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January 20, 2020

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PO Box 11575, Stn. Main  
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Dear Sirs/Mesdames:

**Re: *Orion Fund JV Limited et al v. Red Eagle Mining Corporation et al;*  
SCBC Vancouver Registry No. S1812407**

We are counsel to FTI Consulting, Inc. in its capacity as Receiver and Manager of Red Eagle Mining Corporation and REMDC Holdings Limited

Enclosed for service are the following:

1. Notice of Application by FTI Consulting, Inc. in its capacity as Receiver and Manager of Red Eagle Mining Corporation and REMDC Holdings Limited, filed January 17, 2020, returnable February 3, 2020;
2. Receiver's Report – REMDC Share Transaction, filed January 17, 2020;
3. Notice of Civil Claim, filed November 19, 2018;
4. First Report of Receiver, dated March 19, 2019; and
5. Model Approval and Vesting Order.

The Receiver's application involves a proposed Share Purchase Transaction. The attached Receiver's Report – REMDC Share Transaction, includes a redacted version of the Share Purchase Agreement at issue. We intend to seek a Sealing Order for the filing of an unredacted version of the Share Purchase Agreement. If you wish to view an unredacted version of the Share Purchase Agreement prior to the hearing of the Receiver's application, please advise and we can discuss appropriate confidentiality terms.

Yours truly,

MILLER THOMSON LLP

Per:



Gordon G. Plottel  
GGP/pf

Enclosure

cc FTI Consulting, Inc.  
in its capacity as Receiver and Manager of Red Eagle Mining Corporation and REMDC Holdings Limited  
per Toni Vanderlaan via Email <toni.vanderlaan@fticonsulting.com>

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