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Reference: 11573/375

June 10, 2022

VIA E-MAIL

Supplemental Notification List attached as  
Schedule "A" hereto

RE: **CCA Proceedings in respect of Bloom Lake General Partner Limited, Quinto Mining Corporation, 8568391 Canada Limited, Cliffs Québec Iron Mining ULC, The Bloom Lake Iron Ore Mine Limited Partnership, Bloom Lake Railway Company Limited, Wabush Iron Co. Limited, Wabush Resources Inc., Wabush Mines, Wabush Lake Railway Company Limited and Arnaud Railway Company (collectively, the "CCA Parties")**

Re: **Proposed Destruction of Books and Records of the CCA Parties and their subsidiaries**

We are counsel to the CCA Parties.

On January 27, 2015 and May 20, 2015, the CCA Parties filed for protection from its creditors under the *Companies Creditors Arrangement Act* ("**CCA**") and such proceedings, the "**CCA Proceedings**") in the Québec Superior Court (the "**Court**") and FTI Consulting Canada Inc. was appointed as Monitor (the "**Monitor**").

On June 29, 2018, the Court issued an order (the "**Plan Sanction Order**") approving an Amended and Restated Joint Plan of Compromise and Arrangement in respect of certain of the CCA Parties (the "**Plan**").

The CCA Parties are currently in the process of winding down the CCA Proceedings and are seeking authorization from the Court to destroy approximately 500 boxes of documents (the "**Records**") that have been stored with a third-party storage provider. Based on the list of the Records List, a majority of the Records were delivered into storage prior to the commencement of the CCA Proceedings and the balance of the Records from the CCA Parties' head office in Montreal were delivered into third-party storage on February 2, 2016 (the "**Head Office Records**").

The CCA Parties do not believe that any of the Records constitute records that must be retained in accordance with any provincial and federal laws (subject only to the Head Office Records which may possibly have to be retained until no later than February 2, 2023). However, out of an abundance of caution, you are hereby being served with the CCA Parties' *Motion for the Issuance of an Order extending the Stay Period and Authorization to Destroy Records* (the "**Motion**") to be heard at **9:00 a.m. Montréal time on June 21, 2022.**

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As summarized in paragraphs 71-86 of the Motion, based on the dates the Records were put into storage as set out in the Records List, approximately 70 percent of the Records have been in storage for over seven (7) years and a majority of the Records relate to the period between 2005 and 2013. Based on the Records List, the Head Office Records will have been in storage for over seven (7) years as of February 2, 2023.

In the Motion, the CCAA Parties seek authorization of the Court to destroy the Records as follows:

- a) all Records (with the exception of the Head Office Records) to be destroyed as soon as practicable after the requested Order authorizing such destruction is issued; and
- b) all Head Office Records to be destroyed as soon as practicable after February 2, 2023.

The CCAA Parties believe it is appropriate to seek destruction of the Records and cease incurring costs for retaining such Records for, *among others*, the following reasons:

- a) the Records are dated; as noted above, the Records are at least approximately six (6) years old and a majority appear to mostly relate to periods prior to the commencement of the CCAA Proceedings;
- b) the CCAA Parties have not had any employees since July 2017, all registered pension plans were terminated and the CCAA Parties replaced as administrator thereof in 2016 and all registered and unregistered pension plans have now been wound up;
- c) all pre-filing claims against the CCAA Parties have been finally determined (subject to those claims that are the subject matter of the existing litigation) or have been finally released pursuant to the Plan and Plan Sanction Order;
- d) there are no income tax audits outstanding and all outstanding sales tax audits relate to periods outside of when the Records relate to; and
- e) the CCAA Parties do not believe that any of the Records constitute records that must be retained in accordance with any provincial and federal laws (subject only to the Head Office Records which may possibly have to be retained until no later than February 2, 2023).

No further action is required by you in connection with the Motion unless you wish to object to the proposed destruction of the Records. As per paragraph 100 of the Motion, any person wishing to object to the relief sought in the Motion must serve responding motion materials or a notice stating the objection to the motion and grounds for such objection (a "**Notice of Objection**") in writing to the moving party and the Monitor, with a copy to all persons on the service list found on the Monitor's website at <http://cfcanada.fticonsulting.com/bloomlake/>, **by no later than 5 p.m. Montréal time on June 17, 2022.**

If you have any questions with respect to the proposed destruction of the Records or the Motion, please do not hesitate to contact the CCAA Parties' counsel Milly Chow (416-863-2594 or [milly.chow@blakes.com](mailto:milly.chow@blakes.com)), Bernard Boucher (514-982-4006 or [bernard.boucher@blakes.com](mailto:bernard.boucher@blakes.com)) or the Monitor's counsel, Sylvain Rigaud (514 736-4871 or [srigaud@woods.qc.ca](mailto:srigaud@woods.qc.ca)).

