



Court File No. CV-11-9159-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

THE HONOURABLE MR.)

WEDNESDAY, THE 29TH

JUSTICE MORAWETZ)

DAY OF JUNE, 2011

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

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT
OF PRISZM INCOME FUND, PRISZM CANADIAN OPERATING TRUST, PRISZM
INC. AND KIT FINANCE INC.**

(the "Applicants")

**ORDER
(D&O Claims Solicitation Procedure)**

THIS MOTION, made by Priszm Income Fund, Priszm Canadian Operating Trust, Priszm LP, Priszm Inc. and Kit Finance Inc. (collectively, the "Priszm Entities") for an order approving a procedure for the solicitation of claims against their current and former directors and officers, 2279549 Ontario Inc. in its capacity as the Chief Restructuring Officer of the Priszm Entities, Deborah Papernick, and Jim Robertson and 2289500 Ontario Inc., in its capacity as Chief Restructuring Officer of the Priszm Entities and authorizing and directing FTI Consulting Canada Inc., in its capacity as the Court-appointed monitor of the Priszm Entities (the "Monitor") to administer the D&O Claims Solicitation Procedure (as defined below) in accordance with its terms, was heard this day at 330 University Avenue, Toronto, Ontario.

ON READING the Affidavit of Deborah Papernick sworn June 23, 2011 and the Third Report of the Monitor, and on hearing the submissions of counsel to the Priszm

Olymel, JM

Entities, the Monitor, Prudential Investment Management Inc., Yum! Restaurants International (Canada) Company, 2279549 Ontario Inc., Deborah Papernick, Jim Robertson, 2289500 Ontario Inc., Sysco Canada and 20 VIC Management Inc., Ivanhoe Cambridge Inc., Morguard Investments Limited, Retrocom Mid-Market REIT, Primaris Retail Real Estate Investment Trust, and Oxford Properties Group Inc., no one appearing for any other person on the Service List, although properly served as appears from the affidavit of service, filed:

DEFINITIONS

1. **THIS COURT ORDERS** that for purposes of this Order, in addition to the terms defined elsewhere herein, the following terms shall have the following meanings:
 - a) **"Applicants"** means Prizm Income Fund, Prizm Canadian Operating Trust, Prizm Inc. and Kit Finance Inc.;
 - b) **"Business Day"** means a day, other than a Saturday, Sunday or a statutory holiday, on which banks are generally open for business in Toronto, Ontario;
 - c) **"CCAA"** means the Companies' Creditors Arrangement Act, R.S.C. 1985, c. C-36;
 - d) **"Court"** means the Ontario Superior Court of Justice (Commercial List);
 - e) **"D&O Claim"** means an Initial D&O Claim or a Subsequent D&O Claim;
 - f) **"D&O Claims Solicitation Procedure"** means the procedures outlined in this Order, as they may be amended by further order of the Court, including the Schedules hereto;
 - g) **"D&O Creditor"** means any Person asserting a D&O Claim;
 - h) **"Directors and Officers"** means
 - i) the current and former directors of any of the Prizm Entities;
 - ii) the current and former officers of any of the Prizm Entities;
 - iii) Deborah Papernick and 2279549 Ontario Inc., in its capacity as Chief Restructuring Officer of the Prizm Entities; or

