

CANADA

PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL

N^o: 500-11-048114-157

SUPERIOR COURT

Commercial Division

(Sitting as a court designated pursuant to the *Companies' Creditors Arrangement Act*, 1985 R.S.C., c. C-36, as amended)

**IN THE MATTER OF THE PLAN OF COMPROMISE OR
ARRANGEMENT OF:**

BLOOM LAKE GENERAL PARTNER LIMITED

QUINTO MINING CORPORATION

8568391 CANADA LIMITED

CLIFFS QUÉBEC IRON MINING ULC

WABUSH IRON CO. LIMITED

WABUSH RESOURCES INC.

Petitioners

-and-

**THE BLOOM LAKE IRON ORE MINE LIMITED
PARTNERSHIP**

BLOOM LAKE RAILWAY COMPANY LIMITED

WABUSH MINES

ARNAUD RAILWAY COMPANY

WABUSH LAKE RAILWAY COMPANY LIMITED

Mises-en-cause

-and-

FTI CONSULTING CANADA INC.

Monitor

**MOTION FOR THE ISSUANCE OF AN ORDER
EXTENDING THE STAY PERIOD***
(Section 11 ff. of the *Companies' Creditors Arrangement Act*)

TO MR. JUSTICE STEPHEN W. HAMILTON, J.S.C. OR ONE OF THE HONORABLE JUDGES OF THE SUPERIOR COURT, SITTING IN THE COMMERCIAL DIVISION FOR THE DISTRICT OF MONTRÉAL, THE CCAA PARTIES (AS DEFINED BELOW) SUBMIT:

1. BACKGROUND

1. On January 27, 2015, Mr. Justice Martin Castonguay, J.S.C., issued an Initial Order (as subsequently amended, rectified and/or restated, the "**Bloom Lake Initial Order**") commencing these proceedings (the "**CCAA Proceedings**") pursuant to the *Companies' Creditors Arrangement Act* (the "**CCAA**") in respect of the Petitioners Bloom Lake General Partner Limited, Quinto Mining Corporation, 8568391 Canada Limited ("**8568391**") and Cliffs Québec Iron Mining ULC ("**CQIM**") and the Mises-en-cause The Bloom Lake Iron Ore Mine Limited Partnership and Bloom Lake Railway Company Limited (collectively, the "**Bloom Lake CCAA Parties**"), as appears from the Initial Order dated January 27, 2015, which forms part of the Court record.
2. Pursuant to the Bloom Lake Initial Order, *inter alia*, FTI Consulting Canada Inc. was appointed as monitor of the Bloom Lake CCAA Parties (the "**Monitor**") (para. 39 of the Bloom Lake Initial Order) and a stay of proceedings was ordered in respect of the Bloom Lake CCAA Parties until February 26, 2015 (the "**Bloom Lake Stay Period**") (para. 8 ff. of the Bloom Lake Initial Order).
3. The Bloom Lake Stay Period was extended by order of the Court from time to time, as appears from the Court record.
4. On April 17, 2015, Mr. Justice Stephen W. Hamilton, J.S.C., issued, *inter alia*, the following orders:
 - a) an Order (the "**Sale Advisor Order**"), *inter alia*, authorizing the engagement of Moelis & Company LLC as the Bloom Lake CCAA Parties' mergers and acquisitions financial advisor (the "**Sale Advisor**"), as appears from a copy of the Sale Advisor Order, which forms part of the Court record; and
 - b) an Order (the "**SISP Order**"), *inter alia*, approving sale and investor solicitation procedures (the "**Initial SISP**") in respect of the Bloom Lake CCAA Parties, as appears from a copy of the SISP Order, which forms part of the Court record.
5. On May 20, 2015, Mr. Justice Hamilton, issued an Initial Order (as subsequently amended, rectified and/or restated the "**Wabush Initial Order**") extending the scope of the CCAA Proceedings to the Petitioners Wabush Iron Co. Limited ("**Wabush Iron**") and

* Except as otherwise provided for herein, all capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Bloom Lake Initial Order (as defined herein) and the Wabush Initial Order (as defined herein).

Wabush Resources Inc. ("**Wabush Resources**") and the Mises-en-cause Wabush Mines, an unincorporated contractual joint venture, Arnaud Railway Company and Wabush Lake Railway Company Limited ("**Wabush Lake Railway**") (collectively, the "**Wabush CCAA Parties**"; collectively with the Bloom Lake CCAA Parties, the "**CCAA Parties**"), as appears from the Initial Order dated May 20, 2015, which forms part of the Court record.

