



Blake, Cassels & Graydon LLP  
 Barristers & Solicitors  
 Patent & Trade-mark Agents  
 1 Place Ville Marie  
 Suite 3000  
 Montréal QC H3B 4N8 Canada  
 Tel: 514-982-4000 Fax: 514-982-4099

December 23, 2017

VIA EMAIL AND REGISTERED MAIL

**Bernard Boucher**  
 Partner  
 Dir: 514-982-4006  
 bernard.boucher@blakes.com

Reference: 11573/371

Mr. Anthony M. Candido  
 Clifford Chance US LLP  
 31 West 52<sup>nd</sup> Street  
 New York, NY 10019

RE: Worldlink Resources Limited v.  
 Bloom Lake General Partner Limited et al.  
 Civil Action No. 17 Civ 08486

---

Sir:

We are the attorneys acting on behalf of Bloom Lake General Partner Limited, Bloom Lake Iron Ore Limited Partnership and Cliffs Québec Iron Mining ULC. (collectively, the "**Bloom Lake CCAA Entities**"), which entities have been named as co-defendants by Worldlink Resources Limited ("**Worldlink**") in the above-mentioned proceedings (the "**U.S. Recognition Proceedings**").

As Worldlink is aware, on January 27, 2015, the Bloom Lake CCAA Entities and other related companies (together the "**CCAA Parties**"), sought the protection from their creditors pursuant to the provisions of the *Companies' Creditors Arrangement Act* (Canada) ("**CCAA**", and such proceedings, the "**CCAA Proceedings**"). On that day, an Order was issued by the Québec Superior Court (the "**CCAA Court**") granting them such protection (as amended, restated, rectified or supplemented from time to time "**CCAA Initial Order**"). Pursuant to the CCAA Initial Order, FTI Consulting Canada Inc. was appointed as monitor (the "**Monitor**"). The Monitor is copied on this letter.

Paragraph 8 of the CCAA Initial Order provides for a comprehensive stay of proceedings against the CCAA Parties, including the Bloom Lake CCAA Entities:

**Stay of Proceedings against the CCAA Parties and the Property**

8. ORDERS that, until and including February 26, 2015, or such later date as the Court may order (the "**Stay Period**"), no proceeding or enforcement process in any court or tribunal (each, a "**Proceeding**") shall be commenced or continued against or in respect of the CCAA Parties, or affecting the business operations and activities of the CCAA Parties (the "**Business**") or the Property (as defined herein below), including as provided in paragraph 11 hereinbelow except with leave of this Court. Any and all Proceedings currently under way

8559656.2

against or in respect of the CCAA Parties or affecting the Business or the Property are hereby stayed and suspended pending further order of this Court, the whole subject to subsection 11.1 CCAA.

Since the CCAA Initial Order, the Stay Period has been extended from time to time and paragraph 8 has been amended accordingly. On November 28, 2017, the Stay Period was extended until March 30, 2018.

There is no doubt that Worldlink is aware of the CCAA Proceedings and the stay of proceedings contained in the CCAA Initial Order. By way of email from me to Worldlink's Québec counsel, Bertrand Giroux of BCF, on January 30, 2015, Worldlink was advised in writing of the stay of proceedings. Subsequently, on February 2, 2015, a Notice of Suspension of Proceedings was delivered to Worldlink's counsel Mr Bertrand. Mr. Bertrand has been and remains on the Service List in the CCAA Proceedings as counsel to Worldlink. Moreover, on December 16, 2015 Worldlink filed a Proof of Claim in the CCAA Proceedings, which claim was allowed by the Monitor by way of Notice of Allowance sent to Worldlink dated March 31, 2016. Copies of each of the aforementioned documents are attached to this letter.

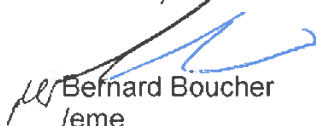
Therefore, it is with great surprise that we received service of the U.S. Recognition Proceedings instituted by Worldlink before the United States District Court for the District of New York (the "**US Court**") without Worldlink having obtained leave of the CCAA Court as required under the CCAA Initial Order. The institution by Worldlink of the U.S. Recognition Proceedings before the US Court constitutes a clear breach of the CCAA Initial Order.

Moreover, it appears that Worldlink has failed to disclose to the US Court in the U.S. Recognition Proceedings documents that were filed to institute such proceedings, the existence of the CCAA Proceedings and the stay of proceedings contained in the CCAA Initial Order.

We hereby request that Worldlink forthwith discontinue the U.S. Recognition Proceeding against the Bloom Lake CCAA Parties. If the discontinuance is not be filed within five (5) days of the receipt of this letter, the Bloom Lake CCAA Parties reserve their rights to pursue before the CCAA Court any and all remedies and recourses available to them as they may see fit, including seeking condemnation for damages or the issuance of an order for contempt of court.

Please instruct your client to govern itself accordingly.

**BLAKE, CASSELS & GRAYDON**



Bernard Boucher  
/eme

Encls

C: Nigel Meakin, FTI Consulting Canada Inc.  
Sylvain Rigaud, Norton Rose  
Bertrand Giroux, BCF

8559656.2