

C A N A D A

PROVINCE OF QUÉBEC
DISTRICT OF **MONTREAL**

N°: 500-11-048114-157

SUPERIOR COURT

Commercial Division

(Sitting as a court designated pursuant to the *Companies' Creditors Arrangement Act*, R.S.C., c. 36, as amended)

**IN THE MATTER OF THE PLAN OF COMPROMISE OR
ARRANGEMENT OF:**

BLOOM LAKE GENERAL PARTNER LIMITED

QUINTO MINING CORPORATION

CLIFFS QUÉBEC IRON MINING ULC

WABUSH IRON CO. LIMITED

WABUSH RESOURCES INC.

Petitioners

-and-

**THE BLOOM LAKE IRON ORE MINE LIMITED
PARTNERSHIP**

BLOOM LAKE RAILWAY COMPANY LIMITED

WABUSH MINES

ARNAUD RAILWAY COMPANY

WABUSH LAKE RAILWAY COMPANY LIMITED

Mises-en-cause

-and-

FTI CONSULTING CANADA INC.

Monitor

-and-

TWIN FALLS POWER CORPORATION

**CHURCHILL FALLS (LABRADOR) CORPORATION
LIMITED**

Mises-en-cause

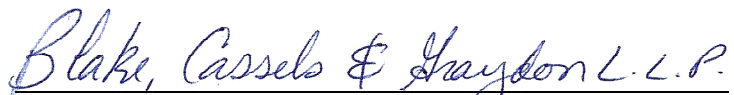
**AUTHORITIES IN SUPPORT OF PETITIONERS AND MISES-EN-CAUSES'
OUTLINE OF ARGUMENTS**

(In response to the *Motion by Twin Falls Power Corporation to dismiss the Application for Lack of Jurisdiction and for Forum Non Conveniens* and to Churchill Falls (Labrador) Corporation Limited's *Contestation*)

1. *Canada Business Corporations Act*, R.S.C. (1985), c. C-44, sections 214 and 241.

2. *Sam Lévy & Associés v. Azco Mining Inc.*, 2001 SCC 92 (CanLII) at paras 27, 36, 39-40, 73-74, 76-77.
3. *Re: Essar Steel Algoma Inc.*, 2016 ONSC 595 at paras 27, 29, 30, 33.
4. *Century Services Inc. v. Canada (Attorney General)*, 2010 SCC 60 at para 22.
5. *Newfoundland and Labrador v. AbitibiBowater Inc.*, 2012 SCC 67 at para 21
6. *Montréal, Maine & Atlantic Canada Co. (Re)*, 2013 QCCS 5194 (C.S. Que.) at paras 24, 25.
7. *Bloom Lake General Partner Ltd. (Re)*, 2017 QCCS 284 at paras 29-33, 46, 70, 73.
8. *Companies' Creditors Arrangement Act*, R.S.C., 1985, c. C-36, s. 11, 42.
9. *Lightstream Resources Ltd (Re)*, 2016 ABQB 665 at para 52.
10. *Stelco Inc. (Re)*, [2005] O.J. No. 1171 at paras 52-54.
11. *Van Breda v. Village Resorts Ltd*, 2012 SCC 17 at paras 79, 105, 108-110.
12. *Microbiz Corp v. Classic Software Systems Inc.*, [1996] OJ no 5094 at para 1 (SCJ).
13. *Joint Venture v. Iannitello et Associés inc.*, 2018 QCCA 504 at para 23.
14. *Cantore v Nemaska Lithium Inc.*, 2020 QCCA 1333 at paras. 9-10.
15. *Les excavations Sanoduc Inc. v. Morency*, 1991 CanLII 3680 (QC CA) at paras. 7-9.
16. *Spar Aerospace Ltd. v. American Mobile Satellite*, 2002 SCC 78 at para 77.
17. *Bloom Lake General Partner Ltd., Re.*, 2018 QCCS 996 at para 35 and ff.
18. General Rules of the Québec Superior Court Commercial Division, section 209(a).

Montréal, May 20, 2021



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