- iv) Jim Robertson and 2289500 Ontario Inc., in its capacity as Chief Restructuring Officer of the Prizm Entities;
- i) "Filing Date" means March 31, 2011;
- j) "FTI Claims Site" means <https://cmsi.ftitools.com/prizm>;
- k) "Information Submission Form" means a form substantially in accordance with the form attached hereto as Schedule "C";
- l) "Initial D&O Claims Bar Date" means 5:00 p.m. (Eastern Standard time) on ~~August 19, 2011~~, or any later date ordered by the Court; *September 15, or representative class of persons*
- m) "Initial D&O Claim" means any right of any Person against one or more of the Directors and Officers which arose as a result of their position, supervision, management or involvement as Director and Officer, where such right arose on or before June 30, 2011, and whether enforceable in any civil, administrative or criminal proceedings;
- n) "Initial Order" means the Initial Order of the Honourable Mr. Justice Morawetz dated March 31, 2011, as extended, amended and restated from time to time, including the Amended and Restated Initial Order of the Honourable Madam Justice Mesbur dated April 29, 2011;
- o) "Monitor's Website" means <http://cfcanda.fticonsulting.com/prizm>;
- p) "Notice to Creditors of Initial D&O Claims Bar Date" means the notice for publication substantially in the form attached as Schedule "A";
- q) "Notice to Creditors of Subsequent D&O Claims Bar Date" means the notice for publication substantially in the form attached as Schedule "B";
- r) "Person" means any individual, partnership, firm, joint venture, trust, entity, corporation, unincorporated organization, trade union, pension plan administrator, pension plan regulator, governmental authority or agency, employee or other association, or similar entity, howsoever designated or constituted; *representative of a class of D&O Creditors*
- s) "Subsequent D&O Claims Bar Date" means 5:00 p.m. (Eastern Standard time) on a date to be determined by the Prizm Entities, in consultation with the Monitor, or any later date ordered by the Court; *or representative class of persons*
- t) "Subsequent D&O Claim" means any right of any Person against one or more of the Directors and Officers which arose as a result of their position, supervision, management or involvement as a Director and Officer, where such right arose after June 30, 2011 and before the Subsequent D&O Claims Bar Date, and whether enforceable in any civil, administrative or criminal proceedings; and *HO*

- u) **“Supporting Documentation Submission Form”** means a form substantially in accordance with the form attached as **Schedule “D”**.

ADMINISTRATION OF THE D&O CLAIMS SOLICITATION PROCEDURE

2. **THIS COURT ORDERS** that the D&O Claims Solicitation Procedure shall govern the solicitation of D&O Claims against the Prizm Entities and shall be administered by the Monitor through the FTI Claims Site, except as otherwise provided for in this Order.
3. **THIS COURT ORDERS** that the Monitor, in addition to its prescribed rights and obligations under the CCAA and under the Initial Order, is hereby directed and empowered to take such actions and fulfill such roles as are contemplated by this Order.

SOLICITATION OF INITIAL D&O CLAIMS

4. **THIS COURT ORDERS** that:
 - a) the Monitor shall cause the Notice to Creditors of Initial D&O Claims Bar Date to be published in each of *The Globe and Mail* (national edition) and *La Presse* as soon as practicable after the date of this order; and
 - b) the Monitor shall cause the Notice to Creditors of Initial D&O Claims Bar Date to be posted on the Monitor’s Website as soon as practicable after the date of this order and cause it to remain posted until its discharge as Monitor of the Prizm Entities.
5. **THIS COURT ORDERS** that any Person that wishes to assert an Initial D&O Claim must either:
 - a) file their Initial D&O Claim together with all relevant supporting documentation via the FTI Claims Site at <https://cmsi.ftitools.com/prizm> by no later than the Initial D&O Claims Bar Date; or

- b) if the Person is unwilling or unable to submit its Initial D&O Claim via the FTI Claims Site, file an Information Submission Form and Supporting Documentation Form with the Monitor by no later than the Initial D&O Claims Bar Date.
6. **THIS COURT ORDERS** that any D&O Creditor with an Initial D&O Claim who does not file proof of such an Initial D&O claim in accordance with the D&O Claims Solicitation Procedure by the Initial D&O Claims Bar Date shall be forever barred from asserting or enforcing such Initial D&O Claim against any of the Directors and Officers and the Directors and Officers shall not have any liability whatsoever in respect of such Initial D&O Claim, and such Initial D&O Claim shall be forever barred and extinguished.

