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June 19, 2015

VIA E-MAIL AND COURIER

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Reference: 11573/371

Honourable Stephen W. Hamilton
Superior Court Judge
Montreal Courthouse
1, Notre-Dame Street East
Suite #7.69
Montréal, Québec H2Y 1B6

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

Mr. Justice Hamilton:

In view of the hearing that will be held before you on June 22, 2015, you will find attached hereto our clients' Outline of arguments as well as the authorities in support their *Motion for the issuance of an Order in respect of the Wabush CCAA Parties*.

Yours truly,

BLAKE, CASSELS & GRAYDON

Bernard Boucher
/em

Encl. Outline of arguments and authorities

c.c. Mtre Pierre Lecavalier (*Department of Justice Canada*)
Mtre Daniel Boudreault (*Philion Leblanc Beaudry Avocats*)
Mtre Nicholas Scheib (*Scheib Legal*)
Mtres Doug Mitchell and Leslie-Anne Wood (*Irving Mitchell Kalichman*)
Mtre Sylvain Rigaud (*Norton Rose Fulbright*)
Mtre Grant B. Moffat (*Thornton Grout Finnigan*)
Mtres Roger P. Simard and Louis Dumont (*Denton*)

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