

**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 LABRADOR IRON MINES HOLDINGS LIMITED, LABRADOR IRON MINES
LIMITED and SCHEFFERVILLE MINES INC. (the "Applicants")**

**MOTION RECORD OF THE APPLICANTS
(Stay Extension)
Returnable April 30, 2015**

April 23, 2015

Paliare Roland Rosenberg Rothstein LLP
155 Wellington Street West
35th Floor
Toronto ON M5V 3H1
Tel: 416.646.4300
Fax: 416.646.4301

Kenneth T. Rosenberg (LSUC #21102H)
Email: ken.rosenberg@paliareroland.com

Massimo Starnino (LSUC #41048G)
Email: max.starnino@paliareroland.com

Lindsay Scott (LSUC #60275G)
Email: lindsay.scott@paliareroland.com

Lawyers for the Applicants

TO: THE SERVICE LIST

**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
LABRADOR IRON MINES HOLDINGS LIMITED, LABRADOR IRON MINES LIMITED
and SCHEFFERVILE MINES INC. (the "Applicants")

SERVICE LIST
(as of April 23, 2015)

**TO: PALIARE ROLAND ROSENBERG
ROTHSTEIN LLP**
155 Wellington St. W., 35th floor
Toronto Ontario M5V 3H1
Tel: 416.646.4300
Fax: 416.646.4301

Kenneth T. Rosenberg
Email: ken.rosenberg@paliareroland.com

Massimo Starnino
Email: max.starnino@paliareroland.com

Lindsay Scott
Email: lindsay.scott@paliareroland.com

Lawyers for the Applicants

AND TO: DUFF & PHELPS CANADA RESTRUCTURING INC.
Bay Adelaide Centre
333 Bay Street, 14th Floor
Toronto, Ontario M5H 2R2

Bobby Kofman
Tel: 416.932.6228
Email: bobby.kofman@duffandphelps.com

Mitch Vininsky
Tel: 416.932.6013
Email: mitch.vininsky@duffandphelps.com

Monitor

AND TO: GOODMAN'S LLP
Bay Adelaide Centre
333 Bay Street, Suite 3400
Toronto, Ontario M5H 2S7
Tel: 416.979.2211
Fax: 416.979.1234

Melaney Wagner
Email: mwagner@goodmans.ca

Lawyers for the Monitor

AND TO: TD COMMERCIAL BANKING
3140 Dufferin Street
Toronto, Ontario M6A 2T1

Brogan Taylor
Tel: 416.785.7483
Fax: 416.785.5082

Email: Brogan.Taylor@td.com

AND TO: GATX RAIL CANADA CORPORATION
1801 McGill College Avenue
Suite 1475
Montreal, Quebec H3A 2N4

AND TO: XEROX CANADA LTD.
33 Bloor St. E., 3rd Floor
Toronto, Ontario M4W 3H1

AND TO: SEPT-ÎLES PORT AUTHORITY
1, Quai Mgr. Blanche
Sept-Îles, Quebec G4R 5P3

AND TO: BRITISH ARAB COMMERCIAL BANK PLC
8-10 Mansion House Place
London, England EC4N 8BJ

AND TO: LABRADOR CATERING LIMITED PARTNERSHIP
30 Queen's Road
St. John's, Newfoundland A1C 2A5

AND TO: LABRADOR CATERING INC.
30 Queen's Road
St. John's, Newfoundland A1C 2A5

AND TO: DENTONS CANADA LLP
77 King Street West, Suite 400
Toronto-Dominion Centre
Toronto Ontario M5K 0A1

John Salmas
Tel: 416.863.4737
Fax: 416.863.4592
Email: john.salmas@dentons.com

DENTONS CANADA LLP
250 Howe Street
20th Floor
Vancouver, British Columbia V6C 3R8

John Sandrelli
Tel : 604.443.7132
Fax : 604.683.5214
Email : john.sandrelli@dentons.com

Lawyers for RBRG Trading (UK) Limited (formerly RB Metalloyd Ltd.)

AND TO: GREY ROCK SERVICES INC. (part of The Municipal Group of Companies)
927 Rocky Lake Drive
Bedford, NS B4A 3Z2
Main Tel: 902.835.3381
Main Fax: 902.835.7300

Ken MacLean
Tel: 902.832.4197
Fax: 902.832.7432
Email: kmaclean@municipalgroup.ca

AND TO: CAIN LAMARRE CASGRAIN WELLS
630 boul. René-Lévesque Ouest,
Suite 2780
Montreal, Quebec H3B 1S6

Caroline Briand
Tel: 514.393.4580
Fax: 514.393.9590
Email: caroline.briand@clcw.qc.ca

Lawyers for the Naskapi Nation of Kawawachikamach

AND TO: LANGLOIS KRONSTRÖM DESJARDINS LLP
1002 Sherbrooke Street West
28th Floor
Montreal, Quebec H3A 3L6

Gerry Apostolatos
Tel: 514.282.7831
Fax: 514.845.6573
Email: gerry.apostolatos@lkd.ca

Dimitri Maniatis
Tel: 514.282.7832
Fax: 514.845.6573
Email: Dimitri.maniatis@lkd.ca

Counsel for the Respondent Quebec North Shore
and Labrador Railway Company Inc.