Regards,



Milly Chow

cc. Bernard Boucher, *Blakes*  
Sylvain Rigaud, *Woods*  
Nigel Meakin, *FTI Consulting Canada, Monitor*

**SCHEDULE "A"**

**SUPPLEMENTAL NOTIFICATION LIST**

<b>TO:</b>	<b>CORPORATIONS CANADA</b> C.D. Howe Building 235 Queen Street Ottawa, ON K1A 0H5  Tel: 613-941-9042 Email: <a href="mailto:ic.corporationscanada.ic@ised-isde.gc.ca">ic.corporationscanada.ic@ised-isde.gc.ca</a>	<b>AND TO:</b>	<b>MINISTRY OF GOVERNMENT AND CONSUMER SERVICES</b> Central Production and Verification Services Branch 393 University Avenue, Suite 200 Toronto, ON M5G 2M2  Tel: 416-229-6086 Email: <a href="mailto:consumer@ontario.ca">consumer@ontario.ca</a> <a href="mailto:cppsb@ontario.ca">cppsb@ontario.ca</a>
<b>AND TO:</b>	<b>REGISTRAIRE DES ENTREPRISES</b> Services Québec Local 105 3175, chemin des Quatre-Bourgeois Québec, QC G1W 2K7  Email: <a href="mailto:registre@servicesquebec.gouv.qc.ca">registre@servicesquebec.gouv.qc.ca</a>	<b>AND TO:</b>	<b>BC REGISTRIES</b> PO Box 9431 STN PROV GOVT Victoria, BC V8W 9V3  Tel: 877-526-1526 Email: <a href="mailto:bcregistries@gov.bc.ca">bcregistries@gov.bc.ca</a>

<p><b>AND TO:</b></p>	<p><b>MINISTER'S OFFICE OF THE DEPARTMENT OF DIGITAL GOVERNMENT AND SERVICE</b>  100 Prince Phillip Drive  P.O. Box 8700  St. John's, NL  A1B 4J6</p> <p>Attn: Sarah Stoodley  Tel: (709) 729-4834  Email: <a href="mailto:SarahStoodley@gov.nl.ca">SarahStoodley@gov.nl.ca</a></p> <p>With a copy to:</p> <p>Office of the Minister  Department of Justice and Public Safety  4th Floor, East Block  Confederation Building  P.O. Box 8700  St. John's, NL  A1B 4J6</p> <p>Tel: (709) 729-2869  Email: <a href="mailto:justice@gov.nl.ca">justice@gov.nl.ca</a></p>	<p><b>AND TO:</b></p>	<p><b>COMMISSIONER FOR EMPLOYERS</b>  Canada Employment Insurance  Commission  Place du Portage, Phase IV  Gatineau, QC  K1A 0J9</p> <p>Attn: Nancy Healey  Tel: 819-654-6276  Email: <a href="mailto:nancy.healey@hrsdc-rhdcc.gc.ca">nancy.healey@hrsdc-rhdcc.gc.ca</a></p>
<p><b>AND TO:</b></p>	<p><b>HER MAJESTY THE QUEEN IN RIGHT OF THE PROVINCE OF ONTARIO AS REPRESENTED BY THE MINISTER OF FINANCE (INCOME TAX, PST),</b>  Insolvency Unit  Ontario Ministry of Finance  33 King Street West, 6<sup>th</sup> Floor  Oshawa, ON  L1H 8H5</p> <p>Attn: Leslie Crawford  Tel: (905) 433-5657  Email: <a href="mailto:leslie.crawford@ontario.ca">leslie.crawford@ontario.ca</a>  <a href="mailto:insolvency.unit@ontario.ca">insolvency.unit@ontario.ca</a></p>	<p><b>AND TO:</b></p>	<p><b>HER MAJESTY THE QUEEN IN RIGHT OF THE PROVINCE OF BRITISH COLUMBIA AS REPRESENTED BY THE MINISTER OF FINANCE</b>  Legal Services Branch, Revenue &amp; Taxation  400 – 1675 Douglas Street PO Box 9289  Stn Prov Govt  Victoria, BC  V8W 9J7</p> <p>Attn: Aaron Welch  Tel: 250-356-8589  Email: <a href="mailto:aaron.welch@gov.bc.ca">aaron.welch@gov.bc.ca</a>  <a href="mailto:AGLSBRevTax@gov.bc.ca">AGLSBRevTax@gov.bc.ca</a></p>

**AND  
TO:**

**HER MAJESTY THE QUEEN IN  
RIGHT OF THE PROVINCE OF  
NEWFOUNDLAND AS REPRESENTED  
BY THE MINISTER OF FINANCE**

Department of Finance

P.O. Box 8700

Main Floor, East Block Confederation  
Building

St. John's, NL

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[bcregistries@gov.bc.ca](mailto:bcregistries@gov.bc.ca); [registre@servicesquebec.gouv.qc.ca](mailto:registre@servicesquebec.gouv.qc.ca); [SarahStoodley@gov.nl.ca](mailto:SarahStoodley@gov.nl.ca);  
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