6. Pursuant to the Wabush Initial Order, *inter alia*, the Monitor was appointed as the monitor of the Wabush CCAA Parties (para. 39 of the Wabush Initial Order) and a stay of proceedings was granted until June 19, 2015 (the "**Wabush Stay Period**"; collectively with the Bloom Lake Stay Period, the "**Stay Period**") (para. 7 *ff.* of the Wabush Initial Order).
7. On June 9, 2015, Mr. Justice Hamilton, issued an order (the "**Wabush Comeback Order**"), *inter alia*:
 - a) extending the Wabush Stay Period to July 31, 2015;
 - b) approving the Initial SISP as it relates to the Wabush CCAA Parties, *nunc pro tunc* to the date of the Wabush Initial Order, authorizing the amendment and restatement of the Initial SISP, and approving the amended and restated sale and investor solicitation procedures (the "**SISP**"); and
 - c) approving the engagement of the Sale Advisor as it relates to the Wabush CCAA Parties, *nunc pro tunc* to the date of the Wabush Initial Order;

the whole as appears from a copy of the Wabush Comeback Order, which forms part of the Court record.

8. On November 5, 2015, Mr. Justice Hamilton issued an order (as amended by an order of the Court issued on November 16, 2015 and as further amended from time to time, the "**Claims Procedure Order**"), *inter alia*:
 - a) approving a procedure for the submission, evaluation and adjudication of claims against the CCAA Parties and their current and former directors and officers; and
 - b) ordering the extinguishment of all Claims, D&O Claims and Restructuring Claims (as each such term is defined in the Claims Procedure Order) not filed in accordance with the applicable deadlines set out in the Claims Procedure Order.
9. The Stay Period has been extended by order of the Court from time to time, most recently on January 30, 2017, and currently expires on June 30, 2017, as appears from the Court record.

2. **ORDER SOUGHT**

10. On this Motion, the CCAA Parties hereby seek the extension of the Stay Period in respect of the CCAA Parties until November 30, 2017.

3. SALES OF ASSETS

11. As outlined above, Mr. Justice Hamilton approved the SISP and the engagement of the Sale Advisor in respect of the assets of the Bloom Lake CCAA Parties and the Wabush CCAA Parties pursuant to the SISP Order, the Sale Advisor Order and the Wabush Comeback Order.
12. Since the expiry of the SISP, the Wabush CCAA Parties established, in consultation with the Monitor a formal sales process for the sale of the Scully Mine (the "**Scully Mine Sale Procedure**").
13. As set out in greater detail below, since the most recent extension of the Stay Period on January 30, 2017, certain of the CCAA Parties (i) have entered into a definitive asset purchase agreement and closed the sale of the buildings and related assets located on the Mont Wright Camp, located in Fermont, Québec (the "**Mont Wright Camp**"), (ii) have entered into a definitive asset purchase agreement, for the sale of the Scully Mine, and (iii) have entered into an agreement and closed the sale of a Conditional Sale Employee Home (as defined below).

3.1 The Mont Wright Transaction

14. Pursuant to an asset purchase agreement dated as of May 3, 2017 between CQIM, as seller, 8568391 as nominee, and 10165581 Canada Inc. ("**10165581**"), as purchaser, CQIM agreed to sell to 10165581 certain buildings, including the main building of the Mont Wright Camp, and related assets located on or about the Mont Wright Camp, located in Fermont, Québec (the "**Mont Wright Transaction**").
15. The Mont Wright Transaction was approved by this Court pursuant to an approval and vesting order dated May 16, 2017 (the "**Mont Wright Approval and Vesting Order**"), which form part of the Court record.
16. The Mont Wright Transaction closed and the Monitor issued its Monitor's Certificate in relation thereto (the "**Mont Wright Monitor's Certificate**"), as provided for in the Mont Wright Approval and Vesting Order, on May 16, 2017, as appears from the Mont Wright Monitor's Certificate, which forms part of the Court record. The Monitor is holding the Net Proceeds (as defined in the Mont Wright Approval and Vesting Order) in trust pursuant to the terms and conditions of the Mont Wright Approval and Vesting Order, pending further order of the Court approving the distribution thereof.

