



Blake, Cassels & Graydon s.e.n.c.r.l./s.r.l.  
 Avocats  
 Agents de brevets et de marques de commerce  
 600, boul. de Maisonneuve Ouest  
 Bureau 2200  
 Montréal (Québec) H3A 3J2 Canada  
 Tél. : 514-982-4000 Téléc. : 514-982-4099

August 10, 2015

**VIA FACSIMILE  
 WITHOUT PREJUDICE**

Mr. Alain Turcotte  
 Coordinating Commissioner  
**Commission des relations du travail**  
 35, rue Port-Royal Est, 2e étage  
 Montréal (Québec) H3L 3T1

**Adam T. Spiro**  
 Attorney / Avocat  
 Direct: 514-982-5074  
 adam.spiro@blakes.com

Client/objet : 00011573/000375

**OBJET : In the Matter of the CCAA of Cliffs Québec Mine de fer ULC et al.  
 S.C. No.: 500-11-048114-157**

**Lemonde v. Cliffs Québec Mine de fer ULC  
 CRT No.: CM-2015-2106**

Sir,

We are in receipt of your letter dated July 6, 2015, which followed ours of June 17, 2015 addressed to Mr. Robert Côte in relation to the above-captioned matters.

We disagree with your interpretation that the *Commission des relations du travail* (the “**Commission**”) would be a “regulatory body” within the meaning of section 11.1 of the *Companies’ Creditors Arrangement Act*, S.R.C. 1985, c. C-36, as amended (the “**CCAA**”) such that the above-captioned proceedings before the Commission would not be stayed.

Rather, it is clear that the Commission is acting as an administrative tribunal herein, and that the above-captioned proceedings before the Commission are stayed by the combined effect of section 11.02 of the CCAA and paragraphs 8 and 17 of the Initial Order (as subsequently amended, rectified and/or restated) rendered in the above-captioned CCAA proceedings.

In light of the foregoing, we hereby reiterate our position that the above-captioned proceedings before the Commission are stayed subject only to an order of the Superior Court to the contrary. Therefore, Mr. Lemonde’s claim can and should properly be dealt with in the CCAA claims process.

Trusting the whole to your satisfaction, we remain,



Yours truly,

**Blake, Cassels & Graydon LLP**

Adam T. Spiro  
/atsp

c: Bernard Boucher  
Blake, Cassels & Graydon LLP  
(via email)

Natalie Bussière  
Blake, Cassels & Graydon LLP  
(via email)

Nigel Meakin  
FTI Consulting Canada Inc.  
(via email)

Sylvain Rigaud  
Norton Rose Fulbright Canada LLP  
(via email)

Sylvain Lemonde  
3214, rue Lareau  
Carignan (Québec) J3L 3P9  
(via registered mail)

Louis-Philippe Tanguay  
Groupe Conseil Tanguay  
6885, boulevard de L'Assomption  
Montréal (Québec) H1T 2N4  
(via registered mail)

8465722.3