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March 22, 2018

VIA EMAIL

**Bernard Boucher**  
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Reference: 11573/371

Honourable Stephen W. Hamilton  
Superior Court Judge  
Montreal Courthouse  
1, Notre-Dame Street East, Suite #11.25  
Montréal, Québec H2Y 1B6

RE: In the matter of the Plan of Compromise or Arrangement of:  
Bloom Lake General Partner Limited & al.  
S.C.: 500-11-048114-157

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Mr. Justice Hamilton:

The present is in furtherance of the service of our *Motion for the Issuance of a Plan Filing and Meetings Order* ("**Motion for Plan Filing**"), the *Motion for the Issuance of a Post-Filing Claims Procedure Order* ("**PFCPO Motion**") and the *Motion to Extend the Stay Period* in the above mentioned matter and in response to the letter that was sent to you earlier this morning by M<sup>re</sup> François Bouchard seeking a postponement of the hearing of these motions planned for March 26, 2018. We have been instructed by our clients to contest said request.

With respect to the Motion for Plan Filing and the PFCPO Motion (collectively the "**Motions**"), they were served on March 19, 2018, seven days before the hearing planned for March 26, 2018.

By definition, these Motions deal more with procedural matters than substantive ones. More specifically, with respect to the Motion for Plan Filing, we are not asking to approve the Plan filed in support thereto, but simply to authorize the convocation of meetings where such Plan will be submitted for approval to the creditors. Since, if said motion is granted, meetings will be held on May 10, 2018, creditors will have no less than six weeks to scrutinize the Plan and the Monitor's Report to be issued in connection with this motion. With respect to this report, we understand that it will be served later today.

Moreover, if ever at some point, any creditor has any concern to voice against the Plan, it could always do so at the Sanction Hearing which is planned to be held on May 22, 2018.

In light of the fact that identifying a moment, other than March 26, 2018, which could be suitable for the Court, the attorneys acting for the various parties and the potential witnesses could significantly delay

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the presentation of the Motions, we do not see what harm could be suffered by the City of Fermont if the Motion for Plan Filing was to be presented on March 26, as requested.

With respect to the PFCPO Motion, we fail to understand what prejudice could be suffered by the City of Fermont if said motion was presented this coming Monday. On that point, the fact that a proof of claim would have already been filed by the City of Fermont which would enclose post-filing amounts is surely not *per se* a sufficient reason to postpone the hearing of this motion.

Yours truly,

**BLAKE, CASSELS & GRAYDON**



Bernard Boucher  
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c.c. M<sup>re</sup> François Bouchard (*Cain Lamarre Casgrain Wells*)  
M<sup>re</sup> Sylvain Rigaud (*Norton Rose Fulbright*)  
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