

CANADA

PROVINCE OF QUÉBEC  
DISTRICT OF MONTREAL

**SUPERIOR COURT**  
Commercial Division  
(Sitting as a court designated pursuant to the *Companies'*  
*Creditors Arrangement Act*, R.S.C., c. 36, as amended)

---

Nº: 500-11-048114-157

**IN THE MATTER OF THE PLAN OF COMPROMISE OR  
ARRANGEMENT OF:**

**BLOOM LAKE GENERAL PARTNER LIMITED**

**QUINTO MINING CORPORATION**

**8568391 CANADA LIMITED**

**CLIFFS QUÉBEC IRON MINING ULC**

**WABUSH IRON CO. LIMITED**

**WABUSH RESOURCES INC.**

Petitioners

-and-

**THE BLOOM LAKE IRON ORE MINE LIMITED  
PARTNERSHIP**

**BLOOM LAKE RAILWAY COMPANY LIMITED**

**WABUSH MINES**

**ARNAUD RAILWAY COMPANY**

**WABUSH LAKE RAILWAY COMPANY LIMITED**

Mises-en-cause

-and-

**FTI CONSULTING CANADA INC.**

Monitor

---

**MOTION FOR THE RECTIFICATION OF AN INITIAL ORDER**  
(Art. 475 C.C.P.)

---

**TO THE HONORABLE STEPHEN W. HAMILTON, J.S.C. OF THE SUPERIOR COURT,  
SITTING IN THE COMMERCIAL DIVISION FOR THE DISTRICT OF MONTREAL, THE  
WABUSH CCAA PARTIES (AS DEFINED BELOW) SUBMIT:**

**1. BACKGROUND**

1. On January 27, 2015, Mr. Justice Martin Castonguay, J.S.C., issued an Initial Order (as amended on February 20, 2015, as further amended from time to time, the "**Bloom Lake Initial Order**") commencing these proceedings (the "**CCAA Proceedings**") pursuant to the *Companies' Creditors Arrangement Act* (the "**CCAA**") in respect of the Petitioners Bloom Lake General Partner Limited, Quinto Mining Corporation, 8568391 Canada Limited and Cliffs Québec Iron Mining ULC and the Mises-en-cause The Bloom Lake Iron Ore Mine Limited Partnership and Bloom Lake Railway Company Limited, as appears from a copy of the Bloom Lake Initial Order communicated herewith as **Exhibit R-1**.
2. On May 20, 2015, Mr. Justice Stephen W. Hamilton, issued an Initial Order (the "**Wabush Initial Order**") extending the scope of the CCAA Proceedings to the Petitioners Wabush Iron Co. Limited and Wabush Resources Inc. and the Mises-en-cause Wabush Mines, Arnaud Railway Company and Wabush Lake Railway Company Limited (collectively, the "**Wabush CCAA Parties**"), as appears from a copy of the Wabush Initial Order communicated herewith as **Exhibit R-2**.
3. In the Wabush CCAA Order:
  - a) The title and paragraph 3 erroneously refer to "Wabush Lake Railway Company, Limited" as a Mise-en-cause, with a comma that should not be included after the word "Company";
  - b) The preamble erroneously refers to "Wabush Resources Limited" as a Petitioner, as the word "Limited" in the name should be replaced with "Inc.";
  - c) Paragraph 2 erroneously makes reference to the heading "Service" which does not appear in the Wabush Initial Order and therefore should be deleted;
  - d) Paragraph 31 erroneously makes a circular reference to "security for the indemnity provided for in paragraph 31 of this Order..." when the reference should be to paragraph 30.
4. The Wabush Initial Order therefore contains certain inadvertent typographical errors.
5. The Wabush CCAA Parties hereby seek the following rectifications:
  - a) The title and paragraph 3 should refer to "Wabush Lake Railway Company Limited" as a Mise-en-cause, rather than "Wabush Lake Railway Company, Limited";
  - b) The preamble should refer to "Wabush Resources Inc." as a Petitioner rather than "Wabush Resources Limited";
  - c) Reference to heading "Service" should be deleted from paragraph 2;
  - d) Paragraph 31 should make reference to "security for the indemnity provided for in paragraph 30 of this Order..."

6. The Wabush Initial Order has not been appealed and the rectifications sought hereby will not affect the execution of the Wabush Initial Order.
7. Therefore, the Wabush CCAA Parties hereby seek the issuance of rectified Wabush Initial Order in the form of the draft rectified Initial Order (the "**Draft Rectified Wabush Initial Order**") communicated herewith as **Exhibit R-3**. A black-lined version comparing the Wabush Initial Order to the Rectified Wabush Initial Order is communicated herewith as **Exhibit R-4**.
8. The present Motion is well founded in fact and in law.

