

CANADA  
PROVINCE OF QUÉBEC  
DISTRICT OF MONTREAL

No: 500-11-048114-157

SUPERIOR COURT  
(Commercial Division)

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IN THE MATTER OF THE  
*COMPANIES'* *CREDITORS*  
*ARRANGEMENT ACT*, R.S.C. 1985, c. C-  
36, AS AMENDED

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

BLOOM LAKE GENERAL PARTNER  
LIMITED, QUINTO MINING CORPORATION,  
8568391 CANADA LIMITED, 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-

MICHAEL KEEPER, TERENCE WATT,  
DAMIEN LEBEL AND NEIL JOHNSON

PETITIONERS-Mises-en-cause

-and-

UNITED STEELWORKERS, LOCAL 6254,  
UNITED STEELWORKERS, LOCAL 6285

Mises-en-cause

-and-

MORNEAU SHEPELL  
Mise-en-cause

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**MOTION FOR LEGAL COSTS OF SALARIED/NON-UNION EMPLOYEES  
AND RETIREES**

**(Sections 11 and 11.52 of the *Companies' Creditors Arrangement Act*)**

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TO THE HONOURABLE MR. JUSTICE STEPHEN W. HAMILTON, J.S.C., OR TO ONE OF THE HONOURABLE JUDGES SITTING IN THE COMMERCIAL DIVISION IN AND FOR THE JUDICIAL DISTRICT OF MONTRÉAL, THE PETITIONERS-MISES-EN-CAUSE RESPECTFULLY SUBMIT THE FOLLOWING:

**INTRODUCTION**

1. Pursuant to the Order of the Honourable Stephen W. Hamilton J.S.C. dated June 22, 2015, as revised by the Order issued on December 21, 2017, (the "**Representation Order**"), Michael Keeper, Terence Watt, Damien Lebel and Neil Johnson are the Court-appointed representatives (the "**Representatives**") of all Salaried/Non-union employees and retirees of the Wabush CCAA Parties (the "**Salaried Members**") in the CCAA proceedings and the firms of Koskie Minsky LLP ("**KM**") of Toronto, and Fishman Flanz Meland Paquin LLP ("**FFMP**") of Montreal are the Representative Counsel of all of the Salaried Members (as defined below).
2. The Representatives and Representative Counsel are responsible for the representation of approximately 656 former non-union employees and retirees (the "**Salaried Members**") in the CCAA proceedings. The Salaried Members are a significant creditor group of the Wabush CCAA Parties (defined below) and have claims for \$27,341,000 for the Salaried Pension Plan wind-up deficit and approximately \$43,452,000 for their terminated health, life insurance, and other supplemental pension benefits ("**OPEBs**").

**BACKGROUND**

3. On May 20, 2015, Wabush Iron Co. Limited, Wabush Resources Inc., Wabush Mines, Arnaud Railway Company, and Wabush Lake Railway Company Limited (collectively, the "**Wabush CCAA Parties**") obtained protection from their creditors under the CCAA. FTI Consulting Canada Inc. was appointed as Monitor.
4. The Salaried Members are elderly individuals who are directly and profoundly impacted by the CCAA proceedings due to the underfunding of the Wabush Salaried Pension Plan and the resulting 25% reduction to their monthly pension benefits, coupled with the total loss of their OPEBs that were terminated by the Wabush CCAA Parties immediately after they obtained CCAA protection.