AND TO: FASKEN MARTINEAU DuMOULIN LLP
Barristers and Solicitors
333 Bay Street, Suite 2400
Bay Adelaide Centre, Box 20
Toronto, ON M5H 2T6

Stuart Brotman (LSUC 43430D)
Tel: 416.865.5419
Fax: 416.364.7813
Email: sbrotman@fasken.com

FASKEN MARTINEAU DuMOULIN LLP
Barristers and Solicitors
The Stock Exchange Tower
800 Victoria Square
Suite 3700, PO Box 242
Montréal, PQ H4Z 1E9

Luc Morin
Tel: 514.397.5121
Fax: 514.397.7600
Email: lmorin@fasken.com

Lawyers for Port Authorities of Sept- Îles
(Administration Portuaire de Sept- Îles)

INDEX

TAB		PAGE
1	Notice of Motion dated April 23, 2015	1
2	Affidavit of Richard Pinkerton sworn April 23, 2015	10
A	Exhibit A – List of Persons Having Registered Notice of a Security Interest	16
3	Initial Order dated April 2, 2015	19

Tab 1

**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 LABRADOR IRON MINES HOLDINGS LIMITED, LABRADOR IRON MINES
LIMITED and SCHEFFERVILLE MINES INC. (the "Applicants")**

NOTICE OF MOTION

The Applicants will make a motion to a judge of the Commercial List, on Thursday, April 30, 2015 at 10:00 a.m. or as soon after that time as the motion can heard at the court house, 330 University Avenue, 8th Floor, Toronto, Ontario, M5G 1R7.

PROPOSED METHOD OF HEARING: The Motion will be heard orally.

THE MOTION IS FOR:

1. An Order substantially in the form attached hereto as Schedule "A" (the "Draft Order"):
 - a. abridging the time for service of the Notice of Motion and Motion Record, if necessary, and validating service thereof;
 - b. extending the Stay Period (as defined in paragraph 15 of the Initial Order of the Honourable Mr. Justice Morawetz dated April 2, 2015) up to and including July 31, 2015;

- c. declaring that
 - i. the Administration Charge and Directors Charge (as defined in paragraphs 32 and 22, respectively, of the Initial Order) (collectively, the “**Charges**”) shall rank in priority to the claims and interests of the Creditors in the Applicants’ Property (the “**Creditors**”); and
 - ii. paragraph 35 of the Initial Order be amended *mutatis mutandis* to reflect the priority granted herein, with all other provisions of the Initial Order remaining in full force and effect, unamended; and
- d. such further and other relief as this Honourable Court may deem just.

THE GROUNDS FOR THE MOTION ARE:

1. The Applicants were granted protection from their creditors under the *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (“*CCAA*”), and Duff & Phelps Canada Restructuring Inc. was appointed as Monitor of the Applicants, pursuant to an Initial Order of the Ontario Superior Court of Justice dated April 2, 2015.
2. The Applicants have acted, and continue to act, in good faith and with due diligence in pursuing the restructuring.
3. An extension of the Stay Period up to and including July 31, 2015 is required to provide time to effect a restructuring.
4. The Applicants are not aware of any stakeholders that would suffer any material prejudice if the Stay Period is extended as requested.

5. The Applicants have given notice to secured creditors affected by the proposed Charges, in accordance with section 11.51 and 11.52 of the CCAA.
6. The requested priority is necessary for the effective participation in these proceedings of the beneficiaries of the Charges;
7. The Monitor is supportive of the extension of the Stay Period and of the request for the Charges to rank in priority to the claims and interests of the Creditors.
8. Section 11.02, 11.51, 11.52, and 11 of the CCAA and the inherent and equitable jurisdiction of this court.
9. Rules 1.04, 1.05, 2.01, 2.03, 3.02, 16 and 37 of the *Rules of Civil Procedure*, R.R.O. 1990, Reg. 194, as amended.
10. Such further and other grounds as counsel may advise and this Honourable Court may permit.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the motion:

1. The affidavit of Richard Pinkerton sworn April 23, 2015;
2. The Monitor's First Report; and
3. Such further and other material as counsel may advise and this Honourable Court permit.

April 23, 2015

Paliare Roland Rosenberg Rothstein LLP
155 Wellington Street West
35th Floor
Toronto ON M5V 3H1
Tel: 416.646.4300
Fax: 416.646.4301

Kenneth T. Rosenberg (LSUC #21102H)
Email: ken.rosenberg@paliareroland.com

Massimo Starnino (LSUC #41048G)
Email: max.starnino@paliareroland.com

Lindsay Scott (LSUC #60275G)
Email: lindsay.scott@paliareroland.com

Lawyers for the Applicants

TO: THE SERVICE LIST

Schedule "A": Draft Order

Court File No. CV-15-10926-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

THE HONOURABLE) THURSDAY, THE 30TH
)
JUSTICE) DAY OF APRIL, 2015

**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 LABRADOR IRON MINES HOLDINGS
LIMITED, LABRADOR IRON MINES LIMITED and
SCHEFFERVILLE MINES INC. (the "Applicants")**

ORDER

THIS MOTION, made by the Applicants, pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended, was heard this day at 330 University Avenue, Toronto, Ontario.

ON READING the affidavit of Richard Pinkerton, sworn April 23, 2015 , the Monitor's First Report dated April ●, 2015 (the "**Monitor's First Report**") and on hearing the submissions of counsel for the Applicants, counsel for the Monitor, and such other parties as were present, no one else appearing, including the parties described in Schedule "A" hereto (the "Creditors") although duly served as appears from the affidavit of service of Michelle Jackson, sworn April 23, 2015, filed:

SERVICE

1. THIS COURT ORDERS that the time for and manner of service of the Notice of Motion and the Motion Record is hereby abridged and validated so that this Motion is properly returnable today and the Court hereby dispenses with further service thereof.

2. THIS COURT ORDERS that terms not otherwise defined herein shall have the meanings accorded to them in the Initial Order made in these proceedings on April 2, 2015 (the "Initial Order").

STAY EXTENSION

3. THIS COURT ORDERS that the Stay Period be and is hereby extended until and including July 31, 2015.

PRIORITY OF CHARGES

4. THIS COURT ORDERS that: (a) the Administration Charge and Directors' Charge shall rank in priority to the claims and interests of the Creditors in the Applicants' Property; and (b) paragraph 35 of the Initial Order be and is hereby amended *mutatis mutandis* to reflect the priority granted herein, with all other provisions of the Initial Order remaining in full force and effect, unamended.

