; Board call to discuss strategy.
04/24/24	15532	Jodi Porepa	3.30	\$ 3,465.00	Review draft Known Creditor listing and provide comments; internal discussion regarding same; review and update claims register.
04/25/24	15532	Jodi Porepa	7.30	\$ 7,665.00	Board call with [REDACTED]; debrief call; review proposed disbursements and provide comments; review financial analyses and provide comments; court attendance; daily professionals call; review proposed [REDACTED]; call with Company to discuss [REDACTED]; review variance analyses and provide comments; review updated financial analyses for SISP and provide comments.
04/25/24	15532	Jodi Porepa	3.60	\$ 3,780.00	Review Known Creditor listing and provide comments; call with Stikemans and Cassels to discuss Known Creditor listing; review newspaper article and provide comments; review forms and provide comments; follow up with Claims Procedure enquiries; internal discussions regarding same.
04/26/24	15532	Jodi Porepa	1.50	\$ 1,575.00	Review draft claims for [REDACTED]; review draft claims for certain duplicate vendor numbers; internal discussion regarding same.
04/26/24	15532	Jodi Porepa	8.80	\$ 9,240.00	Board call with [REDACTED]; debrief regarding same; review updated variance analysis; follow up on third party enquiries; follow up on [REDACTED]; review communications; daily professionals call; review financial analyses; internal call on strategic next steps; call with Cassels.
04/28/24	15532	Jodi Porepa	2.30	\$ 2,415.00	Review updated claims and comments provide; provide additional comments; review outstanding list; review list of Known Creditors.

Tacora Resources Inc.
493044.0001 - April 28, 2024

Date	TK#	Name	Hours	Amount	Narrative
04/22/24	31365	Graham McIntyre	5.50	\$ 4,070.00	Review of updated ██████████ plan; updating Known Creditor listing; preparing financial analyses of cash flows; posting documents to Monitor's website; review of Monitor's hotline and respond where applicable; calls with Company, counsel, and investment bankers.
04/23/24	31365	Graham McIntyre	5.80	\$ 4,292.00	Finalizing materials and responses ██████████; preparing financial analyses on cash flows ██████████; posting documents to Monitor's website; review of ██████████.
04/23/24	31365	Graham McIntyre	4.50	\$ 3,330.00	Finalizing claim statements; internal discussions regarding Claims Procedure; walkthrough of certain draft claim statements with Company.
04/24/24	31365	Graham McIntyre	3.50	\$ 2,590.00	Updating cash flow bridge workbook; correspondence with counsel and Company regarding pre-filing invoices; review of Monitor's hotline and respond accordingly; posting documents to Monitor's website; review of proposed disbursements.
04/24/24	31365	Graham McIntyre	6.80	\$ 5,032.00	Finalizing claim statements; review and walkthrough of debt claims with the Company; internal discussions regarding Claims Procedure.
04/25/24	31365	Graham McIntyre	5.30	\$ 3,922.00	Work on prior week variance analysis and discussions regarding the same; updating cash flow workbook; posting documents to Monitor's website; preparation for court hearing; correspondence with suppliers; review and respond to enquiries left on Monitor's hotline.
04/25/24	31365	Graham McIntyre	3.30	\$ 2,442.00	Discussions with counsel regarding claims procedure; updating Known Creditor listing.
04/26/24	31365	Graham McIntyre	3.80	\$ 2,812.00	Posting documents to Monitor's website; updating cash flow workbook; finalizing variance analysis.
04/26/24	31365	Graham McIntyre	6.50	\$ 4,810.00	Preparing statements for Claims Procedure; updating Known Creditor listing.
04/22/24	39256	Carter Wood	2.80	\$ 1,652.00	Internal discussions; updating and reviewing ██████████ tracker; internal status update.
04/23/24	39256	Carter Wood	0.60	\$ 354.00	Discussions with counsel and management.
04/23/24	39256	Carter Wood	0.50	\$ 295.00	Reviewing updated Claims Procedure Order and associated schedules.
04/24/24	39256	Carter Wood	1.20	\$ 708.00	Reviewing emails and website updates; reviewing draft ad with Globe & Mail.
04/25/24	39256	Carter Wood	2.00	\$ 1,180.00	Internal status update; ██████████ discussion with accounting team; updating professional fee summary.
04/25/24	39256	Carter Wood	3.40	\$ 2,006.00	Internal discussions; review of invoice details to determine entity status for claims; updating claims mail merge details; discussion with Globe & Mail on draft advertisement and review of the same.
04/26/24	39256	Carter Wood	6.50	\$ 3,835.00	Updating statement of known claims and unknown claims; internal discussion; internal status update.
04/27/24	39256	Carter Wood	0.70	\$ 413.00	Mail merge updates for statement of known claims.
04/28/24	39256	Carter Wood	3.10	\$ 1,829.00	Drafting notices to Claimants.
04/22/24	39589	Caitlin Moreland	0.40	\$ 62.00	Update Monitor's website.
04/23/24	39589	Caitlin Moreland	0.80	\$ 124.00	Update Monitor's website.
04/24/24	39589	Caitlin Moreland	0.70	\$ 108.50	Update Monitor's website.
04/25/24	39589	Caitlin Moreland	1.00	\$ 155.00	Update Monitor's website.
04/26/24	39589	Caitlin Moreland	0.60	\$ 93.00	Update Monitor's website.
TOTAL				\$ 139,387.50	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No. **102900001210**
Job No. **493044.0001**
Terms **Due Upon Receipt**
Currency **CAD**
Tax Registration:

RE: FTI Engagement

Current Invoice Period: Charges posted through May 05, 2024

Amount Due Current Invoice \$163,413.03

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque payments to: **FTI Consulting Canada Inc.
C/O T10073
P.O. Box 10073
Postal Station A
Toronto, ON M5W 2B1
Canada**



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No. **102900001210**
Job No. **493044.0001**
Terms **Due Upon Receipt**
Currency **CAD**
Tax Registration:

RE: FTI Engagement

Current Invoice Period: Charges posted through May 05, 2024

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	22.40	\$27,552.00
Jodi Porepa	Senior Managing Director	\$1,050.00	53.20	\$55,860.00
Graham McIntyre	Director	\$740.00	38.80	\$28,712.00
Carter Wood	Senior Consultant	\$590.00	43.50	\$25,665.00
Caitlin Moreland	Administrative Professional	\$155.00	1.10	\$170.50
Total Professional Services			159.00	\$137,959.50
Administrative Fee				\$4,138.79
Invoice Total				CAD Amount
				\$142,098.29
HST (15%)				\$21,314.74
Total Due				\$163,413.03

Tacora Resources Inc.
493044.0001 - May 5, 2024

Date	TK#	Name	Hours	Amount	Narrative
04/29/24	14800	Paul Bishop	6.70	\$ 8,241.00	Call with counsel and Stikemans; review of draft process; call with Board, advisors, and counsel regarding next steps; review of ██████████; call with Management and Greenhill.
04/30/24	14800	Paul Bishop	3.50	\$ 4,305.00	Review of ██████████ review of correspondence; call with Monitor's counsel regarding various matters; daily update call.
05/01/24	14800	Paul Bishop	4.20	\$ 5,166.00	Weekly operations call; daily update call; review of draft correspondence and correspondence; review of ██████████; review of correspondence regarding same.
05/02/24	14800	Paul Bishop	4.90	\$ 6,027.00	Board call; calls with Monitor's counsel and Stikemans; daily update call; review of ██████████ regarding pricing; review of correspondence regarding unpaid amounts.
05/03/24	14800	Paul Bishop	3.10	\$ 3,813.00	Call with interested party; daily update call; review correspondence regarding ██████████; call with ██████████; call with ██████████; daily update call.
04/29/24	15532	Jodi Porepa	3.20	\$ 3,360.00	Review revisions to certain claims; review status of claims; review emails with Claims Package; call with Heng and Jade and Stikemans to discuss certain claim amounts; providing comments on revisions to certain Statements.
04/29/24	15532	Jodi Porepa	6.60	\$ 6,930.00	Call with Stikemans and Cassels to discuss strategic alternatives; review ██████████ in advance of Board call; attend Board call; internal discussions; review financial bridges and provide comments; review and respond to certain enquiries.
04/30/24	15532	Jodi Porepa	4.40	\$ 4,620.00	Call with Cassels; daily professionals call; review proposed disbursements and provide comments; internal status update; review draft communication letters to ██████████; review updated sources and uses.
04/30/24	15532	Jodi Porepa	3.60	\$ 3,780.00	Review final Known Claims listing and follow up; review sample emails; review Statements of Claim; internal discussions regarding same.
05/01/24	15532	Jodi Porepa	4.10	\$ 4,305.00	Review financial analyses; review proposed disbursements and provide comments; review communication and financial summaries to be distributed to key stakeholders; review and respond to enquiries; daily professionals call.
05/01/24	15532	Jodi Porepa	4.40	\$ 4,620.00	Review Statements of Claim and provide comments; review and respond to enquiries; review Known Creditor listing and provide comments; prepare for review process of claims; internal discussions regarding same.
05/02/24	15532	Jodi Porepa	7.20	\$ 7,560.00	Call with Stikemans; call with Cassels; daily professionals update call; review proposed disbursements and provide comments; internal status updates regarding same; review financial analysis; attend Board meeting; call with certain interested parties to discuss SISP.
05/02/24	15532	Jodi Porepa	3.60	\$ 3,780.00	Review updated claims register; review updated claim data room; review Notice of Dispute received and preliminary reconciliation; internal discussions regarding the same.
05/03/24	15532	Jodi Porepa	2.60	\$ 2,730.00	Attend daily professionals call; review and respond to emails; review variance analysis; internal status update.
05/03/24	15532	Jodi Porepa	3.20	\$ 3,360.00	Review and respond to creditor enquiries; review Known Creditor listing; review and provide comments on online data room; review and provide comments on financial reconciliations; review claims register.
05/04/24	15532	Jodi Porepa	10.30	\$ 10,815.00	Site visit; discussions with attendees; review and respond to emails.
04/29/24	31365	Graham McIntyre	2.00	\$ 1,480.00	Updates to cash flow workbook; review of Monitor's hotline and respond accordingly; internal discussions regarding engagement matters.
04/29/24	31365	Graham McIntyre	5.80	\$ 4,292.00	Finalizing Known Claim Statements for Claims Procedure; review of draft emails; correspondence with Company regarding Claims Procedure.
04/30/24	31365	Graham McIntyre	2.80	\$ 2,072.00	Work on cash flow workbook; review of ██████████ plan with Company; review of proposed disbursements.
04/30/24	31365	Graham McIntyre	5.30	\$ 3,922.00	Finalizing notices for Claims Procedure.

Tacora Resources Inc.
493044.0001 - May 5, 2024

Date	TK#	Name	Hours	Amount	Narrative
05/01/24	31365	Graham McIntyre	2.80	\$ 2,072.00	Work on financial analysis; calls with counsels, Company, and investment bankers; review of [REDACTED].
05/01/24	31365	Graham McIntyre	4.50	\$ 3,330.00	Correspondence with claimants; compiling support documents to quantify claims; internal discussions regarding Claims Procedure matters.
05/02/24	31365	Graham McIntyre	2.80	\$ 2,072.00	Review of proposed disbursements; internal discussions regarding engagement matters; calls with Company, counsel, and investment bankers; posting documents to Monitor's website.
05/02/24	31365	Graham McIntyre	5.50	\$ 4,070.00	Correspondence with claimants; review of potential [REDACTED] claims; internal discussions regarding claims; compiling support documents to quantify claims.
05/03/24	31365	Graham McIntyre	1.00	\$ 740.00	Calls with Company, counsel, and investment bankers; finalizing financial analysis on cash flow forecast.
05/03/24	31365	Graham McIntyre	4.00	\$ 2,960.00	Finalizing employee claims; correspondence with Claimants; internal discussions regarding claims.
05/04/24	31365	Graham McIntyre	2.30	\$ 1,702.00	Review of prior week variance analysis; updating variance analysis workbook for new DIP budget.
04/29/24	39256	Carter Wood	8.90	\$ 5,251.00	Drafting claims emails; internal discussions; reviewing and responding to hotline inquiries.
04/30/24	39256	Carter Wood	1.50	\$ 885.00	Reviewing [REDACTED] summary provided by Tacora; [REDACTED] discussion with Tacora.
04/30/24	39256	Carter Wood	5.60	\$ 3,304.00	Drafting and sending claims emails; internal discussions regarding Claims Procedure.
05/01/24	39256	Carter Wood	9.40	\$ 5,546.00	Responding to Tacora related emails; reviewing hotline and responding to claims related enquiries; internal discussions; reviewing Notice of Disputes received; sending Claims packages.
05/02/24	39256	Carter Wood	9.30	\$ 5,487.00	Reviewing and responding to claims hotline enquiries; reviewing Notices of Dispute received; internal discussions regarding claims; updating claims register.
05/03/24	39256	Carter Wood	4.40	\$ 2,596.00	Reviewing and responding to claims related hotline inquiries; discussion with Tacora related to potential [REDACTED] claims; drafting and sending [REDACTED] claim packages; reviewing Notices of Dispute received; updating claims register; internal discussions on claims.
05/05/24	39256	Carter Wood	4.40	\$ 2,596.00	Reviewing Notices of Dispute; updating claims register based on review; responding to claims related hotline inquiries.
04/29/24	39589	Caitlin Moreland	0.50	\$ 77.50	Updates to Monitor's website.
04/30/24	39589	Caitlin Moreland	0.20	\$ 31.00	Updates to Monitor's website.
05/02/24	39589	Caitlin Moreland	0.40	\$ 62.00	Updates to Monitor's website.
TOTAL				\$ 137,959.50	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

May 14, 2024
102900001230
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through May 12, 2024

Amount Due Current Invoice **\$156,475.11**

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque payments to: FTI Consulting Canada Inc.
C/O T10073
P.O. Box 10073
Postal Station A
Toronto, ON M5W 2B1
Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No. **102900001230**
Job No. **493044.0001**
Terms **Due Upon Receipt**
Currency **CAD**
Tax Registration:

RE: FTI Engagement

Current Invoice Period: Charges posted through May 12, 2024

Name	Title	Rate	Hours	Total
Franck Risler	Senior Managing Director	\$2,030.00	5.10	\$10,353.00
Paul Bishop	Senior Managing Director	\$1,230.00	27.10	\$33,333.00
Jodi Porepa	Senior Managing Director	\$1,050.00	45.10	\$47,355.00
Graham McIntyre	Director	\$740.00	23.70	\$17,538.00
Carter Wood	Senior Consultant	\$590.00	22.30	\$13,157.00
Total Professional Services			123.30	\$121,736.00
Expenses				Total
Advertising				\$11,157.90
Air Travel				-\$805.31
Business Meals				\$276.83
Taxi				\$47.81
Total Expenses				\$10,677.23
Administrative Fee				\$3,652.08
Invoice Total				CAD Amount
				\$136,065.31
HST (15%)				\$20,409.80
Total Due				\$156,475.11

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com

Tacora Resources Inc.
493044.0001 - May 12, 2024

Date	TK#	Name	Hours	Amount	Narrative
05/06/24	14800	Paul Bishop	5.40	\$ 6,642.00	Call with [REDACTED]; call with Monitor's counsel and Stikemans; call with [REDACTED]; call with [REDACTED]; daily update call; review of correspondence.
05/07/24	14800	Paul Bishop	7.20	\$ 8,856.00	Call with Monitor's counsel; call with [REDACTED] and Monitor's counsel; follow up call with Monitor's counsel; follow up call with Monitor's counsel, [REDACTED]; daily update call; call with Monitor's counsel; review of auction process; review of correspondence.
05/08/24	14800	Paul Bishop	4.70	\$ 5,781.00	Weekly operations calls with [REDACTED]; call with Greenhill and interested party; daily update call; review of draft auction procedures; correspondence with counsel; review and edit board update; call with [REDACTED]; call with [REDACTED] and follow up regarding the same.
05/09/24	14800	Paul Bishop	4.80	\$ 5,904.00	Board call; call with Monitor's counsel; call with Monitor's counsel and Stikemans; call with [REDACTED]; review of [REDACTED]; correspondence regarding [REDACTED]; multiple correspondence.
05/10/24	14800	Paul Bishop	3.30	\$ 4,059.00	Daily update call review of drafts; email correspondence.
05/11/24	14800	Paul Bishop	1.10	\$ 1,353.00	Call with Monitor's counsel and Stikemans and preparation for same.
05/12/24	14800	Paul Bishop	0.60	\$ 738.00	Call with [REDACTED].
05/06/24	15532	Jodi Porepa	3.90	\$ 4,095.00	Kick off call regarding claims process; call with Cassels regarding certain claims; internal discussion regarding same; review preliminary claims reconciliations; review and respond to third party enquiries; review claims register.
05/06/24	15532	Jodi Porepa	6.70	\$ 7,035.00	Calls with Cassels Brock and Stikemans; calls with [REDACTED] to discuss [REDACTED]; call with [REDACTED] to discuss [REDACTED]; review and respond to email; professionals call; review variance analysis; review interest calculation and provide comments.
05/07/24	15532	Jodi Porepa	9.10	\$ 9,555.00	Review and respond to third party enquiries; review [REDACTED] calculations; discuss same with Tacora; review interest calculations; review proposed [REDACTED]; review proposed auction procedures and provide comments; review variance analysis and provide comments; review other financial analyses and provide comments; [REDACTED] Cassels Brock; call with [REDACTED].
05/07/24	15532	Jodi Porepa	1.00	\$ 1,050.00	Review supporting details and calculations for potential claims; internal status update; review claims register and summary tables of claims and provide comments.
05/08/24	15532	Jodi Porepa	7.40	\$ 7,770.00	Review and respond to third party enquiries; review financing lease calculations; discuss same with Tacora; review interest calculations; review proposed [REDACTED]; review proposed auction procedures and provide comments; review variance analysis and provide comments; review other financial analyses and provide comments; [REDACTED] Cassels Brock; call with [REDACTED].
05/09/24	15532	Jodi Porepa	6.10	\$ 6,405.00	Review and respond to third party enquiries; review financing lease calculations; discuss same with Tacora; review proposed disbursements and provide comments; review proposed [REDACTED] payments; attend calls with SISP interested parties; daily professionals call; Board call.
05/09/24	15532	Jodi Porepa	1.30	\$ 1,365.00	Review claims register and make revisions; review financial reconciliations and provide comments; review online data room.
05/10/24	15532	Jodi Porepa	8.20	\$ 8,610.00	Review variance analysis and provide comments; internal call to discuss [REDACTED]; review [REDACTED] endorsement; call with potentially interested parties.
05/11/24	15532	Jodi Porepa	1.40	\$ 1,470.00	Call with Stikemans and Cassels to discuss auction procedures and timing of next steps; review updated timing and procedures; review precedence.

Tacora Resources Inc.
493044.0001 - May 12, 2024

Date	TK#	Name	Hours	Amount	Narrative
05/06/24	39256	Carter Wood	4.80	\$ 2,832.00	Responding to claims hotline emails and phone calls; reviewing notice of disputes received; updating claims register; discussion with Tacora and counsel on claims process; internal discussions regarding claims.
05/07/24	39256	Carter Wood	4.90	\$ 2,891.00	Responding to hotline emails; discussion with Tacora on claims status; reviewing [REDACTED] details; reviewing notice of disputes received; updating claims register; internal discussion regarding claims.
05/08/24	39256	Carter Wood	2.80	\$ 1,652.00	Responding to hotline emails; discussion with Tacora on claims status; updating claims register; internal discussions regarding claims.
05/09/24	39256	Carter Wood	2.30	\$ 1,357.00	Responding to hotline emails; reviewing claims comments from Tacora; discussion with Tacora on status of claims; drafting claims response emails.
05/10/24	39256	Carter Wood	5.10	\$ 3,009.00	Responding to hotline emails; reviewing notice of disputes received; reviewing proof of claims received; discussion with Tacora on status of claims; updating claims register based on review comments received; internal discussion regarding claims.
05/12/24	39256	Carter Wood	2.40	\$ 1,416.00	Updating claims register based on review comments; reviewing notice of dispute received; preparing for upcoming Claims discussions with Tacora and counsel.
05/10/24	7571	Franck Risler	0.40	\$ 812.00	Review previous notes case and email FTI team and counsel.
05/10/24	7571	Franck Risler	0.30	\$ 609.00	Meet with counsel to discuss scope of analysis and [REDACTED].
05/10/24	7571	Franck Risler	1.20	\$ 2,436.00	Review of [REDACTED].
05/12/24	7571	Franck Risler	3.20	\$ 6,496.00	Detailed analysis [REDACTED].
05/06/24	31365	Graham McIntyre	3.80	\$ 2,812.00	Drafting Monitor's hotline FAQs; review of Monitor's hotline; correspondence with Company regarding supplier payments; review of proposed disbursements.
05/07/24	31365	Graham McIntyre	3.50	\$ 2,590.00	Weekly call to discuss [REDACTED]; review of weekly proposed [REDACTED] plan; internal discussions regarding engagement matters.
05/07/24	31365	Graham McIntyre	3.30	\$ 2,442.00	Review of [REDACTED] claims; internal discussions regarding Claims Procedure.
05/08/24	31365	Graham McIntyre	0.80	\$ 592.00	Daily call with Management, counsel, and advisors; review of proposed disbursements.
05/08/24	31365	Graham McIntyre	1.50	\$ 1,110.00	Internal discussions regarding claims.
05/09/24	31365	Graham McIntyre	4.30	\$ 3,182.00	Proposed disbursements call; variance analysis preparation; internal discussions regarding engagement matters; calls with Company, counsel, and advisors.
05/09/24	31365	Graham McIntyre	1.00	\$ 740.00	Discussions regarding Claims Procedure.
05/10/24	31365	Graham McIntyre	5.50	\$ 4,070.00	Finalizing variance analysis; review of latest cash flow forecast; financial analyses on forecast to previous cash flow; daily call with Management, counsel and advisors.
TOTAL				\$ 121,736.00	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

May 21, 2024
102900001237
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through May 19, 2024

Amount Due Current Invoice **\$152,236.09**

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque payments to: FTI Consulting Canada Inc.
C/O T10073
P.O. Box 10073
Postal Station A
Toronto, ON M5W 2B1
Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No. 102900001237
Job No. 493044.0001
Terms Due Upon Receipt
Currency CAD
Tax Registration:

RE: FTI Engagement

Current Invoice Period: Charges posted through May 19, 2024

Name	Title	Rate	Hours	Total
Franck Risler	Senior Managing Director	\$2,030.00	5.30	\$10,759.00
Margarita Glot	Senior Director	\$1,640.00	3.50	\$5,740.00
Paul Bishop	Senior Managing Director	\$1,230.00	25.20	\$30,996.00
Jodi Porepa	Senior Managing Director	\$1,050.00	39.70	\$41,685.00
Graham McIntyre	Director	\$740.00	30.70	\$22,718.00
Carter Wood	Senior Consultant	\$590.00	28.10	\$16,579.00
Caitlin Moreland	Administrative Professional	\$155.00	0.30	\$46.50
Total Professional Services			132.80	\$128,523.50
Administrative Fee				\$3,855.71
Invoice Total				CAD Amount
HST (15%)				\$19,856.88
Total Due				\$152,236.09

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com

Tacora Resources Inc.
493044.0001 - May 19, 2024

Date	TK#	Name	Hours	Amount	Narrative
05/13/24	7571	Franck Risler	0.60	\$ 1,218.00	Summarize findings ahead of meeting with Cassels Brock and FTI team.
05/13/24	7571	Franck Risler	0.40	\$ 812.00	Assess draft [REDACTED].
05/13/24	7571	Franck Risler	0.40	\$ 812.00	Assess draft [REDACTED].
05/13/24	7571	Franck Risler	1.90	\$ 3,857.00	Further detailed analysis of [REDACTED].
05/13/24	7571	Franck Risler	0.80	\$ 1,624.00	Meeting with counsel and FTI team.
05/13/24	7571	Franck Risler	0.90	\$ 1,827.00	Review [REDACTED].
05/13/24	7571	Franck Risler	0.30	\$ 609.00	Clean-up and send notes to FTI team.
05/13/24	14800	Paul Bishop	4.70	\$ 5,781.00	Call with Monitor's counsel regarding various matters; meeting with [REDACTED]; call regarding [REDACTED] and review of same; call from [REDACTED]; review of multiple correspondence.
05/14/24	14800	Paul Bishop	5.60	\$ 6,888.00	Call with counsel; daily update call; call with [REDACTED]; Board call; review of [REDACTED]; review of [REDACTED].
05/15/24	14800	Paul Bishop	5.30	\$ 6,519.00	Board meeting; calls with [REDACTED]; call with certain interested parties in the SISF; operations call with [REDACTED] and advisors; daily update call; review of term sheets; review of disclaimer execute same.
05/16/24	14800	Paul Bishop	4.90	\$ 6,027.00	Board meeting; call with counsel; review disclaimer reasons and edit same; call with counsel and Stikemans; call with certain interested parties; review of Sale Process Order; multiple correspondence.
05/17/24	14800	Paul Bishop	4.70	\$ 5,781.00	Call with potential investor; call with [REDACTED]; call with Tacora Management, call with Board members; call with certain interested parties; attend daily call; review multiple correspondence.
05/13/24	15532	Jodi Porepa	5.60	\$ 5,880.00	Call with Cassels Brock and Stikemans to discuss strategic alternatives; review CFF and provide comments; review financial analyses; internal status update.
05/13/24	15532	Jodi Porepa	2.60	\$ 2,730.00	Call with counsel and Tacora to discuss status of claims; review claims register; review claims summaries and provide comments; review reconciliations and provide comments.
05/14/24	15532	Jodi Porepa	5.20	\$ 5,460.00	Call with counsel to discuss strategic alternatives; daily professionals call; call with Board members; call with [REDACTED]; review [REDACTED] and provide comments; call with Heng Vuong regarding strategic alternatives and contingency planning; call with Greenhill; internal status update.
05/14/24	15532	Jodi Porepa	3.10	\$ 3,255.00	Review claims received to date; review financial reconciliations and provide comments; internal discussions regarding same.
05/15/24	15532	Jodi Porepa	3.30	\$ 3,465.00	Review claims received to date; review financial reconciliations and provide comments; internal discussions regarding same.
05/15/24	15532	Jodi Porepa	4.10	\$ 4,305.00	Call with counsel and Tacora to discuss status of claims; review claims register; review claims summaries and provide comments; review reconciliations and provide comments.
05/16/24	15532	Jodi Porepa	3.10	\$ 3,255.00	Call with counsel to discuss strategic alternatives; daily professionals call; call with Board members; call [REDACTED]; review [REDACTED] and provide comments; call with Heng Vuong regarding strategic alternatives and contingency planning; call with Greenhill; internal status update.
05/16/24	15532	Jodi Porepa	3.90	\$ 4,095.00	Review claims received to date; review financial reconciliations and provide comments; internal discussions regarding same.
05/17/24	15532	Jodi Porepa	4.70	\$ 4,935.00	Calls with professionals; review financial analyses; internal discussions in respect of same; outline for court report; review updated cash flow forecast.
05/17/24	15532	Jodi Porepa	4.10	\$ 4,305.00	Review claims received to date; review financial reconciliations and provide comments; internal discussions regarding same.
05/13/24	31365	Graham McIntyre	5.50	\$ 4,070.00	Preparing fee affidavit; review of proposed disbursements; posting documents to Monitor's website; review of latest [REDACTED]; internal discussions regarding engagement matters; calls with Management, counsel, and investment bank.

Tacora Resources Inc.
493044.0001 - May 19, 2024

Date	TK#	Name	Hours	Amount	Narrative
05/13/24	31365	Graham McIntyre	1.00	\$ 740.00	Review of claims and correspondence regarding the same.
05/14/24	31365	Graham McIntyre	3.80	\$ 2,812.00	Review of [REDACTED] and other employee matters; review of proposed disbursements; review and correspondence with Company regarding proposed [REDACTED].
05/14/24	31365	Graham McIntyre	1.50	\$ 1,110.00	Review of claims and correspondence regarding the same.
05/15/24	31365	Graham McIntyre	4.30	\$ 3,182.00	[REDACTED] analysis; correspondence with investment bankers regarding leases; correspondence with suppliers; review of proposed disbursements; calls with Management, counsel, and investment bank.
05/15/24	31365	Graham McIntyre	2.00	\$ 1,480.00	Review of claims and correspondence regarding the same.
05/16/24	31365	Graham McIntyre	1.80	\$ 1,332.00	Review of proposed disbursements; internal discussions regarding engagement matters.
05/16/24	31365	Graham McIntyre	2.50	\$ 1,850.00	Review of certain claims; correspondence regarding the same.
05/17/24	31365	Graham McIntyre	4.80	\$ 3,552.00	Variance analysis; review of latest cash flow; correspondence with suppliers.
05/17/24	31365	Graham McIntyre	3.50	\$ 2,590.00	Review of certain claims and correspondence with claimants; internal discussions regarding the same.
05/13/24	39256	Carter Wood	6.70	\$ 3,953.00	Reviewing Notices of Dispute received; discussion with Tacora on claims; updating claims register; reviewing and responding to hotline enquiries; weekly claims discussion with counsel and Tacora; internal discussions regarding claims.
05/14/24	39256	Carter Wood	3.60	\$ 2,124.00	Responding to hotline enquiries; reviewing Notices of Dispute received; updating claims register; internal discussions regarding claims.
05/15/24	39256	Carter Wood	4.30	\$ 2,537.00	Responding to hotline enquiries; phone call to discuss claims procedure with creditor; reviewing Notices of Disputes received; internal discussions regarding claims; reviewing Claims Procedure Order.
05/16/24	39256	Carter Wood	4.60	\$ 2,714.00	Responding to hotline enquiries; reviewing Notices of Dispute received; reviewing proof of claims received; updating claims register; disbursements call with Tacora; internal discussions regarding claims.
05/17/24	39256	Carter Wood	7.80	\$ 4,602.00	Responding to hotline enquiries; reviewing Notices of Disputes received; phone call with creditor regarding claims process; updating claims reconciliation for proof of claims received; updating claims register; internal discussions regarding claims; discussion with Tacora regarding on claims.
05/18/24	39256	Carter Wood	1.10	\$ 649.00	Updating proof of claim reconciliation; responding to claims related emails.
05/14/24	39589	Caitlin Moreland	0.30	\$ 46.50	Update Monitor's website.
05/13/24	42784	Margarita Glot	3.50	\$ 5,740.00	Review documents and discussions regarding the same.
TOTAL				\$ 128,523.50	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

May 30, 2024
102900001263
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through May 26, 2024

Amount Due Current Invoice \$114,608.08

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West Toronto, Ontario M5H 1H1 Canada	Swift/BIC Code:	NOSCCATT
		Transit Code:	47696
		Account Currency:	CAD

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque payments to:
FTI Consulting Canada Inc.
C/O T10073
P.O. Box 10073
Postal Station A
Toronto, ON M5W 2B1
Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No. **102900001263**
Job No. **493044.0001**
Terms **Due Upon Receipt**
Currency **CAD**
Tax Registration:

RE: FTI Engagement

Current Invoice Period: Charges posted through May 26, 2024

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	15.70	\$19,311.00
Jodi Porepa	Senior Managing Director	\$1,050.00	37.90	\$39,795.00
Graham McIntyre	Director	\$740.00	40.20	\$29,748.00
Carter Wood	Senior Consultant	\$590.00	13.00	\$7,670.00
Caitlin Moreland	Administrative	\$155.00	1.50	\$232.50
Total Professional Services			108.30	\$96,756.50
Administrative Fee				\$2,902.70
Invoice Total				CAD Amount
				\$99,659.20
HST (15%)				\$14,948.88
Total Due				\$114,608.08

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com

Tacora Resources Inc.
493044.0001 - May 26, 2024

Date	TK#	Name	Hours	Amount	Narrative
05/20/24	14800	Paul Bishop	0.60	\$ 738.00	Review of communications ██████████ and provide comments.
05/21/24	14800	Paul Bishop	4.20	\$ 5,166.00	Call with Monitor's counsel; call with ██████████; daily update call; further call with Monitor's counsel; review of ██████████; review of correspondence; review of draft process letter.
05/22/24	14800	Paul Bishop	3.50	\$ 4,305.00	Attend case conference; weekly update calls with ██████████; correspondence with Monitor's counsel; daily update call; call with ██████████.
05/23/24	14800	Paul Bishop	3.60	\$ 4,428.00	Call with Monitor's counsel; call with ██████████; ██████████; call with certain interested parties; daily update call and review of correspondence.
05/24/24	14800	Paul Bishop	3.10	\$ 3,813.00	Board call; review of cashflow; daily update call; multiple correspondence.
05/26/24	14800	Paul Bishop	0.70	\$ 861.00	Call with Monitor's counsel; preparation for same.
05/20/24	15532	Jodi Porepa	2.60	\$ 2,730.00	Review draft communication letter and questions and answers and provide comments; review and respond to third party email correspondence.
05/20/24	15532	Jodi Porepa	1.00	\$ 1,050.00	Review claims register; review claims reconciliations; review draft responses to creditors.
05/21/24	15532	Jodi Porepa	3.80	\$ 3,990.00	Weekly update call; call with Cassels Brock; call with Stikemans; internal discussions regarding status update and upcoming case conference; review financial analyses.
05/22/24	15532	Jodi Porepa	1.10	\$ 1,155.00	Review claims register and provide comments; review status of Notices of Dispute received; review reconciliations with Tacora and provide comments.
05/22/24	15532	Jodi Porepa	6.10	\$ 6,405.00	Attend case conference; call with Cassels; call with Cassels and Stikemans; internal discussions regarding incentive plans; internal discussions regarding cash flow forecast; review financial analyses and provide comments; weekly operating update calls with ██████████; internal discussion on ██████████.
05/23/24	15532	Jodi Porepa	4.50	\$ 4,725.00	Prepare for call on cash flows; call with Cassels to discuss strategic alternatives; review ██████████ previously in place; call with ██████████; call on CFF; call with interested parties in the SISF.
05/23/24	15532	Jodi Porepa	4.60	\$ 4,830.00	Review claims register and provide comments; call with professionals and Tacora on claims reconciliation; review reconciliations and provide comments; internal discussions regarding same.
05/24/24	15532	Jodi Porepa	9.00	\$ 9,450.00	Weekly update call; call with Cassels; call with Stikemans; internal discussions regarding status update and upcoming case conference; review financial analyses.
05/25/24	15532	Jodi Porepa	1.90	\$ 1,995.00	Review Management Board ██████████; review updated ██████████; review draft sections for court report and provide comments.
05/26/24	15532	Jodi Porepa	1.20	\$ 1,260.00	Call with Cassels Brock to discuss strategic alternatives; review cash flow forecast.
05/26/24	15532	Jodi Porepa	2.10	\$ 2,205.00	Review claims register and provide comments; review claims reconciliation.
05/21/24	31365	Graham McIntyre	6.80	\$ 5,032.00	Review of proposed disbursements; internal discussions regarding engagement matters; posting documents to Monitor's website; analysis of ██████████; review of motion materials; review and update key milestone calendar; review of disclaimer; review and discussion of upcoming ██████████; correspondence with suppliers.
05/21/24	31365	Graham McIntyre	0.80	\$ 592.00	Discussions and review of certain claims.
05/22/24	31365	Graham McIntyre	9.50	\$ 7,030.00	██████████ analysis; review of proposed disbursements; posting documents to website; daily call with Company, counsel and investment bankers; review of professional fees and professional fee forecast in cash flow; bridging latest cash flow forecast to prior cash flow forecast and discussions regarding the same.

Tacora Resources Inc.
493044.0001 - May 26, 2024

Date	TK#	Name	Hours	Amount	Narrative
05/23/24	31365	Graham McIntyre	8.50	\$ 6,290.00	Proposed disbursements review with Company; review of year to date [REDACTED] against budget; weekly variance analysis; daily call with Company, counsel, and investment bankers; review of cash flow forecast and prepare financial analyses; discussions regarding the same; posting documents to Monitor's website; internal discussions regarding engagement matters.
05/23/24	31365	Graham McIntyre	0.50	\$ 370.00	Weekly call to discuss Claims Procedure.
05/24/24	31365	Graham McIntyre	9.80	\$ 7,252.00	Finalizing variance analysis; review and discussions regarding updated cash flow forecast; finalizing CCAA cash flow forecast; review of business update [REDACTED] and discussions regarding the same; daily call with Company, counsel, and investment bankers; [REDACTED]; internal discussions regarding engagement matters.
05/25/24	31365	Graham McIntyre	1.80	\$ 1,332.00	Review of business update deck and discussions regarding the same.
05/26/24	31365	Graham McIntyre	2.50	\$ 1,850.00	Review of business update deck and discussions regarding the same; updating fee affidavit and review of professional fees.
05/21/24	39256	Carter Wood	4.30	\$ 2,537.00	Updating notice of dispute summary; reviewing new notice of disputes submitted; reviewing and responding to hotline inquiries; updating claims register; reviewing [REDACTED]; internal discussion and status update.
05/22/24	39256	Carter Wood	2.20	\$ 1,298.00	Claims discussion with Company; reviewing and responding to hotline enquiries; updating claims registers in advance of call with counsel; internal status update discussions.
05/23/24	39256	Carter Wood	4.10	\$ 2,419.00	Reviewing and responding to hotline enquiries; drafting claims section of Monitor Report; claims discussion with counsel and Tacora; updating claims register and summaries for newly received notice of disputes; internal discussions regarding status update.
05/24/24	39256	Carter Wood	1.90	\$ 1,121.00	Reviewing and responding to hotline enquiries; reviewing Notice of Disputes submitted; internal status call.
05/26/24	39256	Carter Wood	0.50	\$ 295.00	Updating claims section in Monitor's Court Report; responding to Tacora related emails
05/21/24	39589	Caitlin Moreland	0.30	\$ 46.50	Update Monitor's website.
05/22/24	39589	Caitlin Moreland	0.20	\$ 31.00	Update Monitor's website.
05/23/24	39589	Caitlin Moreland	0.70	\$ 108.50	Update Monitor's website.
05/24/24	39589	Caitlin Moreland	0.30	\$ 46.50	Update Monitor's website.
TOTAL				\$ 96,756.50	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

May 31, 2024
102900001273
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through May 31, 2024

Amount Due Current Invoice **\$151,264.80**

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque payments to: FTI Consulting Canada Inc.
C/O T10073
P.O. Box 10073
Postal Station A
Toronto, ON M5W 2B1
Canada

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No. **102900001273**
Job No. **493044.0001**
Terms **Due Upon Receipt**
Currency **CAD**
Tax Registration:

RE: FTI Engagement

Current Invoice Period: Charges posted through May 31, 2024

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	19.40	\$23,862.00
Jodi Porepa	Senior Managing Director	\$1,050.00	51.90	\$54,495.00
Graham McIntyre	Director	\$740.00	42.90	\$31,746.00
Carter Wood	Senior Consultant	\$590.00	29.70	\$17,523.00
Caitlin Moreland	Administrative	\$155.00	0.50	\$77.50
Total Professional Services			144.40	\$127,703.50
Administrative Fee				\$3,831.11
Invoice Total				CAD Amount
				\$131,534.61
HST (15%)				\$19,730.19
Total Due				\$151,264.80

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com

Tacora Resources Inc.
493044.0001 - May 31, 2024

Date	TK#	Name	Hours	Amount	Narrative
05/27/24	14800	Paul Bishop	5.30	\$ 6,519.00	Calls with Monitor's counsel; call with [REDACTED]; daily update call; review of proposal; review of cashflows; multiple correspondence.
05/28/24	14800	Paul Bishop	3.90	\$ 4,797.00	Call with interested party; review of sale process; review of draft response to [REDACTED]; daily update call; review of litigation time table; call with counsel; multiple correspondence.
05/29/24	14800	Paul Bishop	5.10	\$ 6,273.00	Board meeting; operational calls with Tacora, [REDACTED] on separate calls; call with interested party; review of draft response to [REDACTED]; review of amended sales process; review of affidavit; daily update call.
05/30/24	14800	Paul Bishop	3.30	\$ 4,059.00	Review of cashflows; call with Monitor's counsel and Stikemans; call with [REDACTED]; daily update call; multiple emails.
05/31/24	14800	Paul Bishop	1.80	\$ 2,214.00	Call to review cash flow; review of email correspondence.
05/27/24	15532	Jodi Porepa	9.00	\$ 9,450.00	Call with Stikemans and Cassels to discuss strategic alternatives; review financial analyses; review updated cash flow forecast scenarios and provide comments; review proposed disbursements and provide comments; review draft Monitor's Report and provide comments; internal discussions regarding strategic alternatives.
05/27/24	15532	Jodi Porepa	1.60	\$ 1,680.00	Review claims reconciliations for [REDACTED] claims and [REDACTED]; provide comments in respect of same; internal discussions regarding same.
05/28/24	15532	Jodi Porepa	9.50	\$ 9,975.00	Review cash flow forecast scenarios and provide comments; review key assumptions and provide comments; call with CFO and Greenhill to discuss same; internal discussions regarding same; review sales process and provide comments; review [REDACTED] and provide comments; call with counsel to discuss strategic alternatives; call with [REDACTED].
05/28/24	15532	Jodi Porepa	1.10	\$ 1,155.00	Review claims reconciliations for [REDACTED] claims and [REDACTED]; provide comments in respect of same; internal discussions regarding same.
05/29/24	15532	Jodi Porepa	8.60	\$ 9,030.00	Attend Board call; review cash flow forecast scenarios and provide comments; review key assumptions and provide comments; attend daily operational calls with each of the [REDACTED]; calls [REDACTED]; review proposed deal terms; review sales process outline; internal discussions regarding same; review proposed disbursements.
05/29/24	15532	Jodi Porepa	2.10	\$ 2,205.00	Review updated claims register; review reconciliations; review [REDACTED] claim; review proposed responses to claimants.
05/30/24	15532	Jodi Porepa	11.50	\$ 12,075.00	Review cash flow forecast scenarios and provide comments; review key assumptions and provide comments; call with Cassels Brock to discuss strategic alternatives; call with Stikemans to discuss [REDACTED]; draft court report; review variance analysis; review proposed deal terms; review sales process outline; internal discussions regarding same; review proposed disbursements.
05/31/24	15532	Jodi Porepa	3.30	\$ 3,465.00	Review updated claims register; review reconciliations; review [REDACTED] claim; review proposed responses to claimants.
05/31/24	15532	Jodi Porepa	5.20	\$ 5,460.00	Call with Tacora to review cash flow scenarios; internal discussions regarding same; review financial analyses; review scenario comparisons; review underlying key assumptions; internal discussions regarding strategic alternatives.
05/27/24	31365	Graham McIntyre	5.00	\$ 3,700.00	Internal discussions regarding engagement matters; call with Company and investment bankers to discuss cash flow scenarios; daily call with Company, counsel, and investment bankers; review and correspondence regarding [REDACTED] matters; posting documents to Monitor's website.

Tacora Resources Inc.
493044.0001 - May 31, 2024

Date	TK#	Name	Hours	Amount	Narrative
05/28/24	31365	Graham McIntyre	8.80	\$ 6,512.00	Review of ██████████ and correspondence with Company regarding the same; review of cash flow scenarios and preparing summary page; discussions with Management and investment bankers regarding cash flow scenarios; posting documents to Monitor's website; review of court documents.
05/28/24	31365	Graham McIntyre	0.50	\$ 370.00	Weekly call to discuss Claims Procedure.
05/28/24	31365	Graham McIntyre	0.50	\$ 370.00	Correspondence regarding certain claims.
05/29/24	31365	Graham McIntyre	9.30	\$ 6,882.00	Review of affidavit; correspondence with Company regarding ██████████; review of latest cash flow scenarios and discussions regarding the same; review of proposed disbursements and weekly ██████████.
05/30/24	31365	Graham McIntyre	12.50	\$ 9,250.00	Preparing cash flow scenarios for discussions with ██████████; review of DIP interest invoice; review of proposed disbursements and discussions regarding the same; preparing key milestones summary; updating cash flow for court and discussions regarding the same; review and discussion of various cash flow forecast scenarios; internal discussions regarding engagement matters.
05/31/24	31365	Graham McIntyre	1.30	\$ 962.00	Weekly variance analysis; updating variance analysis workbook for ██████████.
05/31/24	31365	Graham McIntyre	4.50	\$ 3,330.00	Discussions with Management and investment bankers regarding cash flow scenarios; call with ██████████; review of court report; daily call with Company, counsel, and investment bankers; review of ██████████; internal discussions regarding engagement matters.
05/31/24	31365	Graham McIntyre	0.50	\$ 370.00	Call to discuss the ██████████ claim and other matters.
05/27/24	39256	Carter Wood	5.60	\$ 3,304.00	Reviewing and responding to hotline related emails and enquiries; reviewing Proofs of Claim and Notices of Dispute received; responding to voicemails left related to claims; internal discussions.
05/28/24	39256	Carter Wood	7.50	\$ 4,425.00	Reviewing and responding to hotline emails; reviewing and reconciling Notice of Disputes received; claims discussion with Tacora team and Counsel; reviewing endorsement and updating milestones; internal discussions.
05/29/24	39256	Carter Wood	7.90	\$ 4,661.00	Reviewing and responding to hotline related emails; discussion on ██████████ claim with Tacora; reviewing and updating reconciliation of Notice of Disputes received; updating claims register and claims tracker; internal discussions.
05/30/24	39256	Carter Wood	4.70	\$ 2,773.00	Responding to hotline related emails; updating language for claims section of the Monitor report; internal discussions regarding claims; updating reconciliations for Notice of Disputes and Proof of Claims received; internal discussions.
05/31/24	39256	Carter Wood	4.00	\$ 2,360.00	Responding to hotline related emails; responding to voicemails left related to claims; updating reconciliations for Proof of Claim and Notice of Disputes received; discussion on claim reconciliation with Tacora team and Counsel; internal discussions.
05/27/24	39589	Caitlin Moreland	0.20	\$ 31.00	Update Monitor's website.
05/28/24	39589	Caitlin Moreland	0.30	\$ 46.50	Update Monitor's website.
TOTAL				\$ 127,703.50	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

June 12, 2024
102900001332
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through June 09, 2024

Amount Due Current Invoice \$148,735.89

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque payments to: FTI Consulting Canada Inc.
C/O T10073
P.O. Box 10073
Postal Station A
Toronto, ON M5W 2B1
Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

June 12, 2024
Invoice No. 102900001332
Job No. 493044.0001
Terms Due Upon Receipt
Currency CAD
Tax Registration:

RE: FTI Engagement

Current Invoice Period: Charges posted through June 09, 2024

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	24.10	\$29,643.00
Jodi Porepa	Senior Managing Director	\$1,050.00	46.10	\$48,405.00
Graham McIntyre	Director	\$740.00	37.80	\$27,972.00
Carter Wood	Senior Consultant	\$590.00	31.80	\$18,762.00
Natalie St Pierre	Intern	\$215.00	2.00	\$430.00
Caitlin Moreland	Administrative	\$155.00	2.30	\$356.50
Total Professional Services			144.10	\$125,568.50
Administrative Fee				\$3,767.06
Invoice Total				CAD Amount
				\$129,335.56
HST (15%)				\$19,400.33
Total Due				\$148,735.89

Tacora Resources Inc.
493044.0001 - June 9, 2024

Date	TK#	Name	Hours	Amount	Narrative
06/01/24	14800	Paul Bishop	1.90	\$ 2,337.00	Review of correspondence and cash flows.
06/03/24	14800	Paul Bishop	3.10	\$ 3,813.00	Review and finalize Monitor's report; review of drafts CFF; attend daily update call; review of correspondence.
06/04/24	14800	Paul Bishop	4.90	\$ 6,027.00	Call with interested party; call with Monitor's counsel; call with ██████████ regarding cashflow; subsequent follow up calls with ██████████; daily update call; review of correspondence.
06/05/24	14800	Paul Bishop	6.70	\$ 8,241.00	Board call; call with Monitor's counsel; call with Monitor's counsel and Stikemans; attend court; attend call with ██████; call with Board members.
06/06/24	14800	Paul Bishop	4.60	\$ 5,658.00	Call with interested party; call with certain interested parties; call with Monitor's counsel; call with Monitor's counsel and Stikemans; call with Greenhill; daily update; review of diligence requests; review of cash flow.
06/07/24	14800	Paul Bishop	2.90	\$ 3,567.00	Review of decision; daily update call; review of correspondence; draft communications.
06/03/24	15532	Jodi Porepa	7.90	\$ 8,295.00	Call with Stikemans and Cassels to discuss strategic options; review updated financial analyses; review potential ██████████; internal discussions regarding same; review ██████████; review ██████████; review email communication with ██████.
06/03/24	15532	Jodi Porepa	1.90	\$ 1,995.00	Review updated claims register; review Notices of Dispute provided; review Proof of Claims provided.
06/04/24	15532	Jodi Porepa	6.50	\$ 6,825.00	Review proposed disbursements; review cash flow forecasts; call with Stikemans and Cassels to discuss the same; call with Cassels to discuss strategic options; review updated financial analyses; review proposed disbursements; call with ██████████; call with ██████ to discuss cash flow forecast and different financial scenarios.
06/04/24	15532	Jodi Porepa	1.40	\$ 1,470.00	Review updated claims register; review Notices of Dispute provided; review Proof of Claims provided.
06/05/24	15532	Jodi Porepa	10.90	\$ 11,445.00	Attend Board meeting; attend court; discussions in respect of cash flow forecast; status update on CCAA and internal discussions regarding same; review updated cash flow forecast; call with ██████ regarding management presentation and updated financial information.
06/06/24	15532	Jodi Porepa	7.10	\$ 7,455.00	Call with Cassels Brock and Stikemans; call with Stikemans; review and respond to proposed disbursements; review financial analysis; review cash flow scenarios; review and respond to enquiries; attend calls on ██████████; daily professional calls.
06/06/24	15532	Jodi Porepa	2.20	\$ 2,310.00	Review claims reconciliations; review underlying support; provide comments; internal discussions regarding same.
06/07/24	15532	Jodi Porepa	8.20	\$ 8,610.00	Review proposed disbursements; review variance analysis and provide comments; review financial analyses and provide comments; review and respond to enquiries; call with Stikemans; call with CFO and Stikemans; review and respond to enquiries.
06/01/24	31365	Graham McIntyre	1.30	\$ 962.00	Call with ██████████; review of materials to be provided to ██████████.
06/02/24	31365	Graham McIntyre	3.50	\$ 2,590.00	Finalizing variance analysis; review of updated cash flow scenarios; review of capital expenditures.
06/03/24	31365	Graham McIntyre	3.80	\$ 2,812.00	Review of weekly ██████████; posting documents to Monitor's website; review of proposed disbursements; reviewing and updating key milestones; review of motion materials.
06/03/24	31365	Graham McIntyre	1.30	\$ 962.00	Review of certain claims; preparing responses to claimants; discussions regarding Claims Procedure and certain claims.
06/04/24	31365	Graham McIntyre	6.80	\$ 5,032.00	Review of ██████████; review of proposed disbursements; revisions to ██████████ and discussions regarding the same; walkthrough of CFF scenarios with ██████████; updating CFF scenarios for ██████████; posting documents to Monitor's website.
06/04/24	31365	Graham McIntyre	1.00	\$ 740.00	Drafting responses to certain claimants.