5. This case involves complex pension and insolvency issues in the jurisdictions of Québec, Newfoundland and Labrador, and the federal jurisdiction.
6. The Salaried Members are not commercial creditors, do not have union representation, and constitute the most vulnerable creditor group in these proceedings with no means to represent themselves in complex insolvency proceedings of their employers where they have been prejudiced.
7. On June 22, 2015, as part of the Representation Order of Mr. Justice Hamilton, the legal costs of the Representatives incurred from the commencement of the CCAA proceedings to June 22, 2015 were ordered to be paid by the Wabush CCAA Parties in the amount as set out in the June 22, 2015 Order.
8. On October 28, 2016, by Order of Mr. Justice Hamilton, the legal costs of the Representatives incurred prior to October 1, 2016 that were incurred in excess of the amount ordered in the June 22, 2015 Court Order, and the Representatives' legal costs for the period from October 1, 2016 until January 31, 2017, inclusive, were directed to be paid by the Wabush CCAA Parties.
9. On May 31, 2017, by Order of Mr. Justice Hamilton, the legal costs of the Representatives prior to February 1, 2017 that were incurred in excess of the amount ordered in the October 28, 2016 Court Order, and the Representatives' legal costs for the period from February 1, 2017 until June 30, 2017, inclusive, were directed to be paid by the Wabush CCAA Parties.
10. On June 28, 2017, by Order of Mr. Justice Hamilton, the legal costs of the Representatives prior to July 1, 2017 that were incurred in excess of the amount ordered in the May 31, 2017 Court Order, and the Representatives' legal costs for the period from July 1, 2017 until November 30, 2017, inclusive, were directed to be paid by the Wabush CCAA Parties.
11. On December 21, 2017, by Order of Mr. Justice Hamilton, the firm of FFMP was appointed as Québec Representative Counsel to replace Nick Scheib, who resigned as Québec Representative Counsel in June 2017, and the legal costs of the Representatives prior to November 30, 2017 that were incurred in excess of the amount ordered in the May 31, 2017 Court Order, and the Representatives' legal costs for the period from December 1, 2017 until March 31, 2018, inclusive, were directed to be paid by the Wabush CCAA Parties.
12. Due to the continuation of the CCAA proceeding with significant issues remaining to be resolved and the extension of the CCAA Stay Period to June 29, 2018, this motion seeks coverage for the costs of the Salaried Members from April 1, 2018 to June 29, 2018.

**THE ACTIVITIES OF THE REPRESENTATIVES AND REPRESENTATIVE COUNSEL**

13. To date, the Representatives and Representative Counsel have been involved in representing and assisting the Salaried Members with respect to a large number of issues and motions that have arisen and prejudicially impacted their legal entitlements that they earned during their employment for the Wabush Mines entities, and which have been reported in previous motions for the payment of the Salaried Members' costs.
14. Since the December 21, 2017 Court Order approving the legal costs of the Representatives, Representative Counsel have continued to represent the Salaried Members with respect to:
  - (a) finalizing the Salaried Members' claim for their terminated OPEBs for both the Salaried and USW employees and retirees which have progressed but remain subject to on-going negotiations with the Monitor;
  - (b) reviewing the pension plan wind-up report prepared by Morneau Shepell for the Wabush Mines Salaried Pension Plan setting out the wind-up deficiency owing to the Salaried Pension Plan by Wabush Mines of \$27,341,000;
  - (c) in respect of the Québec Court of Appeal hearing scheduled for June 11, 12, and 13, 2018, preparing a Summary Table of Issues as directed by the case management judge and responding to extensive discussions with Monitor's counsel and other parties' regarding same;
  - (d) working on the joint schedules and related documents filed in connection with the appeals to the Québec Court of Appeal;
  - (e) preparing a Factum to the Québec Court of Appeal in respect of certain determinations in the Pension Directions Decision, as well as the Monitor's cross-appeal in respect of other issues; reviewing the Appeal Facta of the Attorney-General of Canada, the Superintendent and USW and other parties in respect of same;
  - (f) reviewing and responding to the Monitor's further request to the Québec Court of Appeal for a page limit increase to their Responding Appeal Factum from 65 pages to 80 pages;
  - (g) reviewing the Responding Factum (80 pages) of the Monitor and other facta;
  - (h) reviewing and responding to the late request from Retraite Québec to intervene in the Quebec Court of Appeal hearing and to file a factum after the Representatives' Reply Factum is filed, despite that it did not file a Notice of Appeal nor a Leave Application, nor attend any of the Court of Appeal case management conferences;