APPROVAL OF MONITOR'S REPORT AND ACTIVITIES

5. THIS COURT ORDERS that the Monitor's First Report and the activities of the Monitor described therein be and are hereby approved.

SCHEDULE "A"**Creditors**

GATX Rail Canada Corporation
RB Metalloyd Ltd. and British Arab Commercial Bank PLC
Labrador Catering Limited Partnership and Labrador Catering Inc.
Sept-Iles Port Authority
RB Metalloyd Ltd.
Grey Rock Services Inc.

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 LABRADOR IRON MINES HOLDINGS LIMITED,
LABRADOR IRON MINES LIMITED and SCHEFFERVILLE MINES INC.

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

PROCEEDING COMMENCED AT
TORONTO

ORDER

PALIARE ROLAND ROSENBERG ROTHSTEIN LLP

Barristers
155 Wellington St. W., 35th floor
Toronto ON M5V 3H1
Tel: 416.646.4300
Fax: 416.646.4301

Kenneth T. Rosenberg (LSUC #21102H)
Email: ken.rosenberg@paliareroland.com

Massimo Starnino (LSUC #41048G)
Email: max.starnino@paliareroland.com

Lindsay Scott (LSUC #60275G)
Email: lindsay.scott@paliareroland.com

Lawyers for the Applicants

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 LABRADOR IRON MINES HOLDINGS LIMITED, LABRADOR IRON MINES LIMITED and SCHEFFERVILLE MINES INC.

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

PROCEEDING COMMENCED AT
TORONTO

NOTICE OF MOTION

PALIARE ROLAND ROSENBERG ROTHSTEIN LLP

Barristers

155 Wellington St. W., 35th floor

Toronto ON M5V 3H1

Tel: 416.646.4300

Fax: 416.646.4301

Kenneth T. Rosenberg (LSUC #21102H)

Email: ken.rosenberg@paliareroland.com

Massimo Starnino (LSUC #41048G)

Email: max.starnino@paliareroland.com

Lindsay Scott (LSUC #60275G)

Email: lindsay.scott@paliareroland.com

Lawyers for the Applicants

Tab 2

Court File No. CV-15-10926-00CL

**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 LABRADOR IRON MINES HOLDINGS LIMITED, LABRADOR IRON MINES
LIMITED and SCHEFFERVILLE MINES INC. (the "Applicants")**

**AFFIDAVIT OF RICHARD PINKERTON
(Sworn April 23, 2015)**

I, Richard Pinkerton, of the City of Toronto, in the Province of Ontario, Canada,
MAKE OATH AND SAY:

1. I am the Chief Financial Officer of the Applicants in this proceeding, and, as such, I have personal knowledge of the matters set out below except where otherwise stated. Where I do not have personal knowledge, I have stated the source of my information and I believe such information to be true.

2. I make this affidavit solely in support of the Applicants' motion for an extension of the Stay Period and the prioritization of the Administration Charge and the Directors' Charge over the claims and interests of creditors set out in Schedule "A" to the draft Order, each of which was provided with notice of this motion (the "Creditors").

3. The Applicants were granted protection from their creditors under the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended ("CCAA") pursuant to an Initial Order of the Ontario Superior Court of Justice dated April 2, 2015

(the "Initial Order"). Under the Initial Order, Duff & Phelps Canada Restructuring Inc. was appointed Monitor of the Applicants (the "Monitor").

4. The Applicants' ability to carry out their operations and address their working capital deficit will depend upon a successful restructuring of the key operational costs and contracts relating to their operations and their ability to secure new financing.

Progress Since the Initial Order

5. The Applicants have undertaken a number of tasks since the making of the Initial Order, approximately three weeks ago.

6. The Applicants have been working, in coordination with the Monitor, to ensure that creditors receive notice of these proceedings, and have assembled a service list. The Applicants, through their counsel, have been in correspondence with various creditors who have outstanding litigation against one or more of the Applicants.

7. I am informed by representatives of the Monitor that the notices required by the Initial Order were posted and sent in accordance with the terms of that order. I understand that the Monitor will be reporting to the Court separately on notice matters.

8. The Applicants have also been in contact with many if not all of their major stakeholders, as well as certain potential financiers of the business to discuss, at a high level, their restructuring plans. Those discussions have been generally positive.

9. The Applicants have continued to honour their obligations under their environmental permits, together with their other environmental monitoring obligations.

10. Finally, the Applicants have been working to improve cash flow by relocating their executive office functions to less costly space, still in the City of Toronto, as well as by eliminating other unnecessary expenses. To that end, the Applicants have delivered the following disclaimers:

- (a) On April 2, 2015, the Applicants delivered a disclaimer of their head office lease, and the landlord has been showing the premises to third parties.
- (b) On April 2, 2015, the Applicants delivered a disclaimer of their lease of office premises in St. John's, Newfoundland.
- (c) On April 15, 2015, the Applicants delivered a disclaimer of certain office equipment leases. Arrangements have been made for the return of the leased equipment, which is of minimal value, to the lessors.

11. The landlords and lessor have all been cooperative, and, to date, no objection to the disclaimers has been received.

12. The relocation of the Applicants' executive office functions has consumed a considerable amount of time and resources over the past three weeks, but is expected to be complete by the end of the month.

13. Since the making of the Initial Order, the price of iron-ore has remained stable, varying between approximately USD\$48/tonne and USD\$52/tonne, albeit at its lowest levels in approximately 10 years and not at levels which would allow the Applicants to commence operations.

19. In addition, Grey Rock Services Inc. ("Grey Rock") has taken steps to assert a construction lien over certain of LIM's real property in connection with services rendered by it. The claim for lien is being reviewed by LIM.

20. The Initial Order proceeded on an *ex parte* basis without notice to all secured creditors. Notice of this motion and the request regarding the priority ranking of the Administration Charge and the Directors' Charge will be provided to each of the Registered Secured Creditors and Grey Rock, in accordance with section 11.52 of the CCAA.