SOLICITATION OF SUBSEQUENT D&O CLAIMS

7. **THIS COURT ORDERS** that the Prizm Entities, in consultation with the Monitor, will establish a Subsequent D&O Claims Bar Date.
8. **THIS COURT ORDERS** that the Monitor shall publish the Notice to Creditors of Subsequent D&O Claims Bar Date in each of *The Globe and Mail* (national edition) and *La Presse* as soon as practicable after the Subsequent D&O Claims Bar Date has been set and not less than four (4) weeks prior to the Subsequent D&O Claims Bar Date.
9. **THIS COURT ORDERS** that the Monitor shall cause the Notice to Creditors of Subsequent D&O Claims Bar Date to be posted on the Monitor's Website as soon as practicable after the Subsequent D&O Claims Bar Date has been set not and not less than four (4) weeks prior to the Subsequent D&O Claims Bar Date and cause the notice to remain posted until its discharge as Monitor of the Prizm Entities.
10. **THIS COURT ORDERS** that any Person that wishes to assert a Subsequent D&O Claim must either:

- a) file their Subsequent D&O Claim together with all relevant supporting documentation via the FTI Claims Site at <https://cmsi.ftitools.com/prizm> by no later than the Subsequent D&O Claims Bar Date; or
 - b) if the Person is unwilling or unable to submit its Subsequent D&O Claim via the FTI Claims Site, file an Information Submission Form and Supporting Documentation Form with the Monitor by no later than the Subsequent D&O Claims Bar Date.
11. **THIS COURT ORDERS** that any D&O Creditor with a Subsequent D&O Claim who does not file proof of such a Subsequent D&O claim in accordance with this D&O Solicitation Procedure by the Subsequent D&O Claims Bar Date shall be forever barred from asserting or enforcing such Subsequent D&O Claim against any of the Directors and Officers and the Directors and Officers shall not have any liability whatsoever in respect of such Subsequent D&O Claim, and such Subsequent D&O Claim shall be forever barred and extinguished.

GENERAL PROVISIONS

12. **THIS COURT ORDERS** that any D&O Creditor who wishes to submit their D&O Claim by filing the Information Submission Form and the Supporting Documentation Submission Form may download a copy of the Information Submission Form and the Supporting Documentation Submission Form from the Monitor's Website at <http://cfcanada.fticonsulting.com/prizm>. A D&O Creditor may also request a copy of the Information Submission Form and the Supporting Documentation Submission Form by contacting the Monitor by facsimile, email, courier, personal delivery or prepaid mail.
13. **THIS COURT ORDERS** that references to the singular include the plural and to the plural include the singular.
14. **THIS COURT ORDERS** that any D&O Creditor who submits the Information Submission Form and the Supporting Documentation Submission Form authorizes the Monitor to input the information contained therein to the FTI Claims Site and that

the Monitor shall have no liability for the information submitted other than as a result of gross negligence or wilful misconduct.

15. **THIS COURT ORDERS** that for the purposes of the D&O Claims Solicitation Procedure, all D&O Claims which are denominated in a foreign currency shall be converted to Canadian dollars at the Bank of Canada noon spot rate of exchange for exchanging the currency to Canadian dollars on the Filing Date.
16. **THIS COURT ORDERS** that any document, notice or communication required to be delivered to the Monitor by a D&O Creditor pursuant to the terms of this Order must be delivered either:
 - a) via the FTI Claims Site at <https://cmsi.ftitools.com/priszm>; or
 - b) by facsimile, email or electronic transmission, personal delivery, courier or prepaid mail to:

FTI Consulting Canada Inc.
In its capacity as Monitor of Priszm Income Fund, Priszm Canadian Operating Trust, Priszm LP, Priszm Inc. and Kit Finance Inc.
TD Waterhouse Tower
79 Wellington Street West
Suite 2010, P.O. Box 104
Toronto ON M5K 1G8

Attention: Rachel Gillespie
Telephone: (416) 649-8057
Facsimile: (416) 649-8101
E-mail: rachel.gillespie@fticonsulting.com
17. **THIS COURT ORDERS** that in the event that the day on which any notice or communication required to be delivered pursuant to the D&O Claims Solicitation Procedure is not a Business Day then such notice or communication shall be required to be delivered on the next Business Day.
18. **THIS COURT ORDERS** that in the event of any strike, lock-out or other event which interrupts postal service in any part of Canada, all notices and communications during such interruption may only be delivered by email, facsimile transmission,

personal delivery or courier and any notice or other communication given or made by prepaid mail within the seven (7) day period immediately preceding the commencement of such interruption, unless actually received, shall be deemed not to have been delivered. All such notices and communications shall be deemed to have been received, in the case of notice by email, facsimile transmission, personal delivery or courier prior to 5:00 p.m. (local time) on a Business Day, when received, if received after 5:00 p.m. (local time) on a Business Day or at any time on a non-Business Day, on the next following Business Day, and in the case of a notice mailed as aforesaid, on the fourth business day following the date on which such notice or other communication is mailed.