- (i) reviewing the CCAA Parties' Motion materials and Monitors' reports for a Stay Extension and the unexpected Motion for Issuance of a Post-Filing Claims Procedure Order, and Motion for Issuance of a Plan Filing and Meetings Order (the "**Plan Meetings Motion**"), which were served on March 15, 2018 and March 19, 2018 and not budgeted for in the prior cost request in December 2017; preparing a Notice of Objection regarding the Plan Meetings Motion, and preparing for and attending in court in respect thereof;
- (j) meeting with the Monitor, Monitor's counsel and debtors' counsel and other parties regarding the proposed plan of compromise and arrangement (the "**Proposed Plan**"), and assessing, with other stakeholders, the position of the Salaried Members' claims in connection therewith and ongoing work in this regard;
- (k) dealing with Salaried Members' inquiries on numerous individual issues relating to their pensions and OPEB claims and the CCAA proceedings;
- (l) maintaining a website with our firm to provide information for the Wabush salaried retirees and employees; and
- (m) discussions with the other pension stakeholders and other creditors, in particular,
  - 1) Morneau Shepell;
  - 2) the Superintendent of Pensions of Newfoundland & Labrador;
  - 3) United Steelworkers International and Locals 6254 and 6285 (USW);
  - 4) Office of the Superintendent of Financial Institutions (OSFI); and
  - 5) Retraite Québec,in order to determine those parties' positions, the commonalities of interests, and the coordination and presentation of these parties' positions in an efficient and coordinated manner.

*The work involved for the Salaried Members for the next three-month Stay Period is expected to be substantial*

15. The Wabush CCAA parties obtained an order extending the CCAA stay to June 29, 2018. Over the next three months, it is expected that the work for the Salaried Members will be substantial. The anticipated events that will require representation for the Salaried Members include the following:
- (a) reviewing the lengthy Responding Factum of the Monitor, the Factum of the City of Sept-Iles, the Factum of the CCAA Parties, and the Factum of Retraite Québec as Intervenor (together with the voluminous authorities cited by such parties) in the appeals before the Quebec Court of Appeal, and preparing a Reply Factum;

- (b) continuing discussions with the Monitor in respect of finalizing the actuarial methodology for the OPEBs claims for submission in the claims process and entering into an agreement with the Monitor, if such agreement is acceptable to the Representatives, failing which the dispute would be referred for determination by a claims officer;
  - (c) preparing for and attending at the Québec Court of Appeal hearing scheduled for three days (originally two days) on June 11 - 13, 2018;
  - (d) reviewing and advising on issues related to the CCAA Parties' Plan Meetings Motion, reviewing the terms of the Proposed Plan, its impact on creditor recovery scenarios, and discussions with the Monitor, pension and other creditors and stakeholders regarding same;
  - (e) discussing and/or negotiating with other stakeholders regarding the different possible economic outcomes for creditors in the Proposed Plan;
  - (f) preparing for and attending the meeting(s) of creditors that may be called to consider the Proposed Plan;
  - (g) attending and making representations at a hearing seeking Court sanction of the Proposed Plan, if passed at the creditors' meetings;
  - (h) preparing for and attending an on-site meeting at the request of the Representatives and Salaried Members, in Sept-Iles and Wabush, with the pension plan administrator, Morneau Shepell and USW to explain developments in the proceeding, the pension plan wind up process and the CCAA process (the last such on-site meeting was in March 2016), the proposed Plan of Compromise and other issues, and answering their questions;
  - (i) advising Salaried Members on all issues in the CCAA proceeding; and
  - (j) responding to individual employee and retiree inquiries regarding pensions and other applicable CCAA-related matters.
16. KM and FFMP do not duplicate professional services;
17. The positions of the Salaried Members in particular in advancing their statutory pension priority rights are vigorously opposed by the Monitor and the CCAA parties, who do not have any fee caps for themselves, nor their legal counsel, and have filed voluminous material both in this proceeding and in the appeal and cross-appeal by the Monitor before the Quebec Court of Appeal.
18. In assessing the reasonableness of the fee request made herein, it is respectfully submitted that the Court should also consider the fees charged to the debtors' estates by all of the others involved in these proceedings.

19. In view of all of the foregoing, and given the anticipated work described above, the Representatives respectfully request approval for the costs of their reasonable legal fees in the on-going CCAA proceedings from the Wabush CCAA Parties for the period from April 1, 2018 to June 29, 2018, in the amount of \$50,000 per month notionally for the fees of KM and \$35,000 per month notionally for the fees of FFMP, with an aggregate cap of \$255,000, plus taxes and disbursements.