21. As indicated in the affidavit of John F. Kearney sworn March 31, 2015 in support of the initial application:

- (a) the Applicants require the expertise, knowledge and continuing participation of the proposed beneficiaries of the Administration Charge in order to complete a successful restructuring; and
- (b) a successful restructuring of the Applicants will only be possible with the continued participation of the Applicants' directors and officers who have provided and will continue to provide strategic advice and guidance and who have specialized expertise and relationships with the Applicants' stakeholders.

22. The purpose of these CCAA proceedings is to allow the Applicants the time and space necessary to restructure their key operating contracts, develop a plan and secure the necessary financing to resume operations, all in the interests of stakeholders.

Tab 3

Court File No. 10926
CV-15-~~10226~~-0002



ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST

HONOURABLE REGIONAL)
SENIOR JUSTICE MORAWETZ)
)

THURSDAY, THE 2ND
DAY OF APRIL, 2015

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 LABRADOR IRON MINES HOLDINGS
LIMITED, LABRADOR IRON MINES LIMITED and
SCHEFFERVILLE MINES INC. (the "Applicants")

INITIAL ORDER

THIS APPLICATION, made by the Applicants, pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "CCAA") was heard this day at 330 University Avenue, Toronto, Ontario.

ON READING the affidavit of John Kearney sworn March 31, 2015 and the Exhibits thereto (the "Kearney Affidavit"), and the pre-filing report of the proposed Monitor, Duff & Phelps Canada Restructuring Inc. ("Duff & Phelps"), and on hearing the submissions of counsel for the Applicants, and the Monitor, and on reading the consent of Duff & Phelps to act as the Monitor,

SERVICE

1. THIS COURT ORDERS that the time for service of the Notice of Application and the Application Record is hereby abridged and validated so that this Application is properly returnable today and hereby dispenses with further service thereof.

APPLICATION

2. THIS COURT ORDERS AND DECLARES that the Applicants are companies to which the CCAA applies.

PLAN OF ARRANGEMENT

3. THIS COURT ORDERS that the Applicants shall have the authority to file and may, subject to further order of this Court, file with this Court a plan of compromise or arrangement (hereinafter referred to as the "Plan").

POSSESSION OF PROPERTY AND OPERATIONS

4. THIS COURT ORDERS that the Applicants shall remain in possession and control of their current and future assets, undertakings and properties of every nature and kind whatsoever, and wherever situate including all proceeds thereof (the "Property"). Subject to further Order of this Court, the Applicants shall continue to carry on business in a manner consistent with the preservation of their business (the "Business") and Property. The Applicants are authorized and empowered to continue to retain and employ the employees, consultants, agents, experts, accountants, counsel and such other persons (collectively "Assistants") currently retained or employed by them, with liberty to retain such further Assistants as they deem reasonably necessary or desirable in the ordinary course of business or for the carrying out of the terms of this Order.

5. THIS COURT ORDERS that the Applicants shall be entitled to continue to utilize the central cash management system currently in place as described in the Kearney Affidavit or replace it with another substantially similar central cash management system (the "Cash Management System") and that any present or future bank providing the Cash Management System shall not be under any obligation whatsoever to inquire into the propriety, validity or

legality of any transfer, payment, collection or other action taken under the Cash Management System, or as to the use or application by the Applicant of funds transferred, paid, collected or otherwise dealt with in the Cash Management System, shall be entitled to provide the Cash Management System without any liability in respect thereof to any Person (as hereinafter defined) other than the Applicant, pursuant to the terms of the documentation applicable to the Cash Management System, and shall be, in its capacity as provider of the Cash Management System, an unaffected creditor under the Plan with regard to any claims or expenses it may suffer or incur in connection with the provision of the Cash Management System.

6. THIS COURT ORDERS that to the extent any Applicant (each such Applicant, a "Recipient Applicant") receives an inter-company loan, other transfer of money (including, without limitation, as a result of the use of the Applicants' cash management system) or goods or services from another Applicant (each such Applicant, a "Protected Applicant") on or after the date of this order, then the Protected Applicant shall be entitled to the benefit of and is hereby granted a charge (an "Intercompany Charge") on the current and future assets, undertakings and properties of every nature and kind whatsoever and wherever situate, including all proceeds thereof, of the Recipient Applicant (the "Recipient Applicant Property") in an amount equal to the net amount owing (calculated with reference only to the period on and after the date of this order) by the Recipient Applicant to the Protected Applicant as may exist from time to time. The Intercompany Charge in favour of any Protected Applicant shall have the priority set out in paragraphs 33 and 35 hereof.

7. THIS COURT ORDERS that the Applicants are permitted but not directed to pay the following expenses whether incurred prior to or after this Order:

- (a) all outstanding and future wages, salaries, employee and pension benefits, vacation pay and expenses payable on or after the date of this Order, in each case incurred in the ordinary course of business and consistent with existing compensation policies and arrangements; and
- (b) the fees and disbursements of any Assistants retained or employed by the Applicants in respect of these proceedings, at their standard rates and charges.

8. THIS COURT ORDERS that, except as otherwise provided to the contrary herein, the Applicants are permitted but not directed to pay all reasonable expenses incurred by the Applicants in carrying on the Business in the ordinary course after this Order, and in carrying out the provisions of this Order, which expenses shall include, without limitation:

- (a) all expenses and capital expenditures reasonably necessary for the preservation of the Property or the Business including, without limitation, payments on account of insurance (including directors and officers insurance), care and maintenance, and security services, and such transfer payments to the Applicants' affiliates as are reasonably necessary, in consultation with the Monitor, for the preservation of the Property or the Business or in furtherance of the Restructuring (as defined below); and,
- (b) payment for goods or services actually supplied to the Applicants following the date of this Order.