19. **THIS COURT ORDERS** that the Monitor is authorized to use reasonable discretion as to adequacy of compliance with respect to the manner in which proof of D&O Claims and other notices are completed and executed and may, where it is satisfied that a D&O Claim has been adequately filed or proven, waive strict compliance with the requirements of this D&O Claims Solicitation Procedure; provided that nothing in this Order shall confer upon the Monitor the discretion or authority to amend or to extend the Initial D&O Claims Bar Date or the Subsequent D&O Claims Bar Date.

20. **THIS COURT ORDERS AND REQUESTS** the aid and recognition of any court or any judicial, regulatory or administrative body in any province or territory of Canada and the Federal Court of Canada and any judicial, regulatory or administrative tribunal or other court or any judicial, regulatory or administrative body of the United States and the states or other subdivisions of the United States and of any nation or state to act in aid of and be complimentary to this court in carrying out the terms of this D&O Claims Procedure Order.



ENTERED AT / INSCRIT À TORONTO
ON / BOOK NO:
LE / DANS LE REGISTRE NO.:

JUN 29 2011

PER/PAR:



Schedule "A"

NOTICE TO CREDITORS AND OTHERS OF INITIAL D&O CLAIMS BAR DATE

IN RESPECT OF CLAIMS AGAINST
THE CURRENT AND FORMER DIRECTORS AND OFFICERS OF
PRISZM INCOME FUND, PRISZM CANADIAN OPERATING TRUST,
PRISZM INC., PRISZM LP AND KIT FINANCE INC.
(collectively, the "Priszm Entities") AND/OR DEBORAH PAPERICK AND/OR
2279549 ONTARIO INC. AND/OR JIM ROBERTSON AND 2289500 ONTARIO INC.
(collectively, the "Directors and Officers")

IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT,

R.S.C.1985, c. C-36, as amended

TO: CREDITORS AND TO ANY OTHER PERSON OR PARTIES

**NOTICE OF D&O CLAIMS SOLICITATION PROCEDURE
AND INITIAL D&O CLAIMS BAR DATE**

PLEASE TAKE NOTICE that this notice is being published pursuant to an order of the Honourable Mr. Justice Morawetz of the Ontario Superior Court of Justice (Commercial List) dated June 29, 2011 (the "**D&O Claims Solicitation Procedure Order**"). Any capitalized terms used herein but not defined have the meaning attributed to them in the D&O Claims Solicitation Procedure Order.

Any Person that believes that it has a claim against one of more Directors and Officers (as defined above) which arose as a result of the Directors and Officers' position, supervision, management or involvement as a Director and Officer on or before June 30, 2011 (an "**Initial D&O Claim**") should either:

- a) go to <https://cmsi.ftitools.com/priszm> (the "**FTI Claims Site**") to create a user account and submit their Initial D&O Claim by following the instructions provided on the FTI Claims Site; or
- b) D&O Creditors with an Initial D&O Claim who are unable or unwilling to use the FTI Claims Site may complete and deliver the Information Submission Form and the Supporting Documentation Submission Form available on the Monitor's Website at <http://cfcanada.fticonsulting.com/priszm>. A D&O Creditor may also request a copy of the Information Submission Form and the Supporting

Documentation Submission Form by contacting the Monitor by telephone at 1-855-492-6215 or (416) 739-2920, by fax at (416) 649-8101, by email at rachel.gillespie@fticonsulting.com or by mail at the address set out below.

The D&O Claim information required to be submitted by the FTI Claims Site must be submitted by or the Information Submission Form and Supporting Documentation Submission Form must be received by mail, fax, email, courier or hand delivery by the Monitor by **no later than 5:00 p.m. (Eastern Standard Time) on August 19, 2011** or such other date as ordered by the Court (the "Initial D&O Claims Bar Date").

