

Schedule "D"

**FORM OF POST-FILING INSTRUCTION LETTER**

**POST-FILING INSTRUCTION LETTER  
FOR THE POST-FILING CLAIMS PROCEDURE FOR PERSONS WITH POST-FILING CLAIMS  
AGAINST  
THE BLOOM LAKE CCAA PARTIES, THE WABUSH CCAA PARTIES AND/OR THEIR  
DIRECTORS AND OFFICERS**

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 the Wabush CCAA Parties collectively form the "**CCAA Parties**")

**Post-Filing Claims Procedure**

By order of the Superior Court of Québec for the district of Montreal (Commercial Division) (the "**Court**") dated March 26, 2018 (as may be amended, restated or supplemented from time to time, the "**Post-Filing Claims Procedure Order**"), in the proceedings commenced by the CCAA Parties under the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c C-36, as amended (the "**CCAA**") and appointing FTI Consulting Canada Inc. as monitor (the "**Monitor**") to the CCAA Parties, the Monitor has been authorized to conduct a post-filing claims procedure (the "**Post-Filing Claims Procedure**"). Capitalized terms used in this letter, which are not defined in this letter shall have the meaning ascribed to them in the Post-Filing Claims Procedure Order. A copy of the Post-Filing Claims Procedure Order, with all schedules, may be found on the Monitor's website at: <http://cfcanada.fticonsulting.com/bloomlake>.

The Post-Filing Claims Procedure is intended for any Person asserting a Post-Filing Claim against any of the CCAA Parties and/or any of their Directors and/or Officers.

This letter provides a description of, and instructions for completing, the following forms:

- (i) Proof of Post-Filing Claim;
- (ii) Directors and Officers ("**D&O**") Proof of Post-Filing Claim; and
- (iii) D&O Post-Filing Notice of Dispute.

### General: Particulars of Post-Filing Creditor

In all forms (e.g. Proof of Post-Filing Claim, D&O Proof of Post-Filing Claim and D&O Post-Filing Notices of Dispute) you must provide the “Particulars of Post-Filing Creditor” information which will be used for all correspondence regarding your claim(s). An example of the information requested in the Particulars of the Post-Filing Creditor section is shown in the table below. The legal name of the Post-Filing Creditor should be the name of the person or company doing business with the CCAA Parties, including for example, the name indicated on invoices, purchase orders, contracts and/or agreements with the CCAA Parties. If the Creditor uses a trade name in its business with the CCAA Parties, that name should be indicated in the “Doing Business As” line in the Particulars of the Post-Filing Creditor.

Legal Name of Post-Filing Creditor:	
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 (including area code):	
E-mail address:	
Attention (Contact Person):	

#### (i) Instructions for Completing a Proof of Post-Filing Claim

##### What is a Post-Filing Claim?

Generally, a Post-Filing Claim is a claim against the CCAA Parties in connection with any indebtedness, liability or obligation of the CCAA Parties as a result of non-payment for goods or services, or a breach of a contract, lease or other agreement **AND** which arose or occurred after January 27, 2015 in respect of Post-Filing Claims against the Bloom Lake CCAA Parties, or which arose or occurred after May 20, 2015 in respect of Post-Filing Claims against the Wabush CCAA Parties **AND** and which does not constitute a Claim pursuant to the Amended Claims Procedure Order. Please refer to the definitions section of the Post-Filing Claims Procedure Order for a complete definition of “Post-Filing Claim.”

##### Proof of Post-Filing Claim

A Proof of Post-Filing Claim is the document in which a Post-Filing Creditor provides the Monitor with information and support for a Post-Filing Claim against the CCAA Parties. The Proof of Post-Filing Claim commences with a certification section in which you must indicate whether the person preparing the claim form is the Post-Filing Creditor, or a

representative of the Post-Filing Creditor. If you are a representative of the Post-Filing Creditor, you must indicate your position or title at the Post-Filing Creditor. Only representatives with knowledge of the circumstances connected with the claim should complete the Proof of Post-Filing Claim form. If the Post-Filing Creditor is a corporation or other legal entity (i.e. not a living person), then the Proof of Post-Filing Claim **MUST** be completed and signed by an authorized representative of the Post-Filing Creditor.

