



**Rivard, Gary**

**From:** MESSIER, EDITH <EDITH.MESSIER@blakes.com> on behalf of BOUCHER, BERNARD <BERNARD.BOUCHER@blakes.com>  
**Sent:** Tuesday, August 30, 2016 4:06 PM  
**To:** Rivard, Gary  
**Subject:** Wabush CCAA - MFC Industrial Ltd.  
**Attachments:** Notice.pdf

Cher confrère,

Nous vous transmettons ci-joint copie d'un avis adressé à MFC Industrial Ltd., lequel sera incessamment signifié à MFC.  
Meilleures salutations,

Bernard Boucher  
Associé/Partner  
[bernard.boucher@blakes.com](mailto:bernard.boucher@blakes.com)  
T : 514-982-4006



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August 30, 2016

**BY BAILIFF**

**Bernard Boucher**  
Associé/Partner  
Dir: 514-982-4006  
bernard.boucher@blakes.com

**Reference: 11573/374**

MFC Industrial Ltd.  
400 Burrard Street, Suite 1860  
Vancouver, BC V6C 3A6

Attention: Mr. Michael Smith

**RE: Notice of Intent to Dismantle or Destroy  
Infrastructure or Fixtures located at the Wabush Mine**

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Sir,

We are the legal counsel for the Wabush CCAA Parties as this term is defined in an initial order issued on May 20, 2015 by Mr. Justice Stephen Hamilton in the Court file bearing number 500-11-048114-157 (the "**CCAA Proceedings**").

As you also know, MFC Industrial Ltd. ("**MFC**") and certain of the Wabush CCAA Parties are parties to various indentures, agreements, and amendments thereto, being collectively referred to as the Mining Lease Documents and as more fully detailed in the Motion for Directions and the Issuance of a Safeguard Order ("**Motion**") filed by the Wabush CCAA Parties in the CCAA Proceedings on November 26, 2015.

In connection with said Motion, Mr. Justice Stephen Hamilton issued notably on December 4, 2015, the following order (the "**December 4<sup>th</sup> Order**"):

"Orders that until such time as the Court renders judgment with respect to the Motion, the Wabush CCAA Parties shall give 14 day prior notice to MFC before dismantling or destroying the infrastructure or fixtures at the Wabush mine, in order to allow MFC to take whatever proceedings it considers appropriate to protect its rights."

In accordance with the December 4<sup>th</sup> Order, you are hereby notified that it is the Wabush CCAA Parties' intention to initiate a request for proposal process for liquidation proposals for the infrastructure and fixtures located at the Wabush Mine, which proposals may lead to the sale and dismantlement of all or some of the infrastructure or fixtures located at the Wabush Mine.

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This letter constitutes the notice to MFC required under the December 4<sup>th</sup> Order.

Yours truly,

**BLAKE, CASSELS & GRAYDON LLP**



Bernard Boucher  
/em

c. Me Gary Rivard

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