9. THIS COURT ORDERS that the Applicants shall remit, in accordance with legal requirements, or pay:

- (a) any statutory deemed trust amounts in favour of the Crown in right of Canada or of any Province thereof or any other taxation authority which are required to be deducted or which are deducted from employees' wages, including, without limitation, amounts in respect of (i) employment insurance, (ii) Canada Pension Plan, (iii) Quebec Pension Plan, and (iv) income taxes;
- (b) all goods and services taxes or other applicable sales taxes (collectively, "Sales Taxes") required to be remitted by the Applicants in connection with the sale of goods and services by the Applicants, but only where such Sales Taxes are accrued or collected after the date of this Order, or where such Sales Taxes were accrued or collected prior to the date of this Order but not required to be remitted until on or after the date of this Order, and
- (c) any amount payable to the Crown in right of Canada or of any Province thereof or any political subdivision thereof or any other taxation authority in respect of

municipal realty, municipal business or other taxes, assessments or levies of any nature or kind which are entitled at law to be paid in priority to claims of secured creditors and which are attributable to or in respect of the carrying on of the Business by the Applicants.

10. THIS COURT ORDERS that until a real property lease is disclaimed or resiliated in accordance with the CCAA, the Applicants shall pay all amounts constituting rent or payable as rent under real property leases (including, for greater certainty, common area maintenance charges, utilities and realty taxes and any other amounts payable to the landlord under the lease) or as otherwise may be negotiated between the Applicants and the landlord from time to time ("Rent"), for the period commencing from and including the date of this Order, twice monthly, on the first and fifteenth day of each month, in advance (but not in arrears). On the date of the first of such payments, any Rent relating to the period commencing from and including the date of this Order shall also be paid.

11. THIS COURT ORDERS that, except as specifically permitted herein, the Applicants are hereby directed, until further Order of this Court: (a) to make no payments of principal, interest thereon or otherwise on account of amounts owing by the Applicants to any of its creditors as of this date; (b) to grant no security interests, trust, liens, charges or encumbrances upon or in respect of any of its Property; and (c) to not grant credit or incur liabilities except in the ordinary course of the Business.

RESTRUCTURING

12. THIS COURT ORDERS that the Applicants shall, subject to such requirements as are imposed by the CCAA and such covenants as may be contained in the Definitive Documents (as defined below), have the right to:

- (a) permanently or temporarily cease, downsize or shut down any of their business or operations, and to dispose of redundant or non-material assets not exceeding \$250,000 in any one transaction or \$1,000,000, in the aggregate, subject to the prior approval of the Monitor, or otherwise in accordance with further order of this Court;

- (b) terminate the employment of such of their employees or temporarily lay off such of their employees as they deem appropriate; and
- (c) pursue all avenues of refinancing of their Business or Property, in whole or part, subject to prior approval of this Court being obtained before any material refinancing,

all of the foregoing to permit the Applicants to proceed with an orderly restructuring of the Business (the "Restructuring").

13. THIS COURT ORDERS that the Applicants shall provide each of the relevant landlords with notice of the Applicants' intention to remove any fixtures from any leased premises at least seven (7) days prior to the date of the intended removal. The relevant landlord shall be entitled to have a representative present in the leased premises to observe such removal and, if the landlord disputes the Applicants' entitlement to remove any such fixture under the provisions of the lease, such fixture shall remain on the premises and shall be dealt with as agreed between any applicable secured creditors, such landlord and the Applicants, or by further Order of this Court upon application by the Applicants on at least two (2) days notice to such landlord and any such secured creditors. If the Applicants disclaim or resiliate the lease governing such leased premises in accordance with Section 32 of the CCAA, they shall not be required to pay Rent under such lease pending resolution of any such dispute (other than Rent payable for the notice period provided for in Section 32(5) of the CCAA), and the disclaimer or resiliation of the lease shall be without prejudice to the Applicants' claim to the fixtures in dispute.

14. THIS COURT ORDERS that if a notice of disclaimer or resiliation is delivered pursuant to Section 32 of the CCAA, then (a) during the notice period prior to the effective time of the disclaimer or resiliation, the landlord may show the affected leased premises to prospective tenants during normal business hours, on giving the Applicants and the Monitor 24 hours' prior written notice, and (b) at the effective time of the disclaimer or resiliation, the relevant landlord shall be entitled to take possession of any such leased premises without waiver of or prejudice to any claims or rights such landlord may have against the Applicants in respect of such lease or leased premises, provided that nothing herein shall relieve such landlord of its obligation to mitigate any damages claimed in connection therewith.

NO PROCEEDINGS AGAINST THE APPLICANT OR THE PROPERTY

15. THIS COURT ORDERS that until and including May 1, 2015, or such later date as this Court may order (the "Stay Period"), no proceeding or enforcement process in any court or tribunal (each, a "Proceeding") shall be commenced or continued against or in respect of the Applicants or the Monitor, or affecting the Business or the Property, except with the written consent of the Applicants and the Monitor, or with leave of this Court, and any and all Proceedings currently under way against or in respect of the Applicants or affecting the Business or the Property are hereby stayed and suspended pending further Order of this Court.

NO EXERCISE OF RIGHTS OR REMEDIES

16. THIS COURT ORDERS that during the Stay Period, all rights and remedies of any individual, firm, corporation, governmental body or agency, or any other entities (all of the foregoing, collectively being "Persons" and each being a "Person") against or in respect of the Applicants or the Monitor, or affecting the Business or the Property, are hereby stayed and suspended except with the written consent of the Applicants and the Monitor, or leave of this Court, provided that nothing in this Order shall: (i) empower the Applicants to carry on any business which they are not lawfully entitled to carry on, (ii) affect such investigations, actions, suits or proceedings by a regulatory body as are permitted by Section 11.1 of the CCAA, (iii) prevent the filing of any registration to preserve or perfect a security interest, or (iv) prevent the registration of a claim for lien.

NO INTERFERENCE WITH RIGHTS

17. THIS COURT ORDERS that during the Stay Period, except with the written consent of the Applicants and the Monitor, or leave of this Court, no Person shall discontinue, fail to honour, alter, interfere with, repudiate, terminate or cease to perform any right, renewal right, contract, agreement, licence or permit in favour of or held by the Applicants or, to the extent that it affects the Business or Property.

