



HERBERT
SMITH
FREEHILLS

R-6

The Honorable Alison J. Nathan, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Herbert Smith Freehills New York LLP
450 Lexington Avenue, 14th floor
New York, NY 10017
USA
T +1 917 542 7600
F +1 917 542 7601
E emily.abrahams@hsf.com
www.herbertsmithfreehills.com

Our ref

Your ref

Date
January 31 2018

Via ECF

Re: Worldlink Resources Ltd. v. Bloom Lake General Partner Ltd., et al., 17 Civ. 8486 (AJN)

Dear Judge Nathan:

We represent Respondents Bloom Lake General Partner Limited, Bloom Lake Iron Ore Mine Limited Partnership, and Cliffs Quebec Iron Mining ULC (collectively, "Respondents"), in the above-referenced matter. We write to request a stay of this action.

Respondents are the subject of Canadian insolvency proceedings in the Superior Court, Commercial Division, Province of Quebec, District of Montréal, File No. 500-11-048114-157 (the "Canadian Insolvency Proceeding"), which was commenced on January 27, 2015. An Initial Order, also issued on January 27, 2015 (as amended, restated, rectified or supplemented from time to time), provides that "no proceeding or enforcement process in any court or tribunal . . . shall be commenced or continued against or in respect of the CCAA Parties . . ." (the "Stay Order"). The Stay Order remains in place to date.

In deference to the Canadian Insolvency Proceeding, and without waiver of any right, remedy, or defense, including any right, remedy, or defense arising out of the Canadian Insolvency Proceeding, we request that all pending deadlines, appearances, and proceedings in this matter be stayed, including the Respondents' deadline to respond to the Petition.

We further request that absent agreement by the parties or further order of the Court, the stay will be lifted 14 days following the conclusion of the Canadian Insolvency Proceeding, and Respondents' time to respond to the Petition, if applicable, will be extended to 45 days after the stay is lifted.

We have consulted with counsel for Petitioner Worldlink Resources Ltd., and they state that, for their own separate reasons, they consent to a stay and the terms described in the immediately preceding paragraph.



HERBERT
SMITH
FREEHILLS

Date
January 31 2018
Letter to
The Honorable Alison J. Nathan, U.S.D.J.

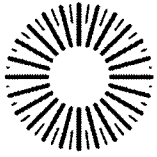
By making these requests, neither Respondents nor Petitioner intend to waive, and expressly preserve, any rights arising out of the Canadian Insolvency Proceeding.

Respectfully submitted,

/s/ Emily Abrahams

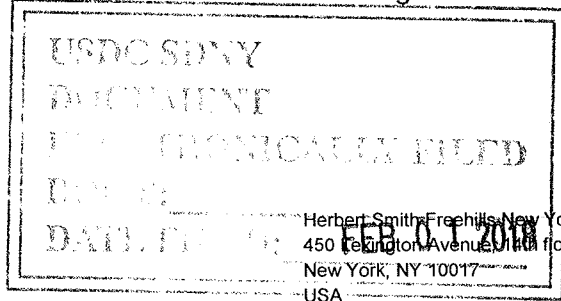
Emily Abrahams

cc: All counsel of record (via ECF)



HERBERT SMITH FREEHILLS

The Honorable Alison J. Nathan, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007



Herbert Smith Freehills New York LLP
450 Lexington Avenue, 14th floor
New York, NY 10017
USA
T +1 917 542 7600
F +1 917 542 7601
E emily.abrahams@hsf.com
www.herbertsmithfreehills.com

SO ORDERED:

[Handwritten signature] 2/1/18
HON. ALISON J. NATHAN
UNITED STATES DISTRICT JUDGE

Our ref
Your ref
Date
January 31, 2018

The Court grants the parties' request for a stay pending Canadian insolvency proceedings. The parties are ordered to inform the Court of the conclusion of those proceedings within five (5) days of their resolution. Accordingly, the February 23, 2018 initial pretrial conference is adjourned. SO ORDERED.

Via ECF

Re: Worldlink Resources Ltd. v. Bloom Lake General Partner Ltd., et al., 17 Civ. 8486 (AJN)

Dear Judge Nathan:

We represent Respondents Bloom Lake General Partner Limited, Bloom Lake Iron Ore Mine Limited Partnership, and Cliffs Quebec Iron Mining ULC (collectively, "Respondents"), in the above-referenced matter. We write to request a stay of this action.

Respondents are the subject of Canadian insolvency proceedings in the Superior Court, Commercial Division, Province of Quebec, District of Montréal, File No. 500-11-048114-157 (the "Canadian Insolvency Proceeding"), which was commenced on January 27, 2015. An Initial Order, also issued on January 27, 2015 (as amended, restated, rectified or supplemented from time to time), provides that "no proceeding or enforcement process in any court or tribunal . . . shall be commenced or continued against or in respect of the CCAA Parties . . ." (the "Stay Order"). The Stay Order remains in place to date.

In deference to the Canadian Insolvency Proceeding, and without waiver of any right, remedy, or defense, including any right, remedy, or defense arising out of the Canadian Insolvency Proceeding, we request that all pending deadlines, appearances, and proceedings in this matter be stayed, including the Respondents' deadline to respond to the Petition.

We further request that absent agreement by the parties or further order of the Court, the stay will be lifted 14 days following the conclusion of the Canadian Insolvency Proceeding, and Respondents' time to respond to the Petition, if applicable, will be extended to 45 days after the stay is lifted.

We have consulted with counsel for Petitioner Worldlink Resources Ltd., and they state that, for their own separate reasons, they consent to a stay and the terms described in the immediately preceding paragraph.

Herbert Smith Freehills New York LLP and Herbert Smith Freehills, an Australian Partnership, are separate member firms of the international legal practice known as Herbert Smith Freehills.

Herbert Smith Freehills New York LLP is a limited liability partnership registered in England and Wales with registered number OC375072. Its registered office is at Exchange House, Primrose Street, London EC2A 2EG.



HERBERT
SMITH
FREEHILLS

Date
January 31 2018
Letter to
The Honorable Alison J. Nathan, U.S.D.J.

By making these requests, neither Respondents nor Petitioner intend to waive, and expressly preserve, any rights arising out of the Canadian Insolvency Proceeding.

Respectfully submitted,

/s/ Emily Abrahams

Emily Abrahams

cc: All counsel of record (via ECF)