***General***

20. Representative Counsel have provided the Representatives with representation in an adversarial proceeding with complex issues that directly affect their rights and prejudice their retirement income security on which they rely for their livelihoods. Funding for the Salaried Members' legal costs has ensured, and will continue to ensure, that the Salaried Members have legal representation
21. The Representatives have reviewed these motion materials and they approve and support the relief sought herein.
22. The shutdown of Wabush Mines and the CCAA proceeding is a highly sensitive matter given the losses imposed on Québec and Newfoundland employees and retirees and their families.
23. Representative Counsel have ensured the uniformity of claims submissions and have avoided a multiplicity of different claims being submitted by a large number of individual employee and retiree creditors. Representative Counsel provide a single voice for the large number of individual Salaried Members in the CCAA proceedings which also contributes to overall costs savings.
24. Consistent with the Representation Order and, in accordance with section 11.52 of the CCAA, it is respectfully submitted that the funding for the next tranche of legal costs of the Salaried Members for the period from April 1, 2018 to June 29, 2018 be paid by the Wabush CCAA Parties upon the rendering of sufficiently detailed accounts (subject to reasonable redaction for solicitor-client privilege) to the Wabush CCAA Parties, and subject to the invoices being approved by the Monitor.

**FOR THESE REASONS THE PETITIONERS-MISES-EN-CAUSE ASK THAT THIS HONOURABLE COURT:**

- [A] **GRANT** the present Motion;
- [B] **ISSUE** an Order in the form of the Draft Order communicated herewith as **Exhibit P-1**; and
- [D] **DECLARE** that service and notice of this Motion was good and sufficient.

**THE WHOLE** without costs, save and except in case of contestation.

Toronto and Montreal, April 6, 2018



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**Andrew J. Hatnay and Amy Tang**  
**KOSKIE MINSKY LLP**



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**Mark Meland and Nicolas Brochu**  
**FISHMAN FLANZ MELAND PAQUIN LLP**

*Representative Counsel for the Petitioners-Mises-en-cause Michael Keeper, Terence Watt, Damien Lebel and Neil Johnson, the Representatives of the Salaried Members.*



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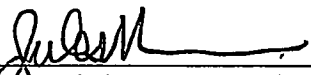
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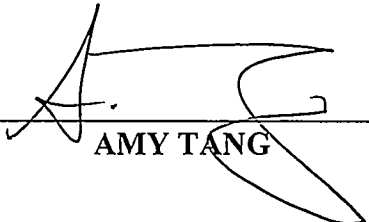
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I, the undersigned Amy Tang, resident for the purposes hereof at 20 Queen Street West, Suite 900, in the City of Toronto, Province of Ontario, M5H 3R3, hereby solemnly declare and make oath and say the following:

1. I am an associate with the firm of Koskie Minsky LLP, the Court-appointed Representative Counsel to all the Salaried Members of the Wabush CCAA Parties;
2. All of the facts alleged in the present *Motion for an Order for Legal Costs of Salaried/Non-Union Employees and Retirees* are true.

SWORN BEFORE ME at Toronto,  
in the Province of Ontario,  
April 6, 2018

  
\_\_\_\_\_  
A Commissioner Oaths/Justice of the Peace  
Jules Monteyne  
LSUC # 72980C

  
\_\_\_\_\_  
AMY TANG

**NOTICE OF PRESENTATION**

*in support of Petitioners-Mise-en-causes' Motion for an Order for Legal Costs of Salaried/Non-Union Employees and Retirees*

**TO:** Me Bernard Boucher ([bernard.boucher@blakes.com](mailto:bernard.boucher@blakes.com))  
Me Sébastien Guy ([sebastien.guy@blakes.com](mailto:sebastien.guy@blakes.com))  
*BLAKE, CASSELS & GRAYDON LLP*  
600 de Maisonneuve West, Suite 2200  
Montreal, Québec H3A 3J2  
Counsel for the Petitioners and the Mises-en-cause (i.e., Wabush CCAA Parties)

**AND TO:** Me Sylvain Rigaud ([sylvain.rigaud@nortonrosefulbright.com](mailto:sylvain.rigaud@nortonrosefulbright.com))  
*NORTON ROSE FULBRIGHT CANADA LLP*  
1 Place Ville Marie, Suite #2500  
Montreal, Québec H3B 1R1  
Counsel for the Monitor

**AND TO: SERVICE LIST**

**TAKE NOTICE** that the present *Motion for an Order for Legal Costs of Salaried/Non-Union Employees and Retirees* will be presented for adjudication before The Honourable Mr. Justice Stephen W. Hamilton, J.S.C., or another of the Honourable Justices of the Superior Court, Commercial Division, sitting in and for the district of Montreal, at the Montreal Courthouse located at 1 Notre-Dame Street East, Montreal, Québec, on April 16, 2018 at a time and in a room to be determined by the Court.

