

**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.**

**(Applicant)**

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**NOTICE OF DISPUTE OF REVISION OR DISALLOWANCE**

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**Reference #:**

Pursuant to the Order of the Ontario Superior Court of Justice (Commercial List) dated April 23, 2024 (the "**Claims Procedure Order**"), I/we hereby give you notice of our intention to dispute the Notice of Revision or Disallowance dated \_\_\_\_\_ issued by FTI Consulting Canada Inc. in its capacity as Monitor of the Applicant in respect of my/our Claim.

All capitalized terms used and not defined in this Notice of Dispute shall have the meaning ascribed to them in the Claims Procedure Order. A copy of the Claims Procedure Order and other information relating to the Claims Procedure can be found on the Monitor's website at <http://cfcanada.fticonsulting.com/tacora/>.

**A. PARTICULARS OF CLAIMANT**

1. Full Legal Name of Claimant (include trade name, if applicable):<sup>1</sup>

\_\_\_\_\_ (the "**Claimant**")

2. Attention (Contact Person): \_\_\_\_\_

3. Email Address: \_\_\_\_\_

4. Telephone Number: \_\_\_\_\_

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<sup>1</sup> Full legal name should be the name of the Claimant of the Applicant or the Directors or Officers as of October 10, 2023 (the "**Filing Date**"), notwithstanding whether an assignment of a Claim, or a portion thereof, has occurred following that date.

5. Full Mailing Address of the Claimant:

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6. Have you acquired this Claim by assignment?

Yes:  No:

*(If yes and not already provided, attach documents evidencing assignment)*

If yes, Full Legal Name of Original Claimant(s): \_\_\_\_\_

**B. DISPUTE OF REVISION OR DISALLOWANCE OF CLAIM**

The Claimant hereby disagrees with the value of its Claim as set out in the Notice of Revision or Disallowance and asserts a Claim as follows:

Type of Claim	Amount allowed, if any, pursuant to the Notice of Revision or Disallowance		Amount claimed by the Claimant per this Notice of Dispute		Currency
	Amount allowed as secured:	Amount allowed as unsecured:	Secured:	Unsecured:	
A. Pre-Filing Claim	\$	\$	\$	\$	
B. D&O Claim	\$	\$	\$	\$	
C. Restructuring Claim	\$	\$	\$	\$	
<b>D. Total Claim</b>	\$	\$	\$	\$	

*(Insert particulars of your Claim per the Notice of Revision or Disallowance, and the value of your Claim as asserted by you).*

**C. REASONS FOR DISPUTE**

Provide full particulars of why you dispute the Monitor’s revision or disallowance of your Claim as set out in the Notice of Revision or Disallowance, and provide all supporting documentation, including any invoices, purchase orders, proof of delivery, calculation of the amount, descriptions of transaction(s) or agreement(s), or legal breach(es) giving rise to the Claim, including any claim assignment/transfer agreement or similar document, if applicable, the name of any guarantor(s) which has guaranteed the Claim and a copy of such guarantee documentation, particulars of all credits, discounts, etc. claimed, as well as a description of the security, if any, granted by the Applicant to the Claimant and the estimated value of such security, along with the underlying security documents, if applicable. The particulars provided must support the value of the Claim as stated by you in item B, above.

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**D. CERTIFICATION**

I hereby certify that:

1. I am the Claimant or an authorized representative of the Claimant;
2. I have knowledge of all the circumstances connected with this Claim;
3. The Claimant submits this Notice of Dispute of Revision or Disallowance in respect of the Claim referenced above; and
4. All available documentation in support of the Claimant's dispute is attached.

All information submitted in this Notice of Dispute of Revision or Disallowance must be true, accurate and complete. Filing false information relating to your Claim may result in your Claim being disallowed in whole or in part and may result in further penalties.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Witness:

Signature: \_\_\_\_\_

Name: \_\_\_\_\_  
(Print)

DATED at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

Your completed Notice of Dispute of Revision or Disallowance **MUST** be received by the Monitor at the below address by no later than 5:00 p.m. (Eastern Time) on the day that is fourteen (14) days after this Notice of Revision or Disallowance is deemed to have been received by you in accordance with the Claims Procedure Order.

**This Notice of Dispute of Revision or Disallowance must be delivered in writing to the Monitor and will be sufficiently given only if delivered by email (in PDF format), or, if you are unable to deliver by email, with the Monitor's consent, by mail, courier or personal delivery addressed to:**

**FTI CONSULTING CANADA INC.**

TD Waterhouse Tower  
79 Wellington Street West  
Suite 2010, P.O. Box 104  
Toronto, ON M5K 1G8

Attention: Paul Bishop / Jodi Porepa

Email: [Tacora@fticonsulting.com](mailto:Tacora@fticonsulting.com)

**Copy to:**

**CASSESLS BROCK & BLACKWELL LLP**

Suite 3200, Bay Adelaide Centre – North Tower 40 Temperance Street  
Toronto, ON M5H 0B4

Attention: Ryan Jacobs / Jane Dietrich

Emails: [rjacobs@cassels.com](mailto:rjacobs@cassels.com) / [jdietrich@cassels.com](mailto:jdietrich@cassels.com)

Any such notice or communication delivered by a Claimant shall be deemed to be received upon actual receipt thereof before 5:00 p.m. (Eastern Time) on a Business Day or if delivered outside of normal business hours, the next Business Day.

**IF YOU FAIL TO FILE A NOTICE OF DISPUTE OF REVISION OR DISALLOWANCE WITHIN THE PRESCRIBED TIME PERIOD, YOUR CLAIM AS SET OUT IN THE NOTICE OF REVISION OR DISALLOWANCE WILL BE BINDING UPON YOU.**