From: AFallon@osler.com Sent: April 17, 2019 8:27 PM

To: brian.riordan@judex.qc.ca; gabrielle@tjl.quebec

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Subject: RE: Rép.: 500-09-025385-154, 500-09-025386-152, 500-09-025387-150

Dear Mr. Justice Riordan,

I am transmitting this response on behalf of both ITL and RBH.

The Plaintiffs' application seeks orders concerning matters that did not form part of the their lift-stay motion before the CCAA court but that are subject to the CCAA court's stay of proceedings. The current orders of the CCAA court lifting the stay only permit approval of the settlements; they do not permit any party to take any other step in this proceeding, including any step regarding distribution of the proceeds of settlement.

The Plaintiffs sought and obtained limited relief from the stay ordered by the CCAA court. The CCAA lift-stay order does not permit them to take the additional steps contemplated by their application. We therefore intend to raise this issue with the CCAA court.

Best regards,

## **OSLER**

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