### **Amount of Post-Filing Claim(s)**

Your Proof of Post-Filing Claim must include the amount of your Post-Filing Claim and certain other information in respect of your Post-Filing Claim. A blank table has been provided in the Proof of Post Filing Claim form indicating the information required to process your Post-Filing Claim including: the name of the CCAA Party against which you are asserting your post filing claim, the amount of the Post-Filing Claim, the currency in which the Post-Filing Claim is denominated, and whether the Post-Filing Claim is unsecured or secured. In the case of secured Post-Filing Claims, please provide a brief description in the table of the type of security held, e.g. general security agreement, hypothec, etc. Please note, unless you have security under an agreement with the CCAA Parties, or pursuant to a statutory right, your Post-Filing Claim is an unsecured claim.

### **Particulars of Post-Filing Claim(s)**

The Proof of Post-Filing Claim includes a section in which you must provide the “particulars” or information supporting your Post-Filing Claim, including for example, a description of the goods or services provided, or other transaction(s) giving rise to your Post-Filing Claim. Please indicate the name of any guarantor which has guaranteed the Post-Filing Claim, and a description of security held, if applicable. If you require additional space to provide information regarding your claim, please attach a separate sheet to your proof of Post-Filing Claim form with the heading, “Particulars of Post-Filing Claim(s) – Continued.”

In the Particulars of Post-Filing Claim(s) section, please list all documentation that will be attached separately to your claim form and which supports the amount or the details of your claim, for example, “Attachment 1: invoice number(s) x through y”, and so on.

### **Signature and Date**

Please sign and date your Proof of Post-Filing Claim, indicating the name and title of the authorized representative, if applicable.

## Filing Your Proof of Post-Filing Claim

Please note the following deadlines for filing your Proof of Post-Filing Claim(s):

A **Proof of Post-Filing Claim** must be delivered to the Monitor such that it is received by the Monitor no later than 5:00 p.m. Eastern time on May 21, 2018, or such later date as may be ordered by the Court (the “**Post-Filing Claims Bar Date**”).

Your Proof of Post-Filing Claim(s) 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 “Proof of Post-Filing Claim – [legal name of creditor]” and the following naming protocol must be used for any attachments included in the email:

For a Proof of Claim: **Proof\_of\_Post-Filing\_Claim\_[legal name of creditor].pdf**

For support schedules (if not already included in the Proof of Post-Filing Claim file):  
**Proof\_of\_Post-Filing\_Claim\_[legal name of creditor]\_schedule\_[x of y].pdf**

In the event that you are unable or unwilling to submit your Proof of Post-Filing Claim by email, you may deliver your Proof of Post-Filing Claim 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

**PLEASE NOTE, IF YOUR PROOF OF POST-FILING CLAIM IS NOT RECEIVED BY THE MONITOR BY THE APPLICABLE POST-FILING CLAIMS BAR DATE:**

- (A) YOUR POST-FILING CLAIM SHALL BE FOREVER **BARRED** AND **EXTINGUISHED** AND YOU WILL BE PROHIBITED FROM MAKING OR ENFORCING A POST-FILING CLAIM AGAINST ANY OF THE CCAA PARTIES;
- (B) YOU SHALL NOT BE ENTITLED TO ANY PROCEEDS OF SALE OF ANY OF THE CCAA PARTIES' ASSETS; AND
- (C) YOU SHALL NOT BE ENTITLED TO PARTICIPATE AS A CREDITOR IN THE CCAA PROCEEDINGS OF THE CCAA PARTIES.

**(ii) Instructions for Filing a Post-Filing Notice of Dispute (in respect of a Post-Filing Claim)**

**What is a Post-Filing Notice of Dispute?**

The Monitor, in consultation with the CCAA Parties, will review all Proofs of Post-Filing Claim received on or before the Post-Filing Claims Bar Date. If the Monitor, in consultation with the CCAA Parties, determines it necessary to revise or disallow your Post-Filing Claim, the Monitor will send you a Post-Filing Notice of Revision or Disallowance advising you of the reasons why, and to what extent your Post-Filing Claim has been revised or disallowed. Please refer to Schedule G of the Post-Filing Claims Procedure Order for an example of a Post-Filing Notice of Revision or Disallowance.