3.2 The Scully Mine Transaction

17. Pursuant to an asset purchase agreement dated as of June 2, 2017 between Wabush Iron, Wabush Resources, and Wabush Lake Railway, as vendors (the "**Scully Mine Vendors**"), and Tacora Resources Inc. ("**Tacora**"), as purchaser, and MagGlobal LLC, as guarantor, the Scully Mine Vendors have agreed to sell to Tacora the Scully Mine Vendors' assets related to the operation of the business of an iron ore mine and processing facility located north of the Town of Wabush in Newfoundland and Labrador, commonly known as the Scully mine, together with the Wabush Lake Railway (the "**Scully Mine Transaction**").

18. On June 13, 2017, the Scully Mine Vendors served a motion seeking Court approval of the Scully Mine Transaction and for the issuance of an approval and vesting order, as well as an assignment order in relation thereto, which motion is scheduled to be heard before Mr. Justice Hamilton on June 26, 2017.

3.3 The Sale of a Conditional Sale Employee Home

19. As was previously reported to this Court, the Wabush CCAA Parties own various residential properties in the Town of Wabush that provided housing to employees while the Scully Mine was operational.
20. At the beginning of the CCAA Proceedings, the Wabush CCAA Parties owned 55 single-family homes subject to conditional agreements of purchase and sale with employees of the Wabush CCAA Parties (the "**Conditional Sale Employee Homes**"). The Wabush CCAA Parties have been liquidating the Conditional Sale Employee Homes throughout the CCAA Proceedings, and since the most recent extension of the Stay Period completed the sale of one Conditional Sale Employee Home.
21. As of the date of this Motion, 8 Conditional Sale Employee Homes remain unsold, and the occupants continue to pay certain amounts to the Wabush CCAA Parties on a monthly basis. In addition, the Wabush CCAA Parties have entered into agreements for the sale of 3 Conditional Sale Employee Homes, closing of the transactions has not yet occurred.

4. EXTENSION OF THE STAY PERIOD

4.1 The Monitor's Motion for Directions

22. As was previously reported to this Court, on September 20, 2016, the Monitor served a motion seeking advice and directions with respect to pension claims asserted against certain of the Wabush CCAA Parties (the "**Motion for Directions**"). The jurisdictional aspect of the Motion for Directions was argued before this Court on December 20, 2016, and the Court issued its decision on same on January 30, 2017.
23. The hearing on the remaining substantive issues raised by the Motion for Directions is scheduled to take place before this Court on June 28 and June 29, 2017.
24. In its decision on the jurisdictional aspect of the Motion for Directions, the Court determined that it has jurisdiction to deal with the issues related to the interpretation of the *Newfoundland and Labrador Pension Benefits Act* in the context of the CCAA Proceedings, and that it would not refer those issues to the Supreme Court of Newfoundland and Labrador.
25. Following the decision of the Court, on May 5, 2017, the Government of Newfoundland and Labrador referred several questions to the Newfoundland and Labrador Court of Appeal (the "**NLCA**") pursuant to the Newfoundland and Labrador *Judicature Act* (1990), as amended (the "**Reference**"). Each of the Monitor and the CCAA Parties filed a Notice of Intention to Intervene in the Reference proceedings.
26. In its Reference, the Government of Newfoundland and Labrador is seeking the interpretation of section 32 of the *Newfoundland and Labrador Pension Benefits Act*

(1997), as amended (“**NPBA**”). Moreover, it has also asked the NLCA to determine, *inter alia*, (i) the applicability of the federal *Pension Benefits Act* and of the *Quebec Supplemental Pension Act* to the Salaried pension plan and if applicable, how should the conflict with the NPBA be resolved, (ii) does section 32(4) of the NPBA create a valid secured claim in favor of the plan administrator and (iii) the quantum of said secured claim, if any.

27. A preliminary or status hearing on the Reference was held on June 9, 2017, in St-John’s, Newfoundland and Labrador before a 3-member panel of the NLCA. The Monitor and counsel to the CCAA Parties attended such hearing and argued that the NLCA should refuse to answer the questions raised in the Reference by the Government of Newfoundland and Labrador, given their scope and the prior decision of this Court on the jurisdictional aspect of the Motion for Directions and only consider more narrow questions on the interpretation of the NPBA in the abstract, and not based on the facts and the context of the CCAA Proceedings.
28. The NLCA did not accept the submissions of the Monitor and of the CCAA Parties and did not narrow the scope of the questions referred to the NLCA, and advised it would reconsider the objections raised by the Monitor and the CCAA Parties during the hearing on the merits of the Reference, when answering the questions referred to it, as appears from the Ruling on Application for Directions of the NLCA, communicated herewith as **Exhibit R-1**.
29. The hearing of the NLCA on the merits of the Reference has been scheduled to take place on September 21 and 22, 2017, as appears from the Amended Timetable for Perfection of Reference, communicated herewith as **Exhibit R-2**.

