

KOSKIE MINSKY

JUSTICE MATTERS

April 29, 2016

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Via E-Mail

Nigel Meakin
FTI Consulting
TD South Tower, TD Centre
79 Wellington St. West, Suite 2010
Toronto, ON, M5K 1G8

Dear Mr. Meakin:

**Re: Wabush Mines (CCAA), Québec Superior Court File No. 500-11-048114-157
Claims of Terminated Employees Charmaine Cull, Guylaine Joncas, Sharlene Baird
Our File No. 15/1359**

Further to our discussions, we are submitting three claims for inclusion in the Wabush claims process on behalf of the above-noted terminated employees.

These claims were recently brought to our attention. As soon as we learned about them, we immediately contacted the individuals to analyse whether they had a claim and if so, in what amount. It appears to us that the individuals do have valid claims for amounts owing in relation to termination of their employment.

It appears to us that these three individuals did not have any notice of the Wabush CCAA claims process nor of the claims bar date, hence the reason for their submission at this time. We note that they did consult a local Wabush lawyer who sent an email to the company on December 18, 2015 asserting these claims, hence providing some notice to the company of these claims.

We understand that there has not been any distribution to creditors from the estate of Wabush and that the sales process is continuing. We do not see any prejudice to other creditors by admitting these claims into the Claims Process at this time. Furthermore, they are for relatively small claim amounts. We ask that the Monitor accept the claims into the claims process. If you require more fulsome legal submissions on the legal test to admit claims into a claims process after the claims bar date, please let us know.

Thank you for your attention to this matter.

Yours truly,

KOSKIE MINSKY LLP



Andrew J. Hatnay

AJH:vdl

encl.

cc. Guylaine Joncas
 Sharlene Baird
 Charmaine Cull
 Barbara Walancik, *Koskie Minsky LLP*
 Client Committee