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**BLG**  
Borden Ladner Gervais



Montreal, December 9, 2015

**BY EMAIL**

Mtre Bernard Boucher  
**BLAKE, CASSELS & GRAYDON S.E.N.C.R.L.**  
600 boulevard de Maisonneuve Ouest  
Suite 2200  
Montréal QC  
H3A 3J2

Me Steven Weisz  
**BLAKE, CASSELS & GRAYDON LLP**  
199 Bay Street  
Suite 4000  
Toronto ON  
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**Re :** In the matter of the Plan of Compromise pursuant to  
the *Companies' Creditors Arrangements Act*  
of BLOOM LAKE GENERAL PARTNER LIMITED et *als.* (the "Petitioners")  
Our file : 296328-000001

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Dear counsel,

We have been advised that QNS&L has signed a confidentiality agreement with The Bloom Lake Iron Ore Mine Limited Partnership and Bloom Lake General Partner Limited (collectively, "**Bloom Lake**"), which agreement covers the confidential information which Bloom Lake has provided to our clients and to PWC pursuant to the confidentiality agreement which was signed September 16<sup>th</sup>, 2015 (the "**Confidentiality Agreement**").

As discussed with Mr. Meakin last week in court, PWC are almost done with their analysis, and other creditors have asked that our clients share the results thereof. Obviously, the execution by such creditor of a confidentiality agreement with Bloom Lake is a pre-requisite to such disclosure, since the results of PWC's analysis are based, at least in part, on the data provided by your clients and subject to the Confidentiality Agreement.

However, under the current language of the Confidentiality Agreement, such disclosure is not authorized, although when it was drafted, it was not foreseen that other creditors may execute such confidentiality agreements.

Therefore, our clients hereby seek an amendment to the Confidentiality Agreement, to allow them to share the Confidential Information (as such term is defined in the Confidentiality Agreement) with other creditors of Bloom Lake which have or will have signed confidentiality agreements with Bloom Lake. We enclose a draft of the amended Confidentiality Agreement, in clean and compared versions to the executed agreement, for your review and comment.


We would kindly ask that you revert to the undersigned at your earliest convenience.

In the event we cannot come to a satisfactory agreement in this respect in the very short term, we have been instructed to serve and file a motion before the Honorable Justice Hamilton seeking the right to share the Confidential Information with other creditors of Bloom Lake which have or will have signed confidentiality agreements with Bloom Lake.

Awaiting your prompt response.

Best regards,

**BORDEN LADNER GERVAIS, S.E.N.C.R.L., S.R.L.**



François D. Gagnon  
FDG/sb

Enclosures (2)

c.c. Mtre Sylvain Rigaud, *Norton Rose Fulbright Canada*  
M. Nigel Meakin, FTI Consulting Inc.  
Mtre Virginie Fortin, *EBC Inc.*  
Mr. Martin Houle, *EBC Inc.*

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