Tacora Resources Inc.
493044.0001 - June 9, 2024

Date	TK#	Name	Hours	Amount	Narrative
06/05/24	31365	Graham McIntyre	4.80	\$ 3,552.00	Revisions to ██████████ and discussions regarding the same; correspondence with suppliers; call with ██████ to discuss business presentation; posting documents to Monitor's website; internal discussions regarding engagement matters.
06/05/24	31365	Graham McIntyre	2.50	\$ 1,850.00	Responding to claims enquiries; reviewing certain claims; discussions regarding Claims Procedure.
06/06/24	31365	Graham McIntyre	5.00	\$ 3,700.00	Prepare and finalize variance analysis; review proposed disbursements and discussions regarding the same; updating key upcoming milestones; review of ██████████ liabilities and associated ██████████; review Administrative Reserve details.
06/06/24	31365	Graham McIntyre	2.80	\$ 2,072.00	Review of certain claims; bridging ██████████ to claims register.
06/07/24	31365	Graham McIntyre	1.50	\$ 1,110.00	Finalizing variance analyses; internal discussions regarding engagement matters.
06/07/24	31365	Graham McIntyre	3.50	\$ 2,590.00	Review of certain claims; review of claims register and bridge to ██████████.
06/01/24	39256	Carter Wood	1.50	\$ 885.00	Reviewing and updating claims register for Proof of Claims and Notice of Disputes received.
06/03/24	39256	Carter Wood	8.70	\$ 5,133.00	Reviewing proof of claims and Notice of Disputes received; updating claims register; internal discussions; internal status update call.
06/04/24	39256	Carter Wood	5.60	\$ 3,304.00	Updating claims register based on review comments; claims discussion with Tacora and counsel; reconciling Proof of Claims and Notice of Disputes; internal status update.
06/05/24	39256	Carter Wood	7.50	\$ 4,425.00	Drafting language to creditors who submitted notice of disputes; reconciling claims received; internal discussions regarding claims and status update.
06/06/24	39256	Carter Wood	5.20	\$ 3,068.00	Preparing and reviewing claim reconciliations; internal discussions on claims; internal status update discussions.
06/07/24	39256	Carter Wood	3.30	\$ 1,947.00	Reviewing and preparing claims reconciliations; internal discussions regarding claims.
06/02/24	39589	Caitlin Moreland	1.00	\$ 155.00	Update Monitor's website.
06/03/24	39589	Caitlin Moreland	0.70	\$ 108.50	Update Monitor's website.
06/04/24	39589	Caitlin Moreland	0.30	\$ 46.50	Update Monitor's website.
06/05/24	39589	Caitlin Moreland	0.30	\$ 46.50	Update Monitor's website.
06/06/24	43179	Natalie St Pierre	2.00	\$ 430.00	Reconciliation of claims.
TOTAL				\$ 125,568.50	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

June 19, 2024
102900001338
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through June 16, 2024

Amount Due Current Invoice **\$92,407.58**

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque payments to: FTI Consulting Canada Inc.
C/O T10073
P.O. Box 10073
Postal Station A
Toronto, ON M5W 2B1
Canada

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

June 19, 2024
Invoice No. 102900001338
Job No. 493044.0001
Terms Due Upon Receipt
Currency CAD
Tax Registration:

RE: FTI Engagement

Current Invoice Period: Charges posted through June 16, 2024

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	14.10	\$17,343.00
Jodi Porepa	Senior Managing Director	\$1,050.00	39.20	\$41,160.00
Graham McIntyre	Director	\$740.00	14.40	\$10,656.00
Carter Wood	Senior Consultant	\$590.00	13.70	\$8,083.00
Joshua Gelman	Intern	\$215.00	1.50	\$322.50
Caitlin Moreland	Administrative	\$155.00	0.60	\$93.00
Kathleen Foster	Executive Assistant II	\$155.00	2.30	\$356.50
Total Professional Services			85.80	\$78,014.00
Administrative Fee				\$2,340.42
Invoice Total				CAD Amount
				\$80,354.42
HST (15%)				\$12,053.16
Total Due				\$92,407.58

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com

Tacora Resources Inc.
493044.0001 - June 16, 2024

Date	TK#	Name	Hours	Amount	Narrative
06/10/24	14800	Paul Bishop	2.60	\$ 3,198.00	Review of cash flow and variances; daily update call; call with Monitor's counsel and Stikemans; review of [REDACTED] document.
06/11/24	14800	Paul Bishop	2.80	\$ 3,444.00	Calls with [REDACTED]; call with Monitor's counsel; daily update call.
06/12/24	14800	Paul Bishop	3.60	\$ 4,428.00	Board call; call with company [REDACTED]; review of motion materials; call with Monitor's counsel.
06/13/24	14800	Paul Bishop	3.40	\$ 4,182.00	Call with Monitor's counsel; call with Monitor's counsel and Stikemans; review of correspondence; review of draft correspondence; review of draft affidavits; daily update call.
06/14/24	14800	Paul Bishop	1.70	\$ 2,091.00	Review of correspondence and cash flow.
06/10/24	15532	Jodi Porepa	1.30	\$ 1,365.00	Calls with Stikemans and Cassels; daily professionals call; review updates to website; review updated SISP and provide comments.
06/10/24	15532	Jodi Porepa	6.30	\$ 6,615.00	Review claims reconciliations; review underlying support; provide comments; internal discussions regarding same.
06/11/24	15532	Jodi Porepa	2.60	\$ 2,730.00	Calls with Cassels Brock to discuss strategic alternatives; review financial analyses; daily professionals call; respond to third party enquiries.
06/11/24	15532	Jodi Porepa	5.10	\$ 5,355.00	Review Claims register and provide comments; review claims reconciliations and provide comments; call with counsel and company regarding status update on claims and follow up on specific enquiries.
06/12/24	15532	Jodi Porepa	3.20	\$ 3,360.00	Attend Board call; attend weekly operational calls; call with Company to discuss new [REDACTED] changes; review supporting calculations in respect of same; daily professionals call; review and respond to third party enquiries.
06/12/24	15532	Jodi Porepa	4.70	\$ 4,935.00	Review reconciliations and provide comments; review and respond to updated CRA correspondence; review and respond to third party claimant enquiries; internal discussions regarding same.
06/13/24	15532	Jodi Porepa	9.30	\$ 9,765.00	Calls with Stikemans and Cassels; daily professionals call; review draft affidavits and provide comments; review motion material and provide comments; review variance analysis and provide comments; review proposed disbursements and provide comments;
06/14/24	15532	Jodi Porepa	6.70	\$ 7,035.00	Review draft SISP letter and provide comments; review draft Monitor's Report and provide comments; call with counsel to discuss strategic alternatives; review Tacora motion materials; review [REDACTED]; review variance analysis.
06/10/24	24354	Kathleen Foster	0.30	\$ 46.50	Update Monitor's website.
06/11/24	24354	Kathleen Foster	2.00	\$ 310.00	Update Monitor's website.
06/10/24	31365	Graham McIntyre	2.50	\$ 1,850.00	Posting documents to Monitor's website; internal discussions regarding engagement matters; updating professional fee summary; review of [REDACTED] and correspondence regarding the same.
06/11/24	31365	Graham McIntyre	3.80	\$ 2,812.00	Updating milestones; posting documents to Monitor's website; review of professional fees; review of proposed disbursements; daily call with Company, counsel, and investment bankers; internal discussions regarding engagement matters.
06/11/24	31365	Graham McIntyre	1.30	\$ 962.00	Review financial analyses; discussions regarding [REDACTED] claims; review financial claims reconciliations.
06/12/24	31365	Graham McIntyre	3.50	\$ 2,590.00	Daily call with Company, counsel, and investment bankers; review of professional fees; review of proposed disbursements; posting documents to Monitor's website; review and discussion regarding [REDACTED].
06/13/24	31365	Graham McIntyre	2.80	\$ 2,072.00	Daily call with Company, counsel and investment bankers; weekly call to review proposed disbursements; posting documents to Monitor's website.
06/13/24	31365	Graham McIntyre	0.50	\$ 370.00	Review of certain claims.
06/10/24	39256	Carter Wood	2.90	\$ 1,711.00	Reviewing claims reconciliations; responding to claims-related emails; updating claims register and tracker in preparation for claims discussion; claims status update call.

Tacora Resources Inc.
493044.0001 - June 16, 2024

Date	TK#	Name	Hours	Amount	Narrative
06/11/24	39256	Carter Wood	5.00	\$ 2,950.00	Reviewing Claims Procedure Order; updating claims review tracker; updating claims reconciliations; discussion on [REDACTED] claims; uploading claims related documents to data room; Claims discussion with Tacora and counsel.
06/12/24	39256	Carter Wood	5.00	\$ 2,950.00	Updating claims reconciliations; preparing for update call with Company and Stikemans and Cassels Brock; drafting language for [REDACTED] Claim; internal discussions regarding claim reconciliations.
06/13/24	39256	Carter Wood	0.50	\$ 295.00	Claims status update call; updating reconciliations.
06/14/24	39256	Carter Wood	0.30	\$ 177.00	Responding to claims related emails.
06/12/24	39589	Caitlin Moreland	0.30	\$ 46.50	Update Monitor's website.
06/14/24	39589	Caitlin Moreland	0.30	\$ 46.50	Update Monitor's website.
06/12/24	43208	Joshua Gelman	0.50	\$ 107.50	Review and updated appendix for Monitor's Report.
06/13/24	43208	Joshua Gelman	1.00	\$ 215.00	Review and updated appendix for Monitor's Report.
TOTAL				\$ 78,014.00	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

June 25, 2024
102900001354
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through June 23, 2024

Amount Due Current Invoice **\$106,379.36**

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque payments to: FTI Consulting Canada Inc.
C/O T10073
P.O. Box 10073
Postal Station A
Toronto, ON M5W 2B1
Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No. **June 25, 2024**
Job No. **102900001354**
Terms **493044.0001**
Currency **Due Upon Receipt**
Tax Registration: **CAD**

RE: FTI Engagement

Current Invoice Period: Charges posted through June 23, 2024

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	17.20	\$21,156.00
Jodi Porepa	Senior Managing Director	\$1,050.00	47.30	\$49,665.00
Graham McIntyre	Director	\$740.00	21.80	\$16,132.00
Carter Wood	Senior Consultant	\$590.00	4.50	\$2,655.00
Caitlin Moreland	Administrative	\$155.00	1.30	\$201.50
Total Professional Services			92.10	\$89,809.50
Administrative Fee				\$2,694.29
Invoice Total				CAD Amount
				\$92,503.79
HST (15%)				\$13,875.57
Total Due				\$106,379.36

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

GST/HST Registration Number: 835718024RT0001, QST Registration Number: 1230160542TQ0001 | fticonsulting.com

Tacora Resources Inc.
493044.0001 - June 23, 2024

Date	TK#	Name	Hours	Amount	Narrative
06/17/24	14800	Paul Bishop	3.10	\$ 3,813.00	Calls and correspondence with counsel; review draft documents; review of correspondence regarding [REDACTED].
06/18/24	14800	Paul Bishop	4.10	\$ 5,043.00	Call with counsel; daily update call; call with Monitor's counsel and company counsel; review of draft correspondence; review and edit.
06/19/24	14800	Paul Bishop	4.90	\$ 6,027.00	Board meeting; multiple email correspondence with Monitor's counsel; review of correspondence with [REDACTED]; review, edit and finalize draft report; daily update call.
06/20/24	14800	Paul Bishop	2.80	\$ 3,444.00	Call with Monitor's counsel and Stikemans; daily update call; review of drafts; review of correspondence.
06/21/24	14800	Paul Bishop	2.30	\$ 2,829.00	Daily update call; review of correspondence; review of drafts.
06/17/24	15532	Jodi Porepa	8.30	\$ 8,715.00	Call with Stikemans and Cassels; review variance analysis; review Monitor's Court Report and provide comments; review motion materials; internal status update;
06/18/24	15532	Jodi Porepa	7.20	\$ 7,560.00	Call with Cassels; assess strategic options and discuss same with professionals; daily call with professionals; review draft communication with [REDACTED]; internal discussions regarding same; review strategic alternatives; internal discussions regarding same; review and provide comments on communication with key stakeholders; update Monitor's Court Report.
06/18/24	15532	Jodi Porepa	3.10	\$ 3,255.00	Review and finalize claims reconciliations; discussions in respect of same.
06/19/24	15532	Jodi Porepa	8.20	\$ 8,610.00	Review and finalize court report; review factum and provide comments; internal discussions regarding strategy; daily professionals call regarding status update; weekly call with [REDACTED] and its advisors; attend Board meeting; internal update.
06/20/24	15532	Jodi Porepa	8.50	\$ 8,925.00	Call with Cassels; call with Stikemans; review and finalize court report; review and provide comments on motion materials; internal discussions regarding same; review financial analyses; review and provide comments on proposed disbursements.
06/21/24	15532	Jodi Porepa	7.30	\$ 7,665.00	Review template APA and SPA and provide comments; review Factums and provide comments; review variance analysis and provide comments; call with Cassels Brock to discuss same; internal call to discuss strategy; review correspondence regarding upcoming hearing; daily call with professionals.
06/23/24	15532	Jodi Porepa	4.70	\$ 4,935.00	Review and finalize claims reconciliations for [REDACTED] and certain vendors; provide comments in respect of the same.
06/17/24	31365	Graham McIntyre	5.50	\$ 4,070.00	Posting documents to Monitor's website; ad-hoc cash flow analysis; daily call with Company, counsel and investment bankers; internal discussions regarding engagement matters; variance analysis for prior week; updating fee application details.
06/18/24	31365	Graham McIntyre	3.80	\$ 2,812.00	Review of [REDACTED]; updating [REDACTED] analysis; daily call with Company, counsel and investment bankers; internal discussions regarding engagement matters.
06/19/24	31365	Graham McIntyre	3.00	\$ 2,220.00	Updating [REDACTED] analysis; daily call with Company, counsel and investment bankers; internal discussions regarding engagement matters.
06/20/24	31365	Graham McIntyre	4.50	\$ 3,330.00	Variance analysis; daily call with Company, counsel and investment bankers; posting documents to Monitor's website; weekly disbursements call.
06/21/24	31365	Graham McIntyre	5.00	\$ 3,700.00	Finalizing variance analysis; updating milestones calendar; review of cash flow scenarios; daily call with Company, counsel and investment bankers.
06/17/24	39256	Carter Wood	1.10	\$ 649.00	Claims related emails; updating reconciliation of [REDACTED]; internal status update.
06/18/24	39256	Carter Wood	0.80	\$ 472.00	Claims related emails; reviewing claims section of draft monitor report; reviewing lease agreement and updating reconciliation accordingly; internal discussions.

Tacora Resources Inc.
493044.0001 - June 23, 2024

Date	TK#	Name	Hours	Amount	Narrative
06/19/24	39256	Carter Wood	1.50	\$ 885.00	Updating claims reconciliations; reviewing email provided regarding [REDACTED]; reviewing [REDACTED] claims and discussions regarding the same; summarizing [REDACTED]; reviewing [REDACTED] provided by counsel.
06/21/24	39256	Carter Wood	1.10	\$ 649.00	Completing reconciliations for Notices of Disallowance received; updating [REDACTED] and preparing claims package email; reviewing and summarizing claims with liens.
06/18/24	39589	Caitlin Moreland	0.30	\$ 46.50	Update Monitor's website.
06/20/24	39589	Caitlin Moreland	0.70	\$ 108.50	Update Monitor's website.
06/21/24	39589	Caitlin Moreland	0.30	\$ 46.50	Update Monitor's website.
TOTAL				\$ 89,809.50	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

June 30, 2024
102900001374
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through June 30, 2024

Amount Due Current Invoice **\$102,789.14**

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque payments to: FTI Consulting Canada Inc.
C/O T10073
P.O. Box 10073
Postal Station A
Toronto, ON M5W 2B1
Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

June 30, 2024
Invoice No. 102900001374
Job No. 493044.0001
Terms Due Upon Receipt
Currency CAD
Tax Registration:

RE: FTI Engagement

Current Invoice Period: Charges posted through June 30, 2024

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	13.60	\$16,728.00
Jodi Porepa	Senior Managing Director	\$1,050.00	35.90	\$37,695.00
Graham McIntyre	Director	\$740.00	30.30	\$22,422.00
Carter Wood	Senior Consultant	\$590.00	16.60	\$9,794.00
Caitlin Moreland	Administrative	\$155.00	0.90	\$139.50
Total Professional Services			97.30	\$86,778.50
Administrative Fee				\$2,603.36
Invoice Total				CAD Amount
				\$89,381.86
HST (15%)				\$13,407.28
Total Due				\$102,789.14

Tacora Resources Inc.
493044.0001 - June 30, 2024

Date	TK#	Name	Hours	Amount	Narrative
06/24/24	14800	Paul Bishop	3.00	\$ 3,690.00	Call with counsel and Stikemans; review of █████; review of court materials; call with Board member.
06/25/24	14800	Paul Bishop	4.50	\$ 5,535.00	Call with Monitor's counsel and Stikemans; board meeting; call regarding adjournment; daily update call; review of █████.
06/26/24	14800	Paul Bishop	2.80	\$ 3,444.00	Case conference; calls with counsel; review of cash flow; review of correspondence.
06/27/24	14800	Paul Bishop	1.40	\$ 1,722.00	Daily call; review of █████; calls with counsel; daily update call.
06/28/24	14800	Paul Bishop	1.90	\$ 2,337.00	Call with counsel; review of documents; daily update call.
06/24/24	15532	Jodi Porepa	4.10	\$ 4,305.00	Review proposed disbursements; review variance analysis and other financial analyses; call with Stikemans and Cassels; daily professionals call.
06/24/24	15532	Jodi Porepa	2.20	\$ 2,310.00	Review and finalize reconciliations and communication with claimants; call with counsel and management to discuss status update and next steps; internal discussions regarding same.
06/25/24	15532	Jodi Porepa	1.40	\$ 1,470.00	Review and finalize reconciliations and communication with claimants; call with counsel and management to discuss status update and next steps; internal discussions regarding same.
06/25/24	15532	Jodi Porepa	6.50	\$ 6,825.00	Review proposed disbursements; calls with counsel; review █████ and updates; provide comments in respect of same; review updated communication and draft documents pertaining to █████; review internal communication and provide comments.
06/26/24	15532	Jodi Porepa	6.40	\$ 6,720.00	Weekly operations calls with █████; call with Tacora to discuss cash flow forecast and status update of operations; review updated █████; review financial analyses and internal discussions regarding same.
06/27/24	15532	Jodi Porepa	9.10	\$ 9,555.00	Review █████ analysis and provide comments; update Admin Reserve; review and respond to questions regarding operations; review and respond to proposed disbursements; review financial analysis; discussions in respect of same; call with Cassels Brock; review █████; review updated financial analysis.
06/28/24	15532	Jodi Porepa	6.20	\$ 6,510.00	Call with Cassels and Stikemans; review █████ and provide comments; internal discussions regarding same; review and update Admin Reserve; review and respond to enquiries on entering into █████; review and respond to proposed disbursements.
06/24/24	31365	Graham McIntyre	3.50	\$ 2,590.00	Review of latest cash flow forecast; review of proposed disbursements; posting documents to Monitor's website; review and analysis of █████.
06/24/24	31365	Graham McIntyre	1.50	\$ 1,110.00	Walkt hrough of certain claims; updates to claim reconciliations.
06/25/24	31365	Graham McIntyre	4.30	\$ 3,182.00	Updating █████ and correspondence regarding the same; posting documents to Monitor's website; review of latest cash flow forecast; posting documents to Monitor's website.
06/25/24	31365	Graham McIntyre	1.00	\$ 740.00	Weekly claims call; correspondence with certain Claimants.
06/26/24	31365	Graham McIntyre	5.50	\$ 4,070.00	Correspondence regarding variance analysis; internal discussions regarding engagement matters; prepare updated █████ analyses; financial analyses and reconciliations; posting documents to Monitor's site; review of █████; internal discussions regarding engagement matters.
06/27/24	31365	Graham McIntyre	7.00	\$ 5,180.00	Update █████ analysis; review of sources and uses analysis and provide comments; daily call with Company, counsel and investment bankers; internal discussions regarding engagement matters.
06/28/24	31365	Graham McIntyre	7.50	\$ 5,550.00	Work on █████ update and discussions regarding the same; review of sources and uses and analysis of the same; internal discussions regarding engagement matters; addressing Monitor bank account matters.

Tacora Resources Inc.
493044.0001 - June 30, 2024

Date	TK#	Name	Hours	Amount	Narrative
06/24/24	39256	Carter Wood	5.00	\$ 2,950.00	Reviewing Notice of Dispute reconciliations; responding to claims related emails; sending out [REDACTED] package; addressing review comments on reconciliations; discussion on claims reconciliations.
06/25/24	39256	Carter Wood	5.10	\$ 3,009.00	Updating claims register; responding to claims related emails; updating reconciliations and uploading to data room; preparing for claims call and having claims call with Tacora and counsel; discussion reconciliations.
06/26/24	39256	Carter Wood	1.70	\$ 1,003.00	Responding to claims related emails; updating claims reconciliations; responding to creditor enquiries; claims discussion with Company and Monitor.
06/27/24	39256	Carter Wood	4.10	\$ 2,419.00	Reviewing reconciliation and provide comments; drafting response language to creditors based on reconciliations and advice from counsel; call with creditor regarding claims; responding to claims related emails; preparing internal status update.
06/28/24	39256	Carter Wood	0.70	\$ 413.00	Reviewing comments on reconciliations; internal discussions regarding government claims.
06/24/24	39589	Caitlin Moreland	0.30	\$ 46.50	Status update on Monitor's website.
06/25/24	39589	Caitlin Moreland	0.30	\$ 46.50	Status update on Monitor's website.
06/27/24	39589	Caitlin Moreland	0.30	\$ 46.50	Status update on Monitor's website.
TOTAL				\$ 86,778.50	



Invoice Remittance

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

Invoice No.
Job No.
Terms
Currency
Tax Registration:

July 10, 2024
102900001401
493044.0001
Due Upon Receipt
CAD

RE: FTI Engagement

Current Invoice Period: Charges posted through July 07, 2024

Amount Due Current Invoice **\$70,808.23**

Bank Information

Please indicate our invoice number with your remittance

Account Name:	FTI Consulting Canada Inc.	Bank Code:	002
Bank Name:	Bank of Nova Scotia	Account Number:	0861715
Bank Address:	Scotia Plaza, 44 King Street West	Swift/BIC Code:	NOSCCATT
	Toronto, Ontario M5H 1H1	Transit Code:	47696
	Canada	Account Currency:	CAD

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque payments to: FTI Consulting Canada Inc.
C/O T10073
P.O. Box 10073
Postal Station A
Toronto, ON M5W 2B1
Canada



Invoice Summary

Tacora Resources Inc.
1 Wabush Mines Road
P.O. Box 3000
Wabush, NL A0R 1B0
Canada

July 10, 2024
Invoice No. 102900001401
Job No. 493044.0001
Terms Due Upon Receipt
Currency CAD
Tax Registration:

RE: FTI Engagement

Current Invoice Period: Charges posted through July 07, 2024

Name	Title	Rate	Hours	Total
Paul Bishop	Senior Managing Director	\$1,230.00	5.40	\$6,642.00
Jodi Porepa	Senior Managing Director	\$1,050.00	28.20	\$29,610.00
Graham McIntyre	Director	\$740.00	23.90	\$17,686.00
Carter Wood	Senior Consultant	\$590.00	9.90	\$5,841.00
Total Professional Services			67.40	\$59,779.00
Administrative Fee				\$1,793.37
Invoice Total				CAD Amount
				\$61,572.37
HST (15%)				\$9,235.86
Total Due				\$70,808.23

Tacora Resources Inc.
493044.0001 - July 7, 2024

Date	TK#	Name	Hours	Amount	Narrative
07/02/24	14800	Paul Bishop	2.20	\$ 2,706.00	Call with counsel; review of ██████████ and admin reserve requirements; review of cash flow; daily call.
07/03/24	14800	Paul Bishop	2.60	\$ 3,198.00	Board meeting; call regarding payables and ██████████ and review of schedules regarding the same; review of correspondence.
07/04/24	14800	Paul Bishop	0.30	\$ 369.00	Review of cash flow and provide comments.
07/05/24	14800	Paul Bishop	0.30	\$ 369.00	Review of correspondence.
07/02/24	15532	Jodi Porepa	6.70	\$ 7,035.00	Call with Cassels Brock; call with Company and Stikemans to discuss ██████████; review and update ██████████; review and update Admin Reserve; internal discussions regarding same.
07/02/24	15532	Jodi Porepa	2.60	\$ 2,730.00	Weekly claims call; review ██████████ and provide comments; review ██████████ and provide comments; review support for ██████████.
07/03/24	15532	Jodi Porepa	7.10	\$ 7,455.00	Review variance analysis; review updated CFF and provide comments; review financial analysis and provide comments; review draft email and provide comments; call with company to review refreshed ██████████ and Admin Reserve; call with counsel to discuss refreshed ██████████ and Admin Reserve; daily professionals call.
07/03/24	15532	Jodi Porepa	2.70	\$ 2,835.00	Review claims tracker and provide comments; internal discussions regarding same; review employee claims and provide comments.
07/04/24	15532	Jodi Porepa	6.60	\$ 6,930.00	Review variance analysis and provide comments; review updated ██████████ and provide comments; review and update Admin Reserve; review correspondence regarding new drill lease.
07/05/24	15532	Jodi Porepa	2.50	\$ 2,625.00	Review variance analysis and provide comments; review updated ██████████ and provide comments; review and update Admin Reserve; review correspondence regarding new drill lease.
07/02/24	31365	Graham McIntyre	6.30	\$ 4,662.00	Prior week variance analysis; internal discussions regarding engagement matters; discussions regarding estimated sources and uses; review of proposed disbursements; updates to ██████████ workbook; review of internal cash flow forecast and discussions regarding the same.
07/03/24	31365	Graham McIntyre	7.30	\$ 5,402.00	Discuss ██████████ analyses with Management; review administrative reserve estimates with counsel; finalizing cash flow forecast package; review proposed disbursements and discussion regarding the same.
07/04/24	31365	Graham McIntyre	5.50	\$ 4,070.00	Variance analysis; internal discussions regarding engagement matters; updating creditor and supplier contact list; review of deposit agreements; updating fee application.
07/05/24	31365	Graham McIntyre	3.80	\$ 2,812.00	Finalizing variance analysis; finalizing draft ██████████ workbook; review of proposed disbursements; correspondence regarding vendor deposit letters and termination terms.
07/05/24	31365	Graham McIntyre	1.00	\$ 740.00	Review and update certain claim reconciliations.
07/02/24	39256	Carter Wood	3.80	\$ 2,242.00	Responding to claims related emails; completing notice of dispute reconciliations; internal discussions regarding claims; preparing for weekly claims call and having claims call with Tacora and counsel.
07/03/24	39256	Carter Wood	4.40	\$ 2,596.00	Claims related emails to counsel; discussion on ██████████ with counsel; completing a notice of dispute reconciliation; internal discussions regarding ██████████; internal status update on claims; updating claims tracker.
07/04/24	39256	Carter Wood	1.70	\$ 1,003.00	Discussion with counsel on ██████████; updating claims tracker and claims register; internal discussions regarding claims.
TOTAL				\$ 59,779.00	

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 TACORA RESOURCES INC.

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

PROCEEDING COMMENCED AT
TORONTO

**AFFIDAVIT OF JODI POREPA
(SWORN JULY 22, 2024)**

Cassels Brock & Blackwell LLP

Suite 3200, Bay Adelaide Centre – North Tower
40 Temperance St.
Toronto, ON M5H 0B4

Ryan Jacobs LSO#59510J

Tel: 416.860.6465
riacobs@cassels.com

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Alan Merskey LSO#413771

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Monique Sassi LSO# 63638L

Tel: 416.860.6886
msassi@cassels.com

Lawyers for the Monitor, FTI Consulting Canada Inc.

Appendix “E”

**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
TACORA RESOURCES INC.**

**AFFIDAVIT OF RYAN JACOBS
(Sworn July 19, 2024)**

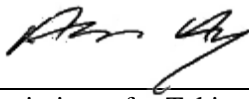
I, Ryan Jacobs, of the City of Toronto, in the Province of Ontario, MAKE OATH AND SAY:

1. I am a lawyer qualified to practice law in Ontario and a Partner¹ with Cassels Brock & Blackwell LLP (“**Cassels**”), counsel for FTI Consulting Canada Inc., in its capacity as the court-appointed monitor of Tacora Resources Inc. (the “**Applicant**”) in the Applicant’s proceedings under the *Companies' Creditors Arrangement Act* (in such capacity, the “**Monitor**”). As such, I have knowledge of the matters hereinafter to which I depose.
2. During the period from October 10, 2023 to July 7, 2024, Cassels incurred fees and disbursements, including HST, in the amount of \$4,675,224.56. Particulars of the work performed are contained in the invoices attached hereto and marked as **Exhibit “A”** to this affidavit. Certain of the invoices contain redactions to protect confidential and privileged information.
3. Attached hereto and marked as **Exhibit “B”** is a summary of the individuals whose services are reflected on the invoices, including year of call, billing rate, and a summary of the total fees and hours billed for each individual.
4. Attached hereto and marked as **Exhibit “C”** is a summary of the invoices in Exhibit “A”, including the total billable hours charged per invoice and the average hourly rate charged per invoice. The average hourly billed rate charged by Cassels is \$1,009.43.
5. To the best of my knowledge, the rates charged by Cassels are comparable to the rates charged for the provision of similar services by other legal firms in the Toronto market.

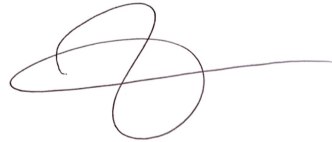
¹ My services are provided through a professional corporation.

6. This affidavit is sworn in support of a motion for, *inter alia*, approval of the fees and disbursements of counsel to the Monitor, and for no other or improper purpose.

AFFIRMED BEFORE ME by
videoconference on July 19, 2024 in
accordance with O.Reg. 431/20: Administering
Oath or Declaration Remotely. The deponent
was located in the City of Toronto in the
Province of Ontario and I was located in the
City of Toronto in the Province of Ontario



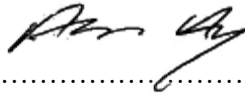
Commissioner for Taking Oaths



RYAN JACOBS

Commissioner Name: Alec Hoy
Law Society of Ontario Number: 85489K

This is Exhibit "A" referred to in the affidavit of Ryan Jacobs, affirmed before me by videoconference on July 19, 2024 in accordance with O.Reg. 431/20: Administering Oath or Declaration Remotely. The affiant was located in the City of Toronto in the Province of Ontario and I was located in the City of Toronto in the Province of Ontario



.....
A Commissioner For Taking Affidavits

Commissioner Name: Alec Hoy
Law Society of Ontario Number: 85489K

EXHIBIT "A"

**True Copies of the Invoices issued to the Monitor
for fees and disbursements incurred by
Cassels Brock & Blackwell LLP**

Cassels

Attn: Nigel Meakin
FTI Consulting Canada Inc.
Toronto-Dominion Centre, TD South Tower
79 Wellington St. W., Suite 2010
Toronto, ON M5K 1G8

Invoice No: 2215670
Date: October 26, 2023
Matter No.: 055118-00003
GST/HST No.: R121379572
Lawyer: Jacobs, Ryan
Tel.: (416) 860-6465
E-mail: RJacobs@cassels.com

Re: Tacora Restructuring

Fees for professional services rendered up to and including October 22, 2023

Our Fees	267,557.50
Disbursements	707.36
Total Fees and Disbursements	268,264.86
HST @ 13.00%	34,851.12
TOTAL DUE (CAD)	303,115.98

We are committed to protecting the environment.

Please provide your email address to payments@cassels.com to receive invoice and reminder statements electronically.

Payment due upon receipt. Please return remittance advice(s) with cheque.

REMITTANCE ADVICE: *Email payment details to payments@cassels.com*

CAD EFT and Wire:

Bank of Nova Scotia
44 King St. West,
Toronto, ON, M5H 1H1

Bank I.D.: 002
Transit No.: 47696
Account No.: 0073911
Swift Code: NOSCCATT
ABA No.: 026002532

Cheque Payments:

Cassels Brock & Blackwell LLP
Finance & Accounting (Receipts)
Suite 3200, Bay Adelaide Centre - North Tower
40 Temperance St., Toronto, ON, M5H 0B4 Canada

Online Bill Payments:

Vendor name is **Cassels Brock Blackwell LLP** and
you are required to enter the first six digits of the
matter #

Invoice No: 2215670
Matter No.: 055118-00003
Amount: **CAD 303,115.98**

e-Transfer Payments: payments@cassels.com

Credit Card Payments: payments.cassels.com

Cassels Brock Blackwell LLP | cassels.com

Suite 3200, Bay Adelaide Centre - North Tower, 40 Temperance Street, Toronto, ON M5H 0B4 Canada | t: 416 869 5300 | f: 416 360 8877

FEE DETAIL			
Date	Name	Description	Hours
Oct-10-23	J. Dietrich	Prepare for and attend initial hearing; follow up discussion regarding scheduling and examinations; review and exchange of email; review of endorsement and email regarding same; discussion with counsel to Ad Hoc Group and follow up regarding same;	6.90
Oct-10-23	M. Wunder	Confer with Cassels team regarding review of Cdn lien search results. Email to FTI regarding applicable provinces for security review. Confer with Cassels team regarding DIP loan terms and possible objections. Review DIP loan term sheet and consider implications related to AHG DIP.	5.90
Oct-10-23	M. Sassi	Call with J. Dietrich re: hearing; attend initial order hearing; calls and correspondence re: same; correspondence re: service list	4.50
Oct-10-23	K. Jamal	Review Tacora Resources Application Record;	0.30
Oct-10-23	J. Picone	Examine application record and factum of Tacora; correspondence and discussions with Alan Merskey regarding litigation issues; reviewing legal research regarding [REDACTED] correspondence in connection with the same; reviewing and considering case law;	2.90
Oct-10-23	A. Merskey	Review research regarding [REDACTED] [REDACTED] consider same. Preparation call with N. Meakin and team, prepare for and attend at initial order hearing, consider next steps. Follow up calls with Bennett Jones and team, work on motion issues.	8.50
Oct-10-23	R. Jacobs	Prep for and attend initial CCAA hearing. Meeting with Cassels team regarding [REDACTED] Discuss case law with A. Merskey. Attend meeting with Bennett Jones regarding litigation schedule. Correspondence with A. Taylor re strategy for comeback and stay extension. Correspondence with N. Meakin. Emails with M. Wunder regarding security review. Call with M. Wasserman (Osler) [REDACTED]	4.90
Oct-10-23	S. Fernandes	Commission Affidavit of Service of M. Sassi; conduct additional research re [REDACTED]	1.20
Oct-10-23	B. Woodman	Calls with M. Wunder to discuss security review and report;	0.40
Oct-10-23	S. Dreksler	Call with M Wunder to discuss security review;	0.60
Oct-11-23	M. Wunder	Work on security review. Emails to and from FTI regarding applicable provinces for review. Emails and call with potential Newfoundland counsel. Instructions to S Dreksler regarding lien search review. Confer with B Woodman regarding opinion for Ontario security interests and related lien filings.	2.80
Oct-11-23	A. Merskey	Video conferences and emails throughout the day regarding litigation schedule, comeback hearing, examination request and cashflows, attending to same.	7.80
Oct-11-23	M. Sassi	Correspondence re: court scheduling for hearing, SISP,	2.10

Date	Name	Description	Hours
Oct-11-23	J. Picone	order and endorsement; review same; correspondence re: service list and posting on Monitor website; Reviewing endorsement of Justice Kimmel and initial order; reviewing correspondence to the Monitor; reviewing correspondence to other counsel; internal discussions and correspondence relating to DIP litigation next steps and potential examinations;	2.50
Oct-11-23	S. Fernandes	Conduct additional research re privilege; summarize research;	2.10
Oct-11-23	J. Dietrich	Exchange of email; Discussion regarding questions from Ad Hoc Group; Discussion with A. Taylor; Email exchange with Commercial Court office; Review of correspondence and comment on same; Review of comments on SISP and Sales Process Order and email regarding same; Discussion with N. Meakin; Discussion with A. Taylor; Draft email regarding proposed scheduling call; Discussion with R. Jacobs; Discussion with A. Mersky regarding draft schedule; Review of email;	4.70
Oct-11-23	B. Woodman	Review of loan and security documents and preparation of security report;	0.50
Oct-11-23	R. Jacobs	Calls with S. Zweig, R. Chadwick and A. Taylor. Review and comment on latest draft of SISP and address comments from FTI. Meeting with FTI team regarding cash flow, stay extension and comeback hearing timing and issues, and response to AHG regarding examination. Brief review of correspondence from FTI. Comment on proposed litigation schedule. Review emails regarding court availability. Discussions with J. Dietrich regarding first report.	4.30
Oct-12-23	M. Wunder	Attend to matters for Ontario lien filing and security review and confer with Cassels team re same. Calls and emails regarding Newfoundland local counsel for security review. Begin review of search results.	2.70
Oct-12-23	J. Dietrich	Review of email and discussion regarding scheduling issues; discussion with N. Meakin; participate in call with counsel to Ad Hoc, Cargill and Company regarding schedule; follow up discussion regarding scheduling issues; review of email; review of SFPPN contract and related issues; review of email regarding schedule issues; discussion regarding case conference and outstanding issues;	4.90
Oct-12-23	M. Sassi	Review and comment on communications protocol; correspondence re: court time and timetable for litigation; attend to booking court time;	2.60
Oct-12-23	R. Jacobs	Discussions and meeting with client team, Company advisors regarding litigation schedule. Review and comment on draft stay extension order. Correspondence with J. Dietrich and A. Merskey regarding same. Negotiations with AHG counsel on litigation schedule. Attend all hands meetings regarding same. Call with R. Chadwick. Call with S. Zweig regarding inquiries of Monitor and written	4.10

Date	Name	Description	Hours
		interrogatories. Review terms of DIP. Prep for case conference and further discussions with Cassels team. Correspondence with M. Wunder regarding security review.	
Oct-12-23	J. Picone	Correspondence relating to proposed schedule; considering scope of potential examinations; considering litigation issues for come-back hearing; other correspondence;	0.80
Oct-12-23	B. Woodman	Review of security documents and due diligence searches, preparing security report and call with M. Wunder;	1.50
Oct-12-23	A. Merskey	Emails and conferences throughout the day with Monitor team, Stikeman, Bennett Jones, Goodmans, court office, regarding litigation timetable and scheduling, issues for hearing, stay extension and other related matters; working on same.	6.80
Oct-12-23	S. Dreksler	Review of corporate and lien searches; Draft search result summary; Review of and revisions to service list;	3.10
Oct-13-23	M. Wunder	Call with Newfoundland counsel to discuss engagement and security review. Review draft notice of objection from counsel for AHG and consider DIP specific arguments and responses for Tacora and Monitor. Confer with Cassels litigation team re same and litigation schedule.	2.40
Oct-13-23	M. Sassi	Correspondence re: court materials i.e. service list, SISP; order and endorsement re: stay extension.	2.20
Oct-13-23	J. Dietrich	Exchange of email regarding status; organize pre-case conference calls; attend case conference; follow up discussion regarding schedule and case conference; review of email and follow upon various payment amounts; participate in discussion with MP and FTI; review and follow up regarding email; review notice of motion from Ad Hoc Group and consider issues; review of SISP principles and comments on same;	4.60
Oct-13-23	A. Merskey	Prepare for and attend at case conference, numerous calls and emails in connection with same and next steps.	2.70
Oct-14-23	M. Sassi	Correspondence re: court materials; review and comment on draft affidavit and correspondence re: same	0.30
Oct-14-23	R. Jacobs	Attend various meetings with Company counsel, Cargill counsel and AHG counsel regarding litigation schedule for comeback relief. Attend case conference. Review final form of stay extension order. Review endorsement. Meetings regarding litigation schedule and negotiations on same. Review and comment on revised form of SISP. Review Javelin NDA received from BJs. Correspondence with J. Dietrich regarding same. Review witness list and correspondence regarding same.	5.10
Oct-14-23	R. Jacobs	Attend meeting with Cassels team Further revise and consider AHG notice of motion and relief. Consider CRO issue raised by AHG. Examine precedent and argument. Call with J. Dietrich regarding same. Call with A. Taylor. Emails regarding examinations and witnesses. Review and	4.30

Date	Name	Description	Hours
		comment on revised draft SISP. Review and comment on draft Greenhill information sharing protocol. Begin review of Company side affidavits for comeback hearing.	
Oct-14-23	J. Dietrich	Discussion with R. Jacobs regarding governance arguments; review of email regarding SISP; review of contract and invoice and consider; email exchange with articling student regarding case issues and supporting research; review of draft affidavits;	1.80
Oct-14-23	C. Gendron	Conduct research;	1.50
Oct-15-23	M. Wunder	Review responding motion record of Tacora and new Tacora affidavit in support of Cargill DIP. Emails with S Dreksler regarding pre-petition security review. Review and analyze DIP loan terms for AHG and Cargill	2.60
Oct-15-23	M. Sassi	Call re: comeback materials; correspondence and comment on same; service list and materials; Motion materials of AHG;	1.90
Oct-15-23	R. Jacobs	Attend meeting with Cassels team regarding draft affidavits. Review and respond to emails with Company advisors. Review and comment on draft affidavits. Correspondence with Cassels and FTI teams regarding same. Review and comment on Javelin NDA. Correspondence regarding same. Call with L. Nicholson. Examine case law regarding CRO issue. Review emails regarding witnesses and examinations. Review and comment on revised SISP and comments from Cargill counsel.	3.80
Oct-15-23	A. Merskey	Reviewing company affidavits, emails and call regarding same.	1.20
Oct-15-23	J. Dietrich	Discussion regarding comments on draft affidavits; review of comments on SISP; review of comments on NDA; review of email regarding examination issues; discussion with R. Jacobs;	3.40
Oct-16-23	M. Wunder	Emails with Newfoundland local counsel. Review draft local agent engagement letter and prepare mark up with comments and send commentary to Cassels team. Calls with advisors to discuss litigation process. Call with Osler to discuss NDA and SISP process. Review court filings for comeback hearing. Review Cdn search summaries and Cargill and AHG Agent lien filings.	2.70
Oct-16-23	J. Picone	Reviewing and considering supplementary application record; reviewing motion record of certain creditors; reviewing and considering extensive correspondence; discussions with Alan Merskey regarding scope of examinations and interrogatories; reviewing case law relating to pending motion;	3.50
Oct-16-23	A. Merskey	Examine supplementary application record, various emails regarding witness arrangements, emails and follow up on SISP.	1.70
Oct-16-23	J. Dietrich	Discussion regarding contract provisions; follow up	4.40

Date	Name	Description	Hours
		discussion with J. Porepa; review of email regarding NDA and SISP; review of email regarding outstanding matters; discussion with R. Jacobs; discussion regarding NDA provisions; discussion regarding SISP; email regarding KERP issues; discussion with J. Thorne, N. Meakin and J. Porepa; review of responding affidavit; review of messages regarding examinations;	
Oct-16-23	R. Jacobs	Call with N. Meakin regarding first report. Examine GH engagement letter. Correspondence with L. Nicholson. Attend meeting with Osler regarding Javelin NDA. Follow up with L. Nicholson regarding same. Attend meeting with Bennett Jones regarding SISP and SISP order. Review AHG motion record, responding evidence and proposed orders. Discuss same with J. Dietrich. Review examination notices and email correspondence from R. Swan regarding proposed examination schedule. Correspondence among Cassels team regarding comeback issues and reporting.	4.70
Oct-16-23	M. Sassi	Correspondence re: comeback hearing; correspondence with Monitor re: website; updates to service list and correspondence with company counsel re: same; correspondence re: KERP	1.70
Oct-17-23	M. Sassi	Review and comment on draft report; correspondence and calls re: same	4.30
Oct-17-23	J. Picone	Reviewing extensive correspondence regarding examinations; reviewing notices of examinations; discussions with Alan Merskey regarding scope of examinations; further review of motion record of the ad hoc group;	0.90
Oct-17-23	J. Dietrich	Review of email regarding payment issues; Discussion regarding comeback issues; Discussion regarding status of examinations and exchange of material; Review of draft report and provide comments on same; Review of comments on draft report and email regarding same; Review of email regarding examinations;	3.70
Oct-17-23	K. Jamal	Conduct research;	0.60
Oct-17-23	A. Merskey	Reviewing examination issues and schedules. Consider issues for interrogatories and Monitor report. Review draft monitor report. Numerous related calls and emails.	3.70
Oct-17-23	M. Wunder	Complete amendments to Newfoundland counsel engagement letter and send to Cox and Palmer and related emails. Review pre petition security with S Dreksler to compile mortgages and personal property security for review by NL agent. Review search summary and call with S Dreksler to provide comments. Emails regarding comeback hearing litigation. Review notice of objection from AHG.	2.50
Oct-18-23	J. Picone	Attending portions of examinations; reviewing correspondence and documents; discussions and correspondence relating to evidence arising from examinations;	1.50

Date	Name	Description	Hours
Oct-18-23	A. Merskey	Review draft first report, team discussion regarding same. Various emails regarding witness examinations, attending same and considering related issues.	10.30
Oct-18-23	K. Jamal	Review correspondence regarding examinations and corr re same;	0.40
Oct-18-23	J. Dietrich	Discussion regarding comments on draft report; Exchange of messages regarding examinations; Review of revised comments; Review of exchange regarding NDA: Observe portions of cross examination; Discussion regarding draft report; discussion regarding status of outstanding matters;	8.10
Oct-18-23	M. Sassi	Review and comment on report; call and correspondence re: same; call with Monitor re: website documents; correspondence re: service list.	2.70
Oct-18-23	R. Jacobs	Attend meeting with Cassels team regarding first report. Comment on revised draft of same. Attend examinations. Call with L. Nichols regarding DIP. Review written interrogatories received from AHG. Review revisions to Javelin NDA and correspondence regarding same. Examine law on CRO issue.	7.70
Oct-18-23	M. Wunder	Work on review for Ontario security review and for NL security. Work on local agent security opinion for NL counsel and review security re same. Corr with NL counsel on engagement letter. Email to FTI with local counsel engagement with explanatory comments. Consider terms of alternative DIP loans.	6.20
Oct-19-23	A. Merskey	Review interrogatories, various calls and emails regarding responses, preparing same. Attending on witness examinations throughout the day.	9.60
Oct-19-23	J. Dietrich	Review of written interrogatories and discussion regarding response to same; Attend portions of examinations; Review of NDA and comments on same; Review of email and address outstanding issues; Review of draft answers to interrogatories and discussion regarding same; Review of revised answers; Review of comments on draft answers; Review of update regarding examinations;	5.30
Oct-19-23	J. Picone	Preparing for and attending on a videoconference with the monitor to discuss various litigation matters; attending portions of various examinations in connection with pending motion; internal discussions with Ryan Jacobs and Alan Merskey regarding evidence arising from examinations; reviewing draft responses to written interrogatories; correspondence with the monitor;	3.80
Oct-19-23	K. Jamal	Assist with written interrogatories; Assist with compilation and production of correspondence; Review materials;	2.60
Oct-19-23	R. Jacobs	Attend portions of certain examinations. Review and comment on revised draft first report. Meeting with FTI and Cassels team regarding written interrogatories received from AHG. Review and comment on responses on written interrogatories. Review comments on draft report from	7.20

