

TABLE OF CONTENTS

TAB	DESCRIPTION	PAGE NOS.
1.	Notice of Motion dated February 9, 2018	1-9
2.	Affidavit of William Turner sworn on February 12, 2018	10-19
	Exhibit "A": Representative Counsel Order for Pensions and Post-Retirement Benefits dated July 13, 2017	20-34
	Exhibit "B": Letter from Morneau Shepell to Sears retirees dated December 8, 2017	35-39
	Exhibit "C": Letter from Koskie Minsky to FTI Consulting dated October 26, 2017	40-43
3.	Consent of Mr. Frank Newbould dated February 9, 2018	44-45
4.	Affidavit of William Turner sworn on August 11, 2017	46-56
	Exhibit "A": Timeline setting out steps taken by SCRG to protect the pension and benefits of Sears retirees	57-60
	Exhibit "B": Letter from SCRG to Sears Canada Inc. dated January 30, 2013	61-66
	Exhibit "C": Letter from Koskie Minsky to Torys LLP dated January 20, 2014	67-90
	Exhibit "D": Letter from Koskie Minsky to Torys LLP dated November 6, 2014	91-93
	Exhibit "E": Letter from Torys LLP to Koskie Minsky dated November 21, 2014	94-95
	Exhibit "F": Letter from Koskie Minsky to FSCO dated February 27, 2015	96-100
	Exhibit "G": Letter from Koskie Minsky to FSCO dated May 4, 2015	101-104

	Exhibit "H": Letter from Koskie Minsky to FSCO dated June 5, 2015	105-112
	Exhibit "I": Letter from FSCO to Torys LLP dated June 11, 2015	113-114
	Exhibit "J": Letter from FSCO to Koskie Minsky dated June 11, 2015	115-116
	Exhibit "K": Letter from Torys LLP to FSCO dated June 22, 2015	117-120
	Exhibit "L": Letter from FSCO to Koskie Minsky dated June 23, 2015	121-122
	Exhibit "M": Letter from Koskie Minsky to FSCO dated July 7, 2015	123-137
	Exhibit "N": Letter from FSCO to Koskie Minsky dated July 30, 2015	138-139
	Exhibit "O": Letter from Koskie Minsky to FSCO dated November 3, 2015	140-141
	Exhibit "P": Letter from FSCO to Torys LLP dated November 6, 2015	142-147
	Exhibit "Q": Letter from Torys LLP to FSCO dated December 9, 2015	148-151
	Exhibit "R": Letter from FSCO to Torys LLP dated January 15, 2016	152-154
	Exhibit "S": Letter from Torys LLP to FSCO dated February 16, 2016	155-160
	Exhibit "T": Letter from Koskie Minsky to FSCO dated March 1, 2016	161-167
	Exhibit "U": Email from Koskie Minsky to FSCO dated March 10, 2016	168-169
	Exhibit "V": Letter from Koskie Minsky to FSCO dated September 12, 2016	170-172
	Exhibit "W": Letter from Koskie Minsky to FSCO dated October 20, 2016	173-175

	Exhibit "X": Letter from Koskie Minsky to Osler LLP dated May 19, 2017	176-178
	Exhibit "Y": Letter from Osler LLP to Koskie Minsky dated June 5, 2017	179-181
5.	Draft Litigation Trustee Order	182-190