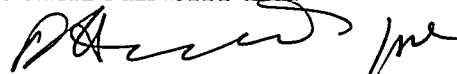
**GOVERN YOURSELF ACCORDINGLY.**

Toronto and Montreal, April 6, 2018



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Andrew J. Hatnay and Amy Tang  
KOSKIE MINSKY LLP



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Mark Meland and Nicolas Brochu  
FISHMAN FLANZ MELAND PAQUIN LLP

*Representative Counsel for the Petitioners-Mises-en-cause Michael Keeper, Terence Watt, Damien Lebel and Neil Johnson, the Representatives of the Salaried Members*


**LIST OF EXHIBITS**

(In support of the *Motion for an Order for Future Legal Costs of Salaried/Non-Union Employees and Retirees*)

**Exhibit P-1**

*Draft Sixth Order for Future Legal Costs of Salaried/Non-Union Employees and Retirees*

Toronto and Montreal, April 6, 2018



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**Andrew J. Hatnay and Amy Tang**  
**KOSKIE MINSKY LLP**



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**Mark Meland and Nicolas Brochu**  
**FISHMAN FLANZ MELAND PAQUIN LLP**

*Representative Counsel for the Petitioners-Mises-en-cause Michael Keeper, Terence Watt, Damien Lebel and Neil Johnson, the Representatives of the Salaried Members.*

# DRAFT

CANADA  
PROVINCE OF QUÉBEC  
DISTRICT OF MONTRÉAL

SUPERIOR COURT  
(Commercial Division)

File: No: 500-11-048114-157

Montreal, April \_\_\_\_, 2018

Presiding: The Honourable Mr. Justice Stephen W.  
Hamilton, J.S.C.

**IN THE MATTER OF THE COMPANIES'  
CREDITORS ARRANGEMENT ACT, R.S.C.  
1985, c. C-36, AS AMENDED**

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

**BLOOM LAKE GENERAL PARTNER  
LIMITED, QUINTO MINING CORPORATION, 8568391  
CANADA LIMITED, 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-

**MICHAEL KEEPER, TERENCE WATT,  
DAMIEN LEBEL, and NEIL JOHNSON**

PETITIONERS-Mises-en-cause

-and-

**UNITED STEELWORKERS, LOCAL 6254,  
UNITED STEELWORKERS, LOCAL 6285**

Mises-en-cause

-and-

**MORNEAU SHEPELL**

Mise-en-cause

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**SIXTH ORDER FOR FUTURE LEGAL COSTS OF SALARIED/NON-UNION  
EMPLOYEES AND RETIREES**

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1. **THE COURT**, upon reading the Petitioners'-Mises-en-cause *Motion for an Order for Future Legal Costs of Salaried/Non-union Employees and Retirees* dated April 6, 2018 (the "**Motion**") and having examined the affidavit of Amy Tang sworn on April 6, 2018;
2. **CONSIDERING** the submissions of counsel for the Petitioners-Mises-en-cause, the submissions of counsel for the Wabush CCAA Parties, the submissions of counsel for the Monitor, and of such other counsel as were present;
3. **GIVEN** the Monitor's 43<sup>RD</sup> Report dated March 19, 2018 and 44<sup>th</sup> Report dated March 22, 2018;
4. **GIVEN** the *Order Appointing Representatives and Representative Counsel* dated June 22, 2015;
5. **GIVEN** the *Order for Legal Costs of Salaried/Non-union Employees and Retirees* dated October 28, 2016;
6. **GIVEN** the *Third Order for Legal Costs of Salaried/Non-union Employees and Retirees* dated May 31, 2017;
7. **GIVEN** the *Fourth Order for Legal Costs of Salaried/Non-union Employees and Retirees* dated June 28, 2017; and
8. **GIVEN** the *Fifth Order for Future Legal Costs of Salaried/Non-Union Employees and Retirees, and Appointment of Replacement Québec Representative Counsel* dated December 21, 2017; and
9. **GIVEN** the provisions of the *Companies' Creditors Arrangement Act*;