INITIAL D&O CLAIMS WHICH ARE NOT RECEIVED BY THE INITIAL D&O CLAIMS BAR DATE WILL BE BARRED AND EXTINGUISHED FOREVER.

Notice of a claims bar date with respect to D&O Claims arising after June 30, 2011 will be posted on the Monitor's website, <http://cfcanada.fticonsulting.com/priszm> and published in *The Globe and Mail* (national edition) and *La Presse* once the Subsequent D&O Claims Bar Date is set by the Priszm Entities in consultation with the Monitor.

Address of the Monitor:

Priszm Income Fund and/or
Priszm Canadian Operating Trust and/or
Priszm Inc. and/or
Priszm LP and/or
Kit Finance Inc.
c/o FTI Consulting Canada Inc., in its capacity as Court-appointed Monitor of
the Priszm Entities
TD Waterhouse Tower
79 Wellington Street West
Suite 2010, P.O. Box 104
Toronto ON M5K 1G8

Attention: Rachel Gillespie

Telephone: (416) 649-8057
Facsimile: (416) 649-8101
E-mail: rachel.gillespie@fticonsulting.com

Dated at _____ this _____ day of _____, 2011.

Schedule "B"

NOTICE TO CREDITORS AND OTHERS OF
SUBSEQUENT D&O CLAIMS BAR DATE

IN RESPECT OF CLAIMS AGAINST
THE CURRENT AND FORMER DIRECTORS AND OFFICERS OF
PRISZM INCOME FUND, PRISZM CANADIAN OPERATING TRUST,
PRISZM INC., PRISZM LP AND KIT FINANCE INC.
(collectively, the "Priszm Entities") AND/OR DEBORAH PAPERICK AND/OR
2279549 ONTARIO INC. AND/OR JIM ROBERTSON AND 2289500 ONTARIO INC.
(collectively, the "Directors and Officers")

IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT,
R.S.C.1985, c. C-36, as amended

TO: CREDITORS AND TO ANY OTHER PERSON OR PARTIES

**NOTICE OF D&O CLAIMS SOLICITATION PROCEDURE
AND SUBSEQUENT D&O CLAIMS BAR DATE**

PLEASE TAKE NOTICE that this notice is being published pursuant to an order of the Honourable Mr. Justice Morawetz of the Ontario Superior Court of Justice (Commercial List) dated June 29, 2011 (the "**D&O Claims Solicitation Procedure Order**"). Any capitalized terms used herein but not defined have the meaning attributed to them in the D&O Claims Solicitation Procedure Order.

Any person who believes that it has a claim against one of more Directors and Officers (as defined above) which arose as a result of such Director's or Officer's position, supervision, management or involvement as a Director or Officer of a Priszm Entity after June 30, 2011 (a "**Subsequent D&O Claim**") should either:

- a) go to <https://cmsi.ftitools.com/priszm> (the "**FTI Claims Site**") to create a user account and submit their Subsequent D&O Claim by following the instructions provided on the FTI Claims Site; or
- b) D&O Creditors with a Subsequent D&O Claim who are unable or unwilling to use the FTI Claims Site may complete an Information Submission Form and the Supporting Documentation Submission Form, available on the Monitor Website at <http://cfcanada.fticonsulting.com/priszm>. A D&O Creditor may also request

a copy of the Information Submission Form and the Supporting Documentation Submission Form by contacting the Monitor by telephone at 1-855-492-6215 or (416) 739-2920, by fax at (416) 649-8101, by email at rachel.gillespie@fticonsulting.com or by mail at the address set out below.

The D&O Claim information required to be submitted by the FTI Claims Site must be submitted by or the Information Submission Form and Supporting Documentation Submission Form must be received by mail, fax, email, courier or hand delivery by the Monitor by **no later than 5:00 p.m. (Eastern Standard Time) on ●, 2011** or such other date as ordered by the Court (the "Subsequent D&O Claims Bar Date").

SUBSEQUENT D&O CLAIMS WHICH ARE NOT RECEIVED BY THE SUBSEQUENT D&O CLAIMS BAR DATE WILL BE BARRED AND EXTINGUISHED FOREVER.