Date	Name	Description	Hours
		Stikeman. Review correspondence with counsel to Javelin and Stikeman regarding NDA and consider open issues. Review proposed email regarding hedges and EFC and discuss briefly with J. Dietrich.	
Oct-19-23	M. Wunder	Complete precedent local counsel opinion for NL local agent security opinion. Review executed security and send to NL counsel with explanatory comments for security review. Review revised NL search summary and send to NL counsel with explanatory comments for security review. Call with NL counsel to discuss NL security review including real property and mineral rights and lien filing. Prepare for and attend cross examinations for AHG group opposition motion.	5.80
Oct-19-23	M. Sassi	Correspondence re: interrogatories, transcripts and service list; review comments on report; call with Monitor re: report; court time;	1.20
Oct-20-23	J. Dietrich	Review of comments on draft report; Review of email regarding interrogatories; Discussion regarding status; Review of revised NDA; Discussion regarding comments on draft report; Discussion regarding insurance financing issues; Discussion with Ad Hoc Group counsel and follow up discussion regarding same; review of revised report and comments on same;	2.90
Oct-20-23	A. Merskey	Reviewing and revising interrogatories, related emails, attending to finalization of same. Emails regarding monitor report, reviewing same, related calls. Consider issues for comeback hearing, prepare for same.	6.30
Oct-20-23	R. Jacobs	Review evidence from examinations. Correspondence with litigation team regarding same. Review and comment on final draft of report and correspondence with FTI and company counsel regarding same. All correspondence with company advisors regarding Javelin NDA and access to info. Meeting with Osler, BJs, GLC and Monitor team. Consider issues raised by Bond Group Consortium. Call with A. Merskey regarding discussion with counsel for Cargill. Call with S. Zweig regarding KERP and DIP.	4.30
Oct-20-23	S. Fernandes	Review and comment on draft Report; review Appendices to Report; draft Service Email; coordinate and review draft Affidavit of Service; serve Report to Service List; swear Affidavit of Service; coordinate filing of Report and upload Report to Caselines;	1.10
Oct-20-23	J. Picone	Reviewing correspondence among counsel; reviewing transcripts of various examinations; internal discussion with Alan Merskey regarding preparation for come-back hearing and next steps;	1.80
Oct-20-23	K. Jamal	Assist with responses to written interrogatories;	1.20
Oct-20-23	M. Sassi	Correspondence re: report; filing and service of same; correspondence re: service list, transcripts and Monitor website;	2.30

Date	Name	Description	Hours
Oct-21-23	J. Dietrich	Discussion regarding data room issues and review of email;	0.60
Oct-21-23	R. Jacobs	Correspondence with Cassels team regarding factums, key issues for comeback hearing and Monitor positions on same. Review correspondence regarding Javelin.	1.90
Oct-21-23	S. Fernandes	Correspondence with Monitor re caselines;	0.10
Oct-22-23	J. Dietrich	Comments on data room email exchange; Discussion with R. Jacobs; Review of facta and discussion with R. Jacobs regarding same;	2.80
Oct-22-23	R. Jacobs	Correspondence with S. Zweig. Call with N. Meakin and J. Dietrich. Review emails from Company on confidentiality issues. Review and analysis of factums filed by the Applicant, Cargill and AHG. Call with J. Dietrich regarding issues in same. Review and respond to emails regarding Javelin confidential info access.	4.10
Oct-22-23	J. Picone	Reviewing and considering the factums of Cargill and the Ad Hoc Group for the comeback motion for an ARIO and the cross-motion of the Ad Hoc Group; reviewing and considering the factum of the company; correspondence in connection with the same; reviewing case law cited in argument; reviewing the first report of the monitor; further internal correspondence in connection with the same;	3.00

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Dietrich, Jane	Partner	54.10	945.00	51,124.50
Wunder, Michael	Partner	33.60	975.00	32,760.00
Merskey, Alan	Partner	58.60	935.00	54,791.00
Picone, John M.	Partner	20.70	895.00	18,526.50
Sassi, Monique	Partner	25.80	700.00	18,060.00
Jacobs, Ryan	Partner	56.40	1,500.00	84,600.00
Woodman, Bryan	Partner	2.40	700.00	1,680.00
Jamal, Kiyan	Associate	5.10	420.00	2,142.00
Fernandes, Stephanie	Associate	4.50	420.00	1,890.00
Dreksler, Simone	Associate	3.70	455.00	1,683.50
Gendron, Camély	Law Student	1.50	200.00	300.00
Total (CAD)		266.40		267,557.50

Our Fees 267,557.50
 HST @ 13.00% 34,782.47

TOTAL FEES & TAXES (CAD) 302,339.97

DISBURSEMENT SUMMARY

Non-Taxable Disbursements

Electronic Due Diligence	144.80
Certificate of Status	26.00
BC Registry Search	8.50
Total Non-Taxable Disbursements	<u>179.30</u>

Taxable Disbursements

Travel	37.06
Electronic Due Diligence	447.00
Certificate of Status	9.00
Search Summary	35.00
Total Taxable Disbursements	<u>528.06</u>
HST @ 13.00%	68.65
Total Taxable Disbursements & Taxes	<u>596.71</u>

TOTAL DISBURSEMENTS & TAXES (CAD) 776.01

TOTAL FEES 267,557.50
TOTAL DISBURSEMENTS 707.36
TOTAL TAXES 34,851.12
TOTAL FEES, DISBURSEMENTS & TAXES (CAD) 303,115.98

Cassels

Attn: Paul Bishop
FTI Consulting Canada Inc.
Toronto-Dominion Centre, TD South Tower
79 Wellington St. W., Suite 2010
Toronto, ON M5K 1G8

Invoice No: 2217756
Date: November 17, 2023
Matter No.: 055118-00003
GST/HST No.: R121379572
Lawyer: Jacobs, Ryan
Tel.: (416) 860-6465
E-mail: RJacobs@cassels.com

Re: Tacora Restructuring

Fees for professional services rendered up to and including October 31, 2023

Our Fees	171,312.00
Disbursements	75.44
Total Fees and Disbursements	171,387.44
HST @ 13.00%	22,278.46
TOTAL DUE (CAD)	193,665.90

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Invoice No: 2217756
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Amount: **CAD 193,665.90**

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Suite 3200, Bay Adelaide Centre - North Tower, 40 Temperance Street, Toronto, ON M5H 0B4 Canada | t: 416 869 5300 | f: 416 360 8877

FEE DETAIL			
Date	Name	Description	Hours
Oct-20-23	M. Wunder	Work on security review for pre petition security for Cargill and AHG. Emails with NL counsel and instructions regarding real property and mineral searches and lien searches. Review revised NL PPSA lien summary. Review and comments on draft Monitor report for comeback hearing and final DIP approval.	4.30
Oct-22-23	M. Wunder	Review court filings by AHG and Cargill regarding CCAA comeback hearing and DIP loan selection. Confer with Cassels team.	2.80
Oct-23-23	S. Fernandes	Correspondence re service; service of First Report;	0.40
Oct-23-23	J. Dietrich	Preparation for hearing; discussion with A. Merskey; discussion with FTI; review of proposed documentation; review of caselaw; participate in discussion with Ad Hoc counsel; discussion with FTI; follow up discussion with S. Zweig; discussion with N. MacParland;	7.20
Oct-23-23	A. Merskey	Review factums, various calls and emails regarding motion submissions and arguments, preparing for hearing.	8.70
Oct-23-23	J. Picone	Reviewing and considering reply factums; correspondence and discussions in connection with the same; reviewing case law relating to motion and cross-motion for ARIO;	2.70
Oct-23-23	R. Jacobs	Prep work for comeback hearing. Calls and correspondence with Stikeman, FTI, BJs, and Cassels teams. Review draft KERP proposal from BJs. Attend meeting with BJs, Osler and FTI teams regarding KERP and DIP. Correspondence with L. Nicholson and A. Taylor regarding [REDACTED] [REDACTED] Examine cases. Review reply facta. Discussion with Cassels team regarding issues raised in same.	5.10
Oct-23-23	K. Jamal	Review Reply Factums in connection with Comeback Hearing; Research law and issues in connection with party positions for comeback Hearing;	1.10
Oct-23-23	M. Sassi	Correspondence and review of documents filed and served; correspondence and calls re: service lit and additions; calls with Monitor and NFLD ministry re: workers insurance amounts; correspondence re: materials and preparation for hearing	4.90
Oct-23-23	M. Wunder	Continue work on security review and review documents for same. Review additional NL security documents and consider re security review. Call with advisors. Review court filings by counsel for Cargill and AHG.	3.70
Oct-24-23	J. Dietrich	Preparation for and attend hearing;	9.10
Oct-24-23	J. Picone	Assisting with preparation for ARIO hearing; internal discussions with Alan Merskey and Kiyam Jamal regarding ARIO hearing, litigation issues, and next steps;	1.40
Oct-24-23	A. Merskey	Prepare for and attend at comeback hearing. Consider next steps relating to same.	8.70
Oct-24-23	K. Jamal	Attend Comeback Hearing;	7.80

Date	Name	Description	Hours
Oct-24-23	M. Wunder	Prepare for and attend court hearing and consider submissions regarding DIP loan. Confer with Cassels team post hearing.	7.60
Oct-24-23	M. Sassi	Correspondence re: hearing details and materials for court etc; correspondence re: website; attending hearing re: comeback	5.50
Oct-25-23	M. Wunder	Preparation of Ontario security review for Monitor. Review Ontario search summary. Email to NL local agent regarding status of NL review.	2.20
Oct-25-23	R. Jacobs	Email correspondence with Cassels team regarding prep for contested hearing. Attend hearing. Correspondence with Stikeman. Correspondence with Bennett Jones regarding cash flow forecast. Correspondence with J. Dietrich regarding SISP and timeline.	6.70
Oct-25-23	R. Jacobs	Review revisions to [REDACTED] Correspondence with Cassels and FTI teams regarding same. Correspondence with Stikeman. Review correspondence from BJs regarding CFF. Correspondence with J. Dietrich regarding same. Review correspondence from N. Meakin and email chain regarding [REDACTED] Phone call with Bond Group Consortium counsel.	3.40
Oct-25-23	J. Picone	Discussion with Alan Merskey regarding litigation issues and next steps; reviewing correspondence;	0.70
Oct-25-23	J. Dietrich	Review of email and discussion with N. Meakin regarding same; review of insurance funding emails and discussion with counsel regarding same; follow up discussion with N. Meakin; review and exchange of email regarding diligence information and cash flow;	3.40
Oct-26-23	J. Picone	Review correspondence from [REDACTED] [REDACTED] reviewing and considering affidavit of Thomas Gray and attachments, including DIP loan agreement and other documents; internal discussions regarding same;	2.80
Oct-26-23	M. Wunder	[REDACTED] Confer with Cassels and FTI re same and next steps [REDACTED] Call with Tacora counsel and FTI regarding [REDACTED] [REDACTED] Review current Cargill DIP loan agreement [REDACTED] [REDACTED]	3.60
Oct-26-23	M. Sassi	Correspondence re revised AHG DIP and materials served;	1.60
Oct-26-23	R. Jacobs	Analysis of [REDACTED] Multiple discussions with FTI, Stikeman and GH teams; Attend meeting with Company advisors re preliminary analysis of [REDACTED] Strategy call with Cassels team re same; Correspond re case conference attendance; Review BJs Affidavit; Attend preparation call re case conference; Correspond with A. Merskey and FTI re Monitor positions;	4.10

Date	Name	Description	Hours
Oct-26-23	J. Dietrich	Review of correspondence and discussion regarding same; discussion regarding response to Bennett Jones; review of Maritime law issue; discussion regarding insurance funding; exchange of email regarding outstanding issues; further discussion regarding case conference and related matters; review of affidavit; review of draft order; discussion regarding strategy;	6.30
Oct-26-23	A. Merskey	Receive and review [REDACTED] consider related issues and attendance to numerous calls and emails throughout day regarding same.	5.10
Oct-27-23	M. Wunder	Calls and emails regarding NL advice for maritime law matters. Emails with C+P regarding NL lien searches and review. Attend advisor call to prepare for court conference. Attend court conference. Review AHG proposed DIP terms and analyze vs Cargill DIP. Post court conference call with advisors and Greenhill.	3.70
Oct-27-23	J. Dietrich	Review of email and discussion regarding case conference preparation; preparation for and attend case conference; follow up discussion regarding case conference; discussion regarding insurance funding; email exchange regarding maritime law issues; follow up discussion regarding outstanding matters; discussion with G. MacDonald and N. Meakin; review of email regarding [REDACTED] and discussion with R. Jacobs;	6.20
Oct-27-23	A. Merskey	Prepare for and attend at case conference, numerous emails and calls regarding same.	3.60
Oct-27-23	J. Picone	Further review of affidavit of Thomas Gray and attachments, including DIP loan agreement and other documents; internal discussions regarding the same; preparing for and attending at case conference; reviewing endorsement arising from the same;	2.70
Oct-27-23	R. Jacobs	Strategy meeting with FTI and the Company advisors regarding case conference. Attend case conference. Review and address correspondence from AHG and Bond Consortium Group advisors. Correspondence with Company counsel regarding same. Call and correspondence with A. Merskey and J. Dietrich regarding [REDACTED] Attend [REDACTED] meeting with Company and advisors. Correspondence with J. Dietrich regarding NL legal issue.	4.10
Oct-27-23	M. Sassi	Correspondence re: hearing and caselines; correspondence re: stay extension and materials re: same; correspondence with Monitor re: website;	1.50
Oct-28-23	J. Dietrich	Review of email and comments on same; email regarding maritime law issues;	0.80
Oct-28-23	R. Jacobs	Email and call with R. Chadwick. Follow up email to R. Chadwick and then Stikemans. Correspondence with FTI. Correspondence regarding SISP.	2.00
Oct-29-23	R. Jacobs	Correspondence with A. Merskey regarding update	0.80

Date	Name	Description	Hours
		correspondence with FTI [REDACTED]	
Oct-30-23	M. Wunder	Review and analyze DIP loan agreement submitted by AHG and consider terms against Cargill DIP terms. Review court endorsement for ARIO and Cargill DIP. Confer with NL local agent. Review and consider SISP terms.	3.40
Oct-30-23	J. Picone	Review and consider endorsement of Justice Kimmel arising from ARIO hearing; reviewing case law cited by Justice Kimmel; correspondence from Alan Merskey regarding the same and next steps; reviewing order of Justice Kimmel;	2.50
Oct-30-23	A. Merskey	Emails and follow up [REDACTED] Consider next steps regarding comeback hearing, following up on order and reasons, review same. Emails with [REDACTED]	2.30
Oct-30-23	M. Sassi	Correspondence with FTI team re: website materials; review order and endorsement;	0.70
Oct-30-23	R. Jacobs	Correspondence with A. Merskey regarding response to Bond Consortium counsel. Attend meeting with Cargill advisors regarding SISP. [REDACTED] Review detailed decision of Justice Kimmel. Correspondence with FTI and then Stikeman regarding same. Review revised draft of ARIO from Stikeman. Review DIP terms and necessary amendments.	4.20
Oct-30-23	J. Dietrich	Review of email; discussion regarding SISP with counsel to Cargill; review of endorsement and exchange of messages regarding same; review of revised draft order; discussion regarding status;	3.30
Oct-31-23	S. Fernandes	Prepare memo for FTI re SISP key dates and action items for Monitor; correspondence and discussions with M. Sassi re same;	2.60
Oct-31-23	J. Dietrich	Review of email; Discussion regarding sale process issues; Discussion with FTI regarding status; Review of email from M. Sassi;	1.90
Oct-31-23	A. Merskey	Emails regarding revised order, consider next steps.	0.50
Oct-31-23	R. Jacobs	Calls with P. Bishop. Examine SISP timeline and discuss key dates and Monitor action items with FTI and Cassels teams. [REDACTED]	1.50
Oct-31-23	M. Sassi	Review SISP; comment on draft memorandum for FTI; discussions with Cassels team re SISP issues and next steps, readiness initiatives, correspondence with FTI team.	4.90

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Picone, John M.	Partner	12.80	895.00	11,456.00
Dietrich, Jane	Partner	38.20	945.00	36,099.00

Name	Title	Hours	Rate	Amount
Merskey, Alan	Partner	28.90	935.00	27,021.50
Wunder, Michael	Partner	31.30	975.00	30,517.50
Jacobs, Ryan	Partner	31.90	1,500.00	47,850.00
Sassi, Monique	Partner	19.10	700.00	13,370.00
Fernandes, Stephanie	Associate	3.00	420.00	1,260.00
Jamal, Kiyam	Associate	8.90	420.00	3,738.00
Total (CAD)		174.10		171,312.00

Our Fees	171,312.00	
HST @ 13.00%	22,270.56	
TOTAL FEES & TAXES (CAD)		193,582.56

DISBURSEMENT SUMMARY

Non-Taxable Disbursements

Other	14.68
Total Non-Taxable Disbursements	14.68

Taxable Disbursements

Copies	31.50
Travel	29.26
Total Taxable Disbursements	60.76
HST @ 13.00%	7.90
Total Taxable Disbursements & Taxes	68.66

TOTAL DISBURSEMENTS & TAXES (CAD) 83.34

TOTAL FEES	171,312.00
TOTAL DISBURSEMENTS	75.44
TOTAL TAXES	22,278.46
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	193,665.90

Cassels

Attn: Paul Bishop
FTI Consulting Canada Inc.
Toronto-Dominion Centre, TD South Tower
79 Wellington St. W., Suite 2010
Toronto, ON M5K 1G8

Invoice No: 2222723
Date: December 29, 2023
Matter No.: 055118-00003
GST/HST No.: R121379572
Lawyer: Jacobs, Ryan
Tel.: (416) 860-6465
E-mail: RJacobs@cassels.com

Re: Tacora Restructuring

Fees for professional services rendered up to and including November 30, 2023

Our Fees	247,932.50
HST @ 13.00%	32,231.23
TOTAL DUE (CAD)	280,163.73

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FEE DETAIL			
Date	Name	Description	Hours
Oct-16-23	S. Dreksler	Revision to service list; Review of lien searches;	0.30
Oct-17-23	S. Dreksler	Call with M Wunder; Revisions to schedules to diligence report;	1.40
Nov-01-23	S. Fernandes	Review and revise memo to FTI re SISP;	0.30
Nov-01-23	M. Sassi	Correspondence re: SISP memo and email with FTI re same; review and comment on Notice of Solicitation;	1.90
Nov-01-23	M. Wunder	Begin review of NL summary of lien searches for real property and mineral rights. Email to NL counsel re same.	0.70
Nov-01-23	J. Dietrich	Review of outstanding matters and discussion regarding next steps; discussion with R. Jacobs; review of email; review of draft summary memo [REDACTED] and email regarding comments on same; discussion with J. Porepa; review of email and exchange of messages regarding comments on same;	2.80
Nov-01-23	R. Jacobs	Meeting with FTI team. Review emails regarding claims and payment issue. Call with S. Zweig. Discussions with P. Bishop. Discussions with J. Dietrich and related analysis. Analysis on case issue. Correspondence with Osler team. Review teaser for SISP. Call with GH regarding comments on same. Review SISP key dates memo and discuss Monitor requirements. Review and comment on draft SISP notice. Correspondence with Cassels team regarding [REDACTED]	3.40
Nov-02-23	M. Wunder	Review NL real property and mineral lien search results and call with Cox and Palmer re same. Work on Cassels security report. Confer with Cassels team regarding SISP process and next steps.	1.70
Nov-02-23	R. Jacobs	Review and comment on memo for FTI regarding SISP. Discuss with J. Dietrich and then emails with FTI. Review and comment on [REDACTED] and email correspondence with J. Dietrich regarding same. Examine emails. Review correspondence and advise FTI.	2.50
Nov-02-23	J. Dietrich	Exchange of email regarding comments on SISP memo; discussion with R. Jacobs; further email exchange regarding case issues; discussion with J. Porepa; review of email and respond to same;	1.50
Nov-02-23	M. Sassi	Review and comment on Notice of solicitation, calls and correspondence with Monitor re: ongoing matters;	1.20
Nov-03-23	R. Jacobs	Attend weekly meeting with Osler, BJs, FTI and Cassels teams. Post meeting debrief with FTI. Consider issues [REDACTED] examine DIP terms. Discussions with J. Dietrich regarding same. Email and then meeting with Stikeman team regarding update on same. Review and comment on latest CIP.	3.00
Nov-03-23	M. Sassi	Correspondence re: materials and website.	1.10
Nov-03-23	J. Dietrich	Discussion with Osler, BJ, FTI and Cassels teams; discussion with FTI and Cassels teams; review of email regarding CIP;	1.80

Date	Name	Description	Hours
Nov-04-23	R. Jacobs	discussion with Stikemans regarding status and outstanding issues; Correspondence with Stikeman team regarding issues on [REDACTED] Review background correspondence regarding same. [REDACTED] Review CIP and email correspondence with comments on same. Correspondence with FTI. Correspondence with J. Dietrich. [REDACTED] Discussions with Cassels team.	2.60
Nov-05-23	R. Jacobs	Review issues wrt [REDACTED] Attend meeting with Company advisors regarding same. [REDACTED] Review revised draft from Stikeman and comment on same. Email correspondence with FTI regarding CIP. Review latest draft.	2.70
Nov-05-23	J. Dietrich	Discussion regarding NDA terms and information sharing issues with advisors; [REDACTED]	0.80
Nov-06-23	S. Voudouris	Review, analysis and revisions to memorandum;	1.70
Nov-06-23	A. Merskey	Consider case next steps, update call with team, consider SISP and issues.	1.20
Nov-06-23	J. Picone	Meeting to review and discuss recent case developments; further discussion regarding preparation of legal research; reviewing legal research; correspondence with Alan Merskey regarding same; discussion with Alan Merskey regarding issues;	1.50
Nov-06-23	R. Jacobs	[REDACTED] Review latest draft of CIP and comments from FTI. Correspondence with J. Dietrich regarding same. Meeting with Cassels team regarding [REDACTED] Examine research. [REDACTED]	2.90
Nov-06-23	J. Dietrich	Exchange of email regarding outstanding issues; discussion with A. Merskey, J. Picone and R. Jacobs regarding [REDACTED] [REDACTED] review of email and exchange of messages;	1.30
Nov-06-23	M. Wunder	Review and consider DIP loan terms. Cassels team strategy and status meeting.	1.00
Nov-07-23	J. Picone	Reviewing, revising, and finalizing memorandum for FTI; videoconference to review and discuss the same; reviewing legal research relating to [REDACTED] internal discussion with Alan Merskey regarding the same; correspondence relating to next steps;	3.90
Nov-07-23	S. Voudouris	Review, analysis and revisions to memorandum and related research;	1.70
Nov-07-23	J. Dietrich	Review of email regarding provision of information; review of email; review of agenda from J. Porepa and email response to same; discussion with FTI regarding status and strategy; email exchange with G. Camelino; review of email; Discussion with J. Porepa; participate in daily update call;	3.20

Date	Name	Description	Hours
Nov-07-23	A. Merskey	follow up discussion with R. Jacobs; review of email; Call with FTI regarding updates and next steps; call with team regarding research; revising memo; related emails; [REDACTED]	3.10
Nov-07-23	R. Jacobs	Attend strategy meeting with FTI. Review latest draft CIP and related emails. [REDACTED] Participate in daily Company update meeting. Review detailed analysis on [REDACTED] and discussion regarding same.	3.00
Nov-07-23	M. Wunder	Review [REDACTED] meet with Cassels team and Tacora advisors [REDACTED]	1.40
Nov-07-23	K. Jamal	Discuss next steps and research regarding [REDACTED] Discuss research memo; Review key documents;	1.20
Nov-07-23	M. Sassi	Update call with FTI;	0.60
Nov-08-23	R. Jacobs	Review comments on CIP. Review latest draft CIP. Strategy meeting with FTI and Cassels teams regarding case issues. [REDACTED] Call with L. Nicholson. Advice to FTI regarding [REDACTED] Examine analysis on AHG DIP. Call with L. Nicholson. Correspondence regarding [REDACTED]	3.50
Nov-08-23	J. Picone	Reviewing case law. Discussions with Alan Merskey and correspondence relating to same; revising draft memo; reviewing agreements;	3.20
Nov-08-23	A. Merskey	Call with FTI regarding status update, SISP and DIP issues; review memo; consider next steps;	1.40
Nov-08-23	K. Jamal	Review jurisprudence; Review applicable CCAA provisions; Discuss research for memorandum;	3.10
Nov-08-23	J. Dietrich	Discussion with FTI regarding update from various discussions; review of email regarding parts exchange; discussion with R. Jacobs regarding response to [REDACTED] review and exchange of email regarding caterpillar lease; review of draft insurance motion and email regarding same; exchange of messages regarding update calls; discussion regarding CIP comments; participate in daily update call; follow up call with M. Sassi;	3.20
Nov-08-23	M. Wunder	Review Tacora NL draft security report. Prepare mark up and comments. Review DIP loan agreement and review reporting covenants and milestones.	1.70
Nov-08-23	M. Sassi	Correspondence re: CAT lease; review factors of true/finance lease and review materials re: same	1.80
Nov-09-23	M. Sassi	Correspondence re: CAT lease; update call with Monitor; review board materials;	1.20
Nov-09-23	J. Dietrich	Review of email regarding outstanding issues; Update call with FTI regarding outstanding matters; [REDACTED] [REDACTED] exchange of email regarding insurance motion; participate in update call; review of draft letter and consider same;	2.80

Date	Name	Description	Hours
Nov-09-23	S. Voudouris	Review, analysis and revisions to memorandum and related research;	4.70
Nov-09-23	J. Picone	Revising memorandum; discussions with Alan Merskey and Stephanie Voudouris; further review of case law; further review of agreements;	1.90
Nov-09-23	A. Merskey	Working on [REDACTED] update call with FTI; consider next steps.	1.20
Nov-10-23	M. Sassi	Correspondence re: Caterpillar lease	0.20
Nov-10-23	M. Wunder	Call with NL counsel to discuss results of security review and lien searches. Prepare mark up of NL security report.	1.60
Nov-10-23	J. Picone	Reviewing and considering [REDACTED] issues; reviewing correspondence from Lee Nicholson; discussion with Alan Merskey regarding same; further review of legal research;	2.80
Nov-10-23	S. Voudouris	Review, analysis and revisions to memorandum and related research;	1.80
Nov-10-23	K. Jamal	Conduct research;	0.70
Nov-10-23	A. Merskey	Review and consider [REDACTED] emails regarding communications with AHG; follow up on next steps; reviewing issues; review letter [REDACTED]	1.40
Nov-10-23	R. Jacobs	Review and comment on draft letter regarding [REDACTED] and call with J. Dietrich regarding same. Correspondence with FTI and Cassels teams regarding same. Correspondence with AHG advisors. Review comments on CIP. Update call with J. Dietrich regarding case status and threshold issues.	3.20
Nov-10-23	J. Dietrich	Review of comments on draft letter; discussion with R. Jacobs; exchange of email regarding caterpillar lease; review of email; review of email; exchange of message with J. Porepa; participate in daily update call; discussion with J. Porepa;	3.10
Nov-11-23	K. Jamal	[REDACTED]	0.40
Nov-11-23	R. Jacobs	Correspondence with J. Dietrich regarding [REDACTED] and analysis. Examine letter correspondence.	1.40
Nov-12-23	R. Jacobs	Continue work on case issue analysis and related research. Discussions with Cassels team regarding same.	1.50
Nov-12-23	J. Dietrich	Exchange of email with L. Nicholson;	0.20
Nov-12-23	J. Picone	Further analysis regarding case issues and related research;	1.50
Nov-12-23	K. Jamal	Examine jurisprudence for memo;	2.40
Nov-13-23	R. Jacobs	Review email correspondence from R. Chadwick regarding [REDACTED] Consider SH issues. Review emails from M. Wasserman. Correspondence with FTI. Further analysis regarding [REDACTED] Discussions with J. Dietrich regarding [REDACTED] Participate in daily update call with Company.	2.10
Nov-13-23	S. Voudouris	Review, analysis and revisions to memorandum;	3.70
Nov-13-23	J. Picone	Updates and follow up regarding SISP steps and process;	1.50

Date	Name	Description	Hours
		further consideration of issues; discussions with Alan Merskey regarding same;	
Nov-13-23	A. Merskey	Reviewing ██████████ and related emails. Working on case issues. Follow up on SISP matters.	1.70
Nov-13-23	K. Jamal	Draft memo;	3.90
Nov-13-23	J. Dietrich	Review of email; review of draft order; discussion with L. Nicholson; participate in update call;	1.30
Nov-13-23	M. Wunder	Correspondence with NL local agent regarding security and lien searches and results. Review summaries re same.	0.40
Nov-14-23	R. Jacobs	Strategy meetings with FTI and Cassels team. Attend meeting with Osler and BJs teams. Attend meeting with Cargill and Company teams. Analysis of issues. Meeting with Company regarding same and case issues. Attend meeting with GLC, Osler and BJs teams. Respond to inquiries from AHG advisors. Discussion with FTI and Cassels teams.	3.60
Nov-14-23	J. Picone	Reviewing documents relating to SISP; considering case law and legal research relating to related issues; correspondence with Alan Merskey regarding same;	1.90
Nov-14-23	K. Jamal	Finalize and circulate memo;	0.90
Nov-14-23	A. Merskey	Update call with FTI, reviewing issues and analysis. Emails regarding SISP, reviewing same.	2.20
Nov-14-23	J. Dietrich	Discussion with FTI, Osler and BJ; discussion with FTI regarding status update; exchange of messages regarding outstanding matters; review of SISP update; participate in discussion with Cargill and follow up discussion regarding same; participate in update call; discussion regarding ██████████ discussion regarding ██████████	6.10
Nov-14-23	S. Voudouris	Review, analysis and revisions to memorandum and related research;	0.70
Nov-14-23	M. Sassi	Update call; review proposal re: ██████████	1.10
Nov-14-23	M. Wunder	Multiple calls and emails regarding case status and next steps. Call with Goodmans, Cargill and Stikeman. Review and consider materials received.	2.40
Nov-15-23	J. Dietrich	Review of email regarding outstanding issues; attend call with company advisors regarding status; attend call with ██████████ and counsel; attend daily update call;	2.90
Nov-15-23	A. Merskey	Review and consider ██████████ and related emails. Follow up on ██████████ reviewing and working on analysis regarding same. Attend ██████████ call with Stikeman team.	1.70
Nov-15-23	M. Sassi	Correspondence re scheduling of insurance motion;	0.20
Nov-15-23	M. Wunder	Work on review of security and Ontario lien filings and NL security report and summaries. Prepare comments on NL report and correspondence to NL counsel. Call with Tacora, Stikeman, ██████████ and counsel and Monitor.	3.20
Nov-15-23	J. Picone	Further review of documents ██████████ considering case law and legal research; discussions with Alan Merskey	1.90

Date	Name	Description	Hours
		regarding same; [REDACTED]	
Nov-15-23	R. Jacobs	Continue review of Cargill proposal. Attend meeting with Osler and BJs teams. Attend all hands call with Company and advisors [REDACTED] Attend daily company update call. Call with L. Nicholson. Correspondence with AHG advisors. Strategy call with FTI team. Examine SISP terms and correspondence from Stikemans.	3.30
Nov-16-23	M. Sassi	Attend update call with client;	0.60
Nov-16-23	K. Jamal	Discuss subsequent draft of memorandum with Cassels team;	0.10
Nov-16-23	A. Merskey	Update call with FTI. Follow up on SISP issues, reviewing materials related to same. Consider issues.	2.20
Nov-16-23	J. Dietrich	Review of email; discussion with FTI regarding status;	0.70
Nov-16-23	R. Jacobs	Attend meeting with FTI team. Correspondence with L. Nicholson. Update correspondence with P. Bishop and J. Dietrich. Analysis regarding [REDACTED] [REDACTED]	2.20
Nov-17-23	M. Wunder	Correspondence with Cassels team. Review and analyze structuring. Review [REDACTED] reporting. Emails with NL counsel re security review.	1.10
Nov-17-23	J. Picone	Discussion with Alan Merskey regarding status of ongoing proceedings and next steps;	0.20
Nov-17-23	R. Jacobs	Email update with J, Dietrich regarding meeting with AHG advisors. Review [REDACTED] [REDACTED] Consider issues regarding same. Correspondence with Company advisors. Correspondence with AHG counsel. Review comments from Company [REDACTED] Correspondence with FTI and J. Dietrich. Correspondence with L. Nicholson. [REDACTED] [REDACTED] [REDACTED] Email correspondence with J. Dietrich regarding daily update call.	2.60
Nov-17-23	J. Dietrich	Discussion with Ad Hoc Group advisors; review of email; attend daily update call;	1.70
Nov-19-23	R. Jacobs	[REDACTED] [REDACTED] Examine latest research and draft memo. [REDACTED]	1.50
Nov-20-23	K. Jamal	Analyze jurisprudence and related research;	1.00
Nov-20-23	M. Sassi	Correspondence re: meeting agenda; correspondence re: independent director agreement	0.60
Nov-20-23	J. Dietrich	Discussion with R. Jacobs; review of email; discussion with M. Sassi; participate in daily update call; review of email regarding [REDACTED] review of draft director engagement letter and provide comments; discussion with R. Jacobs;	1.60

Date	Name	Description	Hours
Nov-20-23	R. Jacobs	Attend daily update call with the Company. Discussions with J. Dietrich. Email correspondence with L. Nicholson. Review and comment on draft engagement letter [REDACTED] [REDACTED] Review letter for [REDACTED] Review ARIO [REDACTED] Correspondence with J. Dietrich.	2.80
Nov-20-23	A. Merskey	Reviewing court filings, emails re [REDACTED] follow up on SISF issues.	0.60
Nov-20-23	M. Wunder	Prepare for status call with Tacora, Monitor and counsel. Email to NL counsel regarding security review.	1.80
Nov-21-23	M. Wunder	Attend call with Tacora, Stikeman, Monitor and counsel for Cargill. Review and consider revised NL security opinion.	1.80
Nov-21-23	R. Jacobs	Attend meeting with FTI and Cassels teams regarding case issues. Review [REDACTED] Advice to FTI. Update call with L. Nicholson. Attend daily update call with Company. Consider comments [REDACTED] Correspondence with FTI and Stikeman team regarding same. Review brief regarding motion for 11/23.	3.00
Nov-21-23	M. Sassi	Update call; correspondence re: insurance motion.	0.60
Nov-21-23	J. Bellissimo	Call with J Dietrich re [REDACTED]	0.40
Nov-21-23	A. Merskey	Update call with FTI. Consider follow up issues and steps.	0.50
Nov-21-23	J. Dietrich	Discussion regarding amounts owing; review of email; review of mining lease and related issues; review of email; discussion with FTI regarding status; review of aide memoir regarding insurance financing and email regarding same; discussion regarding outstanding matters; review of email; attend daily update call;	3.10
Nov-22-23	M. Wunder	Review revised NL security report and emails with NL agent. Attend status call and discuss action items. Review and consider DIP loan matters;	1.60
Nov-22-23	K. Jamal	Research; Revise draft memo;	3.50
Nov-22-23	J. Dietrich	Discussion regarding outstanding matters with FTI and Stikeman; discussion with S. Zweig;	1.10
Nov-22-23	A. Merskey	Follow up on various proceeding steps. Emails regarding lien analysis.	0.30
Nov-22-23	M. Sassi	Correspondence re: updates to service list	0.40
Nov-22-23	R. Jacobs	Review draft process letter from GH. Correspondence and call with S. Zweig. Attend update meeting with Stikeman, FTI and Cassels teams. Correspondence regarding court attendance.	2.50
Nov-23-23	M. Wunder	Calls re status and next steps. Review and consider terms of proposal and consider terms. Review NL security with NL counsel for security review.	1.80
Nov-23-23	K. Jamal	Research; Revise draft memo;	1.10
Nov-23-23	J. Dietrich	Review of email; attend scheduling case conference; attend update call with FTI; review of comments on draft solicitation process letter and related emails regarding same;	2.00

Date	Name	Description	Hours
Nov-23-23	A. Merskey	Update call with FTI. Consider related issues.	0.50
Nov-23-23	R. Jacobs	Meeting with FTI. Correspondence and then call with Stikeman team regarding bid and SISP. Review and comment on GH draft SISP process letter. Update call regarding court attendance and next steps. Review SISP process update.	2.90
Nov-23-23	M. Sassi	Call with Monitor; correspondence and comment on Greenhill letter.	2.50
Nov-24-23	J. Dietrich	Participate in update call with Ad Hoc representatives; review of email regarding tax issues; review of draft correspondence to mining rights holder and comment on same; review additional comments on bid process letter; review of email [REDACTED] regarding outstanding matters;	3.30
Nov-24-23	R. Jacobs	Meeting with Bond Consortium counsel. Call with Stikeman team. Consider issues raised by Bond Consortium counsel and discussions with FTI and Cassels teams. Correspondence with S. Zweig. Review SISP terms.	2.40
Nov-24-23	M. Sassi	Drafting letter re: Wabash lease; correspondence re: SISP.	0.90
Nov-25-23	R. Jacobs	Review email correspondence from L. Nicholson regarding pre-filing payments. Consider same, review order. Correspondence with Cassels team regarding SISP matters.	1.20
Nov-25-23	J. Dietrich	Review of email regarding union issues;	0.30
Nov-26-23	M. Wunder	Email summary to Cassels team re results of NL security review. Review Ontario corporate and search summary.	1.40
Nov-27-23	M. Wunder	Attend on advisors call. Prepare draft Ontario security report for Monitor.	1.70
Nov-27-23	J. Dietrich	Review of comments on draft correspondence; review and exchange of email; review of email regarding security review; participate in update discussion with company counsel and FTI; review of draft correspondence; review of email regarding MTM issues; exchange of messages with R. Jacobs regarding status;	1.60
Nov-27-23	R. Jacobs	Attend update call with FTI and Stikeman teams. Examine security review report and correspondence with M. Wunder regarding same. Review and comment on letter from Stikeman [REDACTED] Call and correspondence with L. Nicholson regarding same. Attend daily update call. Correspondence regarding timing. Consider SISP issues.	3.00
Nov-27-23	M. Sassi	Correspondence re: Wabush responding letter; review and comment on Cargill proposal response letter.	0.70
Nov-28-23	M. Wunder	Call with Cassels team to discuss results of security review. Email to Stikeman with questions regarding security review and NL owned real property. Review correspondence from Stikeman to Tacora's NL counsel. Review correspondence regarding [REDACTED] Attend update call	1.90
Nov-28-23	K. Jamal	Finalize memorandum;	0.70

Date	Name	Description	Hours
Nov-28-23	A. Merskey	Review response letter to Cargill, ██████████ attend on update call with FTI and review outstanding matters.	0.70
Nov-28-23	J. Dietrich	Review of email; consider outstanding issues; exchange of messages with M. Sassi; discussion regarding security review; participate in update discussion; review of email; participate in update call; review of termination letter and related email;	2.00
Nov-28-23	R. Jacobs	Attend update meeting with FTI team. Review revised draft of letter regarding bid. Correspondence regarding timing. Attend daily update meeting with Company. Review SISP update from Greenhill. ██████████ ██████████ and discussions with Cassels team regarding same.	2.10
Nov-28-23	M. Sassi	Attend update call;	0.90
Nov-29-23	R. Jacobs	Correspondence regarding bids. Review LOIs. Brief discussion with J. Dietrich regarding same. Attend daily update meeting with Company and advisors.	1.70
Nov-29-23	J. Dietrich	Review of revised correspondence; review of LOI; review of KERP issues; discussion with J. Porepa; review of email regarding NL property; review of email regarding comments on correspondence; exchange of messages regarding correspondence; participate in daily update call; review of draft report and provide comments on same;	2.90
Nov-29-23	M. Sassi	Correspondence re: Wabush lease;	0.50
Nov-30-23	J. Dietrich	Review of email; participate in update call; review of documents; discussion with M. Wunder regarding security review; participate in daily update call;	1.70
Nov-30-23	R. Jacobs	Meeting with FTI and Cassels teams. Review update correspondence. Attend daily update meeting with Company and advisors. Examine SISP terms.	1.50
Nov-30-23	M. Sassi	Agenda and update call re: CCAA matters.	0.60
Nov-30-23	M. Wunder	Call with J Dietrich to discuss information from Tacora NL counsel regarding owned residential properties. Attend on status call. Review BNS vehicle financing agreements with Tacora and email to Stikeman regarding security review for same and additional requested documents.	1.40

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Wunder, Michael	Partner	28.60	975.00	27,885.00
Dietrich, Jane	Partner	53.00	945.00	50,085.00
Jacobs, Ryan	Partner	68.10	1,500.00	102,150.00
Sassi, Monique	Partner	17.60	700.00	12,320.00
Picone, John M.	Partner	20.30	895.00	18,168.50
Merskey, Alan	Partner	18.70	935.00	17,484.50

Name	Title	Hours	Rate	Amount
Voudouris, Stephanie	Partner	14.30	740.00	10,582.00
Bellissimo, Joseph J.	Partner	0.40	945.00	378.00
Fernandes, Stephanie	Associate	0.30	420.00	126.00
Jamal, Kiyan	Associate	19.00	420.00	7,980.00
Dreksler, Simone	Associate	1.70	455.00	773.50
Total (CAD)		242.00		247,932.50

Our Fees	247,932.50
HST @ 13.00%	32,231.23
TOTAL FEES & TAXES (CAD)	280,163.73

TOTAL FEES	247,932.50
TOTAL TAXES	32,231.23
TOTAL FEES & TAXES (CAD)	280,163.73

Cassels

Attn: Paul Bishop
FTI Consulting Canada Inc.
Toronto-Dominion Centre, TD South Tower
79 Wellington St. W., Suite 2010
Toronto, ON M5K 1G8

Invoice No: 2226662
Date: December 31, 2023
Matter No.: 055118-00003
GST/HST No.: R121379572
Lawyer: Jacobs, Ryan
Tel.: (416) 860-6465
E-mail: RJacobs@cassels.com

Re: Tacora Restructuring

Fees for professional services rendered up to and including December 31, 2023

Our Fees	300,391.50
HST @ 13.00%	39,050.90
TOTAL DUE (CAD)	339,442.40

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Amount: **CAD 339,442.40**

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FEE DETAIL			
Date	Name	Description	Hours
Dec-01-23	M. Sassi	Correspondence regarding service list updates.	0.30
Dec-01-23	R. Jacobs	Review and analysis of phase 1 bids. Discussion with Cassels team. Discussion with FTI. Attend meeting with Company and advisors regarding LOIs.	3.20
Dec-01-23	A. Merskey	Emails regarding [REDACTED]	0.30
Dec-01-23	J. Dietrich	Review of email; review of LOIs and discussion regarding same; discussion with J. Porepa regarding [REDACTED] participate in call with Ad Hoc advisors;	3.30
Dec-01-23	M. Wunder	Review updates for security review from NL. Revise Cassels report. Prepare revised text for C+P report regarding residential properties. Email from Stikeman with request for review of [REDACTED]	1.70
Dec-02-23	R. Jacobs	Further review of LOI and consider issues.	1.30
Dec-03-23	R. Jacobs	Correspondence regarding LOIs.	0.90
Dec-04-23	M. Wunder	Calls and emails with FTI and Cassels team. Emails with J Dietrich. [REDACTED]	2.40
Dec-04-23	R. Jacobs	Attend meeting with Stikeman and FTI teams regarding [REDACTED] Consider email from P. Bishop regarding [REDACTED] advise FTI on same. Call with A. Taylor. Attend meeting with Company and advisors [REDACTED]	3.00
Dec-04-23	J. Dietrich	Review of email and open items; consider structure issues; participate in update call and consider follow up issues; discussion with [REDACTED] review and respond to email; participate in update call and discussion regarding [REDACTED]	4.30
Dec-04-23	M. Sassi	Correspondence re: [REDACTED] and update call Agenda;	1.20
Dec-05-23	M. Sassi	Correspondence re: service list and JSM Electrical	0.90
Dec-05-23	M. Wunder	Confer with Cassels team regarding [REDACTED] Review LOI and consider structure. [REDACTED] re same and send email with summary.	1.80
Dec-05-23	J. Dietrich	Review of agenda and related emails regarding hearing; attend update call; discussion with J. Porepa; review of supplier letter issue and discussion with same; attend insurance financing hearing; attend board meeting; discussion regarding indenture provisions and related issues;	3.60
Dec-05-23	J. Picone	Reviewing and considering motion materials for motion by First Insurance Funding of Canada Inc.;	0.50
Dec-05-23	R. Jacobs	Meeting with FTI and Cassels team regarding case issues, SISP. Review latest draft [REDACTED] Consider issues with [REDACTED] Correspondence with [REDACTED] Examine [REDACTED] and discussion with [REDACTED]	2.90

Date	Name	Description	Hours
		M. Wunder and J. Dietrich regarding ██████████ Emails with A. Taylor regarding counsel for directors, examine DIP terms regarding same.	
Dec-05-23	M. Sassi	Update call; correspondence re: bids, website and ongoing matters; comment on employment matter	1.10
Dec-06-23	M. Sassi	Correspondence re: service list and SISP matters.	0.50
Dec-06-23	R. Jacobs	Attend meeting with FTI team regarding case status, updates. Attend to emails from P. Bishop. Attend meeting with AHG advisors. Attend daily update meeting with ██████████ Company regarding bids, issues and next steps. ██████████ ██████████ Review ██████████ and discussion with M. Wunder and J. Dietrich regarding same.	3.10
Dec-06-23	M. Wunder	Prepare and send overview report to FTI with Newfoundland and Ontario security reports and search summaries. Revise reports and correspondence re same. Review and consider ██████████ ██████████ and email update to Cassels team.	2.40
Dec-06-23	J. Dietrich	Review of email exchange; participate in daily update call; discussion with Ad Hoc advisors and FTI; discussion with advisors and Cargil; review of email;	2.50
Dec-07-23	R. Jacobs	Attend calls with GH team and bidders. Attend daily update call. Examine ██████████ issues, ██████████ Discussions with J. Dietrich regarding same.	2.70
Dec-07-23	J. Dietrich	Review of research; participate in call with Ad Hoc and advisors; review of email and consider same; review of research; participate in update call; review of email;	2.40
Dec-07-23	M. Wunder	Confer with Cassels team regarding ██████████ ██████████ Revise and consider ██████████ Review SISP regarding next stage action items.	2.10
Dec-08-23	M. Sassi	Correspondence re: indenture documents.	0.10
Dec-08-23	J. Dietrich	Review of email; discussion with R. Jacobs; discussion with A. Taylor and R. Jacobs; review of email; discussion regarding terms; review and exchange of email regarding open issues; discussion regarding status; participate in daily update call; review of email and exchange of messages regarding information requests;	2.80
Dec-08-23	R. Jacobs	Attend update calls on SISP. Review emails from Greenhill team regarding same. Emails with FTI regarding advice on same. Review and consider email from A. Taylor. Correspondence with J. Dietrich regarding same. Attend daily update call. Consider ██████████ ██████████ ██████████ Review case law.	2.90
Dec-09-23	J. Dietrich	Review of ██████████ and consider same; email to R. Jacobs;	0.40
Dec-10-23	M. Sassi	Correspondence re: indenture and third supplement	0.30
Dec-11-23	M. Wunder	Review note indenture and security. Research regarding	1.30

Date	Name	Description	Hours
Dec-11-23	R. Jacobs	<p>[REDACTED]</p> <p>Review and respond to email from A. Taylor. Consider draft letter to Cargill. Discuss briefly with J. Dietrich. Examine [REDACTED]</p> <p>Attend meeting with FTI and Stikeman teams [REDACTED]</p> <p>[REDACTED] Attend daily update call with Company. Review emails regarding SISP updates.</p>	3.00
Dec-11-23	J. Dietrich	<p>Review of email; review of email and related issues; discussion with FTI and Stikeman regarding open issues; review of draft correspondence; attend update call; review of correspondence; review of email regarding cash flow and related issues;</p>	2.60
Dec-12-23	M. Wunder	<p>Status call and discuss [REDACTED]</p> <p>[REDACTED]</p>	1.30
Dec-12-23	J. Dietrich	<p>Review of email; review of contracts; discussion regarding outstanding matters; discussion regarding Port contracts and related issues; participate in daily update discussion; follow up with Stikemans and FTI regarding outstanding issues;</p>	4.30
Dec-12-23	R. Jacobs	<p>Meeting with FTI team. Correspondence with S. Zweig. Correspondence with M. Wasserman. [REDACTED]</p> <p>[REDACTED] Review research. Correspondence with Cassels team regarding same. Attend meeting with Company and advisors. Attend case strategy meeting with Stikeman team.</p>	2.90
Dec-12-23	M. Sassi	<p>Attend update call on case issues with Cassels and FTI teams.</p>	0.50
Dec-13-23	J. Dietrich	<p>Review of email and comment on same; discussion with R. Jacobs and email exchange with A. Merskey; review of email; discussion regarding draft memo; initial review of revised memo; discussion with [REDACTED] regarding [REDACTED] and status; participate in daily update call; review of correspondence;</p>	4.20
Dec-13-23	M. Wunder	<p>Emails regarding [REDACTED] and issues. Consider same.</p>	0.50
Dec-13-23	M. Wunder	<p>Meeting with Stikeman, Bennett Jones, Osler and FTI teams regarding [REDACTED] Review [REDACTED] [REDACTED] and discuss with Cassels team. Status call with Stikeman and Monitor and Cassels.</p>	2.20
Dec-13-23	S. Voudouris	<p>Review, analysis and revisions to memorandum for FTI and related research;</p>	0.70
Dec-13-23	A. Merskey	<p>Meet with team regarding SISP issues, working on analysis regarding same, related emails.</p>	1.70
Dec-13-23	R. Jacobs	<p>Calls and correspondence with Stikeman, FTI and Cassels teams. Attend meeting with AHG advisors. Attend daily update meeting with Company. Meeting with J. Dietrich and A. Merskey regarding issues, research and related prep. Consider case authority and memo regarding same.</p>	3.10