CONTINUATION OF SERVICES

18. THIS COURT ORDERS that during the Stay Period, all Persons having oral or written agreements with the Applicants, or statutory or regulatory mandates for the supply of goods and/or services, including without limitation all computer software, communication and other data services, centralized banking services, payroll services, insurance, transportation services, utility or other services to the Business, are hereby restrained until further Order of this Court from discontinuing, altering, interfering with or terminating the supply of such goods or services as may be required by the Applicants, and that the Applicants shall be entitled to the continued use of its current premises, telephone numbers, facsimile numbers, internet addresses and domain names, provided in each case that the normal prices or charges for all such goods or services received after the date of this Order are paid in accordance with normal payment practices or such other practices as may be agreed upon by the supplier or service provider and each of the Applicants and the Monitor, or as may be ordered by this Court.

NON-DEROGATION OF RIGHTS

19. THIS COURT ORDERS that, notwithstanding anything else in this Order, no Person shall be prohibited from requiring immediate payment for goods, services, use of lease or licensed property or other valuable consideration provided on or after the date of this Order, nor shall any Person be under any obligation on or after the date of this Order to advance or re-advance any monies or otherwise extend any credit to the Applicants. Nothing in this Order shall derogate from the rights conferred and obligations imposed by the CCAA.

PROCEEDINGS AGAINST DIRECTORS AND OFFICERS

20. THIS COURT ORDERS that during the Stay Period, and except as permitted by subsection 11.03(2) of the CCAA, no Proceeding may be commenced or continued against any of the former, current or future directors or officers of the Applicants with respect to any claim against the directors or officers that arose before the date hereof and that relates to any obligations of the Applicants whereby the directors or officers are alleged under any law to be liable in their capacity as directors or officers for the payment or performance of such obligations, until a compromise or arrangement in respect of the Applicants, if one is filed, is sanctioned by this Court or is refused by the creditors of the Applicant or this Court.

DIRECTORS' AND OFFICERS' INDEMNIFICATION AND CHARGE

21. THIS COURT ORDERS that the Applicants shall indemnify their directors and officers against obligations and liabilities that they may incur as directors or officers of the Applicants after the commencement of the within proceedings, except to the extent that, with respect to any officer or director, the obligation or liability was incurred as a result of the director's or officer's gross negligence or wilful misconduct.

22. THIS COURT ORDERS that the directors and officers of the Applicants shall be entitled to the benefit of and are hereby granted a charge (the "Directors' Charge") on the Property, which charge shall not exceed an aggregate amount of \$300,000, as security for the indemnity provided in paragraph 21 of this Order. The Directors' Charge shall have the priority set out in paragraphs 33 and 35 herein.

23. THIS COURT ORDERS that, notwithstanding any language in any applicable insurance policy to the contrary, (a) no insurer shall be entitled to be subrogated to or claim the benefit of the Directors' Charge, and (b) the directors and officers of the Applicants shall only be entitled to the benefit of the Directors' Charge to the extent that they do not have coverage under any directors' and officers' insurance policy, or to the extent that such coverage is insufficient to pay amounts indemnified in accordance with paragraph 21 of this Order, and for the purpose of determining the sufficiency of insurance coverage, the directors and officers shall, subject to the terms of the policy and any statutory or other discretion of a court to apportion the insurance, have the ability to apply the insurance amongst competing claims, in their discretion.

APPOINTMENT OF MONITOR

24. THIS COURT ORDERS that Duff & Phelps is hereby appointed pursuant to the CCAA as the Monitor, an officer of this Court, to monitor the business and financial affairs of the Applicants, with the powers and obligations set out in the CCAA or set forth herein, and that the Applicants and their shareholders, officers, directors, and Assistants shall advise the Monitor of all material steps taken by the Applicants pursuant to this Order, and shall co-operate fully with the Monitor in the exercise of its powers and discharge of its obligations and provide the Monitor with the assistance that is necessary to enable the Monitor to adequately carry out the Monitor's functions.

25. THIS COURT ORDERS that the Monitor, in addition to its prescribed rights and obligations under the CCAA, is hereby directed and empowered to:

- (a) monitor the Applicants' receipts and disbursements;
- (b) report to this Court at such times and intervals as the Monitor may deem appropriate with respect to matters relating to the Property, the Business, and such other matters as may be relevant to the proceedings herein;
- (c) advise the Applicants in their preparation of cash flow statements and reporting required by this court;
- (d) undertake a process for determining claims against the Applicants;
- (e) advise the Applicants in their development of a Plan;
- (f) assist the Applicants, to the extent required by them, with the holding and administering of creditors' or shareholders' meetings for voting on a Plan;
- (g) have full and complete access to the Property, including the premises, books, records, data, including data in electronic form, and other financial documents of the Applicants, to the extent that is necessary to adequately assess the Applicants' business and financial affairs or to perform its duties arising under this Order;
- (h) be at liberty to engage independent legal counsel or such other persons as the Monitor deems necessary or advisable respecting the exercise of its powers and performance of its obligations under this Order; and
- (i) perform such other duties as are required by this Order or by this Court from time to time.

26. THIS COURT ORDERS that the Monitor shall not take possession of the Property and shall take no part whatsoever in the management or supervision of the management of the Business and shall not, by fulfilling its obligations hereunder, be deemed to have taken or maintained possession or control of the Business or Property, or any part thereof.