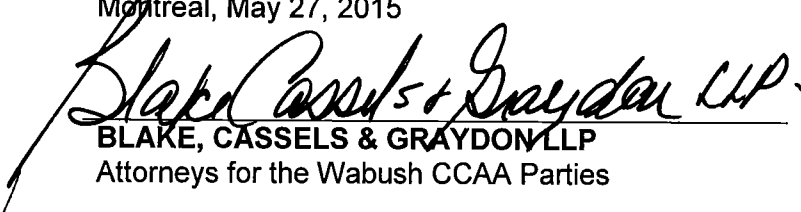
**FOR THESE REASONS, MAY IT PLEASE THE COURT TO:**

**GRANT** the present Motion;

**ISSUE** an order in the form of the draft rectified Initial Order communicated in support hereof as Exhibit R-3.

**WITHOUT COSTS**, save and except in case of contestation.

Montréal, May 27, 2015

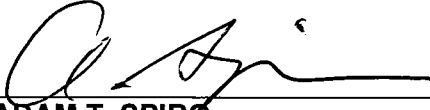
  
**BLAKE, CASSELS & GRAYDON LLP**

Attorneys for the Wabush CCAA Parties

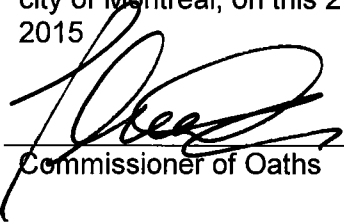
**AFFIDAVIT**

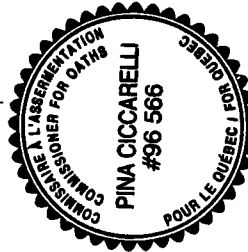
I, the undersigned, **ADAM T. SPIRO**, attorney, practicing my profession at the law firm Blake, Cassels & Graydon LLP located at 600 De Maisonneuve Boulevard West, Suite 2200, Montréal, Québec, H3A 3J2, solemnly affirm that all the facts alleged in the present *Motion for the Rectification of an Initial Order*.

AND I HAVE SIGNED:

  
\_\_\_\_\_  
ADAM T. SPIRO

SOLEMNLY DECLARED before me in the city of Montreal, on this 27th day of May, 2015

 96566  
\_\_\_\_\_  
Commissioner of Oaths



**NOTICE OF PRESENTATION**

**TO: The Honourable Stephen W. Hamilton, J.S.C.**  
Palais de justice  
1 Notre-Dame Street East  
Montréal (Québec) H2Y 1B6

**TAKE NOTICE** that the present *Motion for the Rectification of an Initial Order* will be presented for adjudication before the Honourable Stephen W. Hamilton, J.S.C., or another of the honourable judges of the Superior Court, Commercial Division at a place and time to be determined.

**DO GOVERN YOURSELF ACCORDINGLY.**

Montréal, May 27, 2015

  
**BLAKE, CASSELS & GRAYDON LLP**  
Attorneys for the Wabush CCAA Parties

CANADA

PROVINCE OF QUÉBEC  
DISTRICT OF MONTRÉAL

**SUPERIOR COURT**  
Commercial Division  
(Sitting as a court designated pursuant to the *Companies'*  
*Creditors Arrangement Act*, R.S.C., c. 36, as amended)

---

N°: 500-11-048114-157

**IN THE MATTER OF THE PLAN OF COMPROMISE OR  
ARRANGEMENT OF:**

**BLOOM LAKE GENERAL PARTNER LIMITED  
QUINTO MINING CORPORATION  
8568391 CANADA LIMITED  
CLIFFS QUÉBEC IRON MINING ULC  
WABUSH IRON CO. LIMITED  
WABUSH RESOURCES INC.**

Petitioners

-and-

**THE BLOOM LAKE IRON ORE MINE LIMITED  
PARTNERSHIP  
BLOOM LAKE RAILWAY COMPANY LIMITED  
WABUSH MINES  
ARNAUD RAILWAY COMPANY  
WABUSH LAKE RAILWAY COMPANY LIMITED**

Mises-en-cause

-and-

**FTI CONSULTING CANADA INC.**

Monitor

---


**LIST OF EXHIBITS**

(In support of *Motion for the Rectification of an Initial Order*)

---

- R-1 Bloom Lake Initial Order;
- R-2 Wabush Initial Order;
- R-3 Draft Rectified Wabush Initial Order;
- R-4 Blackline, comparing the Wabush Initial Order to the Draft Rectified Wabush Initial Order.

Montréal, May 27, 2015

  
**BLAKE, CASSELS & GRAYDON LLP**  
Attorneys for the Wabush CCAA Parties

8457423.4

N°: 500-11-048114-157

---

**SUPERIOR COURT  
DISTRICT OF MONTREAL  
(Commercial Division)**

---

**IN THE MATTER OF THE PLAN OF COMPROMISE OR  
ARRANGEMENT OF:  
BLOOM LAKE GENERAL PARTNER LIMITED & ALS.**

Petitioners

-and-

**THE BLOOM LAKE IRON ORE MINE LIMITED  
PARTNERSHIP & AL**

Mises-en-cause

-and-

**FTI CONSULTING CANADA INC.**

Monitor

-

---

**LIST OF EXHIBITS**  
**(IN SUPPORT OF MOTION FOR THE RECTIFICATION OF AN  
INITIAL ORDER)**

---

**M<sup>re</sup> Bernard Boucher**

**BB-8098**

**BLAKE, CASSELS & GRAYDON LLP**  
Barristers & Solicitors  
600 de Maisonneuve Blvd. West  
Suite 2200

Montréal, Québec H3A 3J2

Telephone: 514-982-4006

Fax: 514-982-4099

Email: [bernard.boucher@blakes.com](mailto:bernard.boucher@blakes.com)

Our File: 11573-371