**FOR THESE REASONS, THE COURT HEREBY:**

10. **ORDERS** that the legal fees, taxes and disbursements by the motion of the Petitioners-Mises-en-cause (the “**Representatives**”) of all salaried/non-Union employees and retirees of the Wabush CCAA Parties (namely, Wabush Iron Co. Limited, Wabush Resources Inc., Wabush Mines, Arnaud Railway company and Wabush Lake Railway Company Limited) or any person claiming an interest under or on behalf of such employees or former employees or pensioners and surviving spouses, or group or class of them (collectively, the “**Salaried Members**”), in the present CCAA proceedings, and by Representative Counsel for the period from April 1, 2018 to June 29, 2018 inclusive in the CCAA proceedings, shall be paid by the Wabush CCAA Parties, up to a total amount of \$85,000 (CDN) per month in legal fees notionally split with \$50,000 per month attributable to Koskie Minsky LLP and \$35,000 per month to FFMP, for a total cap for this period of \$255,000 (CDN) plus applicable taxes and disbursements. Any amount that is remaining in the cap in a given month can be carried forward to be applied to increase the cap in a future month, or can be applied toward the legal fees incurred in a past month(s) that exceeded the cap in such past month(s) which has not been paid. In each case, the Representatives and Representative Counsel shall render sufficiently detailed accounts (subject to reasonable redaction due to solicitor-client privilege) to the Wabush CCAA Parties and subject to the invoices being approved by the Monitor. Notwithstanding any other provision of this Order, the Wabush CCAA Parties shall not pay any legal fees, taxes or disbursements of the Representatives and Representative Counsel in respect of (i) any litigation that may be brought or supported by the Representatives or Representative Counsel against the directors of the Wabush CCAA parties in their personal capacity; (ii) the Newfoundland Reference, as defined in the Monitor's 38<sup>th</sup> Report, or; (iii) any other proceedings other than the CCAA Proceedings, without further Order of the Court, it being understood, however, that any and all appeals from a decision rendered in the CCAA Proceedings shall be deemed to be a proceeding in the CCAA Proceeding;
11. **DIRECTS** that any disagreement regarding the legal fees, taxes and disbursements of the Representatives and Representative Counsel may be submitted to this Court for determination;

12. **AUTHORIZES** the Representatives and Representative Counsel to take all steps and to perform all acts necessary or desirable to carry out the terms of this Order, including dealing with any Court, regulatory body and other government ministry, department or agency, and to take all such steps as are necessary or incidental thereto;
13. **DECLARES** that service and notice of this motion was good and sufficient and hereby dispenses with further service thereof;
14. **WITHOUT COSTS.**

, 2018

STEPHEN W. HAMILTON, J.S.C.

N° / No. C.S.: 500-11-048114-157

**SUPERIOR COURT OF DISTRICT OF MONTREAL  
(Commercial Division)**

**IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT, R.S.C. 1985, c. C-36, AS  
AMENDED**

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

**BLOOM LAKE GENERAL PARTNER LIMITED, QUINTO MINING CORPORATION, 8568391 CANADA LIMITED,  
CLIFFS QUÉBEC IRON MINING ULC, WABUSH IRON CO. LIMITED, WABUSH RESOURCES INC.**

**Petitioners**

**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**

**FTI CONSULTING CANADA INC.**

**Monitor**

**MICHAEL KEEPER, TERENCE WATT, DAMIEN LABEL AND NEIL JOHNSON as Representatives of the Salaried/Non-  
Union Employees and Retirees)**

**PETITIONERS - Mises-en-cause**

**FTI CONSULTING CANADA INC.**

**Monitor**

**UNITED STEELWORKERS, LOCAL 6254, UNITED STEELWORKERS, LOCAL 6285**

**Mises-en-cause**

**MORNEAU SHEPELL**

**Mise-en-cause**

**MOTION FOR AN ORDER FOR LEGAL COSTS OF SALARIED/NON-UNION EMPLOYEES AND RETIREES  
(Sections 11 AND 11.52 of the Companies' Creditors Arrangement Act, R.S.C. 1985, c. C-36)**

**ANDREW HATNAY, AMY TANG, AND MARK MELAND**

Attorneys for the PETITIONERS-Mises-en-Cause Michael Keeper, Terence Watt, Damien Lebel and Neil Johnson

**AS-0G41**

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