

CANADA

PROVINCE OF QUÉBEC
District of Montréal

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. 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-

MOELIS & COMPANY LLC

Mise-en-cause

-and-

**LABRADOR WEST CHAMBER OF
COMMERCE**

Objecting Party

**NOTICE OF OBJECTION BY THE LABRADOR WEST CHAMBER OF
COMMERCE TO
THE MOTION FOR THE ISSUANCE OF AN ORDER EXTENDING
THE STAY PERIOD
(paragraph 57 of the Wabush Initial Order)**

**TO THE HONORABLE JUSTICE STEPHEN W. HAMILTON, J.S.C. OF THE
SUPERIOR COURT SITTING IN THE COMMERCIAL DIVISION FOR THE
DISTRICT OF MONTREAL, THE OBJECTING PARTY, LABRADOR WEST
CHAMBER OF COMMERCE RESPECTFULLY SUBMITS:**

1. The Labrador West Chamber of Commerce (the "Chamber") files this Notice of Objection in order to be allowed to make representations to the Court regarding Petitioners' *Motion for the issuance of an Order Extending the Stay Period*, dated September 16, 2016 (the "Motion");
2. The Chamber wishes to make representations regarding the ongoing process and the impact of the strategy followed by the Wabush CCAA Parties;
3. The Chamber believes that no real effort was made to favour a restructuring or sale of the Wabush Mine and that the final liquidation/destruction of mining infrastructure will have a negative impact on the Chamber, its members, and the region and most probably seal the Town of Wabush's fate as a mining community;

4. The Chamber believes that the Motion, as far as the Wabush CCAA Parties are concerned should not be granted and that the Wabush CCAA Parties should no longer benefit from the Stay of proceedings provided by the CCAA;
5. The filing of the Notice of Objection is contemplated by paragraph 57 of the Wabush Initial Order as well as paragraph 52 of the Motion;
6. The Chamber reserves its rights to make further representations and to raise additional arguments at the hearing of the Motion;

FOR THE REASONS SET FORTH ABOVE, MAY IT PLEASE THE COURT TO:

RECEIVE this Notice of Objection and **ALLOW** Labrador West Chamber of Commerce to make representations regarding Petitioners' Motion for the issuance of an Order Extending the Stay Period;

DISMISS the Motion for the Issuance of an Order Extending the Stay Period as far as the Wabush CCAA Parties are concerned;

WITHOUT COSTS, save and except in case of contestation;

**LABRADOR WEST CHAMBER OF
COMMERCE, September 23, 2016**



Colin Vardy, Vice-Chair

NOTICE OF PRESENTATION

TO: Service List

TAKE NOTICE that the present *Notice of objection and contestation in respect of the Motion for the issuance of an order extending the stay period*, will be presented for adjudication before the Honourable Stephen W. Hamilton, J.S.C., or another of the Honourable judges of the Superior Court, Commercial Division, sitting in and for the district of Montreal, in the Montreal Courthouse located at 1, Notre-Dame Est, Montreal, Quebec, on September 28, 2016 at a time and in a room to be determined.

DO GOVERN YOURSELVES ACCORDINGLY.

**LABRADOR WEST CHAMBER OF
COMMERCE, September 23, 2016**



Colin Vardy, Vice-Chair

No.: 500-11-048114-157

**SUPERIOR COURT, PROVINCE OF QUÉBEC .
DISTRICT OF MONTREAL**

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

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

MOELIS & COMPANY LLC

Mise-en-cause

- and -

LABRADOR WEST CHAMBER OF COMMERCE

Objecting Party

**NOTICE OF OBJECTION BY LABRADOR WEST CHAMBER OF
COMMERCE TO THE MOTION FOR THE ISSUANCE OF AN
ORDER EXTENDING THE STAY PERIOD AND NOTICE OF
PRESENTATION**

ORIGINAL

*Colin Vardy
Labrador west Chamber of Commerce
(709) -944-0901*