Address of the Monitor:

Priszm Income Fund and/or
Priszm Canadian Operating Trust and/or
Priszm Inc. and/or
Priszm LP and/or
Kit Finance Inc.
c/o FTI Consulting Canada Inc., in its capacity as Court-appointed Monitor of
the Priszm Entities
TD Waterhouse Tower
79 Wellington Street West
Suite 2010, P.O. Box 104
Toronto ON M5K 1G8

Attention: Rachel Gillespie

Telephone: (416) 649-8057
Facsimile: (416) 649-8101
E-mail: rachel.gillespie@fticonsulting.com

Dated at _____ this ____ day of _____, 2011.

Schedule "C"

INFORMATION SUBMISSION FORM

IN RESPECT OF CLAIMS AGAINST
THE CURRENT AND FORMER DIRECTORS AND OFFICERS OF
PRISZM INCOME FUND, PRISZM CANADIAN OPERATING TRUST,
PRISZM INC., PRISZM LP AND KIT FINANCE INC.
(collectively, the "Priszm Entities") AND/OR DEBORAH PAPERICK AND/OR
2279549 ONTARIO INC. AND/OR JIM ROBERTSON AND 2289500 ONTARIO INC.
(collectively, the "Directors and Officers")

IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT,
R.S.C.1985, c. C-36, as amended

Information Submission Form

Add Contact

Name _____
Attention _____
Address 1 _____
Address 2 _____
City _____
State/Province _____
ZIP/Postal Code _____
Country _____
Phone _____
Fax _____
Email _____
Type Assignee Attorney CC only Claimant
Notice None Notice only Primary contact

Add Claim

Claim Amount _____
Currency _____
Debtor Company Name _____
Claim Type Pre-Filing Subsequent
Classification Secured Unsecured
Category Employee Former Employee Guarantee Landlord
 Deficiency Trade Other: _____

(continued on page 2)

Security Type*

Security Agreement Statutory Lien

*If you are asserting security pursuant to a security agreement, please ensure that you attach the relevant materials, including a copy of your security agreement.

Comments – Please add any comments that may assist us in reviewing your claim.

Future correspondence

All future correspondence will be directed to the email designated in the contact details unless you specifically request that hardcopies be provided.

Hardcopy of correspondence required

Acknowledgement

Signature

Date

Schedule "D"

SUPPORTING DOCUMENTATION SUBMISSION FORM

**IN RESPECT OF CLAIMS AGAINST
THE CURRENT AND FORMER DIRECTORS AND OFFICERS OF
PRISZM INCOME FUND, PRISZM CANADIAN OPERATING TRUST,
PRISZM INC., PRISZM LP AND KIT FINANCE INC.
(collectively, the "Priszm Entities") AND/OR DEBORAH PAPERICK AND/OR
2279549 ONTARIO INC. AND/OR JIM ROBERTSON AND 2289500 ONTARIO INC.
(collectively, the "Directors and Officers")**

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

Supporting Documentation Submission Form

Contact Details

Name _____
Attention _____
Address 1 _____
Address 2 _____
City _____
State/Province _____
ZIP/Postal Code _____
Country _____
Phone _____
Fax _____
Email _____

Supporting Documentation

Please attach hard copies of your supporting documentation to this form.

Comments

Future correspondence

All future correspondence will be directed to the email designated in the contact details unless you specifically request that hardcopies be provided.

Hardcopy of correspondence required

Acknowledgement

Signature

Date

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

Court File No: CV-11-9159-00CL

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT
OF PRISZM INCOME FUND, PRISZM CANADIAN OPERATING TRUST, PRISZM INC.
AND KIT FINANCE INC.**

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at Toronto

**D&O CLAIMS SOLICITATION
PROCEDURE O R D E R**

STIKEMAN ELLIOTT LLP
Barristers & Solicitors
5300 Commerce Court West
199 Bay Street
Toronto, Canada M5L 1B9

Ashley John Taylor LSUC#: 39932E
Tel: (416) 869-5236

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Tel: (416) 869-6820
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Lawyers for the Applicants