4.2 The Allocation Methodology Approval Motion

30. In order to determine the amounts available for distribution in each of the CCAA Parties’ respective estates to each of the CCAA Parties’ creditors, the Monitor, in consultation with the CCAA Parties, has developed and recommended a proposed methodology to allocate proceeds and costs among the CCAA Parties (the “**Allocation Methodology**”).
31. On May 20, 2017, the CCAA Parties served a motion seeking the approval of the Allocation Methodology (the “**Allocation Methodology Approval Motion**”).
32. On May 26, 2017, and May 29, 2017, objections were filed by several parties in regard to the Allocation Methodology Approval Motion. Most of these objections requested additional details as to the Allocation Methodology. Information has been provided in response to those objections and the CCAA Parties anticipate that the Allocation Methodology Approval Motion will proceed on an uncontested basis, or with only a few remaining open issues to be resolved by the Court. The Allocation Methodology Approval Motion and the objections will be heard before this Court on June 26, 2017.

4.3 The Kami Motion

33. On May 29, 2017, the Kami Mine Limited Partnership and Alderon Iron Ore Corp. filed a motion, asking this Court to order the CCAA Parties to obtain copies of various reports prepared by third parties for the Government of Newfoundland and Labrador, which

motion is scheduled to be heard before this Court on June 26, 2017 (the "**Kami Motion**").

34. The CCAA Parties consider the Kami Motion to be without merit and are of the view that it is moot given that it is scheduled to be heard on the same day as the motion for the approval of the Scully Mine Transaction.
35. The CCAA Parties intend to file an objection to the Kami Motion, asking the Court to order petitioners to the Kami Motion reimburse the CCAA Parties their legal fees associated with responding to the Kami Motion and the objection of the CCAA Parties thereto.

4.4 The MFC Litigation

36. Pursuant to the Order of this Court issued on December 4, 2015, Wabush Iron and Wabush Resources have been making payments to the Monitor, in trust, in respect of disputed post-filing amounts that may be potentially payable to MFC Bancorp Ltd. ("**MFC**") pursuant to the Wabush Sub-Lease, pending a final determination by this Court of the post-filing amounts, if any, due to MFC (the "**MFC Litigation**").
37. A pre-trial conference was held on May 31, 2017 and the hearing on the merits of the MFC Litigation which was originally scheduled for June 5, 6 and 7, 2017, has been adjourned to July 19, 20 and 21, 2017 due to scheduling conflicts. The MFC Motion to partially lift the Stay of proceedings has also been adjourned to be heard at the same time.

4.5 General Developments and Overview

38. Since the issuance of the Bloom Lake Initial Order and the Wabush Initial Order, the CCAA Parties have acted and continue to act in good faith and with due diligence.
39. Since the Stay Period was last extended on January 30, 2017, the CCAA Parties or their counsel have, with the assistance of and in consultation with the Monitor, *inter alia*:
 - a) communicated regularly with the Monitor and provided the Monitor with full co-operation and complete access to the CCAA Parties' Property, premises and books and records;
 - b) continued to adhere to procedures for the monitoring of the CCAA Parties' operations and financial circumstances, including receipts and disbursements. Since the closing of the sales by certain of the CCAA Parties of the iron ore pellet production facility and the port facility located at Pointe-Noire, Québec and of the railway known as the Arnaud Railway, at the CCAA Parties' request, the Monitor has been assisting the Wabush CCAA Parties with their cash management functions. Since the closing of the sale by certain Bloom Lake CCAA Parties of the iron ore mine and processing facility located approximately 13 kilometres north of Fermont, Québec, in the Labrador Trough, known as the Bloom Lake mine, the Monitor, at the CCAA Parties' request, has also been assisting the Bloom Lake CCAA Parties with their cash management functions;
 - c) developed and implemented the Scully Mine Sale Procedure;

- d) communicated with applicable environmental and regulatory authorities in relation to the remaining Property of the Wabush CCAA Parties;
- e) reviewed a number of liquidation proposals with the assistance of the Monitor and compared such liquidation proposals to the results of the bids received in the context of the Scully Mine Sale Procedure, and negotiated with persons submitting such liquidation proposals;
- f) as described above, continued to carry out the sale of their remaining assets, including closing the Mont Wright Transaction, the sale of the Conditional Sale Employee Homes, and entering into a definitive asset purchase agreement in relation to the Scully Mine Transaction;
- g) continued to assist and cooperate with the Monitor in the review and determination of claims in accordance with the Claims Procedure Order;
- h) responded to an audit by the Canada Revenue Agency in respect of income tax filings for the tax years 2010 to 2015, as previously reported to the Court in the Monitor's Thirty Fourth Report (the "**CRA Audit**"), and to follow-up inquiries arising from the responses to the CRA Audit;
- i) reviewed and considered the Allocation Methodology proposed and recommended by the Monitor, and brought the Allocation Methodology Approval Motion for the approval thereof; and
- j) continued to advance the proceedings in relation to the dispute between the Wabush CCAA Parties and MFC.

