



Blake, Cassels & Graydon LLP
Barristers & Solicitors
Patent & Trade-mark Agents
1 Place Ville Marie
Suite 3000
Montréal QC H3B 4N8 Canada
Tel: 514-982-4000 Fax: 514-982-4099

June 1, 2017

VIA COURIER

Bernard Boucher
Partner

Dir: 514-982-4006
bernard.boucher@blakes.com

Reference: 11573/371

Registrar
Supreme Court of Newfoundland and Labrador
Court of Appeal
287 Duckworth Street,
P.O. Box 937
St. John's, NL
A1C 5M3

RE: Reference Re *Pension Benefits Act* – 201701H0029

Sir / Madam:

On May 16th, 2017, we filed on behalf of Bloom Lake General Partner Limited, Quinto Mining Corporation, 8568391 Canada Ltd., Cliffs Quebec Iron Mining ULC, Wabush Iron Co. Limited and Wabush Resources Inc. a Notice of Intention to Intervene in the above-mentioned matter.

In a letter sent on May 18, 2017 to Mr. Terry G. Rowe Q.C., acting on behalf of another intervenor, FTI Consulting Canada Inc. ("**FTI**"), you informed Mr. Rowe of the fact that any further material in support of FTI's application should be filed on or before noon (NL time) on June 5, 2017.

We expect that the same rules apply to the intervention that we filed on behalf of our clients.

Therefore, you will find attached hereto a compendium which encloses the material we intend to refer to during the hearing that will be held on June 9, 2017.

Yours truly,

BLAKE, CASSELS & GRAYDON

Bernard Boucher
/eme

Encl. Compendium

8536628.1

File No. 2017 01H 0029

IN THE SUPREME COURT OF NEWFOUNDLAND AND LABRADOR
COURT OF APPEAL

IN THE MATTER OF Section 13 of Part I
of the *Judicature Act*, RSNL 1990, c. J-4

AND

IN THE MATTER OF Section 32 of the
Pension Benefits Act, 1997, SNL 1996,
c. P-4.01

AND

IN THE MATTER OF a Reference of The
Lieutenant-Governor in Council to the
court of Appeal for its hearing,
consideration and opinion on the
interpretation of the scope of s. 32 of the
Pension Benefits Act, 1997

**MATERIAL IN SUPPORT OF THE CCAA PARTIES'
NOTICE OF INTENTION TO INTERVENE**
(for the status hearing to be held on June 9, 2017)

In support of their Notice of Intention to Intervene, Bloom Lake General Partner Limited, Quinto Mining Corporation, 8568391 Canada Limited, Cliffs Quebec Iron Mining ULC, Wabush Iron Co. Limited, and Wabush Resources Inc. (the "**CCAA Parties**") file the following documents.

RELEVANT PROCEEDINGS AND ORDER:

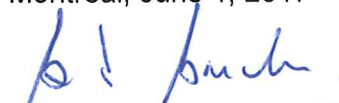
1. Motion by the Monitor for Directions with respect to Pension Claims (September 20, 2016)
2. Amended Motion by the Monitor for Directions with respect to Pension Claims (April 13, 2017)
3. Notice of Objection by Morneau Shepell, in its capacity as the Replacement Pension Plan Administrator (October 7, 2016)
4. Notice of Objection by the USW (October 7, 2016);
5. Notice of Objection by the Representatives of the Salaried Employees and Retirees (October 7, 2016)

6. Notice of Objection by the Superintendent of Pensions of Newfoundland & Labrador (December 15, 2016)
7. Order dated January 30, 2017

AUTHORITIES:

8. Peter W. Hogg, *Constitutional Law of Canada*, 5th Edition Supplemented, Volume 1, 2007, Thomson Carswell, Scarborough, Ontario, p. 8-20
9. *Sam Levy & Associated Inc. v. Azco Mining Inc.*, 2001 SCC 92
10. *Borowski v. Canada (Attorney General)* 1989 CarswellSask 241
11. *Churchill Falls (Labrador) Corp. v. Newfoundland (Attorney General)* 1981 CarswellNfld 45

Montréal, June 1, 2017



BLAKE, CASSELS & GRAYDON LLP

Attorneys for the CCAA Parties

1 Place Ville-Marie, Suite 3000

Montréal, Quebec H3B 4N8

M^{tre} Bernard Boucher

bernard.boucher@blakes.com

Telephone: 514-982-4006

Fax: (514) 982-4099