Date	Name	Description	Hours
Dec-14-23	R. Jacobs	Consider SISP issues and potential outcomes. Review emails and advise regarding hedging matters. Meeting with FTI and Cassels teams. Meeting with A. Merskey and J. Dietrich regarding bid issue and memorandum. Review and comment on same. Begin review of Company analysis. Update call with J. Dietrich regarding Board meeting. Strategic planning regarding [REDACTED] and emails with FTI team regarding same. Discussions with Cassels lit team regarding same.	3.30
Dec-14-23	M. Wunder	Attend strategy call with FTI and Cassels teams. Review [REDACTED]	1.30
Dec-14-23	S. Voudouris	Review, analysis and revisions to memorandum for FTI and related research;	3.70
Dec-14-23	J. Dietrich	Discussion with FTI regarding outstanding issues; mark up of draft memo and email regarding same; review of correspondence and claim; review of agreement; discussion regarding research memo; participate in board call; participate in discussion with [REDACTED]	5.00
Dec-14-23	K. Jamal	Discuss research with respect to agreements; Reviewing authorities;	1.90
Dec-14-23	J. Picone	Discussions and correspondence relating to bid and agreement issues; reviewing correspondence from other counsel regarding the same; reviewing legal memoranda and case law in connection with the same and related issues;	1.50
Dec-14-23	M. Sassi	Correspondence re: Agenda and update call; correspondence re: dataroom; call re: memo; review dataroom and correspondence re same;	3.00
Dec-14-23	C. Wong	Reviewing data room and documents;	0.90
Dec-14-23	A. Merskey	Attend status call with FTI and Cassels team. Analysis of issues related to SISP.	3.60
Dec-15-23	K. Jamal	Research jurisprudence related to [REDACTED] Summarize findings;	3.80
Dec-15-23	M. Sassi	Correspondence and review of diligence materials and key documents and agreements; correspondence with Cassels team re same;	1.10
Dec-15-23	J. Picone	Discussions with Alan Merskey and Stephanie Voudouris regarding [REDACTED] correspondence in connection with same;	0.50
Dec-15-23	C. Wong	Reviewing dataroom materials and diligence same;	0.70
Dec-15-23	R. Jacobs	Call with noteholder counsel. Consider [REDACTED] Emails with Stikeman team [REDACTED] Review [REDACTED] and discussion with A. Merskey regarding [REDACTED] Attend daily update meeting with Company. Examine SISP updates. Correspondence with FTI team.	3.50
Dec-15-23	M. Wunder	Call with FTI and Cassels teams to discuss SISP status and	0.80

Date	Name	Description	Hours
		action items.	
Dec-15-23	S. Voudouris	Review, analysis and revisions to memorandum for FTI and related research;	5.70
Dec-15-23	A. Merskey	Working on SISP issues and analysis. Calls and emails with FTI and Cassels teams regarding same.	3.70
Dec-15-23	J. Dietrich	Review of memo [REDACTED] review of email related to same;	0.70
Dec-16-23	M. Wunder	[REDACTED]	1.20
Dec-16-23	S. Voudouris	Review, analysis and revisions to memorandum for FTI and related research;	4.70
Dec-17-23	S. Voudouris	Review, analysis and revisions to memorandum regarding [REDACTED] and related research;	4.20
Dec-17-23	M. Sassi	Correspondence with Monitor re: claims	0.30
Dec-17-23	R. Jacobs	Review and revise [REDACTED] Correspondence with J. Dietrich regarding same. Email to Stikeman team regarding same. [REDACTED]	2.80
Dec-17-23	J. Dietrich	Review of [REDACTED] review of revisions and consider; exchange of messages;	0.30
Dec-17-23	M. Wunder	Emails with Cassels specialists regarding due diligence review and disclosure schedules. Review Cdn real estate updates.	0.80
Dec-18-23	M. Sassi	Responding letter re: Champion and correspondence re: same; correspondence with litigation team on memo and supporting documents in dataroom	2.20
Dec-18-23	C. Wong	Reviewing data room and diligence same.	0.40
Dec-18-23	S. Voudouris	Review, analysis and revisions to memorandum for FTI and related research;	5.20
Dec-18-23	M. Wunder	Call with Stikeman, FTI and Cassels to discuss [REDACTED] and analysis. [REDACTED]	1.00
Dec-18-23	A. Merskey	Working on SISP issues and analysis, various coordination calls and emails. Receive and commence review of [REDACTED]	6.30
Dec-18-23	J. Dietrich	Review of agenda and exchange of email; discussion with R. Jacobs; discussion with Stikemans and counsel to Caterpillar; participate in update call with FTI, Stikeman and Cassels; review of revised memo; review of case law; attend update call;	4.00
Dec-18-23	R. Jacobs	Attend case strategy meeting with FTI, Stikeman teams. Examine related follow up items. Attend daily update meeting with management team, advisors. Begin detailed review of [REDACTED] Correspondence with Cassels team regarding same. Correspondence with FTI.	4.00
Dec-18-23	K. Jamal	Work on and finalize memoranda for FTI; Assist with caselaw research;	6.20
Dec-18-23	J. Picone	Reviewing and revising memorandum for FTI; discussions	1.20

Date	Name	Description	Hours
		and correspondence with Cassels team in connection with same; reviewing case law in connection with same;	
Dec-19-23	M. Sassi	Prepare agenda, attend update call with FTI; review draft letters; correspondence re: Champion responding letter; review research memoranda;	4.20
Dec-19-23	J. Picone	Attend videoconference to review and discuss [REDACTED] reviewing documents and correspondence in connection with same;	0.50
Dec-19-23	K. Jamal	Review correspondence regarding [REDACTED] Assist with finalization of memorandum;	0.20
Dec-19-23	N. Levine	Research regarding [REDACTED]	0.50
Dec-19-23	J. Dietrich	Review of email; review of case law and draft memo and consider issues; discussion with FTI regarding status; discussion with litigation group [REDACTED] review of [REDACTED] discussion with J. Roy and C. Ground regarding [REDACTED] review of draft order provisions and consider same; review additional research memo from A. Merskey; attend brief update call;	6.90
Dec-19-23	A. Merskey	Working on SISP analysis, various emails and calls regarding same. Update call with FTI.	4.30
Dec-19-23	R. Jacobs	Review and analysis of [REDACTED] Correspondence and calls [REDACTED] regarding same. Meeting with FTI and Cassels team. Attend daily update meeting with Company advisors. Correspondence with A. Taylor. Review [REDACTED] memo and [REDACTED] for FTI. Analysis of law. Emails with counsel to Cargill.	5.90
Dec-19-23	C. Ground	Preparation for and participation in call with Cassels team [REDACTED] begin review of [REDACTED]	1.70
Dec-19-23	M. Wunder	Review [REDACTED] Consider and analyze [REDACTED] structure. Correspondence with FTI and Stikeman re same and review process. Status meeting with Stikeman, Monitor and Cassels. Review memo for FTI.	3.30
Dec-20-23	M. Sassi	Review letter re: [REDACTED] and prepare comments on same; Correspondence with M. Wunder re DIP agreement;	2.50
Dec-20-23	C. Wong	Diligence existing key agreements to support research.;	0.40
Dec-20-23	J. Dietrich	Review of [REDACTED] documents; consider potential [REDACTED] discussion with R. Jacobs regarding status; discussion regarding initial review of [REDACTED] email exchange with Stikeman; review of email regarding open items; participate in discussion with counsel to Cargill; participate in daily update call; exchange of email regarding status;	5.00
Dec-20-23	K. Jamal	Assist with finalizing memoranda for FTI;	0.40
Dec-20-23	N. Levine	Conduct and review research; meetings with Cassels team	0.90

Date	Name	Description	Hours
		re same;	
Dec-20-23	A. Merskey	Working on SISP analysis. Coordination calls with team regarding same. Emails regarding court scheduling.	2.60
Dec-20-23	C. Ground	Reviewing [REDACTED] and related [REDACTED] and participation in call with Cassels team to discuss same;	4.10
Dec-20-23	J. Roy	Review documents relating to [REDACTED] discussions with Cassels team re same;	4.00
Dec-20-23	M. Wunder	Review draft [REDACTED] and meet with Cassels team to discuss. Emails regarding DIP.	3.30
Dec-20-23	R. Jacobs	Analysis on [REDACTED] issues. Work on memo for FTI. Strategy meetings regarding same. Review and comment on [REDACTED] Analysis of issues [REDACTED] Attend meeting with Goodmans. Emails with Stikeman team. Attend daily update meeting with Company.	4.00
Dec-20-23	S. Voudouris	Review, analysis and revisions to memorandum for FTI and related research;	6.20
Dec-21-23	C. Ground	Review and comment on [REDACTED] preparation for and participation in call with Cassels team to discuss issues and issues list for Tacora advisors;	4.50
Dec-21-23	M. Wunder	Continue review of [REDACTED] and issues. Emails with Cassels team. Meeting to prepare issues list. Review DIP docs.	2.60
Dec-21-23	J. Roy	Continue review of [REDACTED] [REDACTED] prepare issues list; review comments on issues list; call with Cassels team re issues list.	3.50
Dec-21-23	A. Merskey	Update call with FTI. Call with Stikeman regarding SISP issues, working on same.	3.60
Dec-21-23	K. Jamal	Work on memoranda for FTI;	4.10
Dec-21-23	J. Dietrich	Review of correspondence from Ad Hoc Counsel; attend board call; discussion with R. Jacobs; discussion with FTI and Cassels; review of email; discussion regarding status [REDACTED] [REDACTED] review of issues list and discussion regarding same; revise email and send to Stikemans; participate in daily update call; review of email regarding [REDACTED]	6.50
Dec-21-23	R. Jacobs	Continue detailed review and analysis of [REDACTED] [REDACTED] Meeting with Cassels team regarding same. Review and comment on issues list. Meeting with FTI team regarding case issues. Meeting with Stikeman team. Attend daily update meeting. Work on memo for FTI.	4.50
Dec-21-23	N. Levine	Research and analysis [REDACTED]	0.70
Dec-21-23	M. Sassi	Correspondence re: Champion letter [REDACTED] [REDACTED] prepare [REDACTED] and correspondence with Cassels and FTI teams re: same.	3.30
Dec-21-23	S. Voudouris	Review, analysis and revisions to memorandum for FTI and	4.60

Date	Name	Description	Hours
		related research;	
Dec-22-23	J. Dietrich	Discussion regarding ██████████ review of email regarding ██████████ review and respond to union grievance related email; review of updated issues list; review of email regarding additional insurance financing; review of email regarding response to stockpile correspondence; exchange of email regarding director meetings; review of email regarding port issues;	3.40
Dec-22-23	M. Sassi	Correspondence re: Dickinson wright; correspondence re: issues list on ██████████ Examine dataroom;	0.70
Dec-22-23	N. Levine	Review research and correspondence with company counsel re same;	0.40
Dec-22-23	M. Wunder	Review issues list regarding ██████████ and provide comments and confer with Cassels team. Review correspondence regarding same and next steps.	1.10
Dec-23-23	M. Sassi	Correspondence re: ██████████ ██████████ and comment on same.	1.10
Dec-23-23	R. Jacobs	Review email correspondence from Dickinson Wright. Correspondence with Cassels and FTI teams. Review emails from Stikeman. Further review of ██████████ memo.	2.20
Dec-24-23	R. Jacobs	Examine LOIs. Consider issues, review research.	3.00
Dec-26-23	R. Jacobs	Emails regarding update call with Company. Examine memorandum regarding case issues. Consider bid issues and timing.	2.10
Dec-27-23	K. Jamal	Review comments on memorandum for FTI;	0.10
Dec-27-23	M. Sassi	Review email correspondence from AHG consortium; correspondence re: memo for FTI;	0.60
Dec-27-23	R. Jacobs	Emails with FTI and Cassels teams regarding update calls. Review and consider letter from ██████████ Call with ██████████ ██████████ regarding same. Advise FTI regarding same. Continue analysis of bid documents and issues, ██████████ Correspondence with Cassels team.	3.10
Dec-27-23	C. Wong	Reviewing dataroom documents and analysis of same;	0.30
Dec-27-23	J. Dietrich	Review of correspondence; exchange of email regarding status; review of email regarding ██████████ issues; review of caselaw;	1.40
Dec-27-23	M. Wunder	Review correspondence from ██████████ ██████████ Review status regarding Scotia Bank PMSI analysis.	0.80
Dec-28-23	N. Levine	Conduct research;	0.30
Dec-28-23	J. Dietrich	Review of draft agreement and exchange of messages regarding same; review of email regarding Ad Hoc advisor inquiries;	1.00
Dec-29-23	R. Jacobs	Email correspondence with L. Nicolson. Email correspondence with FTI and Cassels team. Consider ██████████ and timing. Review memo on case issue.	2.90
Dec-29-23	N. Levine	Conduct additional research;	0.20

Date	Name	Description	Hours
Dec-29-23	J. Dietrich	Review of comments on draft agreement with █████ and email exchange regarding additional comments on same;	0.50
Dec-31-23	R. Jacobs	Review email correspondence from GLC. Email correspondence with Company advisors. Refresh of issues list. Correspondence with FTI.	1.00
Dec-31-23	J. Dietrich	Review and exchange of email regarding Ad Hoc discussion;	0.40

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Voudouris, Stephanie	Partner	35.00	740.00	25,900.00
Jacobs, Ryan	Partner	71.30	1,500.00	106,950.00
Dietrich, Jane	Partner	65.50	945.00	61,897.50
Sassi, Monique	Partner	23.90	700.00	16,730.00
Levine, Natalie	Partner	3.00	775.00	2,325.00
Picone, John M.	Partner	4.20	895.00	3,759.00
Merskey, Alan	Partner	26.10	935.00	24,403.50
Ground, Colin	Partner	10.30	900.00	9,270.00
Wunder, Michael	Partner	31.90	975.00	31,102.50
Roy, Jeffrey P.	Partner	7.50	1,400.00	10,500.00
Jamal, Kiyana	Associate	16.70	420.00	7,014.00
Wong, Courtney	Law Student	2.70	200.00	540.00
Total (CAD)		298.10		300,391.50

Our Fees 300,391.50
 HST @ 13.00% 39,050.90

TOTAL FEES & TAXES (CAD) 339,442.40

TOTAL FEES 300,391.50

TOTAL TAXES 39,050.90

TOTAL FEES & TAXES (CAD) 339,442.40

Cassels

Attn: Paul Bishop
FTI Consulting Canada Inc.
Toronto-Dominion Centre, TD South Tower
79 Wellington St. W., Suite 2010
Toronto, ON M5K 1G8

Invoice No: 2229010
Date: February 27, 2024
Matter No.: 055118-00003
GST/HST No.: R121379572
Lawyer: Jacobs, Ryan
Tel.: (416) 860-6465
E-mail: RJacobs@cassels.com

Re: Tacora Restructuring

Fees for professional services rendered up to and including January 31, 2024

Our Fees	462,194.50
Disbursements	313.48
Total Fees and Disbursements	462,507.98
HST @ 13.00%	60,126.04
TOTAL DUE (CAD)	522,634.02

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FEE DETAIL			
Date	Name	Description	Hours
Jan-01-24	M. Wunder	Review draft note holders replacement DIP facility term sheet and consider changes from pre filing offered DIP. Review and consider case law and commentary regarding credit bids.	2.40
Jan-01-24	M. Sassi	Correspondence with J. Dietrich re: CCAA issues;	0.30
Jan-01-24	J. Picone	Reviewing revisions to draft memorandum setting out analysis of CCAA issues and related matters; further review of memorandum; reviewing correspondence relating to the same; reviewing case law in connection with the same;	1.80
Jan-01-24	J. Dietrich	Review of issues list; email exchange with M. Sassi regarding same;	0.40
Jan-01-24	R. Jacobs	Review issues list in prep for all hands with AHG. Continue review of transaction documents and issues.	2.60
Jan-02-24	S. Voudouris	Review, analysis and revisions to memorandum and related research;	2.40
Jan-02-24	M. Wunder	Review draft issues list for note holder transaction and meet with Cassels team to discuss and provide additional commentary. Call with Stikeman and Monitor to discuss transaction structure and comments.	2.40
Jan-02-24	M. Sassi	Prepare agenda for update call; review AHG closing documents; review subscription agreement;	3.20
Jan-02-24	J. Picone	Reviewing further revisions to draft memorandum setting out analysis of issues and related matters; revising draft memorandum; reviewing case law in connection with the same; correspondence in connection with the same;	1.70
Jan-02-24	K. Jamal	Correspondence regarding memorandum analyzing agreement;	0.10
Jan-02-24	N. Levine	Conduct case law research and advise Cassels team re same;	2.40
Jan-02-24	R. Jacobs	Review issues list. Attend meeting with AHG and Company advisors. Review and consider AHG bid terms and discuss with FTI. Review transaction documents. Consider hedging issues and correspondence. Correspondence with P. Bishop and then J. Dietrich regarding same. Begin review of comments [REDACTED] documents. Review of [REDACTED].	4.10
Jan-02-24	A. Merskey	Review Ad Hoc letter and issues; status call with FTI, consider SISP issues and follow up on same;	2.40
Jan-02-24	J. Dietrich	Review of email; discussion with R. Jacobs; participate in discussion with Ad Hoc advisors regarding draft documents; review of consolidated issues list; exchange of email; participate in update call with FTI; review of case law; review of annotated memo and mark up same; email regarding memo; review of email regarding scheduling issues; exchange of email regarding status; participate in daily status update call;	6.20
Jan-03-24	M. Wunder	Review and analysis regarding proposed transactions and	1.40

Date	Name	Description	Hours
		structures. Confer with Cassels team re same.	
Jan-03-24	J. Dietrich	Exchange of email regarding status; review of email; review [REDACTED]; consider case law; discussion regarding memo; discussion regarding case law research; discussion with Stikeman regarding outstanding issues;	4.70
Jan-03-24	A. Merskey	Working on SISP issues and analysis, calls regarding same;	1.80
Jan-03-24	N. Levine	Correspondence with Cassels team re research;	0.20
Jan-03-24	A. Hoy	Internal call w J. Dietrich & A. Merskey re [REDACTED]	1.00
Jan-03-24	J. Picone	Correspondence relating to agreement issues; further revisions to draft memorandum relating to the same; reviewing operative agreements; videoconference to review and discuss outstanding action items, draft memorandum; further correspondence regarding litigation issues;	2.70
Jan-03-24	S. Voudouris	Review, analysis and revisions to memorandum and related research;	2.70
Jan-03-24	K. Jamal	Discuss comments on memorandum;	0.70
Jan-03-24	R. Jacobs	Review [REDACTED] documents. Attend meeting with FTI. Correspondence with Cassels team regarding memo and revisions. Work on same. Review subscription agreement. Correspondence with Cassels specialists. Attend daily meeting with Company and advisors. Meeting with A. Hoy and J. Dietrich regarding research. Meeting with L. Nicholson regarding AHG letter and response.	3.90
Jan-03-24	M. Sassi	Review and correspondence re: [REDACTED] documents;	0.50
Jan-03-24	J. Roy	Review agreements relating to [REDACTED] and provide comments	3.00
Jan-03-24	C. Ground	Reviewing and summarizing provisions of the [REDACTED] agreements; review of email from J. Roy re. same; preparation of comments on material provisions; emails to and from J. Dietrich re. same;	2.40
Jan-03-24	M. Sassi	Correspondence re: transaction documents	0.60
Jan-04-24	M. Wunder	Review of draft noteholder replacement DIP. Review and consider note holder credit bid structure [REDACTED]	1.90
Jan-04-24	A. Hoy	Research re [REDACTED]	4.50
Jan-04-24	M. Sassi	Update call; correspondence and review of [REDACTED] documents; correspondence re: [REDACTED] documents	1.10
Jan-04-24	K. Jamal	Work on revisions to memorandum;	2.40
Jan-04-24	S. Voudouris	Review, analysis and revisions to memorandum regarding related research;	7.40
Jan-04-24	N. Levine	Additional research; confer with Cassels team re memo revisions;	4.40
Jan-04-24	J. Picone	Discussion with Stephanie Voudouris regarding issues and revisions to draft memorandum; reviewing and considering revisions to draft memorandum; further review of case law;	1.80

Date	Name	Description	Hours
Jan-04-24	C. Ground	Continued review of comments on Subscription Agreement prepared by counsel for Tacora and preparation of comments on same; preparation of chart summarizing comments and email of same to J. Dietrich;	3.70
Jan-04-24	J. Dietrich	Attend board meeting; attend update call; review of email; review of mark up of subscription agreement; review of email; attend daily update call;	4.90
Jan-04-24	A. Merskey	Call with FTI regarding status update; call with team regarding SISP issues and analysis, working on same;	2.60
Jan-04-24	J. Roy	Review revisions to Subscription Agreement provided by counsel to Tacora	3.80
Jan-04-24	R. Jacobs	Continue review and markup of subscription agreement and [REDACTED] docs. Correspondence with Cassels specialists regarding same. Attend meeting with FTI regarding case issues. Review of Stikeman markup of subscription agreement. Review correspondence from R. Chadwick. Consider issues list from FTI and respond to same. Consider SISP issues, strategy and timing. Attend meeting with Cassels team regarding memo and comment on same.	4.60
Jan-05-24	M. Wunder	Meet with Stikeman, Monitor teams to discuss credit bid of note holder consortium and subscription agreement structure and related issues. Research regarding credit bid structure.	2.40
Jan-05-24	M. Sassi	Calls and correspondence re: comments on subscription agreement and circulation of same	2.10
Jan-05-24	S. Voudouris	Review, analysis and revisions to memorandum and related research;	2.70
Jan-05-24	J. Dietrich	Review of email; discussion regarding comments on mark up of subscription agreement; review of email and discussion regarding outstanding issues; review of draft order and email regarding same;	3.00
Jan-05-24	A. Merskey	Emails regarding SISP issues and analysis, working on same; Receive and review Ad hoc letter, consider issues regarding same;	1.80
Jan-05-24	R. Jacobs	Correspondence with AHG counsel. Review and comment on subscription agreement. Meeting with Cassels specialists regarding same. Correspondence with L. Nicolson. Attend daily update meeting with Company. Consider SISP issues and timing. Review letter from M. Wasserman and discuss with J. Dietrich. Examine case law. Correspondence with FTI.	4.10
Jan-05-24	A. Hoy	Research re sale process issues;	2.20
Jan-05-24	K. Jamal	Work on memorandum; Review applicable caselaw;	0.80
Jan-05-24	J. Roy	Conference call with Cassels team re Subscription Agreement;	1.00
Jan-05-24	N. Levine	Revise memo re [REDACTED]	1.50
Jan-05-24	J. Picone	Reviewing and revising draft memorandum and related matters; correspondence from Alan Merskey and Natalie	1.50

Date	Name	Description	Hours
		Levine regarding same; reviewing further revisions by Natalie Levine relating to [REDACTED] [REDACTED] correspondence from Ryan Jacobs; reviewing and considering correspondence from counsel to consortium relating to bid in the SISP;	
Jan-05-24	C. Ground	Continued review of subscription agreement and emails from J. Dietrich re. comments on same; preparation for and participation in call with Cassels team to discuss comments on subscription agreement;	1.90
Jan-06-24	J. Dietrich	Review of mark up of subscription agreement; review of correspondence from Osler; review of comments on ancillary documents; exchange of messages with R. Jacobs;	0.90
Jan-06-24	M. Sassi	Correspondence re: comments on subscription agreement	0.30
Jan-07-24	J. Picone	Reviewing and updating memorandum; correspondence with Alan Merskey; correspondence with Stephanie Voudouris;	0.80
Jan-07-24	J. Dietrich	Review of process letter; review of comments on draft process letter; exchange of email regarding status; exchange of messages with J. Porepa;	0.80
Jan-07-24	R. Jacobs	Review and comment on draft process letter from GH. Correspondence with Cassels team regarding same. Review comments from Stikeman. Review latest draft memo. Consider SISP issues and timing.	2.20
Jan-07-24	M. Sassi	Review and comment on Phase II sale process letter; circulate comments on same	1.80
Jan-08-24	J. Dietrich	Review of email; discussion with M. Sassi; review of email; discussion regarding open issues with Stikeman and FTI; review of revised memo and email regarding same; review of email;	3.70
Jan-08-24	A. Merskey	Review and further consideration of SISP issues and analysis, related emails;	0.80
Jan-08-24	R. Jacobs	Attend meeting with FTI and Stikeman teams. Address follow up issues and review final drafts of responding letter to AHG, and SISP process letters. Review final draft of memo. Review emails from R. Chadwick. Examine case authority. Correspondence with L. Nicholson.	4.00
Jan-08-24	M. Wunder	Work with Cassels team on review of draft note holder transaction documents. Review and provide comments on subscription agreement. Review security reports and updating emails. Emails with Stikeman regarding security review for Scotiabank leased equipment and PMSI analysis.	2.40
Jan-08-24	S. Voudouris	Review, analysis and revisions to memorandum and related research;	2.20
Jan-08-24	J. Picone	Reviewing annotations to draft memorandum; discussions with Stephanie Voudouris regarding case law; reviewing case law; discussion with Alan Merskey regarding correspondence from counsel to consortium, SISP, and related matters;	1.30

Date	Name	Description	Hours
Jan-08-24	A. Hoy	Research re considerations in evaluating competing bids	2.60
Jan-09-24	A. Merskey	Update call with FTI and team; Follow up on SISP issues; Call regarding same;	1.80
Jan-09-24	M. Sassi	Prepare agenda and attend update call with FTI; call regarding [REDACTED]; correspondence re: stay extension.	2.80
Jan-09-24	J. Dietrich	Review of email and exchange of messages regarding outstanding matters; participate in status update discussion with FTI; discussion regarding research; discussion with FTI expert; review of email; discussion with R. Jacobs;	3.60
Jan-09-24	A. Hoy	Research re SISP issues;	2.10
Jan-09-24	M. Wunder	Review DIP loan agreement and consider covenants and milestones for compliance. Review SISP terms and SISP approval order regarding credit bid structure.	1.80
Jan-09-24	J. Picone	Discussion with Alan Merskey regarding recent developments and next steps; discussion with Stephanie Voudouris regarding litigation issues; reviewing further revised memorandum;	0.80
Jan-10-24	M. Sassi	Discussion regarding Monitor reports; drafting same; correspondence re: issues list; correspondence re: stay timing; review [REDACTED]	1.90
Jan-10-24	A. Merskey	Emails regarding [REDACTED], reviewing SISP updates and analysis;	0.30
Jan-10-24	A. Hoy	Research re SISP matters; work on memo;	1.20
Jan-10-24	J. Dietrich	Review of draft [REDACTED] and comment on same; review of updated [REDACTED]; review of email; discussion with R. Jacobs; review of issues list; discussion regarding draft report; review of email; participate in daily update call;	2.60
Jan-10-24	R. Jacobs	Work on finalizing memo for FTI. Attend strategy meetings with FTI, Stikes. Review issues list from AHG counsel. Consider issues and correspondence with J. Dietrich regarding same. Examine case authority. Review correspondence from Goodmans. Consider SISP issues and bids. Meeting with FTI team.	4.00
Jan-10-24	M. Wunder	Meet with Cassels team to discuss structure of noteholders bid and related issues. Correspondence with FTI. Review noteholders bid documents.	1.60
Jan-11-24	A. Hoy	Research re sales process issues; reviewing draft second report of the Monitor	1.80
Jan-11-24	M. Sassi	Prepare agenda and attend update call with FTI; drafting report re: stay extension; correspondence re: stay extension.	1.40
Jan-11-24	J. Dietrich	Review of issues list; discussion with R. Jacobs; review of email; update discussion with FTI; discussion with FTI and company advisors regarding issues list; review of email regarding Port; review of additional email;	3.90
Jan-11-24	R. Jacobs	Meeting with Cassels team regarding issues list for	3.30

Date	Name	Description	Hours
		subscription agreement. Meeting with FTI team. Attend meeting with Company advisors and management regarding same. Correspondence with Oslers. Attend daily update meeting with management. Strategy correspondence with Cassels team regarding SISP issues, next steps.	
Jan-11-24	M. Wunder	Revise and analyze draft transaction agreements and preparation of issues lists for discussion with parties. Cassels meeting re same. Call with FTI to discuss. Meeting with Stikeman team to discuss comments on note holder agreements.	2.10
Jan-11-24	A. Merskey	Update call with FTI, follow up on SISP issues;	0.70
Jan-12-24	M. Sassi	Review draft affidavit re: stay extension; correspondence and revisions to report re: stay extension; discussion re: next report.	1.40
Jan-12-24	A. Merskey	Emails and follow up on SISP issues, stay extension and related steps;	0.40
Jan-12-24	M. Wunder	Meeting with Osler to discuss issues and comments regarding draft transaction agreements. Consider credit bid and DIP loan terms and structures.	1.30
Jan-12-24	A. Hoy	Finalizing memo for FTI on case issues;	1.70
Jan-12-24	J. Dietrich	Review of email; follow up on research; discussion with R. Jacobs; review of email regarding open issues; attend daily update call; attend call with Ad Hoc Advisors regarding issues list;	3.50
Jan-12-24	R. Jacobs	Review subscription agreement issues list and attend meeting with AHG advisors regarding same. Correspondence with Cassels team.	2.50
Jan-13-24	J. Dietrich	Review of research from A. Hoy;	0.30
Jan-13-24	M. Sassi	Review draft affidavit and correspondence re: same; drafting report.	1.00
Jan-14-24	M. Sassi	Correspondence regarding stay extension.	0.40
Jan-14-24	R. Jacobs	Review issues list for meeting with ██████ Examine latest draft memo. Correspondence with Cassels team regarding SISP issues.	1.70
Jan-14-24	J. Dietrich	Exchange of email with M. Sassi; review of email regarding report;	0.30
Jan-15-24	M. Sassi	Call with FTI re offtake matters; revisions to Stay extension materials	2.30
Jan-15-24	R. Jacobs	Review issues list regarding Javelin. Attend meeting with company and ██████ representatives. Review agenda for call with Stikeman. Correspondence with J. Dietrich. Review cash flow assumptions and email correspondence with J. Dietrich and J. Porepa regarding same. Review and comment on draft second Report of FTI. Correspondence with Cassels team regarding same.	3.20
Jan-15-24	A. Merskey	Follow up on SISP issues and analysis, call with FTI regarding same;	1.40

Date	Name	Description	Hours
Jan-15-24	J. Dietrich	Exchange of messages with R. Jacobs; review of email; review of draft report and comments on same; attend update call; attend call regarding [REDACTED] issues; attend daily update call;	4.50
Jan-16-24	M. Sassi	Discussion re: report; correspondence re: report for stay extension.	0.90
Jan-16-24	A. Hoy	Preparing Report;	5.10
Jan-16-24	J. Dietrich	Review of email; consider issues; participate in update call; follow up regarding outstanding items; discussion with R. Jacobs regarding cash flow; discussion with J. Porepa;	3.30
Jan-16-24	R. Jacobs	Attend update meeting with FTI and Cassels teams. Correspondence with J. Dietrich and A. Merskey. Review final form of memo for FTI. Attend meeting with Company and advisors teams. Examine bid issues and potential schedule. Comment on draft report. Correspondence with Stikeman team.	3.50
Jan-16-24	A. Merskey	Update call with FTI, follow up on SISP issues;	3.60
Jan-17-24	A. Merskey	Emails and follow up on SISP issues; Consider same; Emails regarding stay extension, reviewing materials for same;	0.70
Jan-17-24	A. Hoy	Preparing for service and drafting Affidavit of Service; revising Report re Solicitation Process	3.60
Jan-17-24	M. Wunder	Review and analyze noteholder group revised draft DIP loan agreement. Consider bid structures and SIS terms.	1.20
Jan-17-24	R. Jacobs	Attend meeting with FTI. Review and correspondence with FTI on revised cash flow. Comment on revised draft report. Review filed motion materials. Attend daily update meeting with Company and advisors.	3.20
Jan-17-24	J. Dietrich	Exchange of email regarding stay extension and related issues; review of comments on draft report and exchange of email regarding same; review of filed motion record;	1.80
Jan-17-24	M. Sassi	Correspondence and call regarding court reports; review court materials re: stay extension.	3.30
Jan-18-24	A. Hoy	Finalizing Second Report of the Monitor for service; serving Second Report; swearing affidavit of service	3.40
Jan-18-24	J. Picone	Reviewing and considering memorandum; correspondence with Alan Merskey regarding same; reviewing case law;	1.20
Jan-18-24	J. Dietrich	Discussion with A. Merskey regarding stay extension; discussion with R. Jacobs; attend board meeting; review of email; review of comments on draft report and exchange of email regarding same; consider issues regarding cash flow; email exchange regarding service; initial review of draft auction procedures; email exchange regarding Solicitation Procedures;	3.30
Jan-18-24	R. Jacobs	Attend meeting with FTI regarding case issues, strategy, report and motions. Review final draft of report. Review Stikeman comments on report. Attend daily update call. Call with P. Bishop.	2.90

Date	Name	Description	Hours
Jan-18-24	M. Sassi	Update call; Work on auction procedures; review court materials and update report; finalization of report and matters related to service of same.	5.10
Jan-18-24	M. Wunder	Review and analysis of structure issues for purchase transactions under SISP.	1.40
Jan-18-24	A. Merskey	Update call with FTI; Review stay extension materials, related emails; Follow up on SISP issues and consider same;	1.30
Jan-19-24	J. Roy	Review Cargill bid documents;	2.00
Jan-19-24	A. Merskey	Review of bids, team call regarding same.;	1.00
Jan-19-24	R. Jacobs	Begin detailed review of final bids. Attend meeting with FTI regarding same. Attend meeting with Company advisors regarding same. Attend daily update meeting with Company. Comment on draft. Comment on draft auction procedures. Meeting with Cassels team regarding same.	4.70
Jan-19-24	J. Dietrich	Review of comments on auction procedures and discussion regarding same; review of email; initial review of bids and various discussions regarding status and next steps; review of case law;	6.20
Jan-19-24	J. Picone	Correspondence and discussion relating to bids and next steps;	0.30
Jan-19-24	M. Sassi	Revisions and comments to auction procedures; bids and correspondence/calls re: same; correspondence re: royalty payments and CFF; filing of court report and materials	2.30
Jan-19-24	M. Wunder	Review bids submitted for SISP and confer with Cassels team. Analyze purchase structures including note holder consortium credit bid.	2.30
Jan-20-24	J. Roy	Review bid documents;	2.80
Jan-20-24	R. Jacobs	Continue review of bids and outline issues.	2.50
Jan-21-24	R. Jacobs	Correspondence with J. Dietrich. Correspondence with Greenhill team. Continue review and analysis of final bids and issues.	3.00
Jan-21-24	J. Dietrich	Review of messages re bids; correspondence with R. Jacobs;	0.20
Jan-21-24	C. Ground	Continued review of bids and summarizing provisions re. same with respect to certainty of closing and satisfaction of requirements of the SISP;	2.90
Jan-21-24	M. Wunder	Continue to review SISP bids and analyze structures and debt and lien issues.	1.40
Jan-22-24	C. Ground	Continued review of transaction agreements relating to bids;	1.10
Jan-22-24	A. Merskey	Reviewing bids and bid issues and consider next steps;	0.40
Jan-22-24	R. Jacobs	Analysis of bids, issues and risks. Emails and calls with FTI, Cassels and Stikeman teams. Meetings with Company advisors. Attend Company update meeting.	3.50
Jan-22-24	J. Dietrich	Discussion with R. Jacobs; review of email; attend call with Stikemans and FTI to discuss status and strategy; review of issues list; discussion with advisors; consider outstanding	3.40

Date	Name	Description	Hours
		issues regarding bid structures;	
Jan-22-24	M. Wunder	Review and analysis regarding purchase bids and structures. Confer with Cassels team regarding SISP terms and conditions and qualified bid analysis.	1.80
Jan-22-24	M. Sassi	Correspondence re: CCAA matters and timing.	0.20
Jan-23-24	R. Jacobs	Attend meeting with bidders. Attend strategy meetings with company advisors, FTI, Cassels team on bids, issues, next steps. Review [REDACTED] Review bid terms. Call with A. Taylor. Meeting with FTI team.	4.00
Jan-23-24	J. Dietrich	Attend call with bidder and various advisors; follow up discussion regarding bids; attend call with additional bidder and various advisors; discussion regarding Solicitation Process; discussion with FTI regarding status and strategy; discussion with Stikemans and FTI regarding outstanding matters;	3.90
Jan-23-24	A. Merskey	Consider SISP issues, bids and next steps; Call with FTI regarding status;	0.90
Jan-23-24	M. Sassi	Correspondence re: agenda and bids and royalty; update call	0.80
Jan-23-24	M. Sassi	Review affidavit; drafting report;	1.50
Jan-23-24	M. Wunder	Call with Stikeman, FTI and Cassels with Goodmans to discuss SISP bid and structure of proposed Cargill transaction. Review and consider purchase and sale and DIP structure and financial impacts for creditor groups.	1.80
Jan-24-24	R. Jacobs	Attend professional pre-call in advance of Board meeting. Review updated GH deck. Correspondence with J. Dietrich regarding board meeting. Review and comment on updated RVO. Meeting with J. Dietrich regarding same. Review Admin Reserve components, correspondence with FTI regarding same. Review and respond to correspondence from Company regarding bids, issues.	3.90
Jan-24-24	J. Dietrich	Review of Greenhill deck; discussion with Advisors regarding status and strategy; review of email; attend board meeting; attend extension motion; discussion with R. Jacobs; review of draft RVO and provide comments; review of administrative expense reserve and email regarding same;	10.20
Jan-24-24	C. Ground	Continued review of bids and summarizing provisions re. same;	1.10
Jan-24-24	M. Sassi	Correspondence re: board meeting and RVO	0.50
Jan-24-24	M. Wunder	Review and comment on draft reverse approval and vesting order. Meet with Cassels team to discuss changes to order.	1.30
Jan-25-24	C. Ground	Continued review of bids and transaction documentation relating thereto;	2.60
Jan-25-24	M. Sassi	Prepare agenda and attend update call with FTI; correspondence re: bids.	1.20
Jan-25-24	A. Merskey	Update call with FTI; Review stay extension endorsement; Working on SISP issues and next steps; Review bid letters	2.30

Date	Name	Description	Hours
		and related documentation;	
Jan-25-24	J. Picone	Correspondence regarding Cargill Phase 2 Bid; other correspondence;	0.20
Jan-25-24	M. Wunder	Review and analysis of bid structures and confer with Cassels team.	1.30
Jan-25-24	J. Dietrich	Discussion with M. Sassi; discussion with R. Jacobs; discussion with FTI regarding status; review of email; discussion regarding status and strategy; review of documentation; discussion with J. Roy; review of revised documents; review of correspondence; participate in update call; review of email;	3.10
Jan-26-24	M. Wunder	Review correspondence regarding SISP process and submitted bids. Review and consider bid structures and issues.	0.80
Jan-26-24	R. Jacobs	Attend meeting with FTI and Stikemans. Calls regarding bids and strategy on issues. Review latest draft transaction documentation and comment on same. Consider open issues. Calls and correspondence with J. Dietrich.	4.60
Jan-26-24	M. Sassi	Correspondence re: orders; correspondence re: bids.	0.40
Jan-26-24	J. Dietrich	Review of email; discussion regarding strategy and next steps; review and exchange of email; call with Osler, Stikemans and FTI regarding document comments; discussion with FTI; review of email; participate in daily update call; further exchange of messages regarding status;	3.20
Jan-27-24	M. Wunder	Review and analyze revised drafts of agreements for SISP transaction from noteholders and consider structure.	2.40
Jan-27-24	J. Dietrich	Review of email; review of correspondence; exchange of messages with R. Jacobs;	0.90
Jan-27-24	R. Jacobs	Emails with J. Dietrich regarding status and next steps. Prep for meeting with Cargill advisors. Review latest drafts and open issues on transaction docs with AHG. Review letter from Goodmans.	2.90
Jan-28-24	J. Dietrich	Discussion with R. Jacobs; attend board meeting; review of documents and comments on same; review of draft court material and comment on same; discussion regarding comments; exchange of email regarding correspondence;	3.80
Jan-28-24	R. Jacobs	Correspondence with J. Dietrich and P. Bishop regarding Board meeting. Review and comment on revised drafts of subscription agreement and schedules, ████████ agreements. Correspondence with FTI team, Stikeman team regarding same. Review and comment on draft affidavits. Correspondence with Stikeman team regarding same. Calls with L. Nicholson. A. Taylor. Review letter to Goodmans. Review response from R. Chadwick.	4.50
Jan-29-24	M. Sassi	Review court materials and drafting report;	3.20
Jan-29-24	M. Wunder	Review revised SISP Phase 2 bid of consortium. Review and analyze structure and mechanics. Confer with Cassels team regarding same.	1.90

Date	Name	Description	Hours
Jan-29-24	A. Merskey	Review ad-hoc bid; Review and comment on sale approval materials, related emails; Consider issues and time table for court approval of sale;	2.80
Jan-29-24	R. Jacobs	Attend meeting with Stikeman and FTI teams. Prep for and attend in person meeting with Goodmans. Follow up meeting with FTI. Attend all hands advisors meeting. Attend board meeting. Review drafts of all AHG consortium transaction documents and finalization of same. Call with AHG counsel. Strategy calls with L. Nicholson. A. Taylor, A. Merskey. Consider issues raised by Cargill. Discussions with Cassels team regarding same.	6.40
Jan-29-24	J. Picone	Correspondence relating to selection of bid, motion for approval, and related matters;	0.20
Jan-29-24	J. Dietrich	Review of email; attend meeting with Cargill counsel and Monitor; various discussions with company counsel; attend board meeting; follow up discussion with FTI; review of email and respond to same;	6.70
Jan-30-24	M. Sassi	Correspondence re: service list; drafting report; Review endorsement from Justice Kimmel; correspondence re: same;	2.30
Jan-30-24	R. Jacobs	Meeting with A. Taylor regarding case conference. Post conference meeting with FTI team. Correspondence with transaction approval, litigation schedule and next steps. Call with GH. Attend meeting with Company and advisors. Consider issues for approval motion and reporting.	3.60
Jan-30-24	A. Merskey	Various emails regarding bid steps, sale approval, and case conference; Review related documentation, prepare for and attend at case conference; Related calls and emails, consider next steps;	3.80
Jan-30-24	J. Picone	Reviewing endorsement of Justice Kimmel regarding scheduling and related matters; videoconference with Ryan Jacobs and others to review and discuss litigation next steps; reviewing and considering extensive documentation and correspondence; discussion with Alan Merskey regarding litigation issues;	2.80
Jan-30-24	J. Dietrich	Review of email regarding status; discussion regarding case conference; attend case conference; review of email; review of email regarding material comments; discussion regarding status and strategy;	2.30
Jan-31-24	R. Jacobs	Meetings with Monitor. Meetings with Stikeman. Review and comment on court material. Review and comment on litigation schedule. Discussions with FTI regarding same. Consider issues on application and parties positions. Telephone call with AHG advisors.	4.50
Jan-31-24	A. Merskey	Update call with FTI; Consider hearing schedule and related requirements; Emails and calls regarding court materials and schedule, follow up on same;	3.80
Jan-31-24	J. Dietrich	Status update discussion with FTI; review of memo and	2.90

Date	Name	Description	Hours
		email comments on same; attend call with company counsel and FTI regarding update; attend daily update call; discussion regarding status; review of draft time line and discussion regarding same;	
Jan-31-24	M. Sassi	Correspondence with FTI re: memo	0.40
Jan-31-24	M. Sassi	Prepare agenda and attend update call with FTI;	1.30
Jan-31-24	J. Picone	Further review of background documentation relevant to litigation; reviewing correspondence; considering timetabling and litigation issues; correspondence with Monique Sassi; reviewing revised memorandum;	2.90
Jan-31-24	A. Hoy	Review and revise draft Monitor's report;	4.30

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Voudouris, Stephanie	Partner	17.40	825.00	14,355.00
Merskey, Alan	Partner	34.60	1,050.00	36,330.00
Sassi, Monique	Partner	44.50	745.00	33,152.50
Roy, Jeffrey P.	Partner	12.60	1,485.00	18,711.00
Wunder, Michael	Partner	37.30	1,050.00	39,165.00
Dietrich, Jane	Partner	98.50	1,005.00	98,992.50
Jacobs, Ryan	Partner	97.90	1,650.00	161,535.00
Ground, Colin	Partner	15.70	955.00	14,993.50
Picone, John M.	Partner	20.00	995.00	19,900.00
Levine, Natalie	Partner	8.50	825.00	7,012.50
Hoy, Alec	Associate	33.50	485.00	16,247.50
Jamal, Kiyan	Associate	4.00	450.00	1,800.00
Total (CAD)		424.50		462,194.50

Our Fees	462,194.50
HST @ 13.00%	60,085.29
TOTAL FEES & TAXES (CAD)	522,279.79

DISBURSEMENT SUMMARY

Taxable Disbursements

Copies	155.75
Travel	41.10
West Law - Online Searches	83.25
Delivery	33.38
Total Taxable Disbursements	313.48

HST @ 13.00%	40.75
Total Taxable Disbursements & Taxes	<u>354.23</u>

TOTAL DISBURSEMENTS & TAXES (CAD)	354.23
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TOTAL FEES	462,194.50
TOTAL DISBURSEMENTS	313.48
TOTAL TAXES	60,126.04
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	522,634.02

Cassels

Attn: Paul Bishop
FTI Consulting Canada Inc.
Toronto-Dominion Centre, TD South Tower
79 Wellington St. W., Suite 2010
Toronto, ON M5K 1G8

Invoice No: 2230055
Date: March 06, 2024
Matter No.: 055118-00003
GST/HST No.: R121379572
Lawyer: Jacobs, Ryan
Tel.: (416) 860-6465
E-mail: RJacobs@cassels.com

Re: Tacora Restructuring

Fees for professional services rendered up to and including February 29, 2024

Our Fees	379,404.00
Disbursements	124.85
Total Fees and Disbursements	379,528.85
HST @ 13.00%	49,338.75
TOTAL DUE (CAD)	428,867.60

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FEE DETAIL			
Date	Name	Description	Hours
Feb-01-24	M. Sassi	Calls with Monitor; correspondence re: court materials schedule; update service list.	1.40
Feb-01-24	M. Wunder	Confer with Cassels team regarding SISP litigation and related schedule. Review consortium bid documents. Consider ARIO issues.	2.30
Feb-01-24	A. Merskey	Consider issues re schedule; Review affidavits, circulate comments, consider court steps and report; Update call with FTI and team;	3.20
Feb-01-24	A. Hoy	Updating and revising Monitor's Report.	3.40
Feb-01-24	J. Picone	Detailed review of subscription agreement, draft notice of motion, draft affidavits in support of motion, and draft approval and reverse vesting order; reviewing and considering comments on draft affidavits; videoconference with Alan Merskey regarding proposed timeline and related matters;	3.20
Feb-01-24	J. Dietrich	Review of revised affidavits and provide additional comments on same; review of email regarding revised material; review of email; discussion with FTI regarding status;	2.50
Feb-02-24	M. Sassi	Correspondence re: case conference; court materials; review and comment on same	1.30
Feb-02-24	M. Wunder	Correspondence regarding litigation schedule. Examine prior orders and advise Cassels team regarding same.	1.30
Feb-02-24	J. Picone	Further review of draft notice of motion, draft Broking affidavit, draft Nessim affidavit, and subscription agreement; considering proposed timeline; correspondence in connection with the same; reviewing and considering report prepared by NERA;	3.80
Feb-02-24	J. Dietrich	Review of email regarding press release; exchange of email regarding court timing; review and exchange of email regarding materials, including expert report and status;	1.60
Feb-02-24	R. Jacobs	Review final draft of motion record, evidence. Review and comment on litigation schedule. Correspondence with FTI, Cassels teams regarding same. Correspondence regarding Cargill position on issues. Correspondence with AHG advisors. Correspondence with J. Dietrich. Consider issues for sale approval motion.	4.00
Feb-02-24	A. Merskey	Consider issues for case conference and aide memoire; Emails regarding court rescheduling; Review company materials; Receive and review expert report;	1.80
Feb-03-24	A. Merskey	Call with R. Chadwick regarding schedule and process issues; Related emails and follow up steps, working on schedule issues;	1.80
Feb-03-24	J. Dietrich	Discussion with A. Merskey and R. Jacobs regarding position of stakeholders and analysis of same; discussion with R. Chadwick; review of email; follow up discussions regarding litigation scheduling;	1.40

