NO. VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

ORION FUND JV LIMITED, in its capacity as collateral agent for ORION FUND JV LIMITED and LIBERTY METALS AND MINING HOLDINGS LLC

PLAINTIFF

AND:

RED EAGLE MINING CORPORATION REMDC HOLDINGS LIMITED ORION TITHECO LIMITED, as agent ROYAL BANK OF CANADA

DEFENDANTS

APPLICATION RECORD

Solicitors for the Plaintiff

HEATHER M.B. FERRIS

Lawson Lundell LLP Barristers and Solicitors 1600 – 925 West Georgia Street Vancouver, B.C. V6C 3L2 (604) 685-3456 **DATE, TIME , PLACE OF APPLICATION:** November 21, 2018 at 9:45 a.m. in Vancouver

TIME ESTIMATE: 30 Minutes

APPLICATION RECORD PROVIDED BY: Lawson Lundell LLP, Solicitors for the Plaintiff

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APPLICATION RECORD INDEX

TAB No.	Description	Date Filed/Sworn
Relief Being Sought		
1.	Notice of Application with draft Order and Blacklined Receivership Order	D: Nov 19, 2018
2.	Draft Order	(Nov 21, 2018)
Affidavits and Pleadings		
3.	Notice of Civil Claim	D: Nov 19, 2018
4.	Affidavit #1 of Amanda Simister	S: Nov 16, 2018
5.	Affidavit #1 of Jon Lamb	S: Nov 19, 2018