27. THIS COURT ORDERS that nothing herein contained shall require the Monitor to occupy or to take control, care, charge, possession or management (separately and/or collectively, "Possession") of any of the Property that might be environmentally contaminated, might be a pollutant or a contaminant, or might cause or contribute to a spill, discharge, release or deposit of a substance contrary to any federal, provincial or other law respecting the protection, conservation, enhancement, remediation or rehabilitation of the environment or relating to the disposal of waste or other contamination including, without limitation, the *Canadian Environmental Protection Act*, the *Transportation of Dangerous Goods Act*, the *Environmental Protection Act* (Newfoundland and Labrador), the *Environment Quality Act* (Quebec), the *Water Resources Act* (Newfoundland and Labrador), the *Occupational Health and Safety Act* (Newfoundland and Labrador), the *Act Respecting Occupational Health and Safety* (Quebec), and regulations under any such legislation (the "Environmental Legislation"), provided however that nothing herein shall exempt the Monitor from any duty to report or make disclosure imposed by applicable Environmental Legislation. The Monitor shall not, as a result of this Order or anything done in pursuance of the Monitor's duties and powers under this Order, be deemed to be in Possession of any of the Property within the meaning of any Environmental Legislation, unless it is actually in possession.

28. THIS COURT ORDERS that that the Monitor may provide creditors of the Applicants with information provided by the Applicants in response to reasonable requests for information made in writing by such creditor addressed to the Monitor. The Monitor shall not have any responsibility or liability with respect to the information disseminated by it pursuant to this paragraph. In the case of information that the Monitor has been advised by the Applicants is confidential, the Monitor shall not provide such information to creditors unless otherwise directed by this Court or on such terms as the Monitor and the Applicants may agree.

29. THIS COURT ORDERS that, in addition to the rights and protections afforded the Monitor under the CCAA or as an officer of this Court, the Monitor shall incur no liability or obligation as a result of its appointment or the carrying out of the provisions of this Order, save and except for any gross negligence or wilful misconduct on its part. Nothing in this Order shall derogate from the protections afforded the Monitor by the CCAA or any applicable legislation.

30. THIS COURT ORDERS that the Monitor, counsel to the Monitor, counsel to the Applicants and counsel to the Applicants' directors and officers shall be paid their reasonable fees and disbursements, in each case at their standard rates and charges, by the Applicants as part of the costs of these proceedings. The Applicants are hereby authorized and directed to pay the accounts of the Monitor, counsel for the Monitor, counsel for the Applicants and counsel to the Applicants' directors and officers, whether arising prior to, on or after the date of this order, on a monthly basis and, in addition, the Applicants are hereby authorized to have paid or to pay to the Monitor, counsel to the Monitor, and counsel to the Applicants, retainers in the aggregate amount of up to \$135,000, as security for payment of their respective fees and disbursements outstanding from time to time.

31. THIS COURT ORDERS that, if requested by the Applicants, this Court or any interested party, the Monitor and its legal counsel shall pass their accounts from time to time, and for this purpose the accounts of the Monitor and its legal counsel are hereby referred to a judge of the Commercial List of the Ontario Superior Court of Justice.

32. THIS COURT ORDERS that the Monitor, counsel to the Monitor, and the Applicants' counsel shall be entitled to the benefit of and are hereby granted a charge (the "Administration Charge") on the Property in the amount of \$500,000, as security for professional fees and disbursements incurred at the standard rates and charges of the Monitor and such counsel, and outstanding from time to time, both before and after the making of this Order, in respect of these proceedings. The Administration Charge shall have the priority set out in paragraphs 33 and 35 hereof.

VALIDITY AND PRIORITY OF CHARGES CREATED BY THIS ORDER

33. THIS COURT ORDERS that the priorities of the Directors' Charge, the Administration Charge and the Intercompany Charge (collectively, the "Charges"), as among them, shall be as follows:

First – Administration Charge;

Second – Directors' Charge; and,

Third – Intercompany Charge

34. THIS COURT ORDERS that the filing, registration or perfection of the Charges shall not be required, and that the Charges shall be valid and enforceable for all purposes, including as against any right, title or interest filed, registered, recorded or perfected subsequent to the Charges coming into existence, notwithstanding any such failure to file, register, record or perfect.

35. THIS COURT ORDERS that each of the Charges shall constitute a charge on the Property (except in the case of the Intercompany Charge, which shall constitute a charge only on the relevant Recipient Applicant Property) and such Charges shall rank in priority to all other security interests, trusts, liens, charges and encumbrances, claims of secured creditors, statutory or otherwise (collectively, "Encumbrances") in favour of any Person, provided that this order shall not operate to subordinate the interests of any secured creditors ~~until they have been given notice of these proceedings and have had an opportunity to respond.~~ ^{RB} _{RD}

36. THIS COURT ORDERS that except as otherwise expressly provided for herein, or as may be approved by this Court, the Applicants shall not grant any Encumbrances over any Property that rank in priority to, or *pari passu* with, any of the Charges, unless the Applicants also obtain the prior written consent of the Monitor and the beneficiaries of the Charges, or a further Order of this Court.

37. THIS COURT ORDERS that the Charges shall not be rendered invalid or unenforceable and the rights and remedies of the beneficiaries of the Charges shall not otherwise be limited or impaired in any way by (a) the pendency of these proceedings and the declarations of insolvency made herein; (b) any application(s) for bankruptcy order(s) issued pursuant to the BIA, or any bankruptcy order made pursuant to such application(s); (c) the filing of any assignments for the general benefit of creditors made pursuant to the BIA; (d) the provisions of any federal or provincial statutes; or (e) any negative covenants, prohibitions or other similar provisions with respect to borrowings, incurring debt or the creation of Encumbrances, contained in any existing loan documents, lease, sublease, offer to lease or other agreement (collectively, an "Agreement") which binds the Applicants, and notwithstanding any provision to the contrary in any Agreement:

- (a) the creation of the Charges shall not create or be deemed to constitute a breach by the Applicants of any Agreement to which it is a party;
- (b) none of the beneficiaries of the Charges shall have any liability to any Person whatsoever as a result of any breach of any Agreement caused by or resulting from the creation of the Charges; and
- (c) the payments made by the Applicants pursuant to this Order or the granting of the Charges do not and will not constitute preferences, fraudulent conveyances, transfers at undervalue, oppressive conduct, or other challengeable or voidable transactions under any applicable law.

