

2003 01T No. 3807

IN THE SUPREME COURT OF NEWFOUNDLAND AND LABRADOR  
TRIAL DIVISION

**BETWEEN:**

**CLIFFS MINING COMPANY in its capacity as  
Managing Agent of WABUSH MINES**

**PLAINTIFF**

**AND:**

**ROYAL BANK OF CANADA**

**DEFENDANT**

**AND BETWEEN**

**ROYAL BANK OF CANADA**

**PLAINTIFF BY  
COUNTERCLAIM**

**AND:**

**CLIFFS MINING COMPANY in its capacity  
as Managing Agent of WABUSH MINES**

**DEFENDANT BY  
COUNTERCLAIM**

**INTERROGATORIES**

**TO: Paul Burgess**  
BURGESS LAW OFFICES  
PO BOX 23196  
Suite 308, Terrace on the Square  
St. John's, NL A1B 4J9  
**Solicitors for the Plaintiff/Defendant by Counterclaim, Cliffs Mining Company**

**AND Junior Sirivar**  
**TO: McCarthy Tétrault**  
Suite 5300, TD Bank Tower  
Box 48, 66 Wellington Street West  
Toronto ON M5K 1E6  
**Solicitors for US Steel Canada Co./Stelco Inc.**

**AND Gregory M. Smith**  
**TO: Eleventh Floor, Fortis Building**  
139 Water Street  
St. John's, NL A1C 5J9  
**Solicitors for ArcelorMittal Dofasco Inc./Dofasco Inc.**

**AND Wabush Iron Co. Limited**

**TO:** 200 Public Square  
Suite 3300  
Cleveland, OH, USA 44114

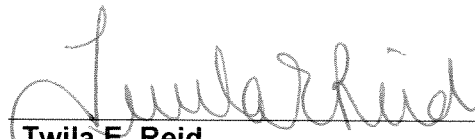
**AND Cliffs Natural Resources Inc.**  
**TO:** 200 Public Square, Suite 3300  
Cleveland, OH 44114-2544

It is hereby required that the following interrogatories be answered by you, and that the answers be served upon the Defendant/Plaintiff by Counterclaim within 10 days from the time these interrogatories are served on you.

1. What property, either real or personal, do you own or possess directly or beneficially, or through an affiliated company or individual, in respect of the mine operation known as Wabush Mine in Newfoundland and Labrador?
  - (a) In particular, do you own or possess directly or beneficially, or through an affiliated company or individual, any of two Bucyrus Erie Electric Shovels, Model No. 295-B, Serial Nos. 136917 and 139500, or any part thereof?
2. If your answer to Questions 1 and/or 1(a) is "none", what is your knowledge, information and/or belief with respect to the ownership and/or possession (in any form set out in those questions) of such property?
3. What property, either real or personal, do you own or possess directly or beneficially, or through an affiliated company or individual, in respect of the unincorporated joint venture or partnership known as "Wabush Mines", which consists of or consisted of Stelco Inc. (now US Steel Canada Co.), Dofasco Inc. (now ArcelorMittal Dofasco Inc.), and Wabush Iron Co. Ltd.?
4. If your answer to Question 3 is "none", what is your knowledge, information and/or belief with respect to the ownership and/or possession (in any form set out in that question) of such property?
5. What is your knowledge, information, and/or belief in respect of the purported exercise of an Option to Purchase the equipment described in 1(a) above in or about May 2003 pursuant to Section 25 of the Master Lease Agreement at issue in this proceeding?

- (a) What is your knowledge, information, and/or belief as to when, if at all, you became aware of the purported exercise of the Option by Cliffs Mining Company purportedly on behalf of "Wabush Mines"?
  - (b) What is your knowledge, information, and/or belief as to the authorization, if any, you gave or were required to give Cliffs Mining Company to exercise the Option on behalf of "Wabush Mines"?
- 6. What is your knowledge, information, and/or belief with respect to the current ownership structure of the mining operation Wabush Mine?
  - 7. What is your knowledge, information, and belief with respect to a transaction or transactions in which the interests of Stelco Inc. and Dofasco Inc. in Wabush Mine and "Wabush Mines" were transferred to Cliffs Natural Resources or companies owned, controlled, or otherwise affiliated with Cliffs Natural Resources?
  - 8. What is your knowledge, information, and belief with respect to the status of the unincorporated joint venture or partnership known as "Wabush Mines"?
  - 9. Provide copies of any documents related to the answers to the questions above.

DATED at St. John's, Newfoundland and Labrador, this 15<sup>th</sup> day of May, 2015.



**Twila E. Reid**  
STEWART MCKELVEY  
Suite 1100, Cabot Place  
100 New Gower Street  
St. John's, NL A1C 6K3  
**Solicitors for the Defendant/Plaintiff by  
Counterclaim, Royal Bank of Canada**