Date	Name	Description	Hours
Feb-03-24	R. Jacobs	Emails with Stikeman team regarding litigation schedule. Review and consider schedule and briefing for case conference. Careful consider of all position by stakeholders. Correspondence with J. Dietrich and A. Merskey.	3.00
Feb-04-24	M. Sassi	Calls and correspondence re: litigation schedule; review and comment on aide memoire; review court materials and drafting report re: sale approval.	6.80
Feb-04-24	M. Wunder	Confer with Cassels team re litigation status and next steps and Cargill issues and requests. Discuss court filing for Monitor.	1.80
Feb-04-24	A. Merskey	Review Cargill timetable, compare key items, internal team call and call with Stikeman and FTI regarding same; Various related emails;	4.20
Feb-04-24	J. Picone	Reviewing, considering, and comparing proposed timetables; internal video conference to review and discuss the same, litigation issues, and related matters; video conference with counsel to the company; discussions with the monitor regarding timetabling issues and other matters; initial preparation of aide memoire; telephone call with Alan Merskey regarding the same;	3.50
Feb-04-24	J. Dietrich	Review of email from R. Chadwick; consider litigation issues and various discussions regarding same; discussion regarding status and strategy; review of company draft of aide memoire; review and exchange of email regarding status and scheduling;	3.40
Feb-04-24	R. Jacobs	Review and consider email from R. Chadwick with proposed litigation schedule. Discussions with Cassels team regarding same. Develop compromise schedule. Meeting with FTI team regarding same. Meetings with Stikeman team. Review and comment on Company proposed alternate litigation schedule. Review aide memoire. Work on Monitor aide memoire.	4.90
Feb-05-24	M. Sassi	Correspondence re: [REDACTED] [REDACTED] review aide memoire; drafting court report re: sale approval	5.80
Feb-05-24	M. Wunder	Call with Stikeman, Osler and Cassels teams. Correspondence regarding court strategy for CCAA court conference. Confer with Cassels team re same. Emails FTI regarding litigation and proposed threshold motion from Cargill and litigation schedule planning.	2.80
Feb-05-24	A. Hoy	Revising Monitor's Report; preparing Aide Memoire for service; serving Aide Memoire	1.70
Feb-05-24	A. Merskey	Drafting aide Memoire; Various emails with team and counsel regarding schedule adjustments, call regarding same; Preparing for case conference and consider issues for same;	9.30
Feb-05-24	J. Picone	Further review of proposed timetables; internal video conferences to review and discuss various developments;	4.70

Date	Name	Description	Hours
Feb-05-24	J. Dietrich	video conferences with the monitor; reviewing and considering aide memoires of the parties; drafting aide memoire of the monitor; further discussions and correspondence; reviewing motion record; Review of email; discussion regarding outstanding issues including scheduling case conference and related issues; review of draft aide memoire and comments on same; review of case conference briefs; discussion regarding daily update and litigation status; exchange of email regarding outstanding matters; review of proposed preliminary motion and discussion regarding same; discussion regarding aid memoire; review of Cargill aide memoire; exchange of messages regarding status;	6.90
Feb-05-24	R. Jacobs	Work on case conference brief. Correspondence and discussions regarding litigation schedule. Consider positions of parties and discuss with FTI. Review case conference brief of Company. Purchaser and Cargill. Review and carefully consider motion record of Cargill regarding preliminary threshold issue. Examine arguments and discuss same with Cassels team. Detailed consideration of issue and discuss with FTI. Work on Monitor brief.	7.00
Feb-06-24	M. Sassi	Calls and correspondence re: litigation schedule and court materials; drafting court report	4.40
Feb-06-24	M. Wunder	Multiple correspondence with counsel regarding litigation schedule. Confer with Cassels team regarding timetable. Review terms and analyze related issues.	2.40
Feb-06-24	A. Merskey	Reviewing Cargill submissions; Numerous emails from Cargill counsel; Confer with team and FTI regarding same and court attendance, discussion with Stikeman, prepare for and attend at court; Post-hearing conferences and considering next steps and timetable;	6.70
Feb-06-24	A. Hoy	Serving Aide Memoire of the Monitor and uploading to CaseLines	1.10
Feb-06-24	J. Picone	Reviewing motion record and various aide memoires; finalizing aide memoire of the monitor; internal correspondence and discussions relating to scheduling attendance; attending at case conference; subsequent discussions and correspondence;	3.80
Feb-06-24	R. Jacobs	Prep for and attend case conference. Post attendance meetings with Company counsel, counsel for Purchaser. Correspondence with FTI and Cassels teams regarding subscription documents and next steps. Review and comment on draft litigation schedule from Stikeman. Consider correspondence from R. Chadwick. Discuss with Cassels team.	5.70
Feb-06-24	J. Dietrich	Review of email regarding outstanding issues; discussion with A. Merskey regarding aide memoire and finalizing same; discussion with R. Jacobs; exchange of email with [REDACTED] discussion regarding scheduling issues; discussion with	7.10

Date	Name	Description	Hours
		FTI regarding status; discussion with Stikeman regarding case conference; attend case conference and follow up discussion regarding same; attend update call; review of email and consider outstanding issues;	
Feb-07-24	M. Sassi	Correspondence re: litigation schedule and timing; drafting third and fourth court report	4.40
Feb-07-24	M. Wunder	Status calls with FTI and Cassels. Assist with drafting portion of reports.	3.70
Feb-07-24	A. Merskey	Numerous emails and calls regarding scheduling matters and next steps on sale approval motion; Working on same;	5.40
Feb-07-24	J. Dietrich	Attend board meeting; discussions regarding various emails; discussion regarding scheduling issues; review of email and comment on same; discussion with J. Porepa regarding tax issues and email regarding same; discussion regarding conversations relating to case conference and outstanding issues;	4.50
Feb-07-24	J. Picone	Reviewing various correspondence from parties' counsel relating to scheduling; reviewing subscription agreement; correspondence with Alan Merskey;	1.90
Feb-07-24	R. Jacobs	Update correspondence with J. Dietrich regarding board meeting. Calls and emails throughout day with counsel to Company, Purchaser, Cargill. Advance litigation schedule matters. Calls and correspondence with FTI, Cassels team regarding same. Call with M. Wasserman.	4.10
Feb-08-24	M. Sassi	Update call and agenda re: same; Correspondence re: litigation schedule hearing and website; work on court reports;	2.60
Feb-08-24	M. Wunder	Calls and correspondence with Monitor and Stikeman teams. Review consortium transaction documents.	1.10
Feb-08-24	A. Merskey	Update call with FTI; Call with Stikeman regarding litigation process; Numerous calls and emails with stakeholder groups throughout the day, considering issues for case conference and working on same;	6.20
Feb-08-24	A. Hoy	Preparing Third Report of the Monitor; revising Fourth Report of the Monitor.	3.90
Feb-08-24	J. Picone	Reviewing various correspondence relating to timetabling issues and related matters; telephone call with Alan Merskey to discuss preparation for case conference, assistance with preparation of reports, litigation timetables, and related litigation issues;	0.90
Feb-08-24	R. Jacobs	Meetings with FTI, Stikeman teams regarding case conference, litigation schedule and planning. Review email from Goodmans regarding proposed litigation schedule. Consider same. Discussions with Cassels team regarding same, issues. Review email from E. Kohlers.	4.30
Feb-08-24	J. Dietrich	Review of email from R. Chadwick; email exchange with P. Bishop; email regarding case conference; discussion with A. Merskey; review of email; participate in update discussion	4.40

Date	Name	Description	Hours
		with FTI; review of email; discussion with R. Jacobs; attend daily update call;	
Feb-09-24	M. Sassi	Calls and correspondence re: litigation schedule and ongoing CCAA matters; review endorsement and final litigation schedule; scheduling dates; correspondence re: CRA; work on fee affidavit and court materials; attend to website updates.	2.70
Feb-09-24	M. Wunder	Review and analysis of DIP term. Review consortium bid documents.	1.40
Feb-09-24	A. Hoy	Revising Report of the Monitor	1.20
Feb-09-24	A. Merskey	Various emails regarding scheduling and case conference; Confer with FTI regarding same; Prepare for and attend at case conference; Consider follow up requirements and requirements for next steps in proceeding;	5.60
Feb-09-24	J. Picone	Reviewing correspondence between counsel to various parties relating to timetabling and related issues; discussions and correspondence with Alan Merskey regarding litigation steps and court materials; reviewing litigation schedule; various correspondence from Monique Sassi;	1.50
Feb-09-24	J. Dietrich	Discussion regarding status and case conference; attend case conference; review of email regarding [REDACTED] issues; review of email; attend daily update call;	3.70
Feb-09-24	R. Jacobs	Meeting with A. Taylor. Review Cargill brief. Attend scheduling case conference. Post hearing correspondence with Company advisors. Attend daily update meeting with Company.	2.80
Feb-10-24	J. Dietrich	Discussion with R. Jacobs;	0.30
Feb-11-24	R. Jacobs	Review and carefully consider Cargill issues and positions.	1.50
Feb-12-24	J. Dietrich	Review of email and respond to same; participate in update call; discussion regarding [REDACTED] issues; attend daily update call;	2.40
Feb-12-24	M. Wunder	Status calls and analysis of issues. Review aide memories.	0.80
Feb-12-24	A. Merskey	Review timetable and consider next steps; Follow up regarding same;	0.40
Feb-12-24	K. Jamal	Review endorsement and correspondence regarding same;	0.20
Feb-12-24	J. Picone	Reviewing endorsement of Justice Kimmel; internal discussion with Alan Merskey regarding next steps;	0.30
Feb-13-24	M. Sassi	Update call and correspondence re: ongoing matters; notices of examination;	0.70
Feb-13-24	A. Merskey	Reviewing schedule regarding next steps on sale approval litigation; Update call with FTI regarding company activities;	0.80
Feb-13-24	A. Hoy	Updating draft reports;	0.50
Feb-13-24	J. Picone	Reviewing and revising draft documents; internal correspondence in connection with the same;	0.50
Feb-13-24	R. Jacobs	Attend meeting with FTI team. Attend daily update call with	1.80

Date	Name	Description	Hours
		Company. Review and comment on draft examination notices. Call with J. Dietrich regarding same.	
Feb-13-24	J. Dietrich	Review of email and consider issues; participate in call with FTI regarding status; review of notices of examination and exchange of email regarding comments on same;	1.50
Feb-14-24	M. Sassi	Calls and correspondence regarding litigation schedule and endorsement;	1.10
Feb-14-24	M. Wunder	Status call with FTI and Stikeman regarding litigation status and third party agreements and related sale issues.	0.80
Feb-14-24	A. Merskey	Various emails regarding company examination notices; Emails regarding Cargill update call; Consider next steps;	1.20
Feb-14-24	R. Jacobs	Consider litigation schedule. Meeting with FTI regarding same. Meeting with Stikeman and FTI regarding DIP and cash flows. Examine same. Carefully examine [REDACTED]	2.70
Feb-14-24	J. Picone	Reviewing correspondence from counsel to the company and notices of examination; correspondence with Alan Merskey;	0.20
Feb-14-24	J. Dietrich	Email regarding notices of examination; discussion with R. Jacobs; discussion with FTI and Stikeman; exchange of email regarding communications; review of email; discussion regarding status with R. Jacobs; attend update call; further review of email;	2.30
Feb-15-24	M. Sassi	Update call and correspondence re: ongoing matters; correspondence re: MFC correspondence	0.70
Feb-15-24	M. Wunder	Review and consider consortium agreements and closing conditions. Confer with Cassels team re same.	0.70
Feb-15-24	A. Merskey	Update call with FTI; Review notices of examination and consider production issues/disputes; Review royalty claim; Emails regarding Cargill information requests;	0.80
Feb-15-24	R. Jacobs	Correspondence with R. Chadwick. Examine DIP issues. Attend meeting with FTI regarding case issues. Attend daily update meeting. Call with L. Nicholson. Research [REDACTED]	2.70
Feb-15-24	J. Picone	Reviewing correspondence from counsel; reviewing notices of examination;	0.50
Feb-15-24	J. Dietrich	Attend board call; review of email; discussion with FTI regarding status; call with [REDACTED] regarding outstanding issues; participate in daily update call; review of email;	3.40
Feb-16-24	A. Merskey	Consider issues regarding examinations and productions, emails and call regarding same; Follow up on litigation timetable steps and issues; Instructions to K. Jamal regarding research issue;	1.30
Feb-16-24	K. Jamal	Meet to discuss [REDACTED] and correspondence regarding same; Review secondary sources;	1.30
Feb-16-24	J. Dietrich	Review of draft order and provide comments on same;	2.60

Date	Name	Description	Hours
		review of email; discussion regarding notices of examination and related issues; participate in update call;	
Feb-16-24	R. Jacobs	Meetings with Stikeman and FTI teams regarding production requests. Consider issues regarding same. Discussions with FTI and Stikeman regarding DIP issues. Examine litigation timeline and deliverables, next steps. Attend daily update call with Company.	2.70
Feb-17-24	K. Jamal	Review jurisprudence with respect to [REDACTED]	5.10
Feb-18-24	K. Jamal	Begin drafting memorandum analyzing [REDACTED] Review jurisprudence and applicable CCAA statutory provisions;	7.60
Feb-18-24	J. Dietrich	Review of email regarding report issues;	0.30
Feb-18-24	R. Jacobs	Consider notices of examination requests for production and issues for Monitor. Correspondence with A. Merskey.	1.20
Feb-19-24	J. Dietrich	Participate in update call; review of presentation and provide comments;	1.10
Feb-19-24	R. Jacobs	Review [REDACTED] and correspondence with J. Dietrich regarding comments on same. Attend daily update meeting. Correspondence with J. Dietrich regarding litigation issues and Monitor's report. Review emails from R. Chadwick. Consider DIP issues.	3.00
Feb-20-24	M. Wunder	Status meeting with advisors and discuss DIP loan status [REDACTED] Emails regarding litigation status and next steps.	1.30
Feb-20-24	A. Merskey	Update call with Stikeman and FTI; Follow up on research; Review draft response [REDACTED]; Review and consider emails regarding redactions; Consider sale approval steps and timetable;	1.60
Feb-20-24	K. Jamal	Finalize and circulate research memorandum regarding [REDACTED]	2.50
Feb-20-24	J. Dietrich	Review of email; consider outstanding issues; review of email; discussion regarding status with FTI and Stikeman; discussion regarding daily update; follow up discussion with L. Nicholson;	2.30
Feb-20-24	R. Jacobs	Strategy meetings with FTI and Cassels team. Meeting with Stikeman team. Review and comment on draft correspondence. Attend board meeting. Attend daily update meeting with Company and advisors.	2.60
Feb-21-24	M. Sassi	Correspondence re: [REDACTED] dispute.	1.90
Feb-21-24	K. Jamal	Meet to discuss research memorandum and subsequent draft; Review and note up jurisprudence; Draft revised research memorandum;	2.30
Feb-21-24	J. Dietrich	Review of email; discussion regarding status; review of outstanding issues; discussion with J. Porepa; review and exchange of email regarding status;	2.20
Feb-21-24	R. Jacobs	Analysis of DIP issues, cash flow forecasts. Review DIP	3.00

Date	Name	Description	Hours
		terms. Call with M. Nessim. Attend daily update call with management. Meeting with FTI. Examine next steps in litigation schedule. Consider stakeholder positions and requests. Calls with L. Nicholson. Review proposed response letter. Provide feedback and advise Monitor. Strategy calls with J. Dietrich on case issues. Review [REDACTED]	
Feb-22-24	M. Sassi	Update call with FTI; prepare report; correspondence with company counsel re: documents for MFC matters	2.70
Feb-22-24	M. Wunder	Attend on status call with Stikeman and Monitor and discuss DIP process. Review CCAA order DIP terms and consider amendments for DIP loan.	0.70
Feb-22-24	J. Dietrich	Discussion regarding status; discussion with J. Porepa; review of email; participate in update call; consider outstanding issues; consider outstanding issues; participate in strategy calls; participate in daily update call;	5.10
Feb-22-24	A. Merskey	Update call with FTI, reviewing research and production steps;	0.80
Feb-22-24	K. Jamal	Finalize and circulate memorandum; Correspondence regarding same;	0.80
Feb-22-24	R. Jacobs	Attend Board meeting. Correspondence with L. Nicholson regarding letter correspondence. Meetings regarding DIP funding and cash flows. Meeting with FTI. Call with Consortium counsel.	2.90
Feb-23-24	M. Sassi	Drafting court materials for stay extension; correspondence re: production of documents;	1.60
Feb-23-24	M. Wunder	Call with Stikeman and Goodmans regarding DIP loan status and related issues. Confer with Cassels team and consider DIP loan items.	1.40
Feb-23-24	M. Wunder	Analysis of DIP issues.	0.70
Feb-23-24	A. Merskey	Call with Stikeman regarding production steps, review confidentiality protocol, related emails, follow up on timetable steps; Call with counsel to negotiate protocol, follow up emails regarding same;	1.60
Feb-23-24	J. Picone	Reviewing correspondence from counsel relating to documents and witnesses; correspondence from Alan Merskey regarding the same; reviewing update to monitor regarding the same; internal discussion with Alan Merskey;	0.50
Feb-23-24	J. Dietrich	Discussion regarding document production; review of email; discussion with A. Merskey; discussion regarding status; review of email regarding document production;	2.30
Feb-23-24	R. Jacobs	Meeting with FTI and Stikeman. Calls with L. Nicholson. Correspondence with J. Dietrich. Attend meetings with Company advisors. Attend meeting with Cargill and advisors regarding DIP. Meeting with Stikeman regarding document production. Review emails regarding document production. Begin initial review of productions. Attend daily update meeting with Company. Consider competing DIP issues.	4.10
Feb-24-24	K. Jamal	Assist with ingesting document productions and	1.30

Date	Name	Description	Hours
		correspondence regarding same;	
Feb-24-24	J. Dietrich	Email exchange regarding document production and related issues;	0.30
Feb-24-24	R. Jacobs	Review document production.	1.50
Feb-25-24	K. Jamal	Review document productions and correspondence regarding same;	0.50
Feb-25-24	J. Picone	Correspondence with Jane Dietrich; correspondence with Kiyam Jamal;	0.20
Feb-25-24	R. Jacobs	Review production. Correspondence with Cassels team regarding same.	2.00
Feb-26-24	C. Stallone	Email regarding productions; organize production;	3.50
Feb-26-24	M. Sassi	Calls and correspondence re: DIP matters and cash flows; work on report.	2.20
Feb-26-24	J. Dietrich	Review of productions; consider issues; participate in update call with Stikeman; discussion with M. Sassi regarding report and outstanding issues; review of email; discussion with J. Porepa; discussion regarding status; email exchange and discussion with J. Porepa;	4.40
Feb-26-24	A. Merskey	Various emails and follow ups on production steps. Update call with Stikeman and FTI; Consider issues regarding confidentiality requests; Call with E. Kolers regarding production issues;	2.40
Feb-26-24	K. Jamal	Assist with document review; Review; Correspondence and discussion with A. Merskey regarding same;	1.10
Feb-26-24	J. Picone	Correspondence with Jane Dietrich and Kiyam Jamal relating to document review;	0.20
Feb-26-24	J. Fish	Process documents produced for review.	3.00
Feb-26-24	R. Jacobs	Meeting with Stikeman and FTI teams. Examine emails regarding production, consider same. Emails regarding DIP budget. Correspondence with FTI regarding same. Attend daily meeting with Company. Review emails to stakeholder groups and updated cash flows. Review document productions. Review emails from parties regarding same.	3.10
Feb-27-24	M. Sassi	Update call and agenda with FTI; preparation of court materials for stay extension; correspondence re: DIP matters; correspondence re: production of documents and access to same.	1.70
Feb-27-24	M. Wunder	Status call with Stikeman and Monitor teams regarding DIP process.	0.80
Feb-27-24	A. Merskey	Emails and follow up on production issues, working on same; Call with FTI regarding cash flows and updates;	1.40
Feb-27-24	K. Jamal	Correspondence regarding productions;	0.20
Feb-27-24	J. Picone	Reviewing correspondence from Peter Kolla; correspondence with Alan Merskey;	0.20
Feb-27-24	C. Stallone	Emails with Alan Merskey regarding productions;	0.40
Feb-27-24	C. Stallone	Review documents and searches; email with Alan Merskey;	1.20

Date	Name	Description	Hours
Feb-27-24	R. Jacobs	Meeting with FTI and Cassels team. Consider DIP issues. Correspondence with J. Dietrich. Continue review of document production.	3.10
Feb-27-24	J. Dietrich	Review of email; review of revised cash flow and related email; discussion with FTI regarding outstanding issues; review of email; consider outstanding issues; review of email and consider outstanding issues;	2.20
Feb-28-24	M. Wunder	Emails with Stikeman and Cassels teams regarding DIP proposals. Begin review of same.	1.50
Feb-28-24	M. Sassi	Discussion re: court materials; correspondence re: DIP;	1.20
Feb-28-24	A. Merskey	Call with P. Kolla on production issues; Various emails and follow ups on party productions; Emails regarding next steps;	1.50
Feb-28-24	K. Jamal	Correspondence regarding productions;	0.10
Feb-28-24	J. Picone	Correspondence from Alan Merskey regarding document production; reviewing correspondence from Richard Swan;	0.20
Feb-28-24	C. Stallone	Review additional productions from Tacora, Cargill and Jefferies; instructions to analyst to upload; email with Alan Merskey; review loaded documents and create searches;	1.20
Feb-28-24	J. Fish	Process productions of AHG	1.00
Feb-28-24	J. Dietrich	Review of email and consider contract related issues; review of email; discussion regarding outstanding matters; attend advisors call; attend board call; discussion regarding status; review of term sheet;	4.20
Feb-28-24	R. Jacobs	Review Cargill letter regarding DIP amendment terms. Review Consortium DIP term sheet. Meeting with FTI and Stikeman teams. Correspondence with Stikeman regarding document production. Discussion with J. Dietrich regarding Board meeting. Meeting with AHG advisors.	3.90
Feb-29-24	J. Dietrich	Exchange of email regarding status; discussion with FTI; discussion with Stikeman and FTI; review of email;	2.90
Feb-29-24	M. Sassi	Correspondence re: stay extension hearing.	0.40
Feb-29-24	A. Merskey	Emails and follow up on DIP issues; Update call with FTI; Follow up on production issues; Emails regarding case conference;	1.20
Feb-29-24	J. Picone	Discussion with Alan Merskey regarding timing of deliverables and next steps;	0.20
Feb-29-24	R. Jacobs	Emails regarding DIP financing terms. Consider AHG and Cargill terms and correspondence with Cassels and FTI teams. Attend update calls. Correspondence regarding report.	3.00

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Sassi, Monique	Partner	43.60	745.00	32,482.00

Name	Title	Hours	Rate	Amount
Wunder, Michael	Partner	25.50	1,050.00	26,775.00
Dietrich, Jane	Partner	75.30	1,005.00	75,676.50
Merskey, Alan	Partner	59.20	1,050.00	62,160.00
Picone, John M.	Partner	26.30	995.00	26,168.50
Jacobs, Ryan	Partner	80.60	1,650.00	132,990.00
Hoy, Alec	Associate	11.80	485.00	5,723.00
Jamal, Kiyam	Associate	23.00	450.00	10,350.00
Stallone, Cathy	Law Clerk / Paralegal	6.30	430.00	2,709.00
Fish, Jeff	Law Clerk / Paralegal	4.00	280.00	1,120.00
Total (CAD)		355.60		376,154.00

ADDITIONAL FEE SUMMARY

Services	Description	Amount
Importing Load File in to DB	ILDF - This is a fixed charge for work involved in ensuring data meets technical specifications to allow for seamless and efficient use of data received from external evidence repositories. Import productions of AHG	1,750.00
Creating Electronic Database	This is a fixed fee to create and configure an evidence management database as a central repository to store, analyze and review documents in a manner that preserves integrity and authenticity of evidence and increase the efficiency of the legal team.	1,500.00
Total (CAD)		3,250.00

Our Fees	379,404.00
HST @ 13.00%	49,322.52
TOTAL FEES & TAXES (CAD)	428,726.52

DISBURSEMENT SUMMARY

Taxable Disbursements

Travel	91.47
Delivery	33.38
Total Taxable Disbursements	124.85
HST @ 13.00%	16.23
Total Taxable Disbursements & Taxes	141.08

TOTAL DISBURSEMENTS & TAXES (CAD)	141.08
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TOTAL FEES	379,404.00
TOTAL DISBURSEMENTS	124.85
TOTAL TAXES	49,338.75
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	428,867.60

OUTSTANDING INVOICES				
Invoice Number	Invoice Date	Bill Amount	Payments / Credits	Balance Due
2229010	02/27/24	522,634.02	0.00	522,634.02
2230055	03/06/24	428,867.60	0.00	428,867.60
Total (CAD)		951,501.62	0.00	951,501.62

Cassels

Attn: Paul Bishop
FTI Consulting Canada Inc.
Toronto-Dominion Centre, TD South Tower
79 Wellington St. W., Suite 2010
Toronto, ON M5K 1G8

Invoice No: 2233262
Date: April 04, 2024
Matter No.: 055118-00003
GST/HST No.: R121379572
Lawyer: Jacobs, Ryan
Tel.: (416) 860-6465
E-mail: RJacobs@cassels.com

Re: Tacora Restructuring

Fees for professional services rendered up to and including March 31, 2024

Our Fees	667,902.00
Disbursements	5,543.78
Total Fees and Disbursements	673,445.78
HST @ 13.00%	87,547.95
TOTAL DUE (CAD)	760,993.73

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FEE DETAIL			
Date	Name	Description	Hours
Mar-01-24	A. Merskey	Various emails regarding DIP proposals, follow up on same, follow up on production steps;	0.60
Mar-01-24	J. Dietrich	Review of amended DIP term sheets and email regarding same; review of email; discussion with R. Jacobs; attend daily update call;	1.10
Mar-01-24	R. Jacobs	Review and consider DIP term sheets. Correspondence with Cassels team regarding issues. Correspondence with J. Dietrich regarding daily update call and updates. Begin detailed review and analysis of Cargill responding and cross motion record, evidence and expert reports.	3.60
Mar-02-24	J. Picone	Reviewing and analyzing confidential responding motion record of Cargill; correspondence in connection with the same;	2.50
Mar-02-24	J. Dietrich	Review of Cargill material and cross motion;	1.30
Mar-02-24	R. Jacobs	Review BJs markup of DIP term sheet. Emails with J. Porepa.	1.00
Mar-03-24	A. Merskey	Review Cargill motion record; Emails regarding production steps, follow up on same;	1.40
Mar-03-24	J. Picone	Further review and analysis of confidential responding motion record of Cargill;	1.50
Mar-03-24	J. Dietrich	Review of comments on DIP Term sheet; review of email correspondence;	0.60
Mar-04-24	M. Sassi	Preparation of court materials for stay extension including fee affidavits matters; review responding motion record; correspondence with company re: PIF;	4.50
Mar-04-24	A. Merskey	Update call with FTI and Stikeman, ongoing review of Cargill record, various related emails;	1.20
Mar-04-24	J. Gill	Draft Fee Affidavit; Correspondence with FTI re same;	2.20
Mar-04-24	M. Wunder	Confer with Cassels team regarding DIP programs and teams. Review DIP term sheets.	2.20
Mar-04-24	J. Picone	Reviewing correspondence relating to confidentiality of certain materials; further review of confidential responding record; correspondence from Alan Merskey; telephone call with Alan Merskey; reviewing aide memoire of the company relating to March 5, 2024 case conference;	1.20
Mar-04-24	C. Stallone	Email with Alan Merskey with additional Cargill production; create search in database;	0.80
Mar-04-24	C. Stallone	Tag Cargill documents for counsel review;	1.80
Mar-04-24	J. Fish	Process Cargill production for counsel review;	1.00
Mar-04-24	J. Dietrich	Attend update call;	1.00
Mar-04-24	R. Jacobs	Continue review of cross motion record and evidence. Meeting with Stikeman and Monitor teams. Examine litigation schedule and work on Monitor's report. Review revised DIP TS from Cargill and Consortium. Discussions with Monitor team regarding same.	3.00
Mar-05-24	A. Hoy	Updating and revising draft of Third Report; reviewing fee	1.50

Date	Name	Description	Hours
Mar-05-24	M. Sassi	affidavits of Cassels and Monitor and preparing redactions; Agenda and update call; Preparation of court materials for stay extension and sale approval motion; correspondence re: website updates; review endorsement;	5.50
Mar-05-24	J. Gill	Drafting Fee Affidavit; Prepare redactions;	4.90
Mar-05-24	A. Merskey	Emails and follow up regarding case conference; Follow up on DIP issues; Review correspondence and call with E. Kolers regarding process issues; Various related emails and follow up;	2.20
Mar-05-24	J. Picone	Reviewing endorsement relating to MFC royalty claim dispute; correspondence from Alan Merskey in connection with the same; videoconference with Alan Merskey to discuss developments relating to document production and confidentiality; reviewing correspondence from counsel to the company in connection with the same; further internal and other correspondence;	1.70
Mar-05-24	J. Dietrich	Discussion with Cargill's counsel and FTI; attend case conference; review of endorsement; review of email; participate in update call; discussion with FTI; discussion with Stikeman; participate in board meeting; review of CRA correspondence;	5.90
Mar-05-24	R. Jacobs	Meeting with FTI team. Work on reports. Meeting with Stikeman team. Meeting with Company and advisors regarding DIP. Attend board meeting. Attend meeting with Goodmans. Meeting with Consortium. Consider DIP issues and terms.	4.00
Mar-06-24	A. Hoy	Review and revise Fourth Report of the Monitor; preparing for drafting of Fifth Report of the Monitor;	1.70
Mar-06-24	M. Sassi	Agenda and update call; and correspondence re: court reports; revised DIP and correspondence re: same	4.40
Mar-06-24	A. Merskey	Working on resolving production issues; Related emails and calls with parties; Update call with FTI; Consider issues and evidence for monitor report;	3.80
Mar-06-24	J. Gill	Finalizing redactions;	0.30
Mar-06-24	M. Wunder	Call with company advisors and Monitor regarding DIP loan proposals and consider terms and conditions.	0.80
Mar-06-24	J. Picone	Reviewing extensive correspondence and documents relating to matters relevant to pending motion; preparing for and attending on a videoconference with counsel to Cargill; preparing for and attending on a videoconference with counsel to the company; discussions with Alan Merskey regarding the same; further correspondence;	2.80
Mar-06-24	J. Fish	Perform Clawback deletion requested by Cargill;	1.00
Mar-06-24	J. Dietrich	Review and exchange of email; discussion with FTI; discussion regarding issues related to DIP selection; consider report structure and review of materials; discussion regarding upcoming motion and related materials; review of email;	3.30

Date	Name	Description	Hours
Mar-06-24	R. Jacobs	Work on reports. Meetings with Cassels team regarding same. Meetings with FTI team. Meetings with Company advisors. Meeting with Consortium advisors. Consider revisions to DIPs. Consider issues and advise on same.	3.40
Mar-07-24	A. Hoy	Reviewing [REDACTED] reviewing proposed alternative DIP Financing Term Sheet; updating and revising Third Report to reflect same; revising Fourth Report; preparing and revising Fee Affidavit;	6.50
Mar-07-24	M. Sassi	Agenda and update call; Drafting third and fourth report; revised DIP terms sheets	8.60
Mar-07-24	A. Merskey	Update call with FTI; Call with Ad-Hoc regarding production issues; Numerous calls and emails throughout the day regarding same; Consider issues for court report, team meeting regarding same;	4.70
Mar-07-24	J. Gill	[REDACTED]	1.10
Mar-07-24	J. Gill	[REDACTED]	0.20
Mar-07-24	J. Picone	Reviewing and considering various documents relating to MFC royalty matter; correspondence with Monique Sassi regarding the same; considering legal and litigation issues, timing, and next steps;	3.80
Mar-07-24	J. Dietrich	Discussion regarding report contents; review of draft Third Report; discussion with FTI regarding status; continue review and comment on draft material; discussion with Stikemans regarding open issues; review of email; discussion regarding outstanding issues; participate in board call; follow up discussion regarding court materials; review of DIP related email; review of document production memo and related email;	5.60
Mar-08-24	A. Hoy	Reviewing and revising Third Report of the Monitor; Updating Fourth Report of the Monitor; internal correspondence regarding same	5.00
Mar-08-24	M. Sassi	Calls and correspondence re: court reports; drafting third and fourth court reports; scheduling and examinations; correspondence re: relief sought by applicants for next hearing;	6.20
Mar-08-24	S. Voudouris	Review and analyze materials regarding MFC royalty claim and prepare report regarding same;	2.20
Mar-08-24	A. Merskey	Reviewing production analysis; Consider issues for and contents of monitor reports; Reviewing same; Attend on counsel call regarding witness scheduling;	3.40
Mar-08-24	A. Stavros	Attending examination deliberation; Correspondence with A. Merskey and J. Picone re same;	1.80
Mar-08-24	K. Jamal	Correspondence regarding upcoming examinations;	0.30
Mar-08-24	J. Picone	Internal discussions and correspondence with Alan Merskey regarding scheduling of examinations and related matters; attending on all-counsel call to discuss the same; reviewing various documents relating to MFC royalty matter; discussions with Stephanie Voudouris regarding the same;	2.80

Date	Name	Description	Hours
Mar-08-24	J. Dietrich	Review and exchange of email regarding status; discussion regarding status; review and exchange of email; review and comment on draft report; participate in update call; review of status; review of additional comments on draft report;	4.20
Mar-08-24	M. Wunder	Work with Cassels team for prep for court hearing. Review and analyze replacement DIP proposals re same.	1.40
Mar-08-24	R. Jacobs	Attend daily update call. Work on draft reports. Emails and calls regarding DIP financing, subscription agreement. Attend meetings with FTI.	3.00
Mar-09-24	M. Sassi	Draft reports; review and comment on affidavit; correspondence and calls re: court materials and preparation re: same;	2.70
Mar-09-24	A. Hoy	Reviewing and updating drafts of Third Report and Fourth Report to reflect ongoing updates to proposed DIP Agreement and discussions regarding same; updating reports to reflect correspondence with Company counsel;	3.60
Mar-09-24	A. Merskey	Various emails regarding DIP approval and sale approval evidence and steps, consider issues for same, reviewing and working on 3rd and 4th reports; Review MFC issues;	1.40
Mar-09-24	J. Picone	Telephone call with Alan Merskey to discuss royalty issues and related matters, preparation of monitor's report, and upcoming examinations; reviewing correspondence;	0.50
Mar-09-24	J. Dietrich	Review and revise draft reports; discussion with R. Jacobs; review of draft affidavit; email exchange regarding status of draft reports and comments draft affidavit;	5.30
Mar-09-24	R. Jacobs	Review and comment on draft affidavit. Review and comment on draft 3rd report. Calls with J. Dietrich regarding same. Call with A. Taylor. Correspondence regarding Subscription Agreement. Correspondence regarding GH. Review mem regarding productions.	3.60
Mar-10-24	M. Sassi	Revisions to draft reports; correspondence and call re: court materials and preparation re: same	3.90
Mar-10-24	A. Hoy	Preparing additional revisions to the Third Report of the Monitor	1.60
Mar-10-24	A. Merskey	Numerous emails and follow ups on 3rd and 4th reports, reviewing motion materials, follow up on scheduling steps;	1.70
Mar-10-24	K. Jamal	Review motion records; Review NOEs; Correspondence regarding same;	2.10
Mar-10-24	J. Dietrich	Review of revisions to draft third report and email comments on same; review of comments on draft fourth report and email comments on same; review and exchange of email regarding status; review of revised affidavit; review of email;	3.20
Mar-10-24	R. Jacobs	Review and comment on draft 3rd and 4th reports. Calls and correspondence with Cassels and FTI teams. Correspondence with Stikeman regarding draft affidavit. Review and comment on affidavit.	3.70

Date	Name	Description	Hours
Mar-11-24	C. Stallone	Email from and to Alan Merskey; create search for clawed back documents to remove from database; email to opposing counsel regarding claw back; instructions to analyst; receive load files from Tacora; instructions to analyst;	1.50
Mar-11-24	S. Voudouris	Review and analysis of materials regarding MFC royalty claim including letters between the parties and materials from arbitration proceedings; review and analysis of caselaw regarding treatment of royalty claims in insolvency proceedings; draft memorandum summarizing materials and legal analysis regarding royalty claim;	3.80
Mar-11-24	M. Sassi	Prepare agenda and attend update call with FTI; Work on portions of Third and Fourth reports and finalization of same; Work on report re MFC dispute;	8.60
Mar-11-24	A. Hoy	Updating Third Report and Fourth Reports; internal discussions re same;	6.70
Mar-11-24	A. Merskey	Update call with Stikemans; Various emails regarding 3rd and 4th reports, working on same; Emails regarding production and cross-examination issues, working on same;	3.70
Mar-11-24	K. Jamal	Review pleadings; Draft examinations chart; Correspondence regarding same;	1.60
Mar-11-24	J. Picone	Reviewing correspondence from counsel to Cargill regarding commercially sensitive documentation; reviewing list of commercially sensitive documents; internal correspondence regarding the same; correspondence regarding MFC royalty; reviewing background documents in connection with the same;	1.70
Mar-11-24	C. Stallone	Emails re collection of documents;	0.40
Mar-11-24	M. Wunder	Review and comment on draft Monitor report.	1.30
Mar-11-24	R. Jacobs	Review and revise draft 3rd and 4th reports. Correspondence with Cassels and FTI teams regarding same. Attend meeting with FTI and Stikeman. Consider timing matters. Review email feedback from Cargill. Review latest draft CFF.	4.00
Mar-11-24	J. Dietrich	Participate in status update discussion; review of revised 3rd report; review of comments on 4th report; review of comments on reports; review of revisions to affidavit; review of mark ups of draft reports and various comments on same;	3.90
Mar-12-24	M. Sassi	Update call; revisions to Third and Fourth Report; calls and correspondence re: same; correspondence re: hearing query and stakeholder correspondence with Monitor; work on appendix and confidential appendix to report;	5.10
Mar-12-24	A. Hoy	Call with Monitor to discuss comments received on Monitor draft Reports; preparing draft of Fifth Report of the Monitor; internal call regarding same; updating Third Report;	4.70
Mar-12-24	S. Voudouris	Review and analysis of materials regarding MFC royalty	5.20

Date	Name	Description	Hours
		claim including letters between the parties and materials from arbitration proceedings; prepare draft monitor's report regarding royalty claim;	
Mar-12-24	A. Merskey	Working on Monitor reports, various related emails, update call with FTI. Emails and updates on production issues, follow up on cross-examination coordination issues, emails regarding same. Emails with court regarding hearing arrangements. Emails and follow up on MFC issues.	3.60
Mar-12-24	K. Jamal	Finalize and circulate examination chart; Correspondence regarding same; Correspondence regarding examination scheduling;	2.20
Mar-12-24	M. Wunder	Litigation preparation and review reports for court hearings. Review and comment on portions of draft Monitor's report.	1.40
Mar-12-24	J. Picone	Reviewing further correspondence from counsel to Cargill regarding document production; internal correspondence regarding the same; correspondence regarding MFC royalty; further review of background documents in connection with the same; correspondence with counsel to the company regarding the same;	1.30
Mar-12-24	C. Stallone	Email with Alan Merskey re additional productions; review and organize for loading into database; prepare various instructions to analyst to load documents re Cargill and Jefferies documents; prepare instructions to claw-back documents; prepare excel chart of all claw-back documents to date; discuss new Cargill productions with analyst;	3.80
Mar-12-24	J. Dietrich	Discussion with counsel to QSNL; review of changes to draft report; discussion with FTI regarding status, outstanding matters and draft reports; review of email; review of draft report; review of revised report and email regarding same; attend daily update call; exchange of email regarding DIP comparison; review of draft comparison;	4.80
Mar-12-24	R. Jacobs	Meeting with FTI and Cassels teams regarding reports. Review and comment on latest draft reports, review filed motion record. Review emails from Cargill on productions.	3.00
Mar-13-24	A. Hoy	Finalizing Third Report and compiling and preparing for service; serving Third Report; updating draft Fifth Report; reviewing MFC royalty claim and Arbitration SOC	3.70
Mar-13-24	M. Sassi	Revisions to Fourth report, calls and correspondence re: same;	6.10
Mar-13-24	W. Onyeaju	Commissioning affidavit of service of A. Hoy.	0.10
Mar-13-24	A. Merskey	Emails and follow up on production issues. Emails regarding Monitor reports. Consider issues for hearing. Working on cross-examination coordination and numerous related emails.	3.60
Mar-13-24	K. Jamal	Correspondence regarding amendments to examination timetable; Review letter and correspondence regarding examinations and production;	0.30
Mar-13-24	J. Picone	Reviewing and considering company memo regarding [REDACTED]	1.90

Date	Name	Description	Hours
		██████████ reviewing and considering company memo regarding ██████████ reviewing and considering company memo regarding ██████████	
Mar-13-24	C. Stallone	correspondence from Alan Merskey regarding the same; Review additional Cargill productions; instructions to analyst to load into database;	0.80
Mar-13-24	C. Stallone	Email from Alan Merskey; prepare search of Jefferies claw-back document; instructions to analyst; create Collection Summary report;	1.30
Mar-13-24	R. Jacobs	Review comments on 3rd and 4th reports. Finalize same. Review draft reply affidavits. Review correspondence and party positions on productions. Attend daily update call with Company. Review update regarding Cargill position on March 18 motion.	3.20
Mar-13-24	J. Dietrich	Review of email; review of email regarding report and appendices; emails regarding finalization of report; discussion with A. Taylor; consider outstanding matters; review of draft report; email regarding contract notices; review of comments on draft report; consider draft affidavits;	2.80
Mar-14-24	M. Sassi	Update call; finalizing fourth report and correspondence re: same; Reply records and correspondence of same;	3.20
Mar-14-24	A. Hoy	Preparing and finalizing Fourth Report for service; serving Fourth Report; coordinating to file Fourth Report; updating Fifth Report draft;	4.10
Mar-14-24	S. Voudouris	Review and analyze documents submitted by the parties in the MFC royalty arbitration and CCAA proceeding; review and analyze subscription agreement and contemplated treatment of MFC Royalty; correspondence regarding same;	1.20
Mar-14-24	A. Merskey	Update call with FTI and team. Working on Monitor report. Coordinating cross-examination issues. Discussion with E Kolers regarding same and related emails.	2.70
Mar-14-24	K. Jamal	Revise examination timetable; Review and circulate salient records for examinations; Correspondence regarding same; Correspondence with N. Gomes regarding diarization and timetable;	1.30
Mar-14-24	J. Picone	Internal discussion with Alan Merskey regarding pending cross-examinations; further discussions with Alan Merskey regarding dispute relating to ██████████ preparing for discussion with company counsel regarding royalty issues;	0.80
Mar-14-24	C. Stallone	Email from Alan Merskey; review of various productions; email to opposing counsel regarding zip files;	0.40
Mar-14-24	C. Stallone	Review all load files and tag documents; email to Alan Merskey regarding claw back document; update Collection Summary report;	1.50
Mar-14-24	J. Dietrich	Attend board meeting; discussion regarding outstanding matters including Fourth Report and reply material;	5.30

Date	Name	Description	Hours
		discussion with Stikeman; discussion regarding contract related issues; participate in daily update call; email regarding service; review of email regarding status; review of Cargill motion record and consider issues; discussion regarding status;	
Mar-14-24	R. Jacobs	Meeting with FTI team regarding 4th report. Finalize draft of same. Calls and emails with Stikeman team. Call with AHG advisor. Review Cargill cross motion record on DIP. Attend daily update call. Call with Stikeman team. Review Cargill cross motion. Call with J. Dietrich.	3.70
Mar-15-24	M. Sassi	Correspondence re: court motion and DIP matters; correspondence re: cross examinations; drafting and comments on supplement report; review court materials served; correspondence with FTI re: website and updates	5.10
Mar-15-24	S. Voudouris	Prepare draft monitor's report in connection with MFC royalty dispute; review and analyze documents submitted by the parties in the MFC royalty arbitration and CCAA proceeding; review and analyze subscription agreement and contemplated treatment of MFC Royalty; correspondence regarding same;	2.70
Mar-15-24	A. Merskey	Review Cargill DIP motion. Various calls and emails regarding same. Consider issues and submissions for stay extension hearing. Emails and follow up on cross-examination steps and schedule.	4.10
Mar-15-24	A. Hoy	Preparing supplemental Third Report; preparing Fourth Supplemental Report	4.40
Mar-15-24	K. Jamal	Retrieve records; Liaise with document production for resizing of records; Assist with organization of examinations; Calls and correspondence with N. Gomes regarding same;	2.10
Mar-15-24	J. Picone	Reviewing and considering motion record of Cargill for responding cross-motion; reviewing timetable for cross-examinations; correspondence in connection with the same; preparing for and attending on a videoconference with counsel to the company to discuss royalty issues;	2.80
Mar-15-24	J. Fish	Process and OCR Jeffries Re-Produced Document Volumes	2.00
Mar-15-24	C. Stallone	Instructions to IT to release zip files sent to Alan Merskey; receive zip files and instructions to analyst to load into database; review document loaded to database; instructions to analyst;	1.60
Mar-15-24	J. Dietrich	Review of responding / cross motion; discussion with FTI regarding DIP motion and related matters; discussion regarding DIP approval motion, status and strategy; participate in update call; discussion with P. Bishop;	3.60
Mar-15-24	R. Jacobs	Analysis regarding competing DIP proposals and issues for March 18 hearing. Emails and calls with FTI team, Cassels team and Company advisors. Review Company factum.	3.90
Mar-16-24	R. Jacobs	Begin review and analysis of Cargill factum. Emails and calls	1.80

Date	Name	Description	Hours
		with Cassels team regarding same.	
Mar-17-24	M. Sassi	Correspondence re: comeback hearing; review materials serviced; budget and DIP matters	0.40
Mar-17-24	A. Merskey	Various emails throughout the day regarding March 18 hearing, call with FTI and Stikemans regarding same. Emails regarding privilege dispute, follow up on same.	2.80
Mar-17-24	K. Jamal	Review correspondence from Arbitration Place and provide internal update;	0.20
Mar-17-24	J. Dietrich	Discussion with J. Porepa; review of email; review of factum of Cargill; email regarding confidential appendix; discussion with R. Jacobs; discussion with Advisors; participate in board meeting;	2.90
Mar-17-24	R. Jacobs	Calls with Stikeman team regarding DIP motion. Calls and emails with FTI team regarding same. Calls with J. Dietrich and A. Merskey regarding party position and issues. Review Cargill factum. Review Consortium factum. Review cash flow, and DIP comparisons.	4.40
Mar-18-24	M. Sassi	Correspondence re: court attendance; discussion re: supplement;	0.30
Mar-18-24	S. Voudouris	Attend cross-examinations in connection with sale approval motion; prepare draft monitor's report in connection with MFC royalty dispute; review and analyze documents submitted by the parties in the MFC royalty arbitration and CCAA proceeding; review and analyze subscription agreement and contemplated treatment of MFC Royalty; correspondence regarding same;	4.80
Mar-18-24	A. Merskey	Emails and updates on DIP comparison. Prepare for and attend at DIP hearing. Consider next steps, related emails. Consider report on the day's cross-examinations. Emails regarding evidence stipulations and follow up on same. Emails regarding DIP revisions.	6.80
Mar-18-24	J. Picone	Correspondence relating to agreement / stipulations regarding value of offtake agreement; reviewing documents relating to royalty issue; discussions with Stephanie Voudouris regarding progress of ongoing cross-examinations;	0.80
Mar-18-24	C. Stallone	Review documents for Jefferies redesignations;	0.60
Mar-18-24	M. Wunder	Confer with Cassels team re order and related DIP issues. Review and consider DIP terms and issues.	2.20
Mar-18-24	J. Dietrich	Preparation for and attendance at hearing; Discussion with R. Jacobs; Consider draft order; Consider outstanding issues;	6.20
Mar-18-24	R. Jacobs	Prep for and attend contested DIP hearing. Correspondence with Company advisors regarding DIP needs and attend meeting with company regarding same. Review and comment on draft order. Review update regarding examinations. Correspondence with FTI regarding communications to Cargill on DIP and CFF. Calls with J. Dietrich regarding case status and issues for Monitor.	4.10

Date	Name	Description	Hours
Mar-19-24	M. Sassi	Agenda and update call re: ongoing CCAA matters; discussion re: supplement, litigation schedule and cross examinations	1.40
Mar-19-24	A. Hoy	Assisting with preparing the Fifth Report of the Monitor (re MFC litigation)	0.50
Mar-19-24	S. Voudouris	Attend cross-examinations in connection with sale approval motion; prepare draft monitor's report in connection with MFC royalty dispute; review and analyze documents submitted by the parties in the MFC royalty arbitration and CCAA proceeding; review and analyze subscription agreement and contemplated treatment of MFC Royalty; correspondence regarding same;	8.50
Mar-19-24	A. Merskey	Emails regarding DIP extension and advances. Attendance at cross-examinations and consider issues for supplemental report and hearing.	6.30
Mar-19-24	K. Jamal	Discuss attendance of examinations with A. Merskey and S. Voudouris; Correspondence regarding same;	0.50
Mar-19-24	J. Picone	Reviewing summaries of cross-examinations; reviewing related correspondence; reviewing materials addressed during cross-examinations;	0.90
Mar-19-24	J. Dietrich	Review of email; discussion with FTI regarding status and strategy; review of email; discussion with FTI and Stikeman regarding status; participate in daily update call; review of email; review of cross examination summaries;	3.10
Mar-19-24	R. Jacobs	Analysis of issues related to transaction. Discussions with client and Cassels team regarding same. Review and consider emails regarding DIP. Discuss same with J. Dietrich. Review update emails and summary regarding examinations. Discuss supplemental report. Examine applicable law and precedent.	4.50
Mar-20-24	M. Sassi	Call and correspondence re: cross examinations and supplemental report; summaries of transcript; correspondence re: MFC dispute	1.40
Mar-20-24	S. Voudouris	Prepare draft monitor's report in connection with MFC royalty dispute. Review and analyze documents submitted by the parties in the MFC royalty arbitration and CCAA proceeding; review and analyze subscription agreement and contemplated treatment of MFC Royalty; correspondence regarding same;	4.60
Mar-20-24	A. Merskey	Attendance at cross-examinations, receiving related reports. Consider supplemental report issues.	6.20
Mar-20-24	K. Jamal	Attend examinations; Prepare internal examination summaries; Correspondence regarding same; Liaise with Arbitration Place regarding scheduling;	9.80
Mar-20-24	J. Picone	Discussion with Stephanie Voudouris regarding preparation of report relating to royalty issues; further internal discussions relating to cross examinations; reviewing summaries of cross examinations;	0.80