38. THIS COURT ORDERS that any Charge created by this Order over leases of real property in Canada shall only be a Charge in the Applicants' interest in such real property leases.

SERVICE AND NOTICE

39. THIS COURT ORDERS that the Monitor shall (i) without delay, publish in *The Globe and Mail* (National Edition; English), *The Telegram* (St. John's, Nfld.; English), and *Le Journal Nord-Côtier* (Sept-Iles, Quebec; French) a notice containing the information prescribed under the CCAA, (ii) within five days after the date of this Order, (A) make this Order publicly available in the manner prescribed under the CCAA, (B) send, in the prescribed manner, a notice to every known creditor who has a claim against the Applicants of more than \$1000, and (C) prepare a list showing the names and addresses of those creditors and the estimated amounts of those claims, and make it publicly available in the prescribed manner, all in accordance with Section 23(1)(a) of the CCAA and the regulations made thereunder.

40. THIS COURT ORDERS that the E-Service Protocol of the Commercial List (the "**Protocol**") is approved and adopted by reference herein and, in this proceeding, the service of documents made in accordance with the Protocol (which can be found on the Commercial List website at <http://www.ontariocourts.ca/scj/practice/practice-directions/toronto/eservice-commercial/>) shall be valid and effective service. Subject to Rule 17.05 this Order shall constitute an order for substituted service pursuant to Rule 16.04 of the Rules of Civil Procedure. Subject to Rule 3.01(d) of the Rules of Civil Procedure and paragraph 21 of the Protocol, service

of documents in accordance with the Protocol will be effective on transmission. This Court further orders that a Case Website shall be established in accordance with the Protocol with the following URL: <http://www.duffandphelps.com/intl/en-ca/Pages/RestructuringCases.aspx>.

41. THIS COURT ORDERS that if the service or distribution of documents in accordance with the Protocol is not practicable, the Applicants and the Monitor are at liberty to serve or distribute this Order, any other materials and orders in these proceedings, any notices or other correspondence, by forwarding true copies thereof by prepaid ordinary mail, courier, personal delivery, facsimile or other electronic transmission to the Applicants' creditors or other interested parties at their respective addresses as last shown on the records of the Applicants and that any such service or distribution by courier, personal delivery, facsimile or other electronic transmission shall be deemed to be received on the next business day following the date of forwarding thereof, or if sent by ordinary mail, on the third business day after mailing.

GENERAL

42. THIS COURT ORDERS that the Applicants or the Monitor may from time to time apply to this Court for advice and directions concerning the discharge of their respective powers and duties under this Order or concerning the interpretation or application of this Order or the conduct of the Restructuring.

43. THIS COURT ORDERS that nothing in this Order shall prevent the Monitor from acting as an interim receiver, a receiver, a receiver and manager, or a trustee in bankruptcy of the Applicants, the Business or the Property.

44. THIS COURT HEREBY REQUESTS the aid and recognition of any court, tribunal, regulatory or administrative body having jurisdiction in Canada or in the United States, to give effect to this Order and to assist the Applicants, the Monitor and their respective agents in carrying out the terms of this Order. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to the Applicants and to the Monitor, as an officer of this Court, as may be necessary or desirable to give effect to this Order, to grant representative status to the Monitor in any foreign proceeding, or to assist the Applicants and the Monitor and their respective agents in carrying out the terms of this Order.

45. THIS COURT ORDERS that each of the Applicants and the Monitor be at liberty and are hereby authorized and empowered to apply to any court, tribunal, regulatory or administrative body, wherever located, for the recognition of this Order and for assistance in carrying out the terms of this Order, and that the Monitor is authorized and empowered to act as a representative in respect of the within proceedings for the purpose of having these proceedings recognized in a jurisdiction outside Canada.

46. THIS COURT ORDERS that any interested party (including the Applicants and the Monitor) may apply to this Court to vary, amend, supplement or replace this Order on not less than seven (7) days notice to any other party or parties likely to be affected by the order sought or upon such other notice, if any, as this Court may order.

47. THIS COURT ORDERS that this Order and all of its provisions are effective as of 12:01 a.m. Eastern Standard Time on the date of this Order.



ENTERED AT / INSCRIT A TORONTO
ON / BOOK NO:
LE / DANS LE REGISTRE NO.:

APR 2 - 2015



Court File No.

CY-15-109126-0001

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 LABRADOR IRON MINES HOLDINGS LIMITED, LABRADOR IRON MINES LIMITED and SCHEFFERVILE MINES INC.

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

PROCEEDING COMMENCED AT
TORONTO

INITIAL ORDER

PALIARE ROLAND ROSENBERG ROTHSTEIN LLP

Barristers

155 Wellington St. W., 35th floor

Toronto ON M5V 3H1

Tel: 416.646.4300

Fax: 416.646.4301

Kenneth T. Rosenberg (LSUC #21102H)

Email: ken.rosenberg@paliareroland.com

Massimo Starnino (LSUC #41048G)

Email: max.starnino@paliareroland.com

Lawyers for the Applicants

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 LABRADOR IRON MINES HOLDINGS LIMITED, LABRADOR IRON MINES LIMITED and SCHEFFERVILLE MINES INC.

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

PROCEEDING COMMENCED AT
TORONTO

**MOTION RECORD OF THE APPLICANTS
(Stay Extension)
Returnable April 30, 2015**

PALIARE ROLAND ROSENBERG ROTHSTEIN LLP

Barristers
155 Wellington St. W., 35th floor
Toronto ON M5V 3H1
Tel: 416.646.4300
Fax: 416.646.4301

Kenneth T. Rosenberg (LSUC #21102H)
Email: ken.rosenberg@paliareroland.com

Massimo Starnino (LSUC #41048G)
Email: max.starnino@paliareroland.com

Lindsay Scott (LSUC #60275G)
Email: lindsay.scott@paliareroland.com

Lawyers for the Applicants