If you receive a Post-Filing Notice of Revision or Disallowance, and you disagree with the revision or disallowance and you wish to claim a different amount, you must send the Monitor a Post-Filing Notice of Dispute. A Post-Filing Notice of Dispute is a form in which you present supporting documentation and arguments disputing the Monitor's revision or disallowance of your Post-Filing Claim. A blank form of a Post-Filing Notice of Dispute will be included in any Post-Filing Notice of Revision or Disallowance sent to you by the Monitor. Please refer to Schedule F of the Post-Filing Claims Procedure Order for an example of a Post-Filing Notice of Dispute.

**Disputed Amount of Post-Filing Claim(s)**

A Post-Filing Notice of Dispute must include the amount by which you dispute the Monitor's revised or disallowed Post-Filing Claim(s). A blank table has been provided in the form of Post-Filing Notice of Dispute indicating the information required to process your Notice of Dispute.

**Reasons for Dispute**

The Post-Filing Notice of Dispute includes a section in which you must provide reasons and any supporting documentation supporting the disputed amount. If you require additional space to provide information regarding your Post-Filing Notice of Dispute, please attach a separate sheet to your Post-Filing Notice of Dispute with the heading, "Reason for Dispute – Continued."

**Signature and Date**

Please sign and date your Post-Filing Notice of Dispute, indicating the name and title of the authorized representative, if applicable.

**Filing your Post-Filing Notice of Dispute**

If you receive a Post-Filing Notice of Revision or Disallowance, and you wish to dispute it, your Post-Filing Notice of Dispute and any supporting documentation must be received by the Monitor within fourteen (14) days after the date of the Post-Filing Notice of Revision or Disallowance, or such other date as may be ordered by the Court. The deadline for submitting your Post-Filing Notice of Dispute will be clearly indicated on the Monitor's Post-Filing Notice of Disallowance.

A 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 "Post-Filing Notice of Dispute – [legal name of post-filing creditor]" and the following naming protocol must be used for any attachments included in the email:

For the Post-Filing Notice of Dispute: **Post-Filing\_Notice\_of\_Dispute\_[legal name of post-filing creditor].pdf**

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

In the event that you are unable or unwilling to submit your Post-Filing Notice of Dispute by email, you may deliver your 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

**(iii) Instructions for Completing a D&O Proof of Post-Filing Claim**

**What is a D&O Post-Filing Claim?**

Generally, a D&O Post-Filing Claim is a claim against one or more of the Directors and/or Officers of the CCAA Parties for which Directors and/or Officers are **BY STATUTE** liable to pay in their capacity as Directors and/or Officers. Please refer to the definitions section of the Post-Filing Claims Procedure Order for a complete definition of "D&O Post-Filing Claim."

**D&O Proof of Post-Filing Claims**

The D&O Proof of Post-Filing Claim is the document in which a D&O Post-Filing Claimant provides the Monitor with information and support for a Post-Filing Claim against the Directors and/or Officers of the CCAA Parties. The D&O Proof of Post-Filing Claim commences with a certification section in which you must indicate whether the person preparing the claim form is the D&O Post-Filing Claimant, or a representative of the D&O Post-Filing Claimant. If you are a representative of the D&O Post-Filing Claimant, you must indicate your position or title at the D&O Post-Filing Claimant. Only representatives with knowledge of the circumstances connected with the claim should complete the D&O Proof of Post-Filing Claim form.

### **Amount of D&O Post-Filing Claim**

Your D&O Proof of Post-Filing Claim must include the amount and basis for your claim. A blank table has been provided in the D&O Proof of Post-Filing Claim form indicating the information required to process your claim including: the name of the CCAA Party against whose Directors and/or Officers you are asserting your claim, the amount of the D&O Post-Filing Claim, the currency in which the claim is denominated, and the basis of the claim being against the Directors and/or Officers.

### **Particulars and Basis of D&O Post-Filing Claim(s)**

The D&O Proof of Post-Filing Claim includes a section in which you must provide the “particulars” or information supporting your D&O Post-Filing Claim. If you require additional space to provide information regarding your D&O Post-Filing Claim, please attach a separate sheet to your D&O Proof of Post-Filing Claim form with the heading, “Particulars and Basis of D&O Post-Filing Claim(s) – Continued.”

In the Particulars and Basis of D&O Post-Filing Claim(s) section, please list all documentation that will be attached separately to your Post-Filing Claim form and which supports the amount or the details of your D&O Post-Filing Claim.

