

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

**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
TACORA RESOURCES INC.**

**AIDE MEMOIRE OF CARGILL, INCORPORATED AND CARGILL
INTERNATIONAL TRADING PTE LTD.
(Case Conference – February 9, 2024)**

February 9, 2024

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TO: **THE SERVICE LIST**

1. The parties have advanced matters significantly on scheduling.
2. Tacora has agreed to a hearing date in April, and seeks a hearing on April 11-12.
3. As previously advised, Mr. Chadwick has a family commitment overseas on April 11-12, and Cargill is seeking the accommodation of the parties and the Court to find alternative dates.
4. Cargill is available for the hearing on any dates after April 17 during the last three weeks of April (i.e. April 17-19, April 22-26, April 29-30 and May 1-3). Cargill appreciates that other parties have a conflict on April 22-23.
5. If no alternative dates can be accommodated, then Cargill will proceed on April 11-12.
6. The chart that follows shows the options available for a schedule (the underlining in the “Event” column shows wording added by Cargill to Tacora’s proposed schedule).

Event	Tacora Proposed Dates	Cargill Proposed Dates for April 11-12 hearing	Cargill Proposed Dates for week of April 22 hearing
Notices of Examination <u>from all parties</u>	Friday, February 9	Wednesday, February 14	Wednesday, February 14
Production in response to notices of examination	Friday, February 23	Friday, February 23	Friday, February 23
Cargill Responding Record <u>and any cross-motion record and any Tacora responding record on preliminary threshold motion</u>	Wednesday, February 28	Friday, March 1	Friday, March 1
Additional Notices of Examination from Tacora and any supporting parties	Friday, March 1	Tuesday, March 5	Tuesday, March 5
Production in response to additional notices of examination	Monday, March 11	Tuesday, March 12	Tuesday, March 12
Fourth Report of the Monitor	Thursday, March 14	Thursday, March 14	Thursday, March 14

Event	Tacora Proposed Dates	Cargill Proposed Dates for April 11-12 hearing	Cargill Proposed Dates for week of April 22 hearing
<u>Reply and any responding record to cross-motion</u>	Friday, March 15	Thursday, March 14	Thursday, March 14
<u>Stay extension motion and any other relief</u>		Monday, March 18	Monday, March 18
Cross-examinations <u>on all motions</u>	Week of March 18	March 19-22, 25	March 19-22, 25-26
<u>Answers to undertakings from cross-examinations</u>		Tuesday, March 26	Thursday, March 28
Supplement to the Fourth Report	Tuesday, March 26	Tuesday, March 26	Wednesday, April 3
Factums of Tacora and any supporting parties <u>and factum of Cargill and any supporting parties on preliminary threshold motion and from any moving parties on any other motions</u>	Thursday, March 28	Wednesday, March 27	Thursday, April 4
Responding factums of Cargill and any supporting parties <u>and responding factums of Tacora and any supporting parties to preliminary threshold motion</u>	Thursday, April 4	Monday, April 8	Monday, April 15
Reply factums	Tuesday, April 9	Wednesday, April 10	Thursday, April 18
Hearing (<u>including of Cargill preliminary threshold motion and any other motions</u>)	April 11 – 12	April 11 – 12 (*Goodmans has conflict April 11-12)	Week of April 22 (*Goodmans is available April 17-19, April 22-26, April 29-30 and May 1-3; Counsel to Tacora and the Ad Hoc Group has conflict April 22-23)

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Court File No. CV-23-00707394-00CL

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TACORA RESOURCES INC.

**ONTARIO
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Proceeding Commenced At Toronto

**CARGILL AIDE MEMOIRE
(CASE CONFERENCE – FEBRUARY 9, 2024)**

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