

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

**IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT,
R.S.C. 1985, c. C-36, AS AMENDED**

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF
TACORA RESOURCES INC.**

(Applicant)

NOTICE OF DISPUTE

For Known Claims against the Applicant

Reference #:

Pursuant to the Order of the Ontario Superior Court of Justice (Commercial List) dated April 23, 2024 (the "**Claims Procedure Order**"), I/we hereby give you notice of our intention to dispute the Statement of Known Claim dated _____ issued by FTI Consulting Canada Inc. in its capacity as Monitor of the Applicant in respect of my/our Claim.

Capitalized terms used herein and not otherwise defined shall have the meaning ascribed to them in the Claims Procedure Order. A copy of the Claims Procedure Order and related materials can be found on the Monitor's website at <http://cfcanada.fticonsulting.com/tacora/>.

A. PARTICULARS OF CLAIMANT

1. Full Legal Name of Claimant (include trade name, if applicable):¹

_____ (the "**Claimant**")

2. Attention (Contact Person): _____

3. Email Address: _____

4. Telephone Number: _____

¹ Full legal name should be the name of the Claimant of the Applicant or the Directors or Officers as of October 10, 2023 (the "**Filing Date**"), notwithstanding whether an assignment of a Claim, or a portion thereof, has occurred following that date.

5. Full Mailing Address of the Claimant:

6. Have you acquired this Claim by assignment?

Yes: No:

(If yes and not already provided, attach documents evidencing assignment)

If yes, Full Legal Name of Original Claimant(s): _____

B. DISPUTE OF KNOWN CLAIM

The Claimant hereby disagrees with the value of its Known Claim as set out in the Statement of Known Claim and asserts a Claim as follows:

Type of Claim	Amount allowed pursuant to Statement of Known Claim:		Amount claimed by the Claimant		Currency
	Amount allowed as secured:	Amount allowed as unsecured:	Secured:	Unsecured:	
A. Pre-Filing Claim	\$	\$	\$	\$	
B. D&O Claim	\$	\$	\$	\$	
C. Restructuring Claim	\$	\$	\$	\$	
D. Total Claim	\$	\$	\$	\$	

(Insert particulars of your Claim per the Statement of Known Claim, and the value of your Claim as asserted by you).

D. CERTIFICATION

I hereby certify that:

1. I am the Claimant or an authorized representative of the Claimant;
2. I have knowledge of all the circumstances connected with this Claim;
3. The Claimant submits this Notice of Dispute in respect of the Claim referenced above; and
4. All available documentation in support of the Claimant's dispute is attached.

All information submitted in this Notice of Dispute must be true, accurate and complete. Filing false information relating to your Claim may result in your Claim being disallowed in whole or in part and may result in further penalties.

Signature: _____
Name: _____
Title: _____

Witness:
Signature: _____
Name: _____
(Print)

DATED at _____ this _____ day of _____, 2024.

This Notice of Dispute MUST be received by the Monitor no later than 5:00 p.m. (Eastern Time) on May 31, 2024 (the "**Claims Bar Date**"), or in the case of a Restructuring Claim, no later than 5:00 p.m. (Eastern Time) on the later of (i) the Claims Bar Date; or (ii) on the day which is fourteen (14) days after the Monitor sends a Claims Package with respect to a Restructuring Claim in accordance with the Claims Procedure Order (the "**Restructuring Claims Bar Date**").

This Notice of Dispute must be delivered in writing to the Monitor and will be sufficiently given only if delivered by email (in PDF format), or, if you are unable to deliver by email, with the Monitor's consent, by mail, courier or personal delivery addressed to:

FTI CONSULTING CANADA INC.

TD Waterhouse Tower
79 Wellington Street West
Suite 2010, P.O. Box 104
Toronto, ON M5K 1G8

Attention: Paul Bishop / Jodi Porepa

Email: Tacora@fticonsulting.com

Copy to:

CASSESLS BROCK & BLACKWELL LLP

Suite 3200, Bay Adelaide Centre – North Tower 40 Temperance Street
Toronto, ON M5H 0B4

Attention: Ryan Jacobs / Jane Dietrich

Emails: rjacobs@cassels.com / jdietrich@cassels.com

Any such notice or communication delivered by a Claimant shall be deemed to be received upon actual receipt thereof before 5:00 p.m. (Eastern Time) on a Business Day or if delivered outside of normal business hours, the next Business Day.

IF A NOTICE OF DISPUTE IS NOT RECEIVED BY THE MONITOR BY THE APPLICABLE BAR DATE, THE CLAIM AS SET OUT IN THE STATEMENT OF KNOWN CLAIM WILL BE BINDING ON YOU AND YOU WILL HAVE NO FURTHER RIGHT TO DISPUTE SUCH CLAIM.