Date	Name	Description	Hours
Mar-20-24	J. Dietrich	Review of email; discussion regarding disclaimer issues with Osler, Stikeman and FTI; review of examination summaries; follow up discussion regarding status and strategy;	2.80
Mar-20-24	R. Jacobs	Review emails regarding DIP terms and open issues. Attend meetings with FTI and Stikeman teams, meeting with Consortium counsel. Careful consideration of issues and discussions with Cassels team regarding same. Email correspondence with P. Bishop. Work on supplemental report.	3.40
Mar-21-24	M. Sassi	Drafting Supplemental report; update call; calls and correspondence re: supplemental report.	5.20
Mar-21-24	S. Voudouris	Attend cross-examinations of parties in connection with sale approval motion and prepare analysis of same; prepare draft monitor's report in connection with MFC royalty dispute including review of documents submitted by the parties in the MFC royalty arbitration and CCAA proceeding and correspondence regarding same;	9.20
Mar-21-24	A. Hoy	Reviewing Fourth Supplemental Report and providing comments to same	1.30
Mar-21-24	A. Merskey	Update call with FTI. Emails with court regarding March 18 order. Consider issues for supplemental report and discuss with team. Consider issues and steps for factum. Reviewing examination summaries and transcripts. Attendance at examinations.	6.80
Mar-21-24	K. Jamal	Attend examinations; Prepare examination summary;	6.00
Mar-21-24	J. Picone	Internal correspondence relating to cross-examinations and other litigation matters; reviewing summaries of cross-examinations; discussion with Ryan Jacobs regarding status of examinations and next steps; reviewing transcripts;	1.80
Mar-21-24	C. Stallone	Review transcripts from examinations;	0.70
Mar-21-24	J. Dietrich	Discussion regarding status; review of summary of examinations; discussion regarding status and outstanding issues; discussion regarding supplemental report and potential factum; discussion with A. Merskey; discussion with FTI and Stikeman regarding status; participate in update call; review of email regarding DIP issues; review of transcripts;	5.60
Mar-21-24	R. Jacobs	Attend calls with Consortium counsel, Company counsel and FTI. Work on supplemental report. Consider litigation issues. Attend update call with Company.	3.00
Mar-22-24	M. Sassi	Drafting portion of Supplement to Fourth reports; calls and correspondence re: same; review transcripts;	7.00
Mar-22-24	S. Voudouris	Attend cross-examinations of parties in connection with sale approval motion; prepare draft monitor's report in connection with MFC royalty dispute including review of documents submitted by the parties in the MFC royalty arbitration and CCAA proceeding and correspondence regarding same; review and analysis of motion regarding	9.40

Date	Name	Description	Hours
		regarding MFC royalty dispute served by Tacora and incorporate relevant facts into draft monitor's report; draft and revise portions of the supplemental fourth report of the Monitor to incorporate evidence from cross-examinations;	
Mar-22-24	A. Merskey	Review and consider examination summaries. Related emails. Emails regarding coordination of examinations. Working on fourth report. Consider issues for factum. Call with AHG and company advisers.	7.20
Mar-22-24	A. Hoy	Assisting with preparation of Fifth Report (re litigation dispute)	0.70
Mar-22-24	K. Jamal	Attend examinations and circulate internal summary; Assist with drafting supplement to monitor's fourth report;	7.50
Mar-22-24	J. Picone	Reviewing and considering the motion record of the application relating to the MFC dispute; internal discussions with Stephanie Voudouris regarding preparation of a report relating to the same; reviewing and considering various examination summaries and transcript summaries; reviewing revised draft supplement to the fourth report of the monitor; internal correspondence regarding the same;	2.70
Mar-22-24	C. Stallone	Review all Cargill volumes of documents; update Collection Summary; create searches in database;	0.80
Mar-22-24	C. Stallone	Email from A. Merskey regarding Cargill claw-back document; instructions to analyst to remove all versions of the document; email to A. Merskey regarding completion of claw-back;	0.50
Mar-22-24	J. Fish	Identify documents to remove from Case from Cargill Clawback request. Process same;	2.00
Mar-22-24	J. Dietrich	Review of draft supplement to Fourth Report and email comments on same; discussion with Osler, FTI, Stikeman, GLC and Greenhill on status; review of transcripts; review and comment on revised draft of report; participate in daily update call; review of correspondence regarding equipment issues; review of transcripts; review of revised drafts of supplemental fourth report and exchange of email regarding same;	7.50
Mar-22-24	R. Jacobs	Attend calls with Company advisers. Attend call with Consortium advisers. Correspondence with Cargill counsel. Review and comment on draft supplemental report. Discussion regarding factum.	3.90
Mar-23-24	M. Sassi	Correspondence re: Supplemental report	0.60
Mar-23-24	S. Voudouris	Prepare draft monitor's report in connection with MFC royalty dispute including review of documents submitted by the parties in the MFC royalty arbitration and CCAA proceeding and correspondence regarding same; review and analysis of motion regarding MFC royalty dispute served by Tacora and incorporate relevant facts into draft monitor's report; draft and revise the supplemental fourth report of the Monitor to incorporate evidence from cross-	6.20

Date	Name	Description	Hours
		examinations including review and analysis of transcripts regarding same; correspondence regarding same;	
Mar-23-24	A. Merskey	Review transcripts and productions, emails regarding same. Working on 4th report and related emails.	1.20
Mar-23-24	K. Jamal	Prepare rider to supplemental fourth report;	0.50
Mar-23-24	J. Picone	Correspondence from Stephanie Voudouris regarding MFC dispute; further review of motion record of the applicant relating to the MFC dispute; related correspondence; further review of draft supplement to the monitor's fourth report; further correspondence;	1.80
Mar-23-24	J. Dietrich	Exchange of email regarding supplemental fourth report and comments on same;	1.70
Mar-23-24	R. Jacobs	Review and comment on draft report. Correspondence with FTI and Cassels team regarding same.	1.70
Mar-24-24	M. Sassi	Calls and correspondence re: supp. to Fourth Report; circulation of same; comment and amendments;	2.60
Mar-24-24	S. Voudouris	Prepare draft monitor's report in connection with MFC royalty dispute including review of documents submitted by the parties in the MFC royalty arbitration and CCAA proceeding and correspondence regarding same; review and analysis of motion regarding MFC royalty dispute served by Tacora and incorporate relevant facts into draft monitor's report; draft and revise the supplemental fourth report of the Monitor to incorporate evidence from cross-examinations including review and analysis of transcripts regarding same; correspondence regarding same;	4.70
Mar-24-24	A. Merskey	Call with team and FTI regarding report, various emails regarding same, review and consider revisions.	1.20
Mar-24-24	J. Dietrich	Review of additional comments on draft report; discussion with FTI and Cassels regarding further amendments;	1.30
Mar-24-24	R. Jacobs	Review and comment on latest draft report. Attend call with FTI regarding same.	2.00
Mar-25-24	S. Voudouris	Prepare draft monitor's report in connection with MFC royalty dispute including review of documents submitted by the parties in the MFC royalty arbitration and CCAA proceeding and correspondence regarding same; review and analysis of motion regarding MFC royalty dispute served by Tacora and incorporate relevant facts into draft monitor's report; draft and revise the supplemental fourth report of the Monitor to incorporate evidence from cross-examinations including review and analysis of transcripts regarding same; correspondence regarding same;	5.60
Mar-25-24	M. Sassi	Correspondence re: report and court materials; case conference correspondence; matters related to taxes; comments on report and edits re: same	7.70
Mar-25-24	K. Jamal	Review and organize transcript productions; Correspondence regarding same; Liaise with e-discovery team regarding retrieval of documents in database;	0.80

Date	Name	Description	Hours
Mar-25-24	S. Fernandes	Review motion records re tax losses;	1.50
Mar-25-24	A. Merskey	Working on 5th report. Conferences with team and FTI regarding same. Various emails regarding court attendances and consider issues for same. Emails regarding production issues	4.20
Mar-25-24	J. Picone	Reviewing and revising draft fifth report of the monitor relating to royalty issues; discussions and correspondence with Stephanie Voudouris regarding the same; other internal correspondence; reviewing various cross-examination transcripts; telephone call with Alan Merskey regarding the same and recent developments; reviewing notice of examination for cross-examination of Joe Broking relating to DIP replacement motion;	2.80
Mar-25-24	C. Stallone	Email from and to Brittnei Tee regarding [REDACTED];	0.20
Mar-25-24	C. Stallone	Email from and to Monique Sassi; [REDACTED]	0.60
Mar-25-24	J. Dietrich	Discussion with Stikemans regarding outstanding issues; discussion with FTI and Goodmans regarding outstanding issues; participate in update call with Oslers; review of revised supplemental report; discussion regarding further revisions to draft report;	2.80
Mar-25-24	R. Jacobs	Work on supplement to 4th report. Attend calls with Goodmans team. Attend meeting with Consortium counsel and Company Call with L. Nicholson. Attend meetings with FTI regarding evidence, Court report.	3.80
Mar-26-24	S. Voudouris	Draft and revise the supplemental fourth report of the Monitor to incorporate evidence from cross-examinations including review and analysis of transcripts regarding same; correspondence regarding same; draft and revise fifth report of the monitor; commence caselaw research in response to preliminary threshold motion and responding cross-motion;	5.50
Mar-26-24	M. Sassi	Correspondence re: tax matters; update call and follow up items; finalization and edits supplement tor 4th report; website matters;	5.00
Mar-26-24	K. Jamal	Review and organize documents received from examinations;	0.20
Mar-26-24	A. Merskey	Emails and calls regarding finalization of Supplemental Report, attending to service. Emails and discussions regarding court agenda for sales approval hearing, consider same. Follow up on confidentiality issues. Consider issues for responding factum	2.60
Mar-26-24	J. Picone	Internal correspondence relating to draft fifth report of the monitor; reviewing and revising the same;	0.80
Mar-26-24	C. Stallone	Run analytics on entire database regarding de-duplication; review status of load file missing;	0.60
Mar-26-24	J. Dietrich	Attend case conference; Discussion regarding status with FTI; Revisions to draft report; Discussion regarding case	3.90

Date	Name	Description	Hours
		conference, status and legal issues; Exchange of email regarding comments on material; Participate in daily update call;	
Mar-26-24	R. Jacobs	Work on supplemental report. Meetings with FTI team regarding same. Correspondence regarding clawback. Meeting with Stikeman team. Attend daily update meeting with Company. Review emails from Goodmans.	2.80
Mar-27-24	S. Voudouris	Draft and revise fifth report of the monitor including reviewing materials delivered by parties regarding MFC royalty; draft and revise factum in response to preliminary threshold motion and responding cross-motion including review and analysis of motion materials, cross-examination transcripts, and applicable caselaw research;	4.60
Mar-27-24	M. Sassi	Correspondence re: Supplemental report; correspondence re CCAA a matters; matters related to service of report.; review draft facta; review draft report re: MFC Dispute	5.30
Mar-27-24	A. Merskey	Meet with S Voudoris regarding MFC report, working on same. Various emails and follow ups regarding confidentiality issues and hearing management steps. Emails and follow up on service steps. Consider issues for factum.	3.40
Mar-27-24	A. Hoy	Preparing and finalizing Supplement to Fourth Report; redacting same; preparing to serve Supplement to Fourth Report	0.70
Mar-27-24	K. Jamal	Review and organize documents received from examinations;	0.10
Mar-27-24	J. Picone	Reviewing and considering further revised draft fifth report of the monitor; reviewing documents referenced in draft report; correspondence in connection with the same; correspondence from counsel to Cargill; reviewing and considering Cargill's factum on its preliminary threshold motion;	2.70
Mar-27-24	C. Stallone	Receive email from opposing counsel regarding Answers to Lehtinen, Carrelo, Roland, Cusiman and Gula examinations;	0.50
Mar-27-24	J. Dietrich	Review of endorsement; Review of emails; Discussion with FTI and R. Chadwick; Review of email regarding confidentiality issues; Participate in update call;	2.50
Mar-27-24	R. Jacobs	Meeting with FTI team. Meeting with Goodmans. Attend daily update call with Company. Finalize Monitor's supplemental report. Begin review of facta.	4.00
Mar-28-24	M. Sassi	Correspondence re: service of supplement to report; update call with Monitor; calls and correspondence re: factum, tax matters, and MFC Disputes; research re: specific case law; discussion re: website and confidential documents.	5.50
Mar-28-24	A. Hoy	Finalizing and serving Supplement to Fourth Report;	0.30
Mar-28-24	S. Voudouris	Review and analysis of facta served by parties regarding sale approval motion, preliminary threshold motion, and responding cross motion; review and analysis of caselaw	5.80

Date	Name	Description	Hours
		referenced in parties facta; draft and revise factum in response to preliminary threshold motion and responding cross-motion including review and analysis of motion materials, cross-examination transcripts, and applicable caselaw research;	
Mar-28-24	A. Merskey	Review MFC materials and confer with S Voudoris regarding motion steps. Update call with FTI. Receive and review AHG, Cargill and Tacora facta and consider same. Meeting with team regarding responding factum preparation. Consider issues for same and discuss with S Voudoris. Various calls and emails with AHG, Cargill and Tacora counsel regarding motion order and preparation, confidentiality issues and sealing order request. Receive and review MFC materials, discuss with S Voudoris.	7.40
Mar-28-24	K. Jamal	Correspondence regarding examinations;	0.10
Mar-28-24	D. Richardson	Reviewing tax matters; researching law and drafting summary of same; office conference with M. Sassi and revising memorandum; researching law and email correspondence with M. Sassi, R. Jacobs and J. Dietrich;	8.40
Mar-28-24	J. Picone	Reviewing and considering Cargill's factum on its preliminary threshold motion; reviewing and considering Cargill's factum on its responding cross-motion; reviewing case law cited in factums; reviewing and considering factum of the consortium noteholder group; reviewing factum of the applicant; reviewing case law; reviewing and considering affidavit of Joe Broking sworn March 28, 2024; internal correspondence in connection with the same;	3.80
Mar-28-24	J. Dietrich	Attend board meeting; begin review of facta; discussion with J. Porepa; email exchange regarding confidentiality issues; participate in update call with FTI; participate in update call with Fasken Review of facta; participate in discussion with Ad Hoc Advisors; discussion regarding tax issues; participate in daily update call; discussion with R. Jacobs;	5.60
Mar-28-24	K. Bond	Telephone conversation with D. Richardson regarding [REDACTED]; Reviewing draft email from D. Richardson regarding [REDACTED]	1.80
Mar-29-24	M. Sassi	Calls and correspondence re: Factum; review case law for Factum; correspondence re: [REDACTED]	3.50
Mar-29-24	S. Voudouris	Draft and revise fifth report of the monitor including reviewing materials delivered by parties regarding MFC royalty; review and analysis of facta served by parties regarding sale approval motion, preliminary threshold motion, and responding cross motion; review and analysis of caselaw referenced in parties facta; draft and revise factum in response to preliminary threshold motion and responding cross-motion including review and analysis of motion materials, cross-examination transcripts, and applicable caselaw research;	6.70

Date	Name	Description	Hours
Mar-29-24	K. Jamal	Assist with research to support Monitor's factum; Summarize findings and correspondence regarding same; Call with M. Sassi to discuss research;	5.50
Mar-29-24	J. Picone	Review correspondence from counsel to Cargill; further review of factums for pending hearing;	0.80
Mar-29-24	D. Richardson	Researching law and considering proposed asset sale; office conference with J. Dietrich and M. Sassi; telephone call with K. Bond regarding [REDACTED]; drafting and revising analysis; office conference with Z. Nurmohamed; reviewing [REDACTED];	6.20
Mar-29-24	R. Jacobs	Review and analysis of facta.	2.60
Mar-29-24	J. Dietrich	Review of facta; review of email regarding potential contract amendment and discussion with J. Porepa regarding same; review of tax email; review of case law;	3.20
Mar-29-24	K. Bond	Reviewing and providing comments on draft email from D. Richardson regarding [REDACTED]; Telephone conversation with D. Richardson regarding [REDACTED];	1.20
Mar-30-24	S. Voudouris	Review and analysis of facta served by parties regarding sale approval motion, preliminary threshold motion, and responding cross motion; review and analysis of caselaw referenced in parties facta; draft and revise factum in response to preliminary threshold motion and responding cross-motion including review and analysis of motion materials, cross-examination transcripts, and applicable caselaw research;	8.50
Mar-30-24	K. Jamal	Assist with research for Monitor's factum; Summarize findings and correspondence regarding same; Call with S. Voudouris to discuss research;	8.00
Mar-30-24	D. Richardson	Researching law and analyzing issues [REDACTED]; email correspondence with H. Dietrich and M. Sassi; office conference with K. Bond to review analysis and draft email;	2.40
Mar-30-24	R. Jacobs	Review redacted facta. Email correspondence with Cassels team regarding litigation issues. Examine case authorities.	2.80
Mar-31-24	M. Sassi	Review MFC responding materials; review tax matters	1.60
Mar-31-24	M. Sassi	Correspondence re: caselaw and factum.	1.20
Mar-31-24	S. Voudouris	Review and analysis of facta served by parties regarding sale approval motion, preliminary threshold motion, and responding cross motion; review and analysis of caselaw referenced in parties facta; draft and revise factum in response to preliminary threshold motion and responding cross-motion including review and analysis of motion materials, cross-examination transcripts, and applicable caselaw research;	2.80
Mar-31-24	A. Merskey	Review and revise factum. Review related research. Ongoing review of company and AHG materials. Emails and	5.80

Date	Name	Description	Hours
		calls regarding factum issues.	
Mar-31-24	K. Jamal	Correspondence regarding Monitor's factum; Assist with research for Monitor's factum;	2.20
Mar-31-24	J. Picone	Reviewing and revising draft factum of the monitor; reviewing confidentiality highlights by Cargill in AHG factum and applicant factum;	2.30
Mar-31-24	R. Jacobs	Review facta. Analysis of arguments. Work on Monitor factum.	2.80
Mar-31-24	J. Dietrich	Email exchange regarding SFPPN; review of MFC material and draft report; consider MFC issues;	2.10

FEE SUMMARY				
Name	Title	Hours	Rate	Amount
Sassi, Monique	Partner	112.60	745.00	83,887.00
Voudouris, Stephanie	Partner	102.00	825.00	84,150.00
Merskey, Alan	Partner	100.00	1,050.00	105,000.00
Wunder, Michael	Partner	9.30	1,050.00	9,765.00
Picone, John M.	Partner	47.30	995.00	47,063.50
Richardson, Doug	Partner	17.00	1,250.00	21,250.00
Jacobs, Ryan	Partner	90.70	1,650.00	149,655.00
Dietrich, Jane	Partner	103.10	1,005.00	103,615.50
Bond, Kurtis	Partner	3.00	1,035.00	3,105.00
Hoy, Alec	Associate	47.00	485.00	22,795.00
Onyeaju, William	Associate	0.10	540.00	54.00
Jamal, Kiyan	Associate	51.30	450.00	23,085.00
Fernandes, Stephanie	Associate	1.50	485.00	727.50
Stallone, Cathy	Law Clerk / Paralegal	18.40	430.00	7,912.00
Fish, Jeff	Law Clerk / Paralegal	6.00	280.00	1,680.00
Gill, Jasman	Law Student	8.70	215.00	1,870.50
Stavros, Andrew	Law Student	1.80	215.00	387.00
Total (CAD)		719.80		666,002.00

ADDITIONAL FEE SUMMARY		
Services	Description	Amount
Data Analytics	This is a fixed fee for data analytics which leverages technology to reduce the volume of data, prioritize review or use predictive analytics. This is charged at a fixed rate of \$150/"useful" GB. [QTY: 1 GB]	150.00
Importing Load File in to DB	ILDF - This is a fixed charge for work involved in ensuring data meets technical specifications to allow for seamless and efficient use of data received from external evidence repositories.	250.00
Importing Load File in	ILDF - This is a fixed charge for work involved in ensuring data meets	250.00

Services	Description	Amount
to DB	technical specifications to allow for seamless and efficient use of data received from external evidence repositories.	
Importing Load File in to DB	ILDF - This is a fixed charge for work involved in ensuring data meets technical specifications to allow for seamless and efficient use of data received from external evidence repositories.	250.00
Importing Load File in to DB	ILDF - This is a fixed charge for work involved in ensuring data meets technical specifications to allow for seamless and efficient use of data received from external evidence repositories. Import 2 Volumes of Jeffries Re-Produced Documents	250.00
Importing Load File in to DB	ILDF - This is a fixed charge for work involved in ensuring data meets technical specifications to allow for seamless and efficient use of data received from external evidence repositories. Import 2 Volumes of Jeffries Re-Produced Documents	250.00
Importing Load File in to DB	ILDF - This is a fixed charge for work involved in ensuring data meets technical specifications to allow for seamless and efficient use of data received from external evidence repositories. Import processed redacted documents produced by Cargill	250.00
Importing Load File in to DB	ILDF - This is a fixed charge for work involved in ensuring data meets technical specifications to allow for seamless and efficient use of data received from external evidence repositories. Import additional production of Cargill	250.00
Total (CAD)		1,900.00

Our Fees	667,902.00	
HST @ 13.00%	86,827.26	
TOTAL FEES & TAXES (CAD)		754,729.26

DISBURSEMENT SUMMARY

Taxable Disbursements

Travel	41.50
Agency Fees and Disbursements	5,448.00
Meals	14.21
Delivery	40.07
Total Taxable Disbursements	5,543.78
HST @ 13.00%	720.69
Total Taxable Disbursements & Taxes	6,264.47

TOTAL DISBURSEMENTS & TAXES (CAD) 6,264.47

Cassels Brock & Blackwell LLP
FTI Consulting
Re: Tacora Restructuring

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Invoice No: 2233262
Matter No. 055118-00003

TOTAL FEES	667,902.00
TOTAL DISBURSEMENTS	5,543.78
TOTAL TAXES	87,547.95
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	760,993.73

Cassels

Attn: Paul Bishop
FTI Consulting Canada Inc.
Toronto-Dominion Centre, TD South Tower
79 Wellington St. W., Suite 2010
Toronto, ON M5K 1G8

Invoice No: 2234666
Date: April 18, 2024
Matter No.: 055118-00003
GST/HST No.: R121379572
Lawyer: Jacobs, Ryan
Tel.: (416) 860-6465
E-mail: RJacobs@cassels.com

Re: Tacora Restructuring

Fees for professional services rendered up to and including April 15, 2024

Our Fees	425,836.00
Disbursements	1,086.37
Total Fees and Disbursements	426,922.37
HST @ 13.00%	55,455.84
TOTAL DUE (CAD)	482,378.21

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Amount: **CAD 482,378.21**

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FEE DETAIL			
Date	Name	Description	Hours
Apr-01-24	S. Voudouris	Review and revise Sixth Report of the Monitor re MFC Royalty Dispute and review and analysis of motion material regarding same; review and analysis of facta served by parties regarding sale approval motion, preliminary threshold motion, and responding cross motion; review and analysis of caselaw referenced in parties facta; draft and revise factum in response to preliminary threshold motion and responding cross-motion including review and analysis of motion materials, cross-examination transcripts, and review and analysis of applicable caselaw;	10.70
Apr-01-24	A. Merskey	Working on factum, review case law, confer with team regarding draft; Update call with Stikeman and FTI; Call with AHG group; Various calls, emails and follow ups regarding sealing order motion and process issues; Emails regarding production steps;	6.80
Apr-01-24	R. Jacobs	Meetings with Cassels team regarding factum. Review and comment on draft factum. Meeting with FTI and Stikeman teams. Examine case law and arguments.	3.80
Apr-01-24	D. Richardson	Consider and advise on tax issues with transaction;	0.70
Apr-01-24	J. Dietrich	Review and exchange of email; discussion regarding MFC related report; review of draft factum; discussion with FTI and Stikemans regarding status and strategy; discussion with SFPPN's counsel; participate in call with Ad Hoc advisors; revise draft factum; review of draft factum and revisions to same; discussion regarding factum; discussion regarding outstanding issues; participate in daily update call;	5.00
Apr-01-24	S. Fernandes	Call with K. Jamal re draft sealing order;	0.40
Apr-01-24	W. Onyeaju	Commissioning affidavit of service of A. Hoy.	0.10
Apr-01-24	A. Hoy	Preparing Affidavit of Service and swearing same;	0.40
Apr-01-24	K. Jamal	Conduct research on various issues for Monitor's factum; Begin drafting Sealing Order; Notice of Motion and Monitor's Fifth Report;	9.50
Apr-01-24	J. Picone	Further review and comment on draft fifth report of the monitor; internal correspondence regarding the same; reviewing and commenting on revised draft factum of the monitor; reviewing CCAA provisions relevant to analysis and case law; videoconference to review draft factum and discuss applicability of certain CCAA provisions; considering case law cited in various factums; telephone call with Alan Merskey to discuss RVO;	4.20
Apr-01-24	M. Sassi	Correspondence re: tax matters; discussion re: MFC report; correspondence re: factum; case law for factum and discussions re: same.	7.00
Apr-02-24	C. Stallone	Email from Alan Merskey and revise chart of (Confidential) Exhibits;	0.40
Apr-02-24	C. Stallone	Email with Alan Merskey; review list of transcripts and	1.80

Date	Name	Description	Hours
		exhibits and prepare chart of confidential transcripts and Exhibits;	
Apr-02-24	S. Voudouris	Review and revise Sixth Report of the Monitor re MFC Royalty Dispute and review and analysis of motion material regarding same; review and analysis of facta served by parties regarding sale approval motion, preliminary threshold motion, and responding cross motion; review and analysis of caselaw referenced in parties facta; draft and revise factum in response to preliminary threshold motion and responding cross-motion including review and analysis of motion materials, cross-examination transcripts, and review and analysis of applicable caselaw research;	6.80
Apr-02-24	J. Picone	Internal correspondence regarding revised draft factum and draft fifth report of the monitor; further review and revision to the same; reviewing case law relating to application of section 11.3 of the CCAA; analysis of the same; videoconferences and internal discussions relating to the same and litigation issues;	2.90
Apr-02-24	M. Sassi	Prepare for an attend update call with FTI; Calls and Correspondence to address Sixth Report and Monitor's factum; further correspondence re: same; case law research; review sealing motion materials;	5.10
Apr-02-24	A. Merskey	Review research regarding RVO issues, work on factum, discuss with Cassels and Stikeman teams; Update call with FTI; Working on sealing order issues and related communications; Working on hearing timetable/agenda;	7.40
Apr-02-24	J. Dietrich	Discussion regarding MFC calculations and related report; discussion with FTI regarding status; work on draft factum; participate in update call; discussion with Stikeman regarding factum and legal argument; follow up discussion with R. Jacobs; review of draft MFC report and comments on same; participate in update call; review of revised MFC report and email regarding same; review of revised factum, provide additional comments and email exchange regarding same; review of emails from A. Merskey;	5.90
Apr-02-24	M. Wunder	Status call regarding DIP loan status and next steps.	0.60
Apr-02-24	K. Jamal	Continue drafting documents for sealing order; Correspondence regarding same;	6.80
Apr-02-24	R. Jacobs	Work on Monitor's factum. Email correspondence with Stikeman and Oslers teams. Consider draft litigation timetable and comment on same. Examine case authorities. Attend daily update call. Discussion with J. Dietrich regarding matters from update call and case impact.	3.60
Apr-03-24	S. Fernandes	Call with M. Sassi re service next steps; instruct B. Nasri to create Affidavits of Service; draft service emails;	0.30
Apr-03-24	J. Picone	Reviewing comments and revisions to draft factum; further comments on same; internal discussion with Stephanie Voudouris regarding same; reviewing draft timetable; discussions with Alan Merskey regarding same; discussion	1.80

Date	Name	Description	Hours
		with Ryan Jacobs regarding litigation issues, timetable, and related matters;	
Apr-03-24	M. Sassi	Correspondence re: service of materials; address workers compensation query; attend to case website matters; correspondence with K. Jamal re sealing order;	0.80
Apr-03-24	S. Voudouris	Review and analysis of facta served by parties regarding sale approval motion, preliminary threshold motion, and responding cross motion; review and analysis of caselaw referenced in parties facta; draft and revise factum in response to preliminary threshold motion and responding cross-motion including review and analysis of motion materials, cross-examination transcripts, and review and analysis of applicable caselaw research;	4.20
Apr-03-24	K. Jamal	Call with M. Sassi to discuss sealing order; Revisions to notice of motion and discussion regarding same;	0.50
Apr-03-24	J. Dietrich	Discussion with R. Jacobs; review of case law; discussion regarding status of hearing organization; participate in update call; discussion with J. Porepa;	4.20
Apr-03-24	A. Merskey	Emails regarding factum, working on same; Calls and emails regarding hearing order, working on allocation; Call with Stikeman and AHG regarding hearing; additional calls and emails regarding sealing order;	7.20
Apr-03-24	C. Stallone	Email from and to Kiyam Jamal regarding final chart of Confidential Exhibits as revised;	0.30
Apr-04-24	S. Voudouris	Attend cross-examinations regarding DIP and MFC Royalty dispute; draft and revise factum in response to preliminary threshold motion and responding cross-motion including review and analysis of motion materials, cross-examination transcripts, and review and analysis of applicable caselaw research;	6.90
Apr-04-24	K. Jamal	Work on drafting notice of motion, sealing order and Monitor's report; Discussions with A. Merskey and M. Sassi regarding same;	2.50
Apr-04-24	A. Merskey	Working on sealing order steps; Numerous related calls and emails; Working on factum: Discuss with S. Voudouris, related emails; Update call with FTI; Update call with AHG/Stikeman; Consider issues for argument; Working on hearing agenda, related emails;	5.30
Apr-04-24	J. Dietrich	Review of email; discussion with R. Jacobs regarding status; discussion regarding outstanding issues with FTI; update discussion with Stikeman; review of draft MFC report; discussion with J. Porepa; discussion regarding factum and legal argument; discussion with ad hoc advisors regarding outstanding issues; discussions regarding Solicitation Process issues; work on outline of submissions; discussion regarding Osler request;	4.70
Apr-04-24	J. Picone	Reviewing and revising draft factum for pending hearing; reviewing hearing agenda; considering comments on	3.80

Date	Name	Description	Hours
		factum provided by the monitor; reviewing cross-examination summaries; reviewing and considering the endorsement of Justice Kimmel relating to confidentiality issues; discussion with Stephanie Voudouris regarding litigation issues and finalization of court materials;	
Apr-04-24	S. Fernandes	Update draft service email; review and update affidavit of service; review notice of motion; serve notice of motion on service list; serve schedules of notice of motion and endorsement and related schedule to service list; review and comment on draft sealing order; review and comment on draft report;	2.50
Apr-04-24	M. Wunder	Work with Cassels team regarding analysis of terms of proposed transactions. Review updates regarding ad hoc position.	1.60
Apr-04-24	R. Jacobs	Continue work on factum. Attend meeting with FTI team. Attend meeting with Stikemans. Work with Cassels lit team on prep for hearing. Emails regarding sealing and NOM. Attend meeting with Consortium advisors. Examine issues and discussion and advice with FTI regarding same.	3.70
Apr-04-24	C. Stallone	Retrieve Tacora DIP Productions; instructions to analyst to load into database; email to Alan Merskey; tag DIP productions in database and tag documents;	1.00
Apr-04-24	A. Hoy	Correspondence with counsel to Ad Hoc group regarding April 10-12 hearing and Monitor reports	0.30
Apr-04-24	M. Sassi	Drafting sealing motion; edit to MFC report and factum; drafting fifth report; correspondence re: workers comp	5.40
Apr-05-24	E. Hyderman	Review draft responding factum; correspondence with M Sassi re same;	0.80
Apr-05-24	J. Picone	Reviewing and considering cross-examination transcripts; reviewing and revising draft factum; internal discussions with Stephanie Voudouris regarding further revisions to draft factum; correspondence with the monitor; considering correspondence and proposal by counsel to Cargill relating to time allocation for hearing; internal discussions and correspondence in connection with the same;	2.80
Apr-05-24	S. Voudouris	Draft and revise factum in response to preliminary threshold motion and responding cross-motion including review and analysis of motion materials, cross-examination transcripts; finalize caselaw research and analysis for inclusion in factum; review and cross-examination regarding MFC Royalty Dispute;	4.10
Apr-05-24	K. Jamal	Attend cross examinations; Prepare reporting summaries; Prepare revised agenda for hearing; Organize transcripts and materials;	7.70
Apr-05-24	M. Sassi	Calls and correspondence re: MFC report and responding factum; summary of cross examinations; drafting sealing materials and correspondence re: same; correspondence and call re: workers compensation; confidential bundles	3.70

Date	Name	Description	Hours
Apr-05-24	A. Merskey	Working on factum; Working on sealing order steps, various emails regarding same; Working on hearing preparations, discussion with team regarding same; Working on schedule issues and coordination, related emails;	6.80
Apr-05-24	R. Jacobs	Work on factum. Meetings with Cassels and FTI teams regarding same. Attend daily update call with Company. Review and consider emails from Goodmans regarding hearing scheduling and issues, discussions with A. Merskey regarding same.	3.30
Apr-05-24	A. Hoy	Preparing confidential documents to provide to Court; review of Monitor documents to preserve confidentiality; managing CaseLines matters to ensure documents are available to the Court	0.80
Apr-05-24	J. Dietrich	Review of email; discussion with R. Jacobs; work on outline of submissions; discussion regarding outline of submissions with A. Merskey and R. Jacobs; review of email and discussion regarding response to same; discussion regarding status; review of email;	4.00
Apr-05-24	S. Fernandes	Review case law and revisions to factum; call with M. Sassi re service of factum and fifth report; review instructions for service of factum and fifth report;	2.60
Apr-06-24	J. Picone	Reviewing and considering cross-examination summaries; correspondence with counsel to the applicant; other correspondence; final review of factum; reviewing and considering facta and case law cited therein;	1.80
Apr-06-24	K. Jamal	Correspondence regarding examination summaries; Assist with preparation for hearing;	2.10
Apr-06-24	A. Merskey	Review Tacora, Cargill, AHG factums, consider hearing issues and arguments, related emails; Various emails regarding schedule coordination;	4.30
Apr-06-24	R. Jacobs	Finalize Monitor factum. Detailed review and analysis of all reply facta filed. Correspondence with Company and FTI. Discussions with J. Dietrich. Calls and correspondence with A Merskey regarding schedule issues.	4.00
Apr-06-24	J. Dietrich	Review of facta; consider issues; discussions and email regarding MFC report;	4.20
Apr-06-24	S. Voudouris	Finalize responding factum of the monitor and correspondence regarding same; review and analysis of responding facta regarding sale and approval motion, preliminary threshold motion, and responding cross-motion; review and analyze cross-examination transcripts from DIP cross-examination and cross-examination regarding MFC Royalty Dispute; review and revise report of the monitor in relation to the MFC Dispute;	7.70
Apr-06-24	S. Fernandes	Serve responding factum; prepare brief of authorities;	1.30
Apr-06-24	M. Sassi	Correspondence re: report.	0.40
Apr-07-24	J. Picone	Further review and consideration of factums served by the parties and the case law cited therein; correspondence	1.50

Date	Name	Description	Hours
		relating to timetabling issues; telephone call with Alan Merskey regarding the same; correspondence with the parties;	
Apr-07-24	S. Voudouris	Review and analysis of responding facta regarding sale and approval motion, preliminary threshold motion, and responding cross-motion; review and analyze cross-examination transcripts from DIP cross-examination and cross-examination regarding MFC Royalty Dispute; review and revise report of the monitor in relation to the MFC Dispute;	2.20
Apr-07-24	A. Merskey	Ongoing review of factums; Further scheduling emails and discussions with parties regarding coordination steps; Revising proposed schedule;	2.50
Apr-07-24	T. Li	Review and attend to commissioning of affidavit of service; call and correspondence with S. Fernandes regarding same;	0.20
Apr-07-24	J. Dietrich	Review of email regarding MFC; discussion regarding scheduling issues;	1.60
Apr-07-24	K. Jamal	Assist with preparation for hearing and correspondence regarding same;	0.20
Apr-07-24	S. Fernandes	Review Fifth Report; draft service email; serve Fifth Report to Service List; draft Affidavit of Service; review and swear affidavit of service; review brief of authorities;	2.10
Apr-07-24	R. Jacobs	Further review of all reply facta filed. Analysis of arguments raised in same and discussion with Cassels team. Assist with hearing and argument prep. Emails with A. Merskey regarding litigation hearing argument timetable issues, strategy. Call with FTI, Company and AHG Consortium counsel. Follow up correspondence with A. Merskey regarding same.	3.80
Apr-08-24	J. Picone	Reviewing and considering draft notice of motion relating to sealing order regarding MFC royalty dispute; conferring with Stephanie Voudouris regarding MFC royalty dispute; internal discussion with Alan Merskey regarding emerging developments and preparation for hearing;	1.20
Apr-08-24	R. Jacobs	Meeting with FTI and Stikeman teams. Hearing prep. Emails with A. Merskey regarding case conference on hearing matters. Attend case conference. Attend meeting with profs for Consortium. Consider matters raised by Consortium and discussions with FTI and Stikeman teams regarding same.	3.50
Apr-08-24	A. Merskey	Prepare for hearing; Numerous emails re scheduling conference; Attend at same and follow up steps; Numerous calls with team, FTI, Stikeman, Osler regarding hearing issues and working on same;	9.30
Apr-08-24	J. Dietrich	Review of email; discussion with J. Porepa; discussion with FTI and Stikes; discussion regarding hearing preparation and scheduling; discussion regarding status and strategy; review of email and consider issues;	4.50
Apr-08-24	K. Jamal	Draft Sealing Order for MFC Motion; Draft Notice of Motion	5.10

Date	Name	Description	Hours
		for Sealing Order for MFC Motion; Draft Monitor's Seventh Report; Call with Tacora's counsel regarding proposed redactions and correspondence regarding same; Calls with A. Merskey and M. Sassi regarding same;	
Apr-08-24	M. Sassi	Work on sealing motion materials; correspondence re: court materials and caselines; seeking materials for MFC dispute; correspondence re: case conference;	4.70
Apr-08-24	M. Wunder	Attend status call with Monitor and Stikeman. Review court filings and analyze DIP loan issues.	1.20
Apr-08-24	S. Voudouris	Continued review and analysis of facta; review and revise motion materials and report regarding sealing order in connection with MFC Royalty Dispute;	6.80
Apr-09-24	M. Sassi	Correspondence and calls re: sealing report and court hearing; second supplemental report;	5.60
Apr-09-24	J. Picone	Reviewing and considering factum of the applicant relating to MFC dispute; reviewing and considering Cargill's supplementary factum on the DIP replacement motion and Cargill cross-motion; reviewing and considering Cargill's reply factum on the threshold motion and plan cross-motion; internal discussions relating to deal developments and related matters;	1.80
Apr-09-24	R. Jacobs	Participate in multiple calls and meetings with FTI, Consortium advisors, Stikeman, Greenhill. Meetings with Cassels team and FTI regarding supplemental report. Review and revise draft report. Consider motions and attendance. Review correspondence from Goodmans.	7.00
Apr-09-24	J. Dietrich	Discussion regarding status; review of email; discussion with M. Sassi regarding various reports; participate in update call; discussion regarding subscription agreement issues; discussion regarding status; work on supplemental report; discussion regarding transaction status, amendments and strategy; discussion regarding reporting and status;	10.40
Apr-09-24	K. Jamal	Review and assist with finalization of notice of motion and sealing order; Correspondence with S. Voudouris regarding same;	1.90
Apr-09-24	A. Merskey	Working throughout the day preparing for hearing; Various emails and calls regarding sales approval sealing steps and MFC sealing steps; review reply facta, consider same; Numerous calls and emails regarding AHG transaction issues; Working on Monitor reports;	12.50
Apr-09-24	S. Voudouris	Review and analysis of reply facta served by parties; review and analysis of caselaw and evidence references cited in the materials; review and revise motion materials and report regarding sealing order in connection with MFC Royalty Dispute; review and analysis of facta served in connection with MFC Royalty Dispute; review and analysis of materials served in connection with DIP motion including supplementary motion materials and facta regarding same;	7.20

Date	Name	Description	Hours
Apr-10-24	K. Jamal	Meet to discuss litigation status and next steps with S. Voudouris; Draft and revise Sealing Order and Notice of Motion; Begin drafting Monitor's Seventh Report; Prepare materials for upcoming case conference; Review MFC motion materials and previous Monitor's Reports;	8.40
Apr-10-24	M. Wunder	Review and analyze draft replacement DIP loan terms. Confer with Cassels and FTI teams regarding same.	1.80
Apr-10-24	R. Jacobs	Attend board meeting. Post meeting call with J. Dietrich. Attend pre-hearing meeting with Cargill counsel. Consider Cargill counsel preliminary request list. Consider same and potential case next steps. Call with M. Wasserman. Attend hearing. Post hearing meeting with Stikeman, Cassels and FTI teams. Attend daily update meeting with Company. Prep for case conference. Attend further meeting with Goodmans, Stikeman, Cassels and FTI teams. Begin review of Cargill proposed CPO. Discussion with J. Dietrich regarding same.	6.70
Apr-10-24	S. Voudouris	Review and revise motion materials and report regarding sealing order in connection with MFC Royalty Dispute; review and analysis of motion materials and facta served in connection with MFC Royalty Dispute;	2.80
Apr-10-24	A. Merskey	Numerous emails regarding supplemental report; Numerous calls and discussions prior to court with team and stakeholder groups with respect to next steps; Prepare for and attend at court; Various calls and emails throughout the day with Court office, company counsel, FTI, Goodmans and team regarding ongoing motions and next steps; Emails and follow ups on sealing issues;	6.60
Apr-10-24	J. Dietrich	Review and respond to email; attend board meeting; discussion regarding status; discussion with Goodmans regarding status; attend at court; discussion regarding status and strategy; discussion with FTI; discussion with Cargill counsel;	7.70
Apr-10-24	J. Picone	Discussions with Ryan Jacobs and Alan Merskey regarding next steps; reviewing correspondence;	0.30
Apr-10-24	M. Sassi	Calls and correspondence re second supplement to fourth report; calls and correspondence re: hearing and related matters	5.00
Apr-11-24	J. Dietrich	Review of draft claims procedure order; discussion with FTI regarding status; discussion with Stikemans and FTI regarding outstanding issues; review and exchange of email regarding court material; discussion with Goodmans regarding next steps and status; discussion regarding status; consider outstanding issues; attend case conference; discussion with Lee Nicholson; review of email and exchange of messages with QNS&L;	6.10
Apr-11-24	S. Voudouris	Review and revise motion materials and report regarding sealing order in connection with MFC Royalty Dispute; review and analysis of facta served in connection with MFC	6.70

Date	Name	Description	Hours
		Royalty Dispute including review and analysis of caselaw regarding same; correspondence with parties regarding logistics and coordinating materials in connection with MFC Royalty Dispute;	
Apr-11-24	K. Jamal	Drafting portions of Monitor's Report, Notice of Motion for Sealing Order and Sealing Order; Review proposed redactions to materials and prepare schedules; Review proposed public materials; Correspondence and meetings with S. Voudouris regarding same; Assist with confidential bundle access; Correspondence with A. Merskey regarding same;	5.70
Apr-11-24	J. Picone	Discussion with Alan Merskey regarding royalty dispute; discussion with Stephanie Voudouris regarding royalty dispute and timing of hearing;	0.30
Apr-11-24	A. Merskey	Emails, calls and discussions throughout the day with FTI, Goodmans, Stikeman, Oslers, regarding future transaction structures, sale approval sealing order, MFC sealing order, MFC motion and materials, court scheduling; Working on steps related to same;	6.20
Apr-11-24	R. Jacobs	Meeting with FTI, Cassels teams. Meeting with Stikeman teams. Meeting with Goodmans. Review and consider termination letter from Osler on subscription agreement. Attend case conference. Consider CPO and discuss same with J. Dietrich. Begin review of DIP amendment. Correspondence with P. Bishop on case next steps and issues. Consider Cargill transaction outline.	5.80
Apr-11-24	M. Sassi	Drafting court report; claims procedure order; amended dip agreement;	8.60
Apr-11-24	A. Hoy	Reviewing draft Seventh Report and updating and revising same	2.40
Apr-12-24	J. Dietrich	Attend board meeting; discussion regarding case conference; email exchange regarding information requests; exchange of email; consider issues; discuss outstanding matters; attend case conference; discussion regarding status and strategy; discussion with Goodmans, Stikemans and FTI regarding status and next steps; participate in daily update call; review of email regrading subscription termination agreement;	5.90
Apr-12-24	A. Merskey	Emails and follow up steps on sale motion confidentiality issues; Emails and follow up on MFC sealing motion, working on same; Prepare for and attend at court; Working on 6th and 7th report;	5.30
Apr-12-24	R. Jacobs	Review and comment on Monitor's report. Meeting with Goodmans, Stikeman, FTI and Cassels teams re Cargill transaction structure. Discussions with J. Dietrich regarding same. Consider potential issues and mechanics. Call with L. Nicholson. Consider revised draft amended DIP term sheet.	4.20
Apr-12-24	S. Voudouris	Review and revise motion materials and report regarding sealing order in connection with MFC Royalty Dispute;	3.20

Date	Name	Description	Hours
		review and analysis of facta served in connection with MFC Royalty Dispute including review and analysis of caselaw regarding same; correspondence with parties regarding logistics and coordinating materials in connection with MFC Royalty Dispute;	
Apr-12-24	K. Jamal	Review final Notice of Motion for sealing; Review and revise Monitor's Report and Sealing Order; Prepare brief of facta index; Retrieve confidential materials from Caselines; Liaise with print services;	4.10
Apr-12-24	A. Hoy	Reviewing and updating Seventh Report	0.60
Apr-13-24	J. Dietrich	Email exchange regarding caterpillar issues; review of email regarding deposit return; email regarding sealing report; email regarding draft of 8th Report;	1.20
Apr-13-24	R. Jacobs	Review DIP term sheet. Begin detailed review and comment on draft CPO and related court materials. Comment on latest draft of Monitor's report. Correspondence with Cassels and FTI teams regarding same. Consider transaction structure presented by Cargill and issues.	3.70
Apr-13-24	S. Voudouris	Review and revise motion materials and report regarding sealing order in connection with MFC Royalty Dispute; review and analysis of motion materials and facta served in connection with MFC Royalty Dispute include review and analysis of caselaw regarding same;	3.20
Apr-13-24	K. Jamal	Correspondence regarding Monitor's Report and service;	0.20
Apr-13-24	A. Merskey	Review and consider draft reports, emails regarding same; Emails regarding hearing preparations;	1.80
Apr-14-24	J. Dietrich	Review of Tacora draft motion material and provide comments; review of revised version of draft report and provide comments; review of revised DIP; review of comments on draft report; review of revised claims procedure order;	3.50
Apr-14-24	R. Jacobs	Review and comment on latest draft of CPO, motion record and Monitor's report. Email correspondence with Cassels and FTI teams regarding same. Consider case next steps.	2.50
Apr-14-24	A. Hoy	Reviewing changes to Claims Procedure Order and revising Eighth Report with respect to same	0.80
Apr-15-24	J. Picone	Reviewing and considering consortium DIP facility term sheet; correspondence with Alan Merskey regarding same;	0.30
Apr-15-24	K. Jamal	Prepare for MFC Motion; Prepare brief of facta and materials; Prepare table of confidential facta paragraphs and materials; Correspondence and discussions with S. Voudouris regarding same;	4.80
Apr-15-24	A. Merskey	Update call with FTI and Stikeman; Numerous emails regarding DIP materials, CPO and court report; Updates regarding DIP offer, consider same, communications to court and service list;	4.70
Apr-15-24	J. Dietrich	Review of comments on draft claims procedure order; review comments on draft report and email regarding	2.80

Date	Name	Description	Hours
		same; participate in update call with Stikeman; discussion with M. Sassi regarding status; attend daily update call; review and comment on email to service list; discussion regarding next steps; review of DIP Term sheet;	
Apr-15-24	A. Hoy	Reviewing and commenting on draft Eighth Report	0.70
Apr-15-24	R. Jacobs	Attend meeting with Stikeman, FTI and Cassels teams. Review and comment on draft report and motion record. Attend daily update meeting. Review AHG DIP term sheet. Discussions with Cassels and FTI teams regarding same. Correspondence regarding hearing. Consider exit paths.	4.40
Apr-15-24	S. Voudouris	Review and analysis of motion materials and facta served in connection with MFC Royalty Dispute include review and analysis of caselaw regarding same; prepare for hearing regarding MFC Royalty Dispute; review and revise draft order in connection with motion to seal materials in connection with MFC Royalty dispute; review of caselaw in connection with sealing order; correspondence with parties regarding same; review of additional materials regarding DIP and correspondence regarding same;	5.20

