#### **SCHEDULE E**

# NOTICE TO CREDITORS OF THE BLOOM LAKE CCAA PARTIES AND THE WABUSH CCAA PARTIES

Wabush Iron Co. Limited

Wabush Resources Inc.

Wabush Mines

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

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

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Wabush Lake Railway Company Limited

The Bloom Lake Iron Ore Mine Limited Partnership

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

# RE: NOTICE OF CLAIMS PROCEDURE FOR CLAIMS AGAINST THE CCAA PARTIES AND THEIR DIRECTORS AND OFFICERS

This notice is being published pursuant to an order of the Superior Court of Québec for the district of Montreal (Commercial Division) (the "Court") dated November 5, 2015, as amended on November 16, 2015 (the "Claims Procedure Order") which approved a claims procedure for the determination of certain claims against the CCAA Parties and/or their Directors and Officers. A copy of the Claims Procedure Order and other public information concerning these CCAA proceedings can be obtained on the website of FTI Consulting Canada Inc., acting as Court-appointed monitor of CCAA **Parties** "Monitor") the (the http://cfcanada.fticonsulting.com/bloomlake. Any person who may have a claim against any of the CCAA Parties and/or any of their Directors and Officers should carefully review and comply with the provisions of the Claims Procedure Order.

Any person having a claim against any of the CCAA Parties arising or relating to the period prior to January 27, 2015 in relation to the Bloom Lake CCAA Parties, or prior to May 20, 2015 in relation to the Wabush CCAA Parties (in each case, and as applicable, the "Determination Date") must send a Proof of Claim to the Monitor, to be received by the Monitor by no later than 5:00 p.m. (prevailing Eastern time) on December 18, 2015, or such later date as may be ordered by the Court (the "Claims Bar Date").

Proofs of Claim for claims arising as a result of a restructuring, disclaimer, resiliation, suspension, termination, or breach by any of the CCAA Parties, on or after the Determination Date, of any arrangement, contract or agreement, whether written or oral, <u>must be received by the Monitor by the later of: (a) the Claims Bar Date; (b) by 5:00 p.m. on the day that is twenty-one (21) days after any of (i) the date that the applicable Notice of Disclaimer or Resiliation becomes effective, (ii) the Court Order settling a contestation against such Notice of Disclaimer or Resiliation brought pursuant to Section 32(5)(b) CCAA, or (iii) the date of the event giving rise to the Restructuring Claim; or (c) such later date as may be ordered by the Court (the "Restructuring Claims Bar Date").</u>

Any person having a claim against any of the Directors and/or Officers of the CCAA Parties for which the Directors and/or Officers, or any of them, are by statute liable to pay in their capacity as Directors and/or Officers must send a Proof of Claim to the Monitor, to be received by the

Monitor by no later than 5:00 p.m. (prevailing Eastern time) on December 18, 2015, or such later date as may be ordered by the Court (the "D&O Claims Bar Date").

The Monitor will be mailing information packages to Known Creditors by no later than **November 18, 2015**. Accordingly, if you have not received an information package by **November 24, 2015**, you should obtain one at <a href="http://cfcanada.fticonsulting.com/bloomlake/claims.htm">http://cfcanada.fticonsulting.com/bloomlake/claims.htm</a>. If you require further information or cannot obtain the information package from the website, you should contact the Monitor by email at:

Bloom Lake CCAA Parties' Creditors bloomlake@fticonsulting.com

Wabush CCAA Parties' Creditors wabush@fticonsulting.com

UNLESS EXPRESSLY PROVIDED IN THE CLAIMS PROCEDURE ORDER, ANY PERSON THAT DOES NOT FILE A PROOF OF CLAIM WITH THE MONITOR BY THE APPLICABLE CLAIMS BAR DATE SPECIFIED ABOVE SHALL NOT BE ENTITLED TO ANY FURTHER NOTICE OR DISTRIBUTION UNDER A PLAN, IF ANY, OR OF ANY PROCEEDS OF SALE OF ANY OF THE CCAA PARTIES' ASSETS, OR TO PARTICIPATE AS A CREDITOR IN THE CCAA PROCEEDINGS OF THE CCAA PARTIES, AND SHALL BE PROHIBITED FROM MAKING OR ENFORCING ANY CLAIM AGAINST ANY OF THE CCAA PARTIES AND/OR ANY OF THEIR DIRECTORS AND/OR OFFICERS. ADDITIONALLY, ANY CLAIMS SUCH CREDITOR MAY HAVE AGAINST ANY OF THE CCAA PARTIES AND/OR ANY OF THEIR DIRECTORS AND/OR OFFICERS SHALL BE FOREVER BARRED AND EXTINGUISHED.

# **Claims Related to Pension Plans:**

You are not required to file a Proof of Claim in respect of entitlements under a pension plan and should <u>not</u> do so. In accordance with the Claims Procedure Order, such claims will be filed by the Plan Administrator on behalf of all pension beneficiaries.

## Claims of Non-Union Employees and Retirees against the Wabush CCAA Parties:

On June 22, 2015, the Court appointed the firm Koskie Minksy LLP (www.kmlaw.ca; Toronto) and Scheib Legal (Montreal) as Representative Counsel to all non-union employees and retirees of the Wabush CCAA Parties. If you are a non-union employee or retiree with a claim against the Wabush CCAA Parties, then you **do not** need to file an individual Proof of Claim form for amounts you claim to be owed by the Wabush CCAA Parties. Such claims will be dealt with by Representative Counsel under a special process ordered by the Court.

## Claims of Unionized Employees and Retirees against the CCAA Parties:

If you are an employee or retiree of the CCAA Parties represented by the United Steelworkers Union with a claim against the CCAA Parties related to or arising from your employment, then you **do not** need to file an individual Proof of Claim form for amounts you claim to be owed by the CCAA Parties. Such claims will be dealt with by the Union under a special process ordered by the Court. If you believe you have any Claim that is **not** with respect to employment or pension entitlements, you **must** file a Proof of Claim in accordance with the Claims Procedure Order as explained above.