

CANADA

PROVINCE OF QUÉBEC
District of Montréal

SUPERIOR COURT

(Commercial division)

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

N°: 500-11-048114-157

**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-

TOWN OF WABUSH

Objecting Party

**NOTICE OF OBJECTION BY THE TOWN OF WABUSH 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, TOWN OF WABUSH
RESPECTFULLY SUBMITS:**

1. The Town of Wabush ("**Wabush**") 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. Wabush wishes to make representations regarding the ongoing process and the impact of the strategy followed by the Wabush CCAA Parties;
3. Wabush 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 Wabush and the region and most probably seal Wabush's fate as a mining community;
4. Wabush 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. Wabush 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** Town of Wabush 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;

TOWN OF WABUSH (Newfoundland and Labrador), September 22, 2016



Colin Vardy, Mayor

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.

TOWN OF WABUSH (Newfoundland and
Labrador), September 22, 2016



Colin Vardy, Mayor

No.: 500-11-048114-157

SUPERIOR COURT, PROVINCE OF QUÉBEC.
DISTRICT OF MONTREAL

IN THE MATTER OF THE PLAN OF COMPROMISE OR
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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

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FTI CONSULTING CANADA INC.

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- and -

TOWN OF WABUSH.

Objecting Party

NOTICE OF OBJECTION BY TOWN OF WABUSH TO THE
MOTION FOR THE ISSUANCE OF AN ORDER EXTENDING
THE STAY PERIOD AND NOTICE OF PRESENTATION

ORIGINAL



TOWN OF WABUSH
INCORPORATED 1967

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