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Picone, John M.	Partner	22.70	995.00	22,586.50
Voudouris, Stephanie	Partner	77.70	825.00	64,102.50
Merskey, Alan	Partner	86.70	1,050.00	91,035.00
Dietrich, Jane	Partner	71.70	1,005.00	72,058.50
Jacobs, Ryan	Partner	60.00	1,650.00	99,000.00
Sassi, Monique	Partner	46.30	745.00	34,493.50
Richardson, Doug	Partner	0.70	1,250.00	875.00
Wunder, Michael	Partner	5.20	1,050.00	5,460.00
Jamal, Kiyana	Associate	59.50	450.00	26,775.00
Li, Timon	Associate	0.20	485.00	97.00
Hoy, Alec	Associate	6.00	485.00	2,910.00
Fernandes, Stephanie	Associate	9.20	485.00	4,462.00
Onyeaju, William	Associate	0.10	540.00	54.00
Stallone, Cathy	Law Clerk / Paralegal	3.50	430.00	1,505.00
Hyderman, Eva	Law Student	0.80	215.00	172.00
Total (CAD)		450.30		425,586.00

ADDITIONAL FEE SUMMARY

Services	Description	Amount
Importing Load File in to DB	ILDF - This is a fixed charge for work involved in ensuring data meets technical specifications to allow for seamless and efficient use of	250.00

Services	Description	Amount
	data received from external evidence repositories. Tacora Production- April 2, 2024	
Total (CAD)		250.00
Our Fees	425,836.00	
HST @ 13.00%	55,358.68	
TOTAL FEES & TAXES (CAD)		481,194.68

DISBURSEMENT SUMMARY

Non-Taxable Disbursements

Court - Sundry	339.00
Total Non-Taxable Disbursements	339.00

Taxable Disbursements

Binding, Tabs, Disks, etc	53.79
Copies	528.00
Agency Fees and Disbursements	130.00
Meals	35.58
Total Taxable Disbursements	747.37
HST @ 13.00%	97.16
Total Taxable Disbursements & Taxes	844.53

TOTAL DISBURSEMENTS & TAXES (CAD) 1,183.53

TOTAL FEES	425,836.00
TOTAL DISBURSEMENTS	1,086.37
TOTAL TAXES	55,455.84
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	482,378.21

OUTSTANDING INVOICES

Invoice Number	Invoice Date	Bill Amount	Payments / Credits	Balance Due
2233262	04/04/24	760,993.73	0.00	760,993.73
2234666	04/18/24	482,378.21	0.00	482,378.21
Total (CAD)		1,243,371.94	0.00	1,243,371.94

Cassels

Attn: Paul Bishop
FTI Consulting Canada Inc.
Toronto-Dominion Centre, TD South Tower
79 Wellington St. W., Suite 2010
Toronto, ON M5K 1G8

Invoice No: 2237344
Date: May 09, 2024
Matter No.: 055118-00003
GST/HST No.: R121379572
Lawyer: Jacobs, Ryan
Tel.: (416) 860-6465
E-mail: RJacobs@cassels.com

Re: Tacora Restructuring

Fees for professional services rendered up to and including April 30, 2024

Our Fees	324,573.00
Disbursements	646.76
Total Fees and Disbursements	325,219.76
HST @ 13.00%	42,278.57
TOTAL DUE (CAD)	367,498.33

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FEE DETAIL			
Date	Name	Description	Hours
Mar-26-24	J. Arnason	Considering tax matters; reviewing correspondence;	0.60
Apr-07-24	M. Sassi	Correspondence re: report; call re: MFC materials with company counsel, hearing agenda	0.40
Apr-08-24	S. Fernandes	Serve notice of motion and fifth report to correct e-mail addresses to address bounce-back messages; swear affidavit of service re same; email parties to service list videoconference details for case conference; serve responding factum to service list; swear affidavit of service re responding factum;	1.80
Apr-09-24	S. Fernandes	Draft service email; serve Sixth Report of Monitor and Sealing Order to service list; review and swear affidavit of service;	0.60
Apr-11-24	M. Wunder	Attend meetings regarding status and next steps with Monitor, Stikeman and Goodmans. Review DIP loan terms and conditions.	2.30
Apr-12-24	M. Sassi	Calls and correspondence re: MFC report; correspondence re: service, DIP matters; mutual termination; updating Eighth Report; service	5.60
Apr-12-24	M. Wunder	Review and analyze DIP term sheet and comments from Stikeman. Confer with Cassels team. Attend call with [REDACTED]	3.50
Apr-13-24	M. Sassi	Review and comment on court materials; CPO and comments on same; drafting report and updates regarding ongoing matters	3.70
Apr-14-24	M. Sassi	Revisions to 8th report; calls and correspondence re: same; service list updates; MFC bundles and confidential documents; appendices to report and correspondence re: same; comment on CPO and correspondence re: same.	6.30
Apr-14-24	M. Wunder	Review revised DIP loan agreement with comments from Goodmans and confer with Cassels team.	2.00
Apr-15-24	M. Sassi	Calls and correspondence re: report and ongoing CCAA matters; correspondence to service list re: court hearing; DIP term sheets; review claims schedules and correspondence with Monitor re: same; MFC matters and bundles for hearing	7.60
Apr-15-24	M. Wunder	Conference call with Monitor and Stikeman to discuss DIP loan status and next steps. Review and consider terms of replacement ad hoc group noteholders DIP loan. Analysis of DIP terms for Cargill loan and new proposed ad hoc group loan.	2.80
Apr-16-24	M. Sassi	Correspondence re: court hearing re: DIP Order, CPO and stay extension; correspondence re: MFC motion; comments on schedules	1.20
Apr-16-24	S. Voudouris	Review and analysis of motion materials and facta served in connection with MFC Royalty Dispute include review and analysis of caselaw regarding same; prepare for and attend hearing regarding MFC Royalty Dispute; review and	9.20

Date	Name	Description	Hours
		consider correspondence regarding MFC Royalty dispute; review and assess materials to be sealed in connection with sealing order;	
Apr-16-24	A. Merskey	Prepare for and attend at court regarding MFC motion and sealing order; Emails and follow up regarding CPO; Follow up on next steps;	8.70
Apr-16-24	R. Jacobs	Attend meeting with FTI and Cassels. Review and comment on revised draft of CPO from company. Review Stikes markup of AHG dip terms and correspondence re same. Attend update meeting with company and advisors. Calls with J. Dietrich re case issues and next steps.	4.00
Apr-16-24	M. Wunder	Review and consider consortium DIP terms. Confer with Cassels team re same. Review correspondence regarding status.	1.60
Apr-16-24	J. Dietrich	Email exchange regarding status; participate in update call with FTI; discussion with R. Jacobs; exchange of email regarding status and timing; exchange of email regarding status and open items; participate in update call; review of NDA; discussion with J. Porepa; review of email regarding DIP amendments;	3.80
Apr-17-24	J. Picone	Reviewing and analyzing term sheet [REDACTED] [REDACTED] internal correspondence in connection with the same;	1.50
Apr-17-24	S. Voudouris	Correspondence regarding materials relied on for MFC Royalty Dispute and finalizing materials for sealing order;	0.70
Apr-17-24	M. Sassi	Review revised CPO; court materials re: Stay extension, DIP and CPO; updating 8th report	2.30
Apr-17-24	A. Merskey	Follow up on sealing order steps, related emails; Reviewing CPO revisions, related emails; Consider next steps for report and hearing; Receive and review term sheet;	2.80
Apr-17-24	K. Jamal	Meeting with S. Voudouris to discuss next steps in litigation and sealing of materials; Draft brief of unredacted materials for sealing; Draft letter to Justice Kimmel regarding sealing order; Correspondence with S. Voudouris regarding same;	6.20
Apr-17-24	J. Dietrich	Review of changes to Claims Procedure Order and email regarding same; review of revised DIP terms; review of [REDACTED] discussion with Stikeman regarding status and revised documents; discussion with Cargill Counsel; review of email; attend update call; [REDACTED]	6.80
Apr-17-24	R. Jacobs	Review and comment on revised DIP and [REDACTED] [REDACTED] [REDACTED] Discussions with Cassels, FTI and Stikeman teams regarding same. Attend meeting with Company and advisors. Review emails with Goodmans. Review update regarding AHG dip terms. Consider competing DIPs. Consider issues with [REDACTED] [REDACTED] and terms. Review company comments on [REDACTED]	5.50

Date	Name	Description	Hours
Apr-17-24	M. Wunder	Review correspondence and proposed DIP terms and discuss with Cassels team. Compare DIP terms.	2.30
Apr-18-24	M. Sassi	Review updated DIP term sheets; updating 8th report regarding same; update call and correspondence re: same	3.60
Apr-18-24	A. Merskey	Update call with FTI; Reviewing term sheet and CPO issues; Follow up on court preparations and reports; Follow up on sealing order steps;	2.60
Apr-18-24	K. Jamal	Review finalized brief of unredacted materials and letter to court; Correspondence with S. Voudouris regarding same;	0.50
Apr-18-24	S. Voudouris	Correspondence regarding materials relied on for MFC Royalty Dispute; review, analyze and finalize material to be included in sealing order;	2.20
Apr-18-24	R. Jacobs	Review DIP proposals and correspondence regarding same. Advise FTI regarding same. Attend meetings with Company advisors. Attend update meeting with Company and advisors. Calls with Stikeman team. Calls with FTI.	4.30
Apr-18-24	M. Wunder	Review and analysis of DIP and offtake issues. Calls with Monitor and counsel for Cargill.	2.40
Apr-18-24	J. Dietrich	Review of email; discussion with R. Jacobs; discussion with FTI regarding status; discussion with Stikeman; exchange of email regarding status; review of mark up of documents; exchange of messages with R. Jacobs; consider next steps and strategy;	5.10
Apr-19-24	M. Sassi	Discussion re: DIP proposals; correspondence re: court materials; CPO materials	5.10
Apr-19-24	A. Merskey	Emails and updates on DIP terms, court steps, follow up on same;	0.40
Apr-19-24	R. Jacobs	Attend board meeting. Work on report. Discussions with Company advisors. Attend meeting with Company and advisors. Calls and correspondence with FTI.	4.00
Apr-19-24	M. Wunder	Calls with multiple parties including Monitor, Stikeman, and counsel for Cargill. Review and analyze revised drafts of DIP loan amendment and confer with Cassels team re same.	2.80
Apr-19-24	J. Dietrich	Review of [REDACTED]; discussion with FTI regarding board meeting; participate in board meeting; discussions regarding status and strategy; update discussion with FTI and Stikeman; discussion with J. Porepa; review of email;	7.30
Apr-20-24	M. Sassi	Updates to Eighth Report; calls and correspondence re: same.	4.00
Apr-20-24	A. Hoy	Coordinating Monitor comments on draft Affidavit; updating Monitor Report to reflect company discussions, updated DIP proposal and ongoing negotiations	4.20
Apr-20-24	R. Jacobs	Review [REDACTED]. Attend board meeting. Follow up correspondence with Stikeman, FTI and Cassels teams. Review and comment on DIP terms, revised draft motion record and draft report.	4.30
Apr-20-24	M. Wunder	Review multiple drafts of revised DIP loan terms and	1.30

Date	Name	Description	Hours
		negotiations regarding payments for ad hoc advisor fees. Confer with Cassels re same.	
Apr-20-24	J. Dietrich	Discussion regarding status update and strategy; review of email regarding revised DIP terms, cash flow and court material; revisions to draft report; consider outstanding issues;	4.70
Apr-21-24	M. Sassi	Updates to and finalization of Eighth Report and service of same; review served motion materials and correspondence re: same; caselines issues	6.80
Apr-21-24	A. Merskey	Emails and updates throughout the day regarding DIP amendment, Monitor report, company motion materials, and considering same;	1.20
Apr-21-24	J. Dietrich	Review of comments on draft report and email exchange regarding same; discussion regarding status of motion; review of revised affidavit and provide additional comments; review of email regarding changes to DIP, Cashflow and motion material; email exchange regarding finalizing report for service;	5.10
Apr-22-24	M. Sassi	Filing report; review served motion materials and correspondence re: same; caselines issues	2.10
Apr-22-24	A. Merskey	Update call with FTI and Stikemans; Reviewing final term sheet; Review final Monitor report; Consider sealing issues; Prepare for hearing; Various calls and emails regarding same;	4.30
Apr-22-24	A. Hoy	Coordinating with internal team for confidential filing of Appendix to Monitor Report and assisting with preparation for hearing	1.90
Apr-22-24	R. Jacobs	Meetings with Stikemans, FTI and Cassels teams. Discussions with FTI regarding April 23 hearing. Consider AHG and position regarding hearing on DIP. Meeting with Goodmans. Attend meeting with Company advisors. Review CFF, consider timing issues.	5.00
Apr-22-24	J. Dietrich	Review of email; Review of draft appendix; Participate in update call; Consider outstanding issues; Same; Same; Discussion with Goodmans regarding status; Preparation for Court;	4.50
Apr-22-24	M. Wunder	Multiple calls with parties and advisors regarding proposed DIP amendment and opposition by ad hoc group. Strategy meeting with Stikeman. Confer with Cassels team to prepare for hearing.	2.20
Apr-23-24	A. Hoy	Preparing supplemental report outline	0.50
Apr-23-24	A. Merskey	Prepare for and attend at court regarding DIP motion; Numerous conferences and emails throughout the day regarding next steps and interrogatories, working on same;	10.70
Apr-23-24	R. Jacobs	Attend meeting in prep for hearing. Attend hearing. Review AHG inquiries and prepare responses to same. Meeting with Company and advisors. Meeting with Company advisors regarding responses to AHG inquiries.	5.20

Date	Name	Description	Hours
Apr-23-24	M. Wunder	Calls and meetings to advance DIP issues and amendments. Calls with Monitor and Stikeman. Court hearing regarding DIP loan. Review list of questions received from counsel for ad hoc group and confer with Monitor and Stikeman teams re same. Review draft responses.	3.20
Apr-23-24	J. Dietrich	Preparation for and attendance at court regarding stay extension, DIP approval and claims procedure order; follow up conversations with J. Porepa; consider information requests from bondholder group and responses to same; discussion regarding responses to Ad Hoc Group queries;	8.90
Apr-23-24	T. Lisowski	Attend brief strategy meeting with A. Merskey; draft and assemble interrogatories chart summarizing questions for Monitor; circulate for review and comment;	0.40
Apr-24-24	M. Sassi	Review supplemental report and court materials filed in connection with court hearing correspondence claims; correspondence with Monitor on claims schedule comments.	3.20
Apr-24-24	A. Hoy	Preparing and finalizing Supplement to the Eighth Report of the Monitor; serving Supplement to the Eighth Report	2.80
Apr-24-24	A. Merskey	Emails regarding Monitor responses; Consider issues for DIP hearing and working on same; Related calls and emails; Emails regarding court attendance; Emails regarding supplemental report, call regarding same and working on same;	5.20
Apr-24-24	R. Jacobs	Attend board meeting. Meeting with FTI and Cassels teams. Review aide memoire and responding motion record of AHG. Meetings with FTI and Cassels teams. Attend update call with Company and advisors. Review Company reply brief. Review and comment on supplemental report. Correspondence with Cassels and FTI teams regarding same. Prep for hearing.	6.60
Apr-24-24	M. Wunder	Multiple calls and meetings regarding DIP loan litigation and prepare for court hearing re same. Review and analyze alternative DIP loan term sheets and court filings with submissions and confer with Cassels team regarding analysis.	3.10
Apr-24-24	J. Dietrich	Exchange of messages regarding status; exchange of messages regarding Ad Hoc inquiries; review of responding motion record; participate in status update call with FTI; work on draft of Supplement to 8th report; email exchange regarding status; participate in daily update call; discussion regarding response material including draft report; email exchange regarding supplement to 8th report; review of company factum; discussion with Crossingbridge counsel;	5.20
Apr-25-24	M. Sassi	Call re: claims process and creditor listing;	2.10
Apr-25-24	A. Merskey	Prepare for and attend on DIP motion; Related emails, review of aide memoire and reply factum; Consider next steps; Emails on claims issues;	7.70

Date	Name	Description	Hours
Apr-25-24	M. Marot	Commission Affidavit of Service;	0.20
Apr-25-24	A. Hoy	Coordinating with Company counsel to update service list; swearing Affidavit of Service regarding Supplement to the Eighth Report	0.50
Apr-25-24	J. Dietrich	Review of email; discussion regarding hearing; review of information regarding claims information; discussion regarding claims statements; discussion regarding hearing preparation; attend hearing regarding DIP Approval; discussion with FTI regarding outstanding issues and status; review of email regarding claim issues; consider claims and outstanding issues; review of email; discussion with R. Jacobs; discussion with N. MacParland; exchange of email regarding claims issues;	7.50
Apr-25-24	R. Jacobs	Prep for and participate in hearing on DIP financing. Participate in meetings with FTI and Company advisors. Work on claims process materials. Correspondence with Cassels team regarding same.	4.80
Apr-25-24	M. Wunder	Attend CCAA court hearing regarding DIP approval and review DIP term sheets for analysis as per Osler submissions for ad hoc group and proposed superiority of terms. Calls with advisors and Stikeman post hearing.	4.70
Apr-26-24	M. Sassi	Discussion re: claims and next steps in CCAA proceeding; review endorsement and order	1.10
Apr-26-24	A. Merskey	Consider stay and DIP issues; Review endorsement and consider next steps; Related emails with Monitor and Cassels teams;	0.80
Apr-26-24	M. Wunder	Review CCAA court decision and confer with Cassels team. Discuss case status and next steps including regarding DIP loan action items.	1.80
Apr-26-24	J. Dietrich	Attend meeting with Cargill and Board; attend follow up board meeting; discussion with FTI regarding status and strategy; review of endorsement regarding DIP approval; participate in daily update call;	5.00
Apr-26-24	R. Jacobs	Participate in meeting with J. Dietrich regarding update on meetings with Board and Cargill. Attend meeting with FTI and Cassels teams. Review Justice Kimmel decision on DIP and correspondence with Cassels and KSV teams regarding same. Consider case next steps, strategic process. Correspondence with Cassels team regarding CPO deliverables and action items.	4.10
Apr-27-24	M. Sassi	Review claims and comments to Monitor on same.	1.70
Apr-27-24	R. Jacobs	Review and comment on draft statements of known claims. Advise M. Sassi and FTI regarding same. Examine claims packages. Consider strategic next steps for case.	3.40
Apr-27-24	J. Dietrich	Review of emails regarding claims issues;	0.20
Apr-28-24	M. Sassi	Review and comment on claims re: claims package and notification; correspondence re: same.	0.90
Apr-28-24	R. Jacobs	Further review and comment on latest drafts of known	3.90

Date	Name	Description	Hours
		claim statements. Correspondence with M. Sassi regarding same. Review emails from FTI on claims process and readiness initiatives. Review and respond to emails from L. Nicholson and revised draft claims process letters. Consider strategic process and next steps.	
Apr-28-24	J. Dietrich	Review and consider emails regarding claims issues and creditor listing;	0.40
Apr-29-24	J. Dietrich	Review and consider [REDACTED] and related email;	1.60
Apr-29-24	R. Jacobs	Attend meeting with FTI and Stikeman teams. Review and comment on latest draft statements of known claims, emails regarding same. Review draft restructuring term sheet. Advise FTI on same, Call with L. Nicholson regarding same. Attend Board meeting.	4.20
Apr-30-24	M. Sassi	Correspondence re: term sheet and claims package materials, service list update and correspondence re: same.	0.60
Apr-30-24	A. Merskey	Update call with FTI and team; Review [REDACTED] and considering next steps; Emails with court and counsel regarding MFC cost issues; Emails regarding NDA;	2.80
Apr-30-24	R. Jacobs	Review multiple drafts of TS and draft letters to constituents. Calls and correspondence with FTI and Stikeman teams. Attend meeting with FTI team. Review financial analysis from GH. Attend daily meeting with Company and advisors.	4.20
Apr-30-24	J. Dietrich	Review and consider draft term sheet and correspondence regarding same;	1.50

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Picone, John M.	Partner	1.50	995.00	1,492.50
Sassi, Monique	Partner	58.30	745.00	43,433.50
Voudouris, Stephanie	Partner	12.10	825.00	9,982.50
Merskey, Alan	Partner	47.20	1,050.00	49,560.00
Wunder, Michael	Partner	36.00	1,050.00	37,800.00
Dietrich, Jane	Partner	67.60	1,005.00	67,938.00
Jacobs, Ryan	Partner	63.50	1,650.00	104,775.00
Hoy, Alec	Associate	9.90	485.00	4,801.50
Fernandes, Stephanie	Associate	2.40	485.00	1,164.00
Jamal, Kiyen	Associate	6.70	450.00	3,015.00
Arnason, Jocelyn	Associate	0.60	650.00	390.00
Marot, Michael	Associate	0.20	485.00	97.00
Lisowski, Tara	Law Clerk / Paralegal	0.40	310.00	124.00
Total (CAD)		306.40		324,573.00

Our Fees	324,573.00
HST @ 13.00%	42,194.49
TOTAL FEES & TAXES (CAD)	366,767.49

DISBURSEMENT SUMMARY

Taxable Disbursements

Agency Fees and Disbursements	278.76
Travel	29.00
Filing Fees	339.00
Total Taxable Disbursements	646.76
HST @ 13.00%	84.08
Total Taxable Disbursements & Taxes	730.84

TOTAL DISBURSEMENTS & TAXES (CAD) 730.84

TOTAL FEES	324,573.00
TOTAL DISBURSEMENTS	646.76
TOTAL TAXES	42,278.57
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	367,498.33

OUTSTANDING INVOICES

Invoice Number	Invoice Date	Bill Amount	Payments / Credits	Balance Due
2234666	04/18/24	482,378.21	0.00	482,378.21
2237344	05/09/24	367,498.33	0.00	367,498.33
Total (CAD)		849,876.54	0.00	849,876.54

Cassels

Attn: Paul Bishop
FTI Consulting Canada Inc.
Toronto-Dominion Centre, TD South Tower
79 Wellington St. W., Suite 2010
Toronto, ON M5K 1G8

Invoice No: 2238522
Date: May 23, 2024
Matter No.: 055118-00003
GST/HST No.: R121379572
Lawyer: Jacobs, Ryan
Tel.: (416) 860-6465
E-mail: RJacobs@cassels.com

Re: Tacora Restructuring

Fees for professional services rendered up to and including May 15, 2024

Our Fees	198,128.50
Disbursements	81.38
Total Fees and Disbursements	198,209.88
HST @ 13.00%	25,767.28
TOTAL DUE (CAD)	223,977.16

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FEE DETAIL			
Date	Name	Description	Hours
Apr-27-24	M. Wunder	Review of Court decision regarding DIP loan. Review DIP loan terms and confer with Cassels team re next steps.	1.20
Apr-29-24	M. Wunder	Review and consider revised DIP agreement and terms. Confer with Cassels team.	1.70
Apr-30-24	M. Wunder	Revise draft term sheet for transaction. Review DIP terms. Calls with Monitor and Stikeman team regarding status and process.	1.70
May-01-24	M. Wunder	Confer with Cassels team regarding draft term sheets and overview correspondence to stakeholders with explanatory comments. Review letter regarding hedging matters and response correspondence from counsel for counterparties.	1.80
May-01-24	J. Dietrich	Review of email regarding comments on draft term sheet; review of email regarding claims issues; provide comments on lease claim statements; review of email regarding hedging issues and consider same;	0.90
May-01-24	M. Sassi	Review letters and term sheet correspondence; review stay letter re: department of justice; correspondence re: claims;	2.60
May-01-24	A. Merskey	Reviewing term sheet, ██████████, NDA; Consider litigation path and requirements; Attendance at Board call; Emails regarding MFC cost submissions;	2.80
May-01-24	R. Jacobs	Comment on final drafts of TS and letter correspondence to stakeholders. Correspondence with and advice to FTI regarding same. Review sensitivity analysis. Review and consider language for side letter on hedging. Review responding letter correspondence from Goodmans. Update correspondence with A. Merskey. Review ██████████ ██████████. Consider scope of next report. Review notice of dispute on claim and correspondence with FTI regarding claims reconciliation process.	3.80
May-01-24	A. Hoy	Preparing claims tracker and review and comment on claims notice;	0.50
May-02-24	M. Wunder	Review and consider DIP terms and covenants. Attend on status calls	1.80
May-02-24	J. Dietrich	Review of correspondence from Goodmans; consider email regarding amendments to side letters; review of email regarding NDA amendments and consider same; review and consider email regarding status of negotiations and related strategy; exchange of messages with R. Jacobs regarding update calls; review of draft demand letter and comments on same; review and consider email regarding additional claims issues;	1.20
May-02-24	R. Jacobs	Attend board meeting. Attend meetings with FTI and Stikeman teams. Review and comment on letter regarding hedging. Correspondence advice to FTI regarding same. Correspondence with Stikeman team. Review emails from Goodmans and correspondence with Stikeman regarding same. Attend daily meeting with Company and advisors. Call	4.10

Date	Name	Description	Hours
		with P. Bishop. Emails with Goodmans and Osler teams. Strategic planning regarding case next steps.	
May-02-24	A. Merskey	Review Cargill correspondence; Reviewing term sheets and analysis; Considering issues for process and next Court steps;	3.10
May-02-24	M. Sassi	Update call; correspondence re: term sheet; correspondence re: claims and notices	2.60
May-03-24	A. Merskey	Emails and follow up correspondence on stakeholder negotiations, hedging arrangements; Consider next steps and reviewing term sheet;	0.40
May-03-24	R. Jacobs	Review email update from P. Bishop. Consider term sheet feedback and issues. Correspondence with Cassels team regarding same. Attend daily update meeting with Company advisors.	3.00
May-03-24	J. Dietrich	Review of email regarding claims issues and related responses; review of additional changes to draft side letter; review of email and respond regarding additional stakeholder update calls;	0.80
May-03-24	M. Sassi	Correspondence and call with Monitor re: claims queries; correspondence re: hedging matters.	1.40
May-04-24	R. Jacobs	Review and consider emails from R. Chadwick. Work on draft outline for report. Consider strategic next steps in case and process.	3.30
May-04-24	J. Dietrich	Review of email from Cargill counsel;	0.30
May-06-24	M. Sassi	Call regarding claims procedure; correspondence re: report, claims and ongoing CCAA matters.	1.20
May-06-24	M. Wunder	Multiple calls and meetings regarding DIP loan terms and structures and transaction terms sheet terms. Calls with FTI and Stikeman to discuss.	3.10
May-06-24	A. Merskey	Update call with FTI and Stikeman; Call with Goodmans; Call with Oslers; Considering next steps regarding sale process and litigation; Emails regarding MFC cost submissions, follow up on same;	2.70
May-06-24	R. Jacobs	Attend meeting with FTI and Stikeman teams. Attend meeting with Goodmans. Attend meeting with Osler. Attend daily update meeting with Company and advisors. Correspondence with Stikemans team.	3.50
May-06-24	J. Dietrich	Review of email; discussion regarding status update with R. Jacobs; discussion with Ad Hoc Group advisors; participate in status update call; participate in call with counsel to Cargill; participate in call with Ad Hoc Group advisors; discussion regarding claims process; discussion with M. Sassi regarding claims issues; participate in status update call; discussion with J. Porepa;	4.80
May-06-24	A. Hoy	Updating claim notice tracker in accordance with Claim Procedure Order	0.30
May-06-24	L. Jessome	Advise on employment issue;	0.30

Date	Name	Description	Hours
May-07-24	M. Sassi	Calls and correspondence regarding ongoing CCAA matters; preparation of report; update call and agenda re: same	2.30
May-07-24	M. Wunder	Meetings with Company counsel and Monitor re process and terms for proposed transaction. Calls and negotiations with counsel for Cargill and noteholders. Status meeting with Tacora and counsel. Consider DIP loan terms and credit bid matters.	2.80
May-07-24	R. Jacobs	Attend meeting with FTI and Cassels teams. Attend meeting with Stikeman. Prep for and attend meeting with advisors for Cargill and AHG. Post meeting debrief with FTI. Call with M. Wasserman. Update meeting with Stikeman team. Attend update meeting with Company. Consider disclaimer issue and advise. Correspondence with J. Dietrich.	6.70
May-07-24	A. Hoy	Attend to claims;	0.20
May-07-24	A. Merskey	Call with Cassels team and FTI regarding status of case matters, following up on same; Attend call with Monitor and stakeholders, consider next steps;	1.80
May-07-24	J. Dietrich	Discussion regarding status and strategy with FTI; review of draft sales process; participate in discussion with Ad Hoc Group and Cargill advisors; discussion regarding Cargill response to term sheet; follow up discussion with advisors and consider sales process issues; exchange of messages regarding case status with R. Jacobs;	4.50
May-07-24	M. Sassi	Attend case update call; correspondence re: sales procedures; comment on same;	2.60
May-08-24	M. Wunder	Multiple calls and meetings with Monitor and Company counsel regarding transaction structures and stakeholder positions. Review and consider draft sale process and analysis of same.	2.70
May-08-24	J. Picone	Reviewing and considering endorsement of Justice Kimmel relating to royalty dispute; discussion with Alan Merskey regarding same and next steps;	0.80
May-08-24	A. Merskey	Review MFC endorsement, follow up emails with court regarding costs; Review sale procedures, review term sheet comments, consider next steps; Discussion with J. Picone;	2.00
May-08-24	R. Jacobs	Discussion with J. Dietrich re board meeting. Debrief with J. Dietrich and P. Bishop. Attend meeting with FTI. Attend meeting with Stikeman team. Attend daily update meeting with management and advisors. Review term sheet from Cargill. Consider update email from P. Bishop. Strategic planning regarding case next steps and timing.	5.00
May-08-24	J. Dietrich	Review of email regarding MFC endorsement, sales process comments and status; discussion regarding status; discussion regarding sales process; review of email; review of draft email and comments on same; participate in daily update call; discussion with P. Bishop; discussion with J. Porepa; review of email regarding board materials; discussion with R. Jacobs regarding status;	3.80

Date	Name	Description	Hours
May-08-24	M. Sassi	Calls and correspondence re: sales procedures and ongoing CCAA matters;	2.80
May-09-24	M. Wunder	Conference calls with Monitor and Stikemans teams regarding positions of Cargill and noteholders. Review term sheet and discuss with Cassels team.	2.10
May-09-24	A. Merskey	Update call with team and FTI; Reviewing updated term sheet and related emails; Follow up on MFC cost issues;	0.80
May-09-24	J. Dietrich	Review of email and exchange of messages with P. Bishop; attend board meeting; discussion with R. Jacobs; review of revised term sheet; review and respond to email; review of email; discussion regarding strategy;	3.80
May-09-24	M. Sassi	Update call and correspondence re: ongoing matters; correspondence re: transaction terms;	1.60
May-09-24	R. Jacobs	Discussion with J. Dietrich re board meeting. Debrief with J. Dietrich and P. Bishop. Attend meeting with FTI. Attend meeting with Stikeman team. Attend daily update meeting with management and advisors. Review term sheet from Cargill. Consider update email from P. Bishop. Strategic planning regarding case next steps and timing.	4.30
May-10-24	A. Hoy	Reviewing submitted claims notices and update tracker;	0.50
May-10-24	R. Jacobs	Review email from Stikemans. Consider same, Discussions with FTI, Stikeman. Correspondence with J. Dietrich. Review feedback on term sheet. Review Company term sheet. Review revised term sheet. Correspondence with FTI and Cassels teams regarding same. Attend daily meeting with Company and advisors.	4.70
May-10-24	A. Merskey	Consider issues regarding motion sequencing, related emails; Review and consider sales procedure comments; Emails regarding MFC costs and redactions;	1.30
May-10-24	J. Dietrich	Discussion with FTI regarding offtake related issues; consider outstanding issues; review of email regarding timing considerations and consider same; review of email regarding term sheet;	1.30
May-10-24	M. Wunder	Work with Cassels team regarding status and analysis of next steps. Review Cargill term sheet and consider terms. Review term sheet prepared by Stikeman.	1.80
May-10-24	M. Sassi	Work on Ninth report; calls and correspondence re: off take;	1.60
May-11-24	J. Dietrich	Consider issues; discussion regarding timeline; review of email;	1.30
May-11-24	R. Jacobs	Attend meeting with Stikeman and FTI teams. Follow up discussion with P. Bishop and A. Merskey. Analysis regarding sequencing.	3.00
May-12-24	R. Jacobs	Correspondence regarding offtake. Consider motion sequencing and related issues. Examine prior briefing.	2.40
May-12-24	M. Wunder	Confer with Cassels team regarding offtake agreement issues and next steps, and proposed steps for process.	2.20

Date	Name	Description	Hours
		Review court filings re same.	
May-13-24	R. Jacobs	Review, consider and respond to emails with FTI, Company. Discussions with J. Dietrich. Attend daily update meeting with Company and advisors. Review email correspondence from Osler to Goodmans on term sheet terms and issues. Correspondence regarding without prejudice settlement discussions.	3.10
May-13-24	A. Merskey	Reviewing Company process and planning, related emails and calls; Update call with Stikeman and FTI; Emails re consensual negotiations; Working on related steps; Emails regarding MFC issues;	2.30
May-13-24	J. Dietrich	Review of email; discussion regarding status update; discussion regarding agreement terms;	1.60
May-13-24	M. Sassi	Call with claims matters and claims process; preparation of next court report and fee invoices regarding same; correspondence re: notices of dispute.	3.50
May-13-24	M. Wunder	Calls with Monitor and Stikeman to discuss status of negotiations and next steps. Review correspondence regarding deal terms.	1.80
May-13-24	A. Hoy	Reviewing and assessment of claims;	0.20
May-14-24	A. Merskey	Emails regarding meetings and negotiations; Update call with FTI; Reviewing scheduling issues;	1.80
May-14-24	J. Dietrich	Discussion with J. Porepa; discussion with R. Jacobs; review of draft correspondence and comment on same; discussion regarding status of outstanding issues with FTI; attend update call; review of comments on disclaimer related correspondence and further comments on same; review of revised term sheet;	2.50
May-14-24	M. Sassi	Update call; correspondence re: disclaimer and timetable; work on report;	2.30
May-14-24	R. Jacobs	Consider and assess case strategy and paths forward to exit. Discussions with FTI, Company counsel regarding same. Review and consider email and settlement terms received. Advise FTI. Calls with A. Taylor. Review and comment on disclaimer correspondence. Correspondence with J. Dietrich. Review and comment on [REDACTED]. Attend daily update meeting with Company and advisors.	3.90
May-14-24	A. Hoy	Preparing draft report; reviewing claims;	2.30
May-14-24	M. Wunder	Review and consider proposed DIP terms and priorities for pre petition security. Review inter creditor agreements re same. Consider case status and next steps.	1.80
May-15-24	R. Jacobs	Attend meetings with advisors to Company, Cargill and AHG. Review emails and settlement terms. Consider issues. Correspondence with Stikeman team regarding disclaimer notice. Review revised draft of sales process and comment on same. Participate in board meeting. Participate in daily meeting with Company and advisors.	3.80
May-15-24	J. Dietrich	Attend board meeting; review of KERP material; exchange	5.00

Date	Name	Description	Hours
		of email regarding same; exchange of email regarding status; attend all hands call with Cargill, Ad Hoc Group and Company advisors; discussion with J. Porepa; review of revised sales process; discussion with R. Jacobs; attend all hands call with representatives of Cargill, Ad Hoc Group and company; review of claims emails; participate in daily update call; review and exchange of email; follow up call with J. Porepa;	
May-15-24	A. Hoy	Revisions to draft report;	2.70
May-15-24	M. Sassi	Drafting Court report; calls and correspondence re: claims matters; review correspondence and documents related to same; calls and correspondence re: sales procedures.	5.30
May-15-24	A. Merskey	Various emails regarding motion scheduling, stakeholder negotiations, follow up on same;	0.40
May-15-24	M. Wunder	Conference call with Monitor and company counsel to discuss negotiations for transaction process. Review correspondence re same.	1.30

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Merskey, Alan	Partner	19.40	1,050.00	20,370.00
Dietrich, Jane	Partner	31.80	1,005.00	31,959.00
Sassi, Monique	Partner	29.80	745.00	22,201.00
Jacobs, Ryan	Partner	54.60	1,650.00	90,090.00
Wunder, Michael	Partner	27.80	1,050.00	29,190.00
Picone, John M.	Partner	0.80	995.00	796.00
Jessome, Laurie	Partner	0.30	910.00	273.00
Hoy, Alec	Associate	6.70	485.00	3,249.50
Total (CAD)		171.20		198,128.50

Our Fees	198,128.50
HST @ 13.00%	25,756.70
TOTAL FEES & TAXES (CAD)	223,885.20

DISBURSEMENT SUMMARY

Taxable Disbursements

Meals	35.72
Travel	45.66
Total Taxable Disbursements	81.38
HST @ 13.00%	10.58

Total Taxable Disbursements & Taxes 91.96

TOTAL DISBURSEMENTS & TAXES (CAD) 91.96

TOTAL FEES 198,128.50

TOTAL DISBURSEMENTS 81.38

TOTAL TAXES 25,767.28

TOTAL FEES, DISBURSEMENTS & TAXES (CAD) 223,977.16

Cassels

Attn: Paul Bishop
FTI Consulting Canada Inc.
Toronto-Dominion Centre, TD South Tower
79 Wellington St. W., Suite 2010
Toronto, ON M5K 1G8

Invoice No: 2240216
Date: June 07, 2024
Matter No.: 055118-00003
GST/HST No.: R121379572
Lawyer: Jacobs, Ryan
Tel.: (416) 860-6465
E-mail: RJacobs@cassels.com

Re: Tacora Restructuring

Fees for professional services rendered up to and including May 31, 2024

Our Fees	240,322.00
Disbursements	35.42
Total Fees and Disbursements	240,357.42
HST @ 13.00%	31,246.46
TOTAL DUE (CAD)	271,603.88

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Amount: **CAD 271,603.88**

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FEE DETAIL			
Date	Name	Description	Hours
May-16-24	M. Sassi	Update call with FTI; correspondence re: claims; correspondence re: court time; correspondence re: disclaimer letter and disclaimer notice; review revised letter and correspondence re: same; correspondence with claimant;	2.70
May-16-24	A. Merskey	Update call with FTI. Various emails and follow ups regarding court scheduling matters; Reviewing disclaimer and demand letters, consider litigation issues;	1.40
May-16-24	A. Hoy	Updating and revising draft Ninth Report;	2.80
May-16-24	R. Jacobs	Attend board meeting. Calls and correspondence with Stikeman team. Calls and correspondence with FTI team. Correspondence with M. Wasserman. Call with L. Nicholson regarding update from discussion with Goodmans, consider same. Attend meeting with FTI and Stikemans. Review final disclaimer notice, letter regarding setoff. Attend daily update meeting with Company and advisors.	3.00
May-16-24	J. Dietrich	Attend board meeting; discussion with FTI regarding status; review and exchange of email; review and exchange of email regarding comments on disclaimer reasons; discussion regarding status and disclaimer reasons; review of revised correspondence; review of email;	3.70
May-17-24	M. Sassi	Update call regarding CCAA matters; correspondence with claimants regarding claims queries; correspondence with company and counsel regarding [REDACTED]	0.90
May-17-24	A. Hoy	Revising draft Ninth Report;	1.10
May-17-24	R. Jacobs	Meetings with FTI ad Cassels teams. Review auction process. Strategy meetings with Cassels team regarding case conference, hearing and motion timing. Review existing evidence and briefing.	3.10
May-17-24	J. Dietrich	Review of email; discussion regarding case status;	0.80
May-19-24	R. Jacobs	Review and consider draft auction process. Consider preliminary matters for determination and arguments.	2.30
May-20-24	M. Sassi	Correspondence re: case conference; correspondence re comments on process letter; correspondence with court office to book court time and related matters	1.20
May-20-24	R. Jacobs	Review and comment on draft process letter and business update deck. Correspondence with Cassels and then FTI teams regarding same. Review announcement regarding J. Broking.	2.10
May-20-24	J. Dietrich	Review of comments on bid process letter and exchange of email regarding same;	0.30
May-20-24	M. Wunder	Review draft aide memoirs for case conference.	1.70
May-21-24	M. Sassi	Attend update call; review Aide memoire; correspondence re: same; drafting report and materials re: same; calls and correspondence re: claims matters and notices of dispute.	3.60

Date	Name	Description	Hours
May-21-24	J. Gordon	Review Aide Memoire, Call with Cassels and FTI teams.	1.90
May-21-24	A. Hoy	Correspondence re proofs of claim and notice of dispute forms; updating and revising draft Report;	3.30
May-21-24	A. Merskey	Various emails regarding case conference steps; Consider issues for litigation schedule; Reviewing materials for court; Update call with FTI; Update call with Stikeman;	3.30
May-21-24	R. Jacobs	Meeting with FTI and Cassels teams. Call with P. Bishop. Call with J. Dietrich. Review case conference aide memoire filed by Applicants. Call with R. Chadwick. Discussion with Stikemans. Consider stakeholder positions. Review chronology and issues. Further discussions with FTI. Attend daily meeting with Company and advisors.	3.80
May-21-24	J. Dietrich	Review and exchange of email; review of aide memoire and consider same; discussion regarding aid memoire; review of email; discussion regarding status; review of email regarding communication with stakeholders; discussion regarding status and upcoming case conference; review of email;	3.10
May-22-24	M. Sassi	Correspondence re: case conference; correspondence re: report and CCAA matters; notices of dispute and matters related to claims process; discussion with A. Hoy regarding report and matters related thereto; discussion with A. Mersey regarding case lines.	2.70
May-22-24	J. Gordon	Review of Factum of Applicant Re: Stay Extension, Amended DIP and Claims Procedure Order. Meeting with R. Jacobs re same. Work on draft report. Assist litigation team with case conference prep.	3.20
May-22-24	A. Hoy	Correspondence with the Court regarding Case Conference; updating Report and preparing appendices;	1.50
May-22-24	A. Merskey	Consider litigation steps and schedule requirements; Prepare for and attend at case conference, related emails and calls; Consider issues for Friday case conference;	4.20
May-22-24	R. Jacobs	Prep for and attend case conference. Calls with Stikeman team. Meetings with FTI team. Post hearing debrief on next steps and attendance on May 24. Review updated process letter and emails with Company advisors regarding same. Call with M. Wasserman. Calls with J. Dietrich regarding [REDACTED]	3.80
May-22-24	M. Wunder	Court conference and conference with Cassels team re next steps.	0.80
May-22-24	J. Dietrich	Discussion with N. MacParland; discussion with R. Jacobs; discussion with A. Merskey; various discussions regarding status update; consider case conference results and outstanding matters; follow up regarding strategy and status; attend daily update call; discussion regarding employee issues; review of email;	4.50
May-23-24	M. Sassi	Preparation of Ninth report; update call;	3.80
May-23-24	J. Gordon	Review Application Record.	1.70

Date	Name	Description	Hours
May-23-24	A. Hoy	Review Notice of Dispute forms received; updating draft report; reviewing [REDACTED] and revising; reviewing invoices; weekly claims discussion	4.50
May-23-24	A. Merskey	Update call with FTI; Consider issues for case conference; Coordinate on agenda with Stikeman; Related calls and emails; Drafting case conference agenda and summary, numerous related emails and calls;	4.30
May-23-24	S. Fernandes	Review [REDACTED]	0.20
May-23-24	R. Jacobs	Meeting with FTI and Cassels team. Attend meeting with Cargill advisors, Company advisors. Attend follow up meeting with Stikemans and GH teams. Attend daily update meeting with Company and advisors. Work on portion of report. Prep for case conference. Review draft aide memoire of Cargill. Work on scheduling issues. Review and comment on draft agenda for Court. Correspondence and advice to FTI. Consider [REDACTED]. Review updated process letter.	4.20
May-23-24	J. Picone	Discussion with Alan Merskey regarding case developments and anticipated next steps;	0.20
May-23-24	M. Wunder	Calls to discuss case status and path forward and Cdn court case conference and scheduling. Confer with Cassels team. Review Goodmans correspondence regarding proposed scheduling.	2.50
May-23-24	J. Dietrich	Review of email; discussion with R. Jacobs; discussion with FTI regarding outstanding issues; discussion with Cargill advisors; follow up discussion with company advisors; attend conference calls; review of draft aide memoire from Goodmans and consider issues; discussion regarding agenda;	5.90
May-24-24	J. Picone	Discussions regarding case status and next steps; correspondence regarding same; reviewing documents in connection with same;	0.50
May-24-24	M. Sassi	Meetings related to case conferences; correspondence re: ninth report; preparation of Ninth report; review endorsement of Justice Kimmel and correspondence regarding timing of court reports and court materials based on schedule;	3.30
May-24-24	A. Merskey	Revising case conference agenda; Consider issues for hearing, numerous calls and emails regarding same. Review Cargill Aide Memoire; Prepare for and attend at hearing; Emails regarding next steps;	5.40
May-24-24	A. Hoy	Further revisions to report; revising [REDACTED] [REDACTED]	3.40
May-24-24	R. Jacobs	Meeting with Stikeman team in prep for case conference. Attend case conference. Post case conference discussions with FTI and Cassels teams. Call with P. Bishop re [REDACTED] [REDACTED] Call with R. Chadwick. Reporting update to Stikeman team.	3.80

Date	Name	Description	Hours
May-24-24	J. Dietrich	Attend board meeting; review of email regarding agenda for court and revise same; discussion regarding case conference; consider case conference issues and strategy; review of endorsement; discussion regarding next steps; review of email and exchange of messages regarding draft of report;	4.30
May-24-24	M. Wunder	Consider [REDACTED] Calls and meetings with Stikeman, Goodmans and Osler teams re case status and negotiations.	2.30
May-25-24	A. Hoy	Reviewing and updating draft Report; reviewing revisions [REDACTED]	0.50
May-25-24	M. Sassi	Correspondence re: Ninth report; review and comment same,	0.50
May-25-24	R. Jacobs	Consider update from P. Bishop on case developments. Correspondence with FTI and Cassels teams re same.	1.80
May-25-24	J. Dietrich	Review of email regarding update from FTI;	0.30
May-26-24	R. Jacobs	Attend meeting with FTI and Cassels teams re developments. Consider same and discussions with J. Dietrich. Planning for next steps. Examine documentation.	2.70
May-26-24	M. Wunder	Review Cargill proposed terms and confer with Cassels team. Emails with Monitor and Cassels. Review DIP terms [REDACTED]	2.30
May-26-24	J. Dietrich	Discussion regarding update from Cargill;	0.50
May-27-24	M. Sassi	Revision to draft report and updates; call with J. Porepa regarding claims matters and report;	2.30
May-27-24	M. Sassi	Revision [REDACTED] call with J. Porepa regarding [REDACTED]	1.80
May-27-24	A. Hoy	Reviewing Notice of Dispute forms and Known Claim forms; reviewing [REDACTED]	1.70
May-27-24	M. Wunder	Status calls and negotiations regarding case process and [REDACTED] Call to discuss [REDACTED] Review revised draft documents. Consider stay extension [REDACTED]	2.40
May-27-24	R. Jacobs	Call with Stikeman team. Meeting with Stikeman and FTI team. Attend meeting with Goodmans and Cargill team. Consider [REDACTED] Analysis regarding same. Meeting with FTI regarding same. Review document [REDACTED] Examine cash flows and assumptions. Strategic case planning. Attend update meeting with Company and advisors.	4.20
May-27-24	A. Merskey	Update call with FTI and Stikeman; Call with Goodmans and others regarding [REDACTED] Review timetable issues and court requirements;	3.40
May-27-24	J. Dietrich	Review and exchange of email regarding status calls; discussion with FTI and Stikemans regarding status update and next steps; discussion with Cargill and advisors regarding path forward; discussion regarding outstanding	4.30

Date	Name	Description	Hours
		issues and potential path forward; review of initial outline of draft report and comment on same;	
May-28-24	M. Sassi	Update call regarding CCAA matters; Call regarding claims process; revisions to Ninth report and exhibits thereto; review claims procedure order and comments on same; report circulation and comments on same; review of claim and disputed amounts;	5.10
May-28-24	A. Merskey	Consider litigation issues, agenda and schedule, discuss with J. Picone; Update call with FTI; Reviewing [REDACTED]	2.60
May-28-24	A. Hoy	Updating and revising report; correspondence with Company re updates to Sales Process; weekly claims discussion with Company and Monitor	3.60
May-28-24	R. Jacobs	Strategy meeting with FTI. Call with M. Wasserman. Review [REDACTED] and comment on same. Discussion with J. Dietrich regarding same. Call with L. Nicholson. Review Company comments [REDACTED] Examine issues and discuss with P. Bishop. Consider motions and cadence. Review [REDACTED].	3.90
May-28-24	J. Picone	Meeting with Alan Merskey regarding case status, matters to be addressed by the court, and next steps;	0.50
May-28-24	M. Wunder	Review and consider Tacora terms and conditions and comments from Stikeman re same. Due diligence re approval motion.	2.40
May-28-24	J. Dietrich	Review of email; email to J. Porepa regarding website; review of claims notification draft email and comment on same; review of updated sales process; review of email and message to M. Sassi; participate in claims update call; discussion with FTI regarding status; discussion regarding [REDACTED] mark up of terms; review of email;	3.90
May-29-24	M. Sassi	Review revised Sale Procedures and affidavit and provide comments on same; correspondence and call with Monitor regarding claims responses and related matters; court booking forms and correspondence with company regarding same. review draft of motion schedule and correspondence re: same.	2.30
May-29-24	A. Merskey	Reviewing sales process procedures and emails, consider same; Review endorsement, motion materials, aide memoires and prepare litigation timetable; Review and revise with team, related emails and further revisions;	2.60
May-29-24	A. Hoy	Reviewing Company Affidavit; revising Monitor Report;	1.10
May-29-24	R. Jacobs	Review and comment on revised sales procedures. Correspondence with Cassels and FTI teams regarding same. Meeting with FTI team. Review [REDACTED] [REDACTED] Discuss with FTI. Attend daily update meeting with Company and advisors. Work on report. Discuss with J. Dietrich. Work on litigation schedule and meeting with Cassels team regarding same. Review and comment on	4.70