### **Signature and Date**

Please sign and date your D&O Proof of Post-Filing Claim, indicating the name and title of the authorized representative, if applicable.

### **Filing of D&O Post-Filing Claims:**

Your D&O Proof of Post-Filing Claim must be received by the Monitor by no later than 5:00 p.m. (prevailing Eastern time) on May 21, 2018, or such later date as may be ordered by the Court (the “**D&O Post-Filing Claims Bar Date**”).

D&O Proofs of Post-Filing Claim 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 Proof of Post-Filing Claim – [legal name of D&O Post-Filing Claimant]” and the following naming protocol must be used for any attachments included in the email:

For a D&O Proof of Post-Filing Claim: **D&O\_Proof\_of\_Post-Filing\_Claim\_[legal name of D&O Post-Filing Claimant].pdf**

For support schedules (if not already included in the D&O Proof of Post-Filing Claim file): **D&O\_Proof\_of\_Post-Filing\_Claim\_[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 Proof of Post-Filing Claim by email, you may deliver your D&O Proof of Post-Filing Claim 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

**FAILURE TO FILE YOUR D&O PROOF OF POST-FILING CLAIM BY THE D&O POST-FILING CLAIMS BAR DATE WILL RESULT IN YOUR D&O POST-FILING CLAIM BEING FOREVER BARRED AND EXTINGUISHED, AND YOU WILL BE PROHIBITED FROM MAKING OR ENFORCING A D&O POST-FILING CLAIM AGAINST ANY OF THE DIRECTORS AND/OR OFFICERS OF THE CCAA PARTIES.**

**(iv) Instructions for Completing a D&O Post-Filing Notice of Dispute**

**What is a D&O Post-Filing Notice of Dispute?**

The Monitor, in consultation with legal counsel to the Directors and Officers of the CCAA Parties (“D&O Counsel”), will review all D&O Proofs of Post-Filing Claim, received on or before the D&O Post-Filing Claims Bar Date. If the Monitor, in consultation with D&O Counsel, determines it necessary to revise or disallow a D&O Post-Filing Claim, the Monitor will send the claimant a D&O Post-Filing Notice of Revision or Disallowance indicating the reasons why and to what extent a D&O Post-Filing Claim has been revised or disallowed. Please refer to Schedule B of the Post-Filing Claims Procedure Order for an example of a D&O Post-Filing Notice of Revision or Disallowance.

If you receive a D&O Post-Filing Notice of Revision or Disallowance, and you disagree with the revision or disallowance, you must send the Monitor a D&O Post-Filing Notice of Dispute. A D&O Post-Filing Notice of Dispute is a form in which you present supporting documentation and arguments disputing the Monitor’s revision or disallowance of your D&O Post-Filing Claim as submitted. A blank form of D&O Post-Filing Notice of Dispute will be included in any D&O Post-Filing Notice of Revision or Disallowance sent to you by the Monitor. Please refer to Schedule C of the Post-Filing Claims Procedure Order for an example of a Post-Filing D&O Notice of Dispute.

**Disputed Amount of D&O Post-Filing Claim(s)**

A D&O Post-Filing Notice of Dispute must include the amount that you dispute of the Monitor’s revised or disallowed D&O Post-Filing Claim(s). A blank table has been provided in the form of D&O Post-Filing Notice of Dispute indicating the information required to process your D&O Post-Filing Notice of Dispute.

**Reasons for Dispute**

The D&O Post-Filing Notice of Dispute includes a section in which you must provide reasons and any supporting documentation supporting the disputed amount. If you require additional



space to provide information regarding your D&O Post-Filing Notice of Dispute, please attach a separate sheet to your D&O Post-Filing Notice of Dispute with the heading, “Reason for Dispute – Continued.”

### **Signature and Date**

Please sign and date your D&O Post-Filing Notice of Dispute, indicating the name and title of the authorized representative, if applicable.

### **Filing your D&O Post-Filing Notice of Dispute**

If you receive a D&O Post-Filing Notice of Revision or Disallowance, and you wish to dispute it, your D&O Post-Filing Notice of Dispute and any supporting documentation must be received by the Monitor within 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 to by the Court. The deadline for submitting your D&O Post-Filing Notice of Dispute will be clearly indicated on the Monitor’s D&O Post-Filing Notice of Disallowance

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 Post-Filing 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