40. It is respectfully submitted that the extension of the Stay Period to November 30, 2017 is required to provide all CCAA Parties with sufficient time to, *inter alia*:

- a) close the Scully Mine Transaction, if the conditions to closing are satisfied and the Scully Mine Transaction is approved by the Court;
- b) if the Scully Mine Transaction does not close and is terminated, disclaim the MFC Sub-Lease and abandon the balance of the assets associated with the Scully Mine;
- c) continue to assist the Monitor in connection with the implementation of the Claims Procedure with respect to the CCAA Parties;
- d) advance and if possible complete the responses to the Canada Revenue Agency in relation to the CRA Audit and any follow-up inquiries;
- e) resolve the MFC Litigation by way of agreement among the parties or, if not so resolved, to proceed with the hearing currently scheduled for July 19, 20 and 21, 2017;
- f) apply and implement, with the assistance of the Monitor, and following Court approval, the Allocation Methodology to the recoveries of the estates;

- g) consider, formulate and potentially develop a plan of arrangement or compromise to resolve claims and distribute recoveries to creditors with the required approval of the creditors and the Court, or, alternatively, consider and formulate other appropriate methods of distribution to creditors, potentially by way of distribution order, or otherwise;
 - h) intervene before the NLCA on the merits of the Reference, scheduled for September 20 and 21, 2017 in St-John's, Newfoundland and Labrador; and
 - i) receive outstanding tax refunds due to the CCAA Parties.
41. It is anticipated that the requested extension of the Stay Period until November 30, 2017, will afford the CCAA Parties additional time that is needed to progress the foregoing, and to complete, or attempt to complete transactions as may be approved by the Court.
42. The Monitor has advised the CCAA Parties that it supports the requested extension of the Stay Period. The CCAA Parties understand that the Monitor will file a report regarding the proposed extension of the Stay Period.
43. The CCAA Parties understand that the Monitor's report will also include the CCAA Parties' revised and extended cash flow forecast. Subject to the underlying assumptions therein, the CCAA Parties believe that there is sufficient liquidity to fund the estimated ongoing costs and expenses of the CCAA Parties and any obligations incurred by them until November 30, 2017.
44. The CCAA Parties have acted and are acting with good faith and due diligence, circumstances exist that make the extension of the Stay Period appropriate and no stakeholder will be materially prejudiced by the extension of the Stay Period.
45. In light of the foregoing, the CCAA Parties respectfully ask this Court to extend the Stay Period to November 30, 2017, the whole subject to all other terms of the Bloom Lake Initial Order and the Wabush Initial Order.

5. PROCEDURAL MATTERS

46. The CCAA Parties submit that the notices given of the presentation of the present Motion are proper and sufficient.
47. Pursuant to paragraph 54 of the Bloom Lake Initial Order and paragraph 56 of the Wabush Initial Order, all motions in these CCAA Proceedings are to be brought on not less than ten (10) calendar days' notice to all Persons on the Service List. Each motion must specify a date (the "**Initial Return Date**") and time for the hearing.
48. The service of the present Motion serves as notice pursuant to paragraphs 47 and 54 of the Bloom Lake Initial Order and paragraphs 47 and 56 of the Wabush Initial Order.
49. Paragraph 55 of the Bloom Lake Initial Order and paragraph 57 of the Wabush Initial Order require that any Person wishing to object to the relief sought on a motion in the CCAA Proceedings must serve responding motion materials or a notice stating the objection to the motion and grounds for such objection (a "**Notice of Objection**") in writing to the moving party and the Monitor, with a copy to all persons on the Service

List, no later than 5 p.m. Montréal time on the date that is four (4) calendar days prior to the Initial Return Date (the "**Objection Deadline**"). Accordingly, any persons wishing to object to the relief sought on this Motion must serve responding motion materials or a Notice of Objection by no later than 5 p.m. Montréal time on June 22, 2017.

