

Schedule "C"

**FORM OF D&O POST-FILING NOTICE OF DISPUTE**

**D&O POST-FILING NOTICE OF DISPUTE IN RELATION TO A D&O POST-FILING CLAIM  
AGAINST THE DIRECTORS AND/OR OFFICERS OF THE BLOOM LAKE CCAA PARTIES  
AND/OR THE WABUSH CCAA PARTIES**

The "**Bloom Lake CCAA Parties**" are:

Bloom Lake General Partner Limited  
Quinto Mining Corporation  
856839 Canada Limited  
Cliffs Quebec Iron Mining ULC  
Bloom Lake Railway Company Limited  
The Bloom Lake Iron Ore Mine Limited Partnership

The "**Wabush CCAA Parties**" are:

Wabush Iron Co. Limited  
Wabush Resources Inc.  
Wabush Mines  
Arnaud Railway Company  
Wabush Lake Railway Company Limited

(The Bloom Lake CCAA Parties and Wabush CCAA Parties collectively form the "**CCAA Parties**")

**Particulars of D&O Post-Filing Claimant and Reference Number:**

Legal Name of D&O Post-Filing Claimant:	
Doing Business As:	
Legal Counsel or Representative (if applicable):	
Address	
Number and Street (line 1)	
Number and Street (line 2)	
City	
Province / State	
Postal / Zip Code	
Country	
Telephone Number:	
E-mail address:	
Attention (Contact Person):	
<b>Reference Number</b>	

Pursuant to the order of the Superior Court of Quebec for the district of Montreal (Commercial Division) (the "**Court**") dated March 26, 2018 (as may be amended, restated or supplemented from time to time), I/we hereby dispute the D&O Post-Filing Notice of Revision or Disallowance bearing Reference Number # \_\_\_\_\_ and dated \_\_\_\_\_ issued by FTI Consulting Canada Inc., in its capacity as court-appointed Monitor of the CCAA Parties, in respect of my/our D&O Post-Filing Claim.

Post-Filing Claim(s) against the Directors and/or Officers of... CCAA Party Name	Revised D&O Post-Filing Claim Amount	Disputed D&O Post-Filing Claim Amount
<b>Bloom Lake CCAA Parties</b>		
Cliffs Quebec Iron Mining ULC	CAD \$	CAD \$
The Bloom Lake Iron Ore Mine Limited Partnership	CAD \$	CAD \$
Bloom Lake General Partner Limited	CAD \$	CAD \$
Quinto Mining Corporation	CAD \$	CAD \$
8568391 Canada Limited	CAD \$	CAD \$
Bloom Lake Railway Company Limited	CAD \$	CAD \$

<b>Wabush CCAA Parties</b>		
Wabush Mines	CAD \$	CAD \$
Wabush Iron Co. Limited	CAD \$	CAD \$
Wabush Resources Inc.	CAD \$	CAD \$
Arnaud Railway Company	CAD \$	CAD \$
Wabush Lake Railway Company Limited	CAD \$	CAD \$

**Reasons for Dispute:**

(Please attach additional sheet and copies of all supporting documentation if necessary.):

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DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
Witness:

Per: \_\_\_\_\_

Print name of D&O Post-Filing Claimant:

\_\_\_\_\_  
*If D&O Post-Filing Claimant is other than an individual, print name and title of authorized signatory*

Name: \_\_\_\_\_

Title: \_\_\_\_\_

**This form and supporting documentation must be received by the Monitor by 5:00 p.m. (prevailing Eastern time) on ●, 2018 [being fourteen (14) days after the date of the D&O Post-Filing Notice of Revision or Disallowance], or such other date as may be ordered by the Court.**

A D&O Post-Filing Notice of Dispute must be delivered by email to the Monitor at the applicable email address shown below.

Bloom Lake CCAA Parties' Post-Filing  
Creditors: [bloomlake@fticonsulting.com](mailto:bloomlake@fticonsulting.com)

Wabush CCAA Parties' Post-Filing Creditors:  
[wabush@fticonsulting.com](mailto:wabush@fticonsulting.com)

The subject line of your email should read "D&O Post-Filing Notice of Dispute – [legal name of D&O Post-Filing Claimant]" and the following naming protocol must be used for any attachments included in the email:

For the Notice of Dispute: **D&O\_Post-Filing\_Notice\_of\_Dispute\_[legal name of D&O Post-Filing Claimant].pdf**

For support schedules (if not already included in Notice of Dispute):  
**D&O\_Post-Filing\_Notice\_of\_Dispute\_[legal name of D&O Post-Filing Claimant]\_schedule\_[x of y].pdf**

In the event that you are unable or unwilling to submit your D&O Post-Filing Notice of Dispute by email, you may deliver your D&O Post-Filing Notice of Dispute by prepaid registered mail, personal delivery or courier to the following address:

FTI Consulting Canada Inc., in its capacity as Monitor of the CCAA Parties

79 Wellington Street West  
TD Waterhouse Tower, Suite 2010  
PO Box 104  
Toronto, Ontario M5K 1G8  
Attention: Michael Basso