Date	Name	Description	Hours
		draft affidavit. Correspondence with Cassels team regarding same.	
May-29-24	M. Wunder	Meetings to discuss proposed transaction terms and litigation strategies. Confer with Cassels team regarding [REDACTED]	1.80
May-29-24	J. Dietrich	Participate in board call; discussion with R. Jacobs regarding status; review of email; review of revised sales process; discussion with FTI regarding status; review of email; discussion regarding proposed schedule; participate in daily update call; review of draft affidavit and email regarding comments;	4.60
May-30-24	M. Sassi	Update call with FT; Correspondence regarding draft affidavit, sale procedures and court materials; drafting Ninth report and correspondence regarding matters pertaining to same; correspondence re: claims received; comment on draft sale procedure	3.50
May-30-24	K. Jamal	Review and consider documents; Correspondence with A. Merskey regarding same;	0.30
May-30-24	A. Hoy	Reviewing, revising draft Report; reviewing of Claims;	5.60
May-30-24	J. Gordon	Research to support litigation team on potential litigation issues in case;	1.20
May-30-24	R. Jacobs	Review and comment on draft affidavit. Emails with Cassels and FTI teams regarding same. Attend meetings with FTI team. Review updated CFF and scenarios. Comment on draft report. Work on litigation timetable and emails with Stikeman and Cassels teams regarding same. Negotiate timetable and consider position of Cargill. Attend update meeting with Company. Review and consider DIP term sheet. Review and consider revisions to [REDACTED] [REDACTED] Correspondence with J.. Dietrich regarding same.	5.40
May-30-24	M. Wunder	Meetings to discuss status of [REDACTED] [REDACTED] Confer with FTI and Stikeman teams.	1.50
May-30-24	J. Dietrich	Follow up on schedule comments; follow up regarding comments on draft affidavit and revised sales process; exchange of email regarding schedule status; review of [REDACTED]; discussion with FTI regarding outstanding issues; review and discussion regarding schedule and [REDACTED]; participate in daily update call; email exchange regarding [REDACTED] and schedule issues; review of email; discussion with J. Porepa;	4.90
May-30-24	A. Merskey	Update call with FTI; Update call with Stikeman; Reviewing [REDACTED] various discussions regarding same; Reviewing company affidavit and related emails, consider issues for June 5 hearing; Revising litigation schedule, numerous emails and calls regarding same among parties;	4.70
May-31-24	M. Sassi	Call with Company and Monitor; revisions to Ninth report; Review Notices of motion regarding Prelim Motion and	5.20

Date	Name	Description	Hours
		Disclaimer motion; internal discussion regarding updates to Ninth report; Review served motion materials re: stay extension and sale process motion; review timetable and correspondence re: same;	
May-31-24	A. Merskey	Working throughout the day on timetable negotiations and revisions and Monitor report; Review and consider company motion materials regarding Sale Process and threshold motion;	5.20
May-31-24	A. Hoy	Reviewing proof of claim and notice of dispute forms; updating and finalizing draft Ninth Report;	4.60
May-31-24	J. Gordon	Research to support litigation team on potential litigation issues in case.	1.70
May-31-24	R. Jacobs	Work on report. Review Cargill NOM opposing disclaimer. Correspondence with Cassels and FTI teams regarding same. Examine revised sales procedures. Review and comment on draft litigation schedule and notice to Court. Review and comment on draft NOM on preliminary threshold motion.	4.30
May-31-24	J. Dietrich	Attend call regarding cash flow status; review of draft report and provide comments; review of revised [REDACTED] [REDACTED] review of revised report and further comments on same; review of draft notice of motion and comments on same; review of email regarding comments on notice of motion; review and exchange of messages regarding scheduling issues; attend daily update call; review of certain claims; review of email and discussion with M. Sassi regarding draft report; review of notice of motion regarding disclaimer objection; review of email regarding scheduling issues; review of sale process approval order;	5.00

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Picone, John M.	Partner	1.20	995.00	1,194.00
Sassi, Monique	Partner	38.90	745.00	28,980.50
Merskey, Alan	Partner	37.10	1,050.00	38,955.00
Wunder, Michael	Partner	17.70	1,050.00	18,585.00
Jacobs, Ryan	Partner	53.10	1,650.00	87,615.00
Dietrich, Jane	Partner	46.10	1,005.00	46,330.50
Hoy, Alec	Associate	33.70	485.00	16,344.50
Fernandes, Stephanie	Associate	0.20	485.00	97.00
Jamal, Kiyana	Associate	0.30	450.00	135.00
Gordon, Joshua	Law Student	9.70	215.00	2,085.50
Total (CAD)		238.00		240,322.00

Our Fees	240,322.00
HST @ 13.00%	31,241.86
TOTAL FEES & TAXES (CAD)	271,563.86

DISBURSEMENT SUMMARY

Taxable Disbursements

Travel	35.42
Total Taxable Disbursements	35.42
HST @ 13.00%	4.60
Total Taxable Disbursements & Taxes	40.02

TOTAL DISBURSEMENTS & TAXES (CAD) 40.02

TOTAL FEES	240,322.00
TOTAL DISBURSEMENTS	35.42
TOTAL TAXES	31,246.46
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	271,603.88

OUTSTANDING INVOICES

Invoice Number	Invoice Date	Bill Amount	Payments / Credits	Balance Due
2238522	05/23/24	223,977.16	0.00	223,977.16
2240216	06/07/24	271,603.88	0.00	271,603.88
Total (CAD)		495,581.04	0.00	495,581.04

Cassels

Attn: Paul Bishop
FTI Consulting Canada Inc.
Toronto-Dominion Centre, TD South Tower
79 Wellington St. W., Suite 2010
Toronto, ON M5K 1G8

Invoice No: 2243350
Date: July 03, 2024
Matter No.: 055118-00003
GST/HST No.: R121379572
Lawyer: Jacobs, Ryan
Tel.: (416) 860-6465
E-mail: RJacobs@cassels.com

Re: Tacora Restructuring

Fees for professional services rendered up to and including June 30, 2024

Our Fees	417,169.00
Disbursements	443.34
Total Fees and Disbursements	417,612.34
HST @ 13.00%	54,289.60
TOTAL DUE (CAD)	471,901.94

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Matter No.: 055118-00003
Amount: **CAD 471,901.94**

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FEE DETAIL			
Date	Name	Description	Hours
Jun-01-24	M. Sassi	Correspondence with Company counsel regarding Ninth Report;	0.20
Jun-01-24	M. Sassi	Correspondence re: court report; correspondence with Monitor re: claims;	0.40
Jun-01-24	M. Sassi	Correspondence with FTI re: Ninth Report;	0.40
Jun-01-24	R. Jacobs	Emails with Cassels and Stikemans teams regarding report. Emails regarding latest CFF. Review same. Consider issues for June 26 hearing. Review and analysis of [REDACTED]	3.10
Jun-01-24	M. Wunder	Confer with Cassels and Monitor teams re DIP and [REDACTED] and comments.	1.40
Jun-01-24	J. Dietrich	Exchange of email regarding draft report; review of email regarding revised [REDACTED] exchange of email regarding information provided to [REDACTED] exchange of email regarding status of report;	1.00
Jun-02-24	M. Sassi	Correspondence with Company counsel regarding Ninth Report;	1.40
Jun-02-24	M. Sassi	Calls and correspondence re: Ninth report; drafting and revising Ninth Report; prepare appendices to Ninth report; review company comments on draft report and review and revisions to report to address comments; update to report re: claims process;	2.60
Jun-02-24	A. Hoy	Finalizing Ninth Report appendices; preparing Confidential Appendix to Ninth Report; preparing for service of documents;	1.90
Jun-02-24	R. Jacobs	Review and comment on latest draft pf report. Review and consider comments from Stikemans, FTI. Consider litigation schedule and reservation of rights issues raised by Cargill.	3.10
Jun-02-24	J. Dietrich	Review of comments on draft report and related email;	0.60
Jun-03-24	M. Sassi	Revisions to report and confidential appendix;	0.10
Jun-03-24	M. Sassi	Correspondence re: claims query; address matters pertaining to confidential appendix and delivery to commercial list and filing of same; correspondence re: Motion on June 5; review company factum for hearing; finalization of report and correspondence with comments on same; review materials from Cargill regarding [REDACTED] review Monitor comments on Report and incorporation of same; correspondence re: KERP; correspondence re: confidential appendix ; service and filing of Ninth report;	4.20
Jun-03-24	S. Fernandes	Commission Affidavit of Service of M. Sassi;	0.10
Jun-03-24	A. Merskey	Update call with Stikeman; Working on Monitor report, various related emails and discussions; Consider sales process and sale process approval hearing issues; Working on same; Reviewing consensual negotiation documents; Coordinating hearing agenda for June 5, various related	4.80

Date	Name	Description	Hours
Jun-03-24	R. Jacobs	emails; Attend meeting with FTI and Stikeman teams. Follow up correspondence with Cassels reams. Review markup of DIP. Review further markup of schedule A from AHG. Attend update meeting with Company and advisors. Review and comment on draft hearing schedule for Court. Discussions with A. Merskey and J. Dietrich regarding same.	4.30
Jun-03-24	M. Wunder	Emails with Stikeman and FTI teams regarding DIP loan status and terms. Review comments on draft DIP agreement. Status meetings to prepare for court hearing.	2.20
Jun-03-24	J. Dietrich	Review of email; discussion with R. Jacobs; review of comments on draft report and email regarding same; participate in status call with FTI and Stikeman; discussion regarding revision to draft report; review of term sheet; review and exchange of email regarding service; email regarding hearing agenda and status of outstanding matters; participate in daily update call; review of draft agenda and discussion regarding same; review of revised agenda and related email; review of term sheets;	4.40
Jun-04-24	M. Sassi	Calls regarding claims; update call re: CCAA matters; correspondence re: court hearing and agenda; correspondence and review alternative DIP; correspondence with counsel to the company re: confidential appendix; review facta filed regarding June 5 hearing; correspondence with Court regarding court hearing;	2.50
Jun-04-24	A. Hoy	Attending weekly Claims discussion;	0.50
Jun-04-24	A. Merskey	Meet with team regarding motion preparation and hearing agenda, various related emails; Review facta and motion materials, prepare for hearing;	5.70
Jun-04-24	R. Jacobs	Consider Cargill position on CF. Discussions with Company counsel, FTI re same. Call with R. Chadwick. Meeting with Stikeman team. Review Cargill factum. Meeting with Cassels team re litigation schedule for Court. Revise draft of same.	4.10
Jun-04-24	M. Wunder	Review and consider revised draft DIP loan terms. Multiple correspondence re same with FTI. Status call with Stikeman, debtor financial advisors and Monitor to discuss litigation strategy including DIP analysis and approval process.	2.40
Jun-04-24	J. Dietrich	Review of revised DIP agreement; Review of [REDACTED]; Discussion with A. Merskey and R. Jacobs regarding upcoming hearing and preparation for same; Review of responding factum; Review of email regarding agenda and respond to same; Discussion regarding status and strategy; Discussion with Cargill and counsel regarding status and cash flows; discussion with R. Jacobs; Review of email; Discussion regarding status of cashflow and motion related issues;	5.30
Jun-05-24	M. Sassi	Call regarding hearing; correspondence re: claims and equipment financier; review revised DIP terms and	2.90

Date	Name	Description	Hours
		correspondence re: same; review facta served and consideration of same; review revised DIP materials; agenda for hearing and correspondence re: same; correspondence re: agenda;	
Jun-05-24	A. Hoy	Updating Caselines in advance of hearing; preparing Citation Aide for the Court;	0.90
Jun-05-24	A. Merskey	Meet with FTI, Stikeman regarding hearing coordination; Prepare for and attend at same; Emails regarding index for court; Review steps and issues for next hearing;	5.80
Jun-05-24	R. Jacobs	Attend hearing prep meetings. Attend hearing. Post hearing meetings and correspondence with FTI, Cassels and Company advisors. Attend update meeting with Company and advisors.	4.10
Jun-05-24	J. Dietrich	Review of email; Attend board meeting; Prepare for and attend at hearing for stay extension and sale process approval; Review of email regarding cash flow issues;	7.30
Jun-05-24	M. Wunder	Attend court hearing. Confer with Cassels and Monitor teams post hearing. DIP loan credit bid analysis.	2.80
Jun-06-24	M. Sassi	Update call re: ongoing CCAA matters; review and comment on revised sales procedures; correspondence regarding Tenth report and contents of same; call with A. Hoy regarding report; revised DIP budget and correspondence re: same	2.20
Jun-06-24	A. Merskey	Update call with FTI; Consider follow up issues from court hearing and steps for next Monitor report; Reviewing motions timetable;	0.70
Jun-06-24	A. Hoy	Preparing draft report for Motions timetable obligations re June 26 Motions;	3.10
Jun-06-24	R. Jacobs	Update correspondence with J. Dietrich regarding meeting with Stikeman. Review emails from R. Chadwick. Emails with FTI team regarding CFF. Review same. Correspondence with J. Dietrich regarding SISP. Review and comment on revised draft of same.	2.40
Jun-06-24	J. Dietrich	Discussion with FTI regarding status update; Discussion with Stikeman and FTI regarding outstanding matters and next steps; Review of email; Review of sale procedures amendments and comments on same; Attend update call;	2.30
Jun-07-24	M. Sassi	Correspondence re: sale procedures; review and comment on tenth report and call with A. Hoy re: same, review court order and endorsement; calls and correspondence with Monitor and Company counsel regarding Ninth report and additional KERP employee correspondence re: confidential appendix; correspondence with company re: sale procedures and comments on same revisions to Tenth report and appendices	3.10
Jun-07-24	A. Merskey	Review endorsement; Emails regarding same; Review motions timetable and consider next steps;	0.70
Jun-07-24	A. Hoy	Preparing draft Fifth Report; call with M. Sassi; reviewing	3.40

Date	Name	Description	Hours
		endorsement from June 5 hearing	
Jun-07-24	R. Jacobs	Attend calls and meetings with FTI, Company advisors. Review correspondence from Goodmans. Consider latest emails regarding CFF. Review endorsement and correspondence with FTI and Cassels teams regarding same. Attend daily update call with Company and advisors.	3.30
Jun-07-24	M. Wunder	Calls and emails regarding status and negotiations for sales process and litigation timetable. Review comments on DIP terms and consider DIP credit bid matters.	1.60
Jun-07-24	J. Dietrich	Review of email; exchange of email regarding sale process; review of endorsement and email exchange regarding same; discussion with FTI;	1.40
Jun-09-24	R. Jacobs	Work on report. Correspondence regarding fee affidavit. Examine [REDACTED] and advise on same.	1.50
Jun-10-24	M. Sassi	Review and comments on 10th Report; review notices of motion; correspondence re: case website; correspondence re: claims register;	2.70
Jun-10-24	A. Merskey	Update call with Stikeman and FTI; review litigation schedule and preparations related to same;	1.20
Jun-10-24	A. Hoy	Updating draft Tenth Report; reviewing proof of claim and notice of dispute forms;	1.30
Jun-10-24	R. Jacobs	Attend meeting with Stikeman, FTI and Cassels teams. Review litigation timetable. Review draft report. Correspondence with Cassels team.	2.10
Jun-10-24	M. Wunder	Work with Cassels team regarding analysis for process motion and consultation of terms.	2.20
Jun-10-24	J. Dietrich	Review and exchange of email; participate in update call with FTI; participate in daily update call with Company and advisors;	1.40
Jun-11-24	M. Sassi	Update call with FTI; call with company and Monitor regarding claims updates; correspondence re: appendices to next report; review claim analysis; review issued order re: sales process; correspondence re: Cargill Claim;	2.50
Jun-11-24	A. Hoy	Tracking proof of claims forms; updating Tenth Report draft; weekly claims procedure discussion;	3.40
Jun-11-24	A. Merskey	Meet with Cassels and FTI teams re case issues; Consider issues for monitor report and next court hearing; Discuss with M. Sassi;	1.20
Jun-11-24	R. Jacobs	Attend update meeting with FTI and Cassels team. Detailed review and analysis of Cargill motion record for Global Process Motion and Disclaimer Motion. Review Tacora motion record on preliminary threshold motion. Review and consider email from Goodmans regarding hearing. Correspondence with Stikeman team. Advise FTI regarding same.	3.90
Jun-11-24	M. Wunder	Review court filings regarding global process motion. Review filing by Tacora. Confer with Monitor and Cassels	1.80

Date	Name	Description	Hours
		teams.	
Jun-11-24	J. Dietrich	Discussion with FTI; participate in update call; review of motion material as served;	2.30
Jun-12-24	A. Hoy	Reviewing various motion materials for June 26 Motions; updating draft Tenth Report of Monitor;	3.10
Jun-12-24	A. Merskey	Review of motion materials; Calls with Goodmans, Stikeman, FTI regarding proceeding issues;	1.80
Jun-12-24	S. Voudouris	Review and analysis of Cargill's motion to set aside disclaimer including review of affidavit and expert evidence, and key documents regarding same; review and analysis of Tacora's preliminary threshold motion, including review of affidavit evidence and key documents regarding same;	2.90
Jun-12-24	R. Jacobs	Review motion records. Correspondence with P. Bishop regarding email from Goodmans. Correspondence with Cassels and Stikeman teams. Call with J. Dietrich regarding call with Goodmans. Consider email from Osler. Email with FTI. Work on report.	3.10
Jun-12-24	J. Picone	Reviewing and considering notice of motion of the Applicant relating to RVO; reviewing and considering affidavit of Natasha Rambaran and exhibits included in affidavit; discussion with Alan Merskey regarding developments and next steps;	2.30
Jun-12-24	J. Dietrich	Exchange of email regarding conversation with Cargill counsel; attend board meeting; discussion with Cargill counsel; discussion with Stikemans; discussion with FTI; review of email;	3.80
Jun-13-24	M. Sassi	Review Company motion materials; review Cargill material; correspondence re Tenth Report;	2.80
Jun-13-24	A. Merskey	Review draft affidavits, various related emails, consider process issues for hearing;	0.60
Jun-13-24	A. Hoy	Internal correspondence and updating report; reviewing served motion materials from Tacora and Cargill;	3.80
Jun-13-24	R. Jacobs	Review and comment on draft affidavits. Correspondence with Cassels and FTI teams regarding same. Review further [REDACTED] and correspondence with FTI team regarding same. Review motion records and work on report.	2.40
Jun-13-24	M. Wunder	Review legal briefs; advise Cassels team on DIP issues;	1.20
Jun-13-24	J. Dietrich	Review of draft affidavit and email same; Attend call with FTI; Attend call with Stikeman and FTI; Review of additional draft affidavit and coordinate comments on same; Review of draft report and provide comments on same; Review of email; Attend daily update call; Exchange of messages with J. Porepa; Discussion with A. Hoy regarding comments on draft report;	4.70
Jun-14-24	M. Sassi	Review and revisions to tenth report and internal circulation of same; Review responding factum of the Company; review company draft affidavits and updating report regarding	3.90

Date	Name	Description	Hours
		same; circulation of draft report to FTI; confidential case lines bundles matters;	
Jun-14-24	A. Hoy	Internal correspondence; reviewing and updating draft Report; reviewing motion materials;	3.40
Jun-14-24	A. Merskey	Emails regarding confidentiality and sealing issues;	0.20
Jun-14-24	R. Jacobs	Review and comment on draft report. Calls and emails with Cassels and FTI teams regarding same. Correspondence with Stikeman team. Consider Cargill motion record and legal positions.	3.10
Jun-14-24	J. Dietrich	Review of revised draft report and comment on same; review of revised report and comments on same; review of updated affidavits; email exchange regarding draft report;	1.70
Jun-15-24	J. Picone	Reviewing and considering responding record of the Applicant; correspondence regarding same;	1.30
Jun-16-24	M. Sassi	Correspondence re: court report and comments on same.	0.50
Jun-16-24	M. Wunder	Revise and consider correspondence regarding global process motion. Confer with Cassels team.	1.40
Jun-17-24	M. Sassi	Correspondence re: 10th Report; revisions and updates to same; discussion re: factum addendum; correspondence re: Monitor case site documents and confidentiality of same; drafting addendum factum; correspondence with court re; confidential bundles; correspondence re: claims files;	4.20
Jun-17-24	S. Voudouris	Review and analysis of motion materials filed regarding motions returnable June 26, 2024 including global process motion and disclaimer motion; draft addendum to factum regarding legal availability of RVO transaction structure;	1.90
Jun-17-24	A. Merskey	Review motion materials, working on Monitor report; Update call with FTI; Emails with Court regarding confidentiality steps; Working on factum update, calls with team regarding same;	4.60
Jun-17-24	K. Jamal	Correspondence with M. Sassi regarding research;	0.20
Jun-17-24	R. Jacobs	Review latest [REDACTED] Analysis of offtake issues. Review emails from Goodmans and Stikemans regarding resolving record on preliminary motion. Prepare for hearing. Attend update call with FTI, Stikeman and Cassels teams. Attend daily update call with Company and advisors.	3.40
Jun-17-24	J. Picone	Correspondence with counsel to the Applicant regarding confidentiality matters; further review of materials filed in support of pending motion; discussion with Stephanie Voudouris regarding scope and content of factum addendum; related correspondence;	1.30
Jun-17-24	M. Wunder	Review Cargill motion record and confer with Cassels team regarding Monitor position and draft court report.	1.00
Jun-17-24	J. Dietrich	Review of email and exchange of messages regarding comments on draft report; review of email; additional comments on draft report; discussion regarding status; discussion with R. Jacobs; consider outstanding matters;	1.40

Date	Name	Description	Hours
		review of email;	
Jun-18-24	S. Voudouris	Review and analysis of motion materials filed regarding motions returnable June 26, 2024 including global process motion and disclaimer motion; review of additional caselaw regarding availability of RVO and analysis/framework to be applied; draft and revise supplement to factum regarding court's jurisdiction to approve RVOs;	6.20
Jun-18-24	M. Sassi	Calls and correspondence re: draft factum; correspondence re: set off matters; updates to draft 10th report; review responding materials filed by company; correspondence re: supplementary factum	5.80
Jun-18-24	A. Merskey	Update call with FTI; Emails and follow up regarding confidentiality issues; Emails and follow up on draft report; Working on supplementary factum, confer with team regarding same; Consider outstanding timetable matters;	4.60
Jun-18-24	K. Jamal	Correspondence and meetings with M. Sassi and S. Voudouris regarding caselaw research; Review and consider responding factum and addendum and issues; Research jurisprudence for inclusion in factum; Review and consider factum and circulate subsequent draft; Correspondence with S. Voudouris regarding same;	9.30
Jun-18-24	R. Jacobs	[REDACTED] Review and comment on communication to Goodmans from Monitor. Attend meeting with FTI and Cassels teams. Correspondence with Stikemans Call with J. Dietrich regarding factum. Review initial draft of same.	2.70
Jun-18-24	J. Picone	Reviewing and revising draft addendum to factum; discussion with Alan Merskey regarding legal arguments included in addendum;	0.90
Jun-18-24	J. Dietrich	Review of email; discussion with FTI regarding status; review of correspondence and discussion regarding same; review of draft factum and provide initial comments; participate in update call; discussion regarding payment/set off issues; review of email and various conversations regarding correspondence; review of comments on draft monitor's report;	3.90
Jun-19-24	M. Sassi	Revisions to and correspondence with Monitor and Company regarding Tenth Report; calls with Monitor regarding Tenth Report; finalization and service of same; review various correspondence from Cargill, Company and Monitor regarding vessels and demands; Calls regarding same;	6.00
Jun-19-24	A. Merskey	Review and consider draft Monitor report and comments; Working on draft factum; Confer with team regarding same; Emails and follow up on confidentiality issues;	5.30
Jun-19-24	K. Jamal	Review and consider jurisprudence cited in supplementary factum; Correspondence with S. Voudouris regarding same;	2.60
Jun-19-24	S. Fernandes	Review and update Appendices to Report; redact certain	1.20

Date	Name	Description	Hours
Jun-19-24	S. Voudouris	Appendices; review compiled Report; Review and analysis of motion materials filed regarding motions returnable June 26, 2024 including global process motion and disclaimer motion; review of additional caselaw; draft and revise supplement to factum;	5.70
Jun-19-24	R. Jacobs	Consider issues regarding Cargill positions. Attend strategy meeting with FTI and Cassels team regarding same. Review draft demand letter. Correspondence with A. Merskey regarding litigation issues, legal positions and authority. Work on report and finalizing same. Consider comments on draft. Work on Monitor's factum. Call with J. Dietrich and correspondence with A. Merskey. Call with A. Merskey regarding same. Attend daily update meeting with Company and advisors. [REDACTED] [REDACTED]	4.70
Jun-19-24	J. Picone	Reviewing and revising draft addendum to factum; reviewing and considering other court materials; discussion with R. Jacobs regarding finalization of factum;	3.20
Jun-19-24	M. Wunder	Review draft Monitor report and confer with Cassels team re same.	1.50
Jun-19-24	J. Dietrich	Attend board meeting; revisions to draft factum; revisions to draft monitors report; review of draft correspondence and email regarding same; discussion with R. Jacobs; revisions to draft report; discussion regarding correspondence between Stikeman and Goodmans; email exchange with Goodmans; review of correspondence; update draft report; review of revised factum; review report prior to service and email regarding same;	6.00
Jun-20-24	J. Roy	Review and comment on APA and Share Subscription Agreement;	4.50
Jun-20-24	M. Sassi	Review transaction agreements and comments on same; correspondence with corporate and employment specialists re comments on same; internal correspondence re: same; service of Tenth report, filing of same; review demand letter and Monitor responses updating report re: same;	3.20
Jun-20-24	A. Merskey	Finalizing factum, related emails; Review company and Cargill motion materials, consider issues for hearing; Working on motions agenda and index issues; Follow up on confidentiality issues; Emails regarding Cargill motion position;	4.30
Jun-20-24	K. Jamal	Review and consider issues in factum; Assist with finalization of factum;	2.60
Jun-20-24	S. Fernandes	Commission affidavits of service of M. Sassi;	0.60
Jun-20-24	S. Voudouris	Review and analysis of motion materials filed regarding motions returnable June 26, 2024 including global process motion and disclaimer motion; draft addendum to factum; review of additional caselaw; review of prior factum; prepare and review materials for oral argument;	3.10

Date	Name	Description	Hours
Jun-20-24	R. Jacobs	Attend update meeting with FTI and Cassels teams. Attend meeting with Stikeman team. Consider key case developments, implications. Review and comment on draft litigation schedule for June 26. Discussions with A. Merskey. Consider party positions. Review facta and analysis of law. Review draft transaction agreements and specialists comments. Correspondence regarding same.	4.40
Jun-20-24	J. Picone	Correspondence with the Monitor; finalizing draft factum addendum; reviewing and considering factum of the Applicant regarding reconstituted preliminary threshold motion; reviewing and considering factum of Cargill regarding motion to set aside disclaimer; reviewing and considering factum of Cargill regarding global process motion; reviewing and considering caselaw cited in factums;	3.80
Jun-20-24	C. Ground	Reviewing comments by J. Roy on form of Asset Purchase Agreement and form of Subscription Agreement; commenting on same; email to Cassels team re. same;	0.70
Jun-20-24	J. Dietrich	Review of revised factum; review of email discussion with FTI regarding status; review of email; discussion with counsel regarding status; participate in daily update call; initial review of Cargill facta;	2.50
Jun-20-24	G. Richard	Review and comment on Subscription Agreement and Asset Purchase Agreement and email Monique Sassi;	3.10
Jun-21-24	S. Voudouris	Review and analyze materials for oral argument;	0.70
Jun-21-24	M. Sassi	Prepare Monitor comments on transaction agreement; discussion with J. Porepa regarding same; correspondence with company regarding same; confirmation of service and correspondence re: same; correspondence re: confidential bundles;	1.70
Jun-21-24	K. Jamal	Prepare for hearing; Prepare materials for hearing; Review materials on Caselines;	3.70
Jun-21-24	S. Fernandes	Commission Affidavit of Service of M. Sassi;	0.20
Jun-21-24	R. Jacobs	Attend update meetings and correspondence with Cassels and FTI teams regarding developments, June 26 hearing issues. Consider scheduling issues and Cargill position. Discussion with A. Merskey on same. Correspondence with Company advisors. Consider Company issues with setoff points and Cargill responses. Discussion with J. Dietrich.	3.10
Jun-21-24	J. Picone	Further review and considering of factum of the Applicant regarding reconstituted preliminary threshold motion, factum of Cargill regarding motion to set aside disclaimer, and factum of Cargill regarding global process motion; discussion with Alan Merskey regarding legal positions of the parties and litigation issues; reviewing and considering caselaw cited in factums;	3.20
Jun-21-24	M. Wunder	Review draft Monitor report and provide comments.	0.80
Jun-21-24	J. Dietrich	Review of facta; discussion with R. Jacobs; review of email; participate in update call;	1.20

Date	Name	Description	Hours
Jun-21-24	A. Merskey	Emails and calls regarding motion schedule; Emails and follow up on confidentiality issues; Reviewing factums and records;	4.20
Jun-22-24	R. Jacobs	Review and consider emails and positions from Goodmans and consider same. Discussions with Cassels team regarding June 26 hearing issues.	2.10
Jun-22-24	J. Dietrich	Review of email from R. Chadwick; review of email regarding agenda issues;	0.40
Jun-23-24	M. Sassi	Correspondence with Monitor regarding correspondence with Cargill.	0.10
Jun-23-24	K. Jamal	Prepare for hearing; Prepare materials for hearing; Review materials on Caselines; Review and consider caselaw;	2.70
Jun-23-24	R. Jacobs	Review email update regarding Cargill and correspondence with FTI regarding same. Emails with Stikemans regarding hearing schedule and issues. Prep for June 26 hearing.	3.20
Jun-23-24	M. Wunder	Review emails regarding negotiations in advance of court hearing. Confer with Cassels team re same.	1.70
Jun-23-24	J. Dietrich	Review of email regarding status updates;	0.30
Jun-24-24	A. Hoy	Reviewing claims submitted in Claim Process and internal correspondence with respect to same;	1.10
Jun-24-24	S. Voudouris	Review and analyze materials for oral argument; prepare materials to be relied on for oral argument; review and analysis of responding facta filed by parties including review of key evidence and caselaw relied on;	1.80
Jun-24-24	M. Sassi	Address claims procedures queries and correspondence re: same; call with claimant re: query;	1.70
Jun-24-24	A. Merskey	Various emails regarding motion agenda and timetable, finalizing same; Emails regarding sales process; Consider issues for motion, working on submissions for same; Update call with FTI and Stikeman; review Cargill and Tacora factums; Emails re service issues;	5.40
Jun-24-24	K. Jamal	Review and consider materials in advance of hearing; Prepare for hearing; Correspondence and discussion with S. Voudouris and A. Merskey regarding same;	13.40
Jun-24-24	J. Picone	Discussion with Alan Merskey regarding hearing preparation; reviewing motion hearing agenda; reviewing and considering Addendum Factum of Cargill; reviewing and considering Responding Factum of the Applicant (Disclaimer Motion and Global Process Motion); correspondence with counsel to Cargill regarding confidentiality matters;	2.80
Jun-24-24	R. Jacobs	Attend meeting with FTI and Cassels teams. Review email update and draft support agreement and transaction terms. Call with J. Dietrich regarding same. Attend meeting with Goodmans and Stikemans regarding same. Call with L. Nicholson. Update correspondence with FTI and Cassels team. Review facta. Discuss same with Cassels team.	3.90
Jun-24-24	M. Wunder	Attend status call with Monitor, Stikeman and Cassels	1.40

Date	Name	Description	Hours
		teams. Review emails and status of negotiations. Confer with Cassels team regarding proposed transaction terms. Consider DIP issues.	
Jun-24-24	J. Dietrich	Discussion with A. Merskey regarding motion; review of email regarding various claims; participate in discussion with Stikeman and FTI regarding status; follow up email regarding status; discussion with R. Jacobs; review of email; review of facta;	3.40
Jun-25-24	A. Hoy	Work on fee affidavits and addressing privilege issues;	2.40
Jun-25-24	S. Voudouris	Review and analyze materials for oral argument; review and analysis of responding factum filed by parties including review of key evidence referenced and caselaw cited; prepare and analyze materials for oral argument including strategic discussions regarding same; correspondence regarding potential adjournment;	4.70
Jun-25-24	M. Sassi	Update call; preparation of materials for next court appearance; review of facta; correspondence with Monitor regarding hearing; review Cargill document; correspondence to service list regarding hearing; correspondence re: specific claim queries and requests;	3.10
Jun-25-24	A. Merskey	Working on hearing preparations. Working on index for court, directions to team regarding same. Various calls and emails throughout the day regarding adjournment negotiations. Communications with court regarding status;	7.40
Jun-25-24	K. Jamal	Review and consider materials in advance of hearing; Prepare for hearing, including preparation of materials for Justice Kimmel; Correspondence and discussion with S. Voudouris and A. Merskey regarding same;	6.70
Jun-25-24	J. Picone	Further review of Addendum Factum of Cargill and Responding Factum of the Applicant (Disclaimer Motion and Global Process Motion); reviewing and considering Addendum Factum of Cargill (Reconstituted Threshold Motion); reviewing and considering caselaw cited in factums; discussion with Alan Merskey regarding caselaw and legal analysis; reviewing draft terms of proposed adjournment; correspondence with counsel;	2.80
Jun-25-24	R. Jacobs	Call and emails with L. Nicholson. Attend meeting with FTI, Stikeman and Cassels teams. Review and comment on draft adjournment terms. Consider same and discuss with A. Merskey and J. Dietrich. Review emails from Goodmans and Stikemans.	3.90
Jun-25-24	J. Dietrich	Review of email; discussion regarding status update with FTI and Stikeman; review of adjournment terms and discussion regarding same; discussion regarding adjournment terms and related issues; participate in daily update call; discussion with A. Merskey; review and exchange of messages regarding adjournment and status;	3.50
Jun-26-24	M. Sassi	Correspondence re: court hearing; correspondence re: employee queries;	1.30

Date	Name	Description	Hours
Jun-26-24	A. Merskey	Various emails and calls regarding adjournment hearing, consider issues for and attend on same. Follow up regarding court materials and reporting to court on negotiations;	2.40
Jun-26-24	J. Picone	Correspondence relating to confidentiality issues; discussion with Alan Merskey regarding adjournment and next steps;	0.30
Jun-26-24	R. Jacobs	Emails regarding RVO preliminary motions and scheduling. Correspondence with Cassels team regarding same. Examine support agreement and recap terms.	3.00
Jun-26-24	J. Dietrich	Discussion with A. Merskey regarding hearing; exchange of email regarding adjournment hearing; attend hearing; participate in daily update call; review of email;	2.10
Jun-27-24	M. Sassi	Attend update call with the Monitor; Call with terminated employee; correspondence regarding same; review Greenhill presentation;	2.00
Jun-27-24	A. Merskey	Follow up on stakeholder inquiries. Emails regarding briefing materials. Update call with FTI and team. Reviewing RSA summary and subscription agreement status;	1.30
Jun-27-24	R. Jacobs	Attend daily update meeting with Company and advisors. Consider case next steps including related to joint bid Emails regarding issues on same.	2.30
Jun-27-24	J. Dietrich	Exchange of messages with R. Jacobs; review of Greenhill deck; participate in update calls; review of email; exchange of messages with J. Porepa regarding potential leased equipment; discussion with R. Jacobs;	1.60
Jun-28-24	R. Jacobs	Attend meeting with FTI, Stikemans and Cassels teams. Consider updates regarding stakeholder bid, documentation, next steps and timing. Review terms and open issues. Review case update emails.	2.70

FEE SUMMARY

Name	Title	Hours	Rate	Amount
Roy, Jeffrey P.	Partner	4.50	1,485.00	6,682.50
Sassi, Monique	Partner	61.50	745.00	45,817.50
Voudouris, Stephanie	Partner	27.00	825.00	22,275.00
Merskey, Alan	Partner	62.20	1,050.00	65,310.00
Jacobs, Ryan	Partner	79.90	1,650.00	131,835.00
Picone, John M.	Partner	21.90	995.00	21,790.50
Ground, Colin	Partner	0.70	955.00	668.50
Dietrich, Jane	Partner	62.50	1,005.00	62,812.50
Wunder, Michael	Partner	23.40	1,050.00	24,570.00
Hoy, Alec	Associate	28.30	485.00	13,725.50
Fernandes, Stephanie	Associate	2.10	485.00	1,018.50
Jamal, Kiyana	Associate	41.20	450.00	18,540.00

Name	Title	Hours	Rate	Amount
Richard, Guy-Etienne (Guy)	Associate	3.10	685.00	2,123.50
Total (CAD)		418.30		417,169.00

Our Fees	417,169.00	
HST @ 13.00%	54,231.96	
TOTAL FEES & TAXES (CAD)		471,400.96

DISBURSEMENT SUMMARY

Taxable Disbursements

Copies	351.50
Travel	91.84
Total Taxable Disbursements	443.34
HST @ 13.00%	57.64
Total Taxable Disbursements & Taxes	500.98

TOTAL DISBURSEMENTS & TAXES (CAD) 500.98

TOTAL FEES	417,169.00
TOTAL DISBURSEMENTS	443.34
TOTAL TAXES	54,289.60
TOTAL FEES, DISBURSEMENTS & TAXES (CAD)	471,901.94

Cassels

Attn: Paul Bishop
FTI Consulting Canada Inc.
Toronto-Dominion Centre, TD South Tower
79 Wellington St. W., Suite 2010
Toronto, ON M5K 1G8

Invoice No: 2244587
Date: July 17, 2024
Matter No.: 055118-00003
GST/HST No.: R121379572
Lawyer: Jacobs, Ryan
Tel.: (416) 860-6465
E-mail: RJacobs@cassels.com

Re: Tacora Restructuring

Fees for professional services rendered up to and including July 07, 2024

Our Fees	25,647.50
HST @ 13.00%	3,334.18
TOTAL DUE (CAD)	28,981.68

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40 Temperance St., Toronto, ON, M5H 0B4 Canada

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Vendor name is **Cassels Brock Blackwell LLP** and
you are required to enter the first six digits of the
matter #

Invoice No: 2244587
Matter No.: 055118-00003
Amount: **CAD 28,981.68**

e-Transfer Payments: payments@cassels.com

Credit Card Payments: payments.cassels.com

Cassels Brock Blackwell LLP | cassels.com

Suite 3200, Bay Adelaide Centre - North Tower, 40 Temperance Street, Toronto, ON M5H 0B4 Canada | t: 416 869 5300 | f: 416 360 8877

FEE DETAIL			
Date	Name	Description	Hours
Jul-01-24	R. Jacobs	Review and consider emails regarding recap transaction and path forward. Consider potential issues and correspondence with Cassels team regarding same.	1.50
Jul-02-24	R. Jacobs	Attend meeting with FTI and Cassels teams. Attend meeting with Company and advisors. Correspondence regarding transaction documentation, SISP and timing. Examine SISP terms. Consider case issues. Prepare portion of report.	2.90
Jul-02-24	J. Dietrich	Attend update call; Review of email; Attend claims meeting;	1.00
Jul-02-24	M. Sassi	Update call with FTI; Call regarding claims; review employee claims and correspondence re: same	1.30
Jul-02-24	A. Hoy	Drafting Eleventh report re Sale Process results; claims process	3.50
Jul-03-24	J. Dietrich	Attend board meeting; Status update call with R. Jacobs; Discussion with J. Porepa; Review of email; Attend daily update call; Discussion regarding administration reserve, cure costs and related matters;	2.60
Jul-03-24	M. Sassi	Call with C. Woods re: employee claims; review information pertaining to employee claims and correspondence with J. Dietrich and Monitor regarding strategy	0.70
Jul-03-24	A. Hoy	Updating draft Eleventh Report	1.60
Jul-04-24	R. Jacobs	Email correspondence with Stikeman and FTI teams. Emails with Cassels team.	1.50
Jul-04-24	J. Dietrich	Review of email;	0.40
Jul-04-24	M. Sassi	Discussion with Carter Woods regarding employee claims; correspondence re: CCAA updated and check in; call with J. Porepa regarding same and correspondence regarding plan forward.	0.60
Jul-04-24	A. Hoy	Preparing Fee Affidavit; address privilege issues; updating draft Eleventh Report;	2.10
Jul-05-24	R. Jacobs	Emails with FTI and Stikeman teams. Consider transaction structure and next steps, necessary documentation and issues.	1.80
Jul-05-24	A. Hoy	Preparing draft Eleventh Report	2.10
Jul-07-24	R. Jacobs	Review key dates and emails regarding transaction structure. Consider issues.	1.50

FEE SUMMARY				
Name	Title	Hours	Rate	Amount
Jacobs, Ryan	Partner	9.20	1,650.00	15,180.00
Dietrich, Jane	Partner	4.00	1,005.00	4,020.00
Sassi, Monique	Partner	2.60	745.00	1,937.00
Hoy, Alec	Associate	9.30	485.00	4,510.50

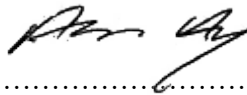
Name	Title	Hours	Rate	Amount
Total (CAD)		25.10		25,647.50

Our Fees		25,647.50		
HST @ 13.00%		3,334.18		
TOTAL FEES & TAXES (CAD)				28,981.68

TOTAL FEES				25,647.50
TOTAL TAXES				3,334.18
TOTAL FEES & TAXES (CAD)				28,981.68

OUTSTANDING INVOICES				
Invoice Number	Invoice Date	Bill Amount	Payments / Credits	Balance Due
2243350	07/03/24	471,901.94	0.00	471,901.94
2244587	07/17/24	28,981.68	0.00	28,981.68
Total (CAD)		500,883.62	0.00	500,883.62

This is Exhibit "B" referred to in the affidavit of Ryan Jacobs, affirmed before me by videoconference on July 19, 2024 in accordance with O.Reg. 431/20: Administering Oath or Declaration Remotely. The affiant was located in the City of Toronto in the Province of Ontario and I was located in the City of Toronto in the Province of Ontario



.....
A Commissioner For Taking Affidavits

Commissioner Name: Alec Hoy
Law Society of Ontario Number: 85489K

EXHIBIT "B"

Billing Rates of Cassels Brock & Blackwell LLP


For the period from October 10, 2024 to July 7, 2024

Year of Call	Lawyer	Rate (\$)	Total Hours Billed	Total Fees Billed (\$)
1981	Jeffrey Roy (2023 rate)	1,400.00	7.50	10,500.00
1981	Jeffrey Roy (2024 rate)	1,485.00	17.10	25,393.50
1988	Doug Richardson	1,250.00	17.70	22,125.00
1990	Michael Wunder (2023 rate)	975.00	125.40	122,265.00
1990	Michael Wunder (2024 rate)	1,050.00	182.20	191,310.00
1999	Alan Merskey (2023 rate)	935.00	132.30	123,700.50
1999	Alan Merskey (2024 rate)	1,050.00	446.40	468,720.00
2001	Colin Ground (2023 rate)	900.00	10.30	9,270.00
2001	Colin Ground (2024 rate)	955.00	16.40	15,662.00
2002	Joseph Bellissimo	945.00	0.40	378.00
2003	Laurie Jessome	910.00	0.30	273.00
2004	Ryan Jacobs (2023 rate)	1,500.00	227.70	341,550.00
2004	Ryan Jacobs (2024 rate)	1,650.00	589.50	972,675.00
2004	Jane Dietrich (2023 rate)	945.00	210.80	199,206.00
2004	Jane Dietrich	1,005.00	560.60	563,403.00

	(2024 rate)			
2005	Kurtis Bond	1,035.00	3.00	3,105.00
2008	Natalie Levine (2023 rate)	775.00	3.00	2,325.00
2008	Natalie Levine (2024 rate)	825.00	8.50	7,012.50
2010	John Picone (2023 rate)	895.00	58.00	51,910.00
2010	John Picone (2024 rate)	995.00	141.70	140,991.50
2013	Monique Sassi (2023 rate)	700.00	86.40	60,480.00
2013	Monique Sassi (2024 rate)	745.00	438.10	326,384.50
2014	Stephanie Voudouris (2023 rate)	740.00	49.30	36,482.00
2014	Stephanie Voudouris (2024 Rate)	825.00	236.20	194,865.00
2014	Bryan Woodman	700.00	2.40	1,680.00
2019	Jocelyn Arnason	650.00	0.60	390.00
2020	Guy-Etienne Richard	685.00	3.10	2,123.50
2021	Simone Dreksler	455.00	5.40	2,457.00
2021	William Onyeaju	540.00	0.20	108.00
2022	Alec Hoy	485.00	186.20	90,307.00
2022	Stephanie Fernandes (2023 rate)	420.00	7.80	3,276.00
2022	Stephanie Fernandes (2024 rate)	485.00	15.20	7,372.00
2022	Timon Li	485.00	0.20	97.00
2022	Michael Marot	485.00	0.20	97.00
2023	Kiyan Jamal (2023 rate)	420.00	49.70	20,874.00
2023	Kiyan Jamal	450.00	186.00	83,700.00

	(2024 rate)			
	Courtney Wong (Law Student)	200.00	2.70	540.00
	Camély Gendron (Law Student)	200.00	1.50	300.00
	Jasman Gill (Law Student)	215.00	8.70	1,870.50
	Andrew Stavros (Law Student)	215.00	1.80	387.00
	Eva Hyderman (Law Student)	215.00	0.80	172.00
	Joshua Gordon (Law Student)	215.00	9.70	2,085.50
	Cathy Stallone (Law Clerk / Paralegal)	430.00	28.20	12,126.00
	Jeff Fish (Law Clerk / Paralegal)	280.00	10.00	2,800.00
	Tara Lisowski (Law Clerk / Paralegal)	310.00	0.40	124.00

This is Exhibit "C" referred to in the affidavit of Ryan Jacobs, affirmed before me by videoconference on July 19, 2024 in accordance with O.Reg. 431/20: Administering Oath or Declaration Remotely. The affiant was located in the City of Toronto in the Province of Ontario and I was located in the City of Toronto in the Province of Ontario



.....
A Commissioner For Taking Affidavits

Commissioner Name: Alec Hoy
Law Society of Ontario Number: 85489K

EXHIBIT "C"

**Calculation of Average Hourly Billing Rates of
Cassels Brock & Blackwell LLP
for the period October 10, 2023 to July 7, 2024**

Invoice No./ Period	Fees (\$)	Disbursements (\$)	HST (\$)	Total Fees, Disbursements and HST (\$)	Hours Billed	Average Billed Rate (\$)
2215670 Oct 10-23 to Oct 22-23	267,557.50	707.36	34,851.12	303,115.98	266.40	1,004.34
2217756 Oct 20-23 to Oct 31-23	171,312.00	75.44	22,278.46	193,665.90	174.10	983.99
2222723 Oct 16-23 to Nov 30-23	247,932.50	0.00	32,231.23	280,163.73	242.00	1,024.51
2226662 Dec 1-23 to Dec 31-23	300,391.50	0.00	39,050.90	339,442.40	298.10	1,007.69
2229010 Jan 1-24 to Jan 31-24	462,194.50	313.48	60,126.04	522,634.02	424.50	1,088.80
2230055 Feb 1-24 to Feb 29-24	379,404.00	124.85	49,338.75	428,867.60	355.60	1,066.94

Invoice No./ Period	Fees (\$)	Disbursements (\$)	HST (\$)	Total Fees, Disbursements and HST (\$)	Hours Billed	Average Billed Rate (\$)
2233262 Mar 1-24 to Mar 31-24	667,902.00	5,543.78	87,547.95	760,993.73	719.80	927.90
2234666 Apr 1-24 to Apr 15-24	425,836.00	1,086.37	55,455.84	482,378.21	450.30	945.67
2237344 Mar 26-24 to Apr 30-24	324,573.00	646.76	42,278.57	367,498.33	306.40	1,059.31
2238522 Apr 27-24 to May 15-24	198,128.50	81.38	25,767.28	223,977.16	171.20	1,157.29
2240216 May 16-24 to May 31-24	240,322.00	35.42	31,246.46	271,603.88	238.00	1,009.76
2243350 Jun 1-24 to Jun 30-24	417,169.00	443.34	54,289.60	471,901.94	418.30	997.30
2244587 Jul 1-24 to Jul 7-24	25,647.50	0.00	3,334.18	28,981.68	25.10	1,021.81
Total	4,128,370	9,058.18	537,796.38	4,675,224.56	4,089.80	1,009.43

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 TACORA RESOURCES INC.

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

PROCEEDING COMMENCED AT
TORONTO

AFFIDAVIT OF RYAN JACOBS
(SWORN JULY 19, 2024)

Cassels Brock & Blackwell LLP

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Lawyers for the Monitor, FTI Consulting Canada Inc.

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TORONTO

ELEVENTH REPORT OF THE MONITOR

Cassels Brock & Blackwell LLP

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