50. Paragraph 56 of the Bloom Lake Initial Order and paragraph 58 of the Wabush Initial Order further provide that if no Notice of Objection is served by the Objection Deadline, the Judge having carriage of the motion may determine whether a hearing is necessary, whether such hearing will be in person, by telephone or in writing and the persons from whom submissions are required (collectively, the "**Hearing Details**").
51. Paragraph 57 of the Bloom Lake Initial Order and paragraph 59 of the Wabush Initial Order provide that the Monitor shall communicate with the Judge and the Service List with respect to the Hearing Details.

6. CONCLUSIONS

52. In light of the foregoing, the CCAA Parties hereby seek the issuance of an Order substantially in the form of the draft Order communicated herewith as **Exhibit R-3**, which provides for the extension of the Stay Period in respect of the CCAA Parties until November 30, 2017.
53. The present Motion is well founded in fact and in law.

FOR THESE REASONS, MAY IT PLEASE THE COURT TO:

GRANT the present Motion;

ISSUE an order in the form of the draft Order communicated in support hereof as Exhibit R-3;

WITHOUT COSTS, save and except in case of contestation.

Montréal, June 16, 2017


BLAKE, CASSELS & GRAYDON LLP
Attorneys for the CCAA Parties

AFFIDAVIT

I, the undersigned, **CLIFFORD T. SMITH**, the Executive Vice-President and a director of Bloom Lake General Partner Limited and Cliffs Quebec Iron Mining ULC, the President and a director of Bloom Lake Railway Company Limited and 8568391 Canada Limited, the President of Wabush Resources Inc., the President and a director of Wabush Iron Co. Limited, the Vice-President and a director of Arnaud Railway Company Limited and Wabush Lake Railway Company Limited, and a director of Quinto Mining Corporation, having a place of business at 1 Place Ville Marie, Bureau 3000, Montréal, Québec, H3B 4N8, solemnly affirm that all the facts alleged in the present *Motion for the Issuance of an Order Extending the Stay Period* are true.

AND I HAVE SIGNED:



CLIFFORD T. SMITH

SOLEMNLY DECLARED before me at
Cleveland, Ohio, on this 19th day of June,
2017



Notary Public

ADAM D. MUNSON, Atty.
NOTARY PUBLIC
STATE OF OHIO
My Commission Has No
Expiration Date
Section 147.03 R.C.

NOTICE OF PRESENTATION

TO: Service List

TAKE NOTICE that the present *Motion for the Issuance of an Order Extending the Stay Period* will be presented for adjudication before the Honourable Stephen W. Hamilton, J.S.C., or another of the honourable judges of the Superior Court, Commercial Division, sitting in and for the district of Montréal, in the Montréal Courthouse located at 1, Notre-Dame Street East, Montréal, Québec, on **June 26, 2017** at a time and in a room to be determined.

DO GOVERN YOURSELF ACCORDINGLY.

Montréal, June 16, 2017


BLAKE, CASSELS & GRAYDON LLP
Attorneys for the CCAA Parties

CANADA

PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL

SUPERIOR COURT

Commercial Division

(Sitting as a court designated pursuant to the *Companies' Creditors Arrangement Act*, R.S.C., c. C-36, as amended)

N°: 500-11-048114-157

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**THE BLOOM LAKE IRON ORE MINE LIMITED
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WABUSH LAKE RAILWAY COMPANY LIMITED**

Mises-en-cause

and
FTI CONSULTING CANADA INC.

Monitor

LIST OF EXHIBITS

(In support of the *Motion for the Issuance of an Order Extending the Stay Period*)

-
- R-1 Ruling on Application for Directions of the NLCA
 - R-2 Amended Timetable for Perfection of Reference
 - R-3 Draft Order

Montréal, June 16, 2017


BLAKE, CASSELS & GRAYDON LLP
Attorneys for the CCAA Parties

N°: 500-11-048114-157

**SUPERIOR COURT
DISTRICT OF MONTREAL
(Commercial Division)**

**IN THE MATTER OF THE PLAN OF COMPROMISE
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Petitioners

-and-

**THE BLOOM LAKE IRON ORE MINE LIMITED
PARTNERSHIP & AL.**

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-and-

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Monitor

**MOTION FOR THE ISSUANCE OF AN ORDER
EXTENDING THE STAY PERIOD, AFFIDAVIT,
NOTICE OF PRESENTATION
AND EXHIBITS R-1 TO R-3
(Sections 11 ff. CCAA)**

ORIGINAL

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