

**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 July 27, 2015**

July 20, 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 SCHEFFERVILLE MINES INC. (the "Applicants")

**SERVICE LIST**  
(as of May 5, 2015)

**TO: PALIARE ROLAND ROSENBERG  
ROTHSTEIN LLP**

155 Wellington St. W., 35<sup>th</sup> floor  
Toronto Ontario M5V 3H1  
Tel: 416.646.4300  
Fax: 416.646.4301

Kenneth T. Rosenberg  
Email: [ken.rosenberg@paliareroland.com](mailto:ken.rosenberg@paliareroland.com)

Massimo Starnino  
Email: [max.starnino@paliareroland.com](mailto:max.starnino@paliareroland.com)

Lindsay Scott  
Email: [lindsay.scott@paliareroland.com](mailto:lindsay.scott@paliareroland.com)

Lawyers for the Applicants

**AND TO: DUFF & PHELPS CANADA RESTRUCTURING INC.**

Bay Adelaide Centre  
333 Bay Street, 14<sup>th</sup> Floor  
Toronto, Ontario M5H 2R2

Bobby Kofman  
Tel: 416.932.6228  
Email: [bobby.kofman@duffandphelps.com](mailto:bobby.kofman@duffandphelps.com)

Mitch Vininsky  
Tel: 416.932.6013  
Email: [mitch.vininsky@duffandphelps.com](mailto:mitch.vininsky@duffandphelps.com)

Monitor

**AND TO: GOODMANS 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](mailto: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](mailto:Brogan.Taylor@td.com)

**AND TO: GATX CORPORATION**  
222 West Adams Street  
5<sup>th</sup> Floor  
Chicago, Illinois 60606-5314

Brian L. Glassberg  
Tel: 312.621.6678  
Fax: 312.499.7559

Email: [brian.glassberg@gatx.com](mailto:brian.glassberg@gatx.com)

**AND TO: XEROX CANADA LTD.**  
33 Bloor St. E., 3<sup>rd</sup> Floor  
Toronto, Ontario M4W 3H1

**AND TO: SEPT-ILES 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](mailto: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](mailto: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](mailto: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](mailto:caroline.briand@clcw.qc.ca)

Lawyers for the Naskapi Nation of Kawawachikamach

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

**Gerry Apostolatos**  
Tel: 514.282.7831  
Fax: 514.845.6573  
Email: [gerry.apostolatos@lkd.ca](mailto:gerry.apostolatos@lkd.ca)

**Dimitri Maniatis**  
Tel: 514.282.7832  
Fax: 514.845.6573  
Email: [Dimitri.maniatis@lkd.ca](mailto: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](mailto: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](mailto:lmorin@fasken.com)

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

## INDEX

TAB		PAGE
1	Notice of Motion dated July 20, 2015	1
A	Draft Order	6
2	Affidavit of Richard Pinkerton sworn July 20, 2015	9

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 Monday, July 27, 2015 at 10:00 a.m. or as soon after that time as the motion can heard at the court house, 330 University Avenue, 8<sup>th</sup> 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":
  - 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 December 18, 2015; and
  - c. 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. On June 30, 2015, Duff & Phelps Canada Restructuring Inc. ("D&P") was acquired by KSV Kofman Inc. ("KSV"). Pursuant to an Order of the Court made on July 10, 2015, D&P's ongoing mandates were transferred to KSV, including acting as Monitor in these proceedings. The licensed trustees/restructuring professionals overseeing this mandate prior to June 30, 2015 remain unchanged.
3. The Applicants have acted, and continue to act, in good faith and with due diligence in pursuing the restructuring.
4. On April 30, 2015, Justice Conway granted an extension of the Stay Period up to and including July 31, 2015.
5. A further extension of the Stay Period up to and including December 18, 2015 is required to provide time to effect a restructuring.
6. The Applicants are not aware of any stakeholders that would suffer any material prejudice if the Stay Period is extended as requested.
7. The Monitor is supportive of the extension of the Stay Period.

8. Sections 11, and 11.02 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 July 20, 2015;
2. The Monitor's Second Report; and
3. Such further and other material as counsel may advise and this Honourable Court permit.

July 20, 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

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

PROCEEDING COMMENCED AT  
TORONTO

**NOTICE OF MOTION**

**PALIARE ROLAND ROSENBERG ROTHSTEIN LLP**

Barristers

155 Wellington St. W., 35<sup>th</sup> 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 A**

Schedule "A": Draft Order

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

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
COMMERCIAL LIST**

THE HONOURABLE ) MONDAY, THE 27<sup>TH</sup>  
 )  
JUSTICE ) DAY OF JULY, 2015

**IN THE MATTER OF THE *COMPANIES' CREDITORS  
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**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 July 20, 2015, the Monitor's Second Report dated July •, 2015 (the "**Monitor's Second 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, although duly served as appears from the affidavit of service of Michelle Jackson, sworn July •, 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 11:59 p.m. on December 18, 2015.

**APPROVAL OF MONITOR'S REPORT AND ACTIVITIES**

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

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

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**ONTARIO  
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**ORDER**

**PALIARE ROLAND ROSENBERG ROTHSTEIN LLP**

Barristers

155 Wellington St. W., 35<sup>th</sup> 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

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
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LIMITED and SCHEFFERVILLE MINES INC. (the "Applicants")**

**AFFIDAVIT OF RICHARD PINKERTON  
(Sworn July 20, 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 each 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 in support of the Applicants' motion for an extension of the Stay Period

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") until May 1, 2015 pursuant to an Initial Order of the Ontario Superior Court of Justice (the "Court") dated April 2, 2015 (the "Initial Order").

4. Under the Initial Order, Duff & Phelps Canada Restructuring Inc. was appointed Monitor of the Applicants (the "**Monitor**"). On June 30, 2015, Duff & Phelps Canada Restructuring Inc. ("D&P") was acquired by KSV Kofman Inc. ("KSV"). Pursuant to an Order of the Court made on July 10, 2015, D&P's ongoing mandates were transferred to KSV, including acting as Monitor in these proceedings. The licensed trustees/restructuring professionals overseeing this mandate prior to June 30, 2015 remain unchanged.

5. The Applicants' protection from their creditors under the CCAA was extended from May 1, 2015 to July 31, 2015 pursuant to an Extension Order of the Ontario Superior Court of Justice dated April 30, 2015 (the "**Extension Order**").

6. 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. The ability to meaningfully advance the restructuring process is largely dependent on the price of iron ore. As more fully described below, prices were at multi-year lows at the time of commencement of these CCAA proceedings and iron ore prices have continued at these levels.

### **Progress Since the Extension Order**

7. The Applicants have undertaken a number of initiatives since the making of the Extension Order to maintain their assets and business on a care and maintenance basis

and to comply with applicable environmental permits and monitoring obligations as well as health and safety regulations.

8. As disclosed in the Monitor's report accompanying this application, the Applicants have pursued efforts to generate revenue from their existing operational assets including the continued rental of their camp facilities to Tata Steel Minerals Canada Limited, the provision of rail maintenance services and rail car rental arrangements. In particular, the Applicant, Labrador Iron Mines Limited ("**LIM**") undertook a process for the sale of three diesel generators which are surplus to its current needs and has received two conditional offers to purchase, both of which are being evaluated.

9. The Applicants have suspended all exploration activities to conserve cash resources other than lease payments and minimum expenditures required to maintain mineral claims in good standing. A number of non-core mineral claims have been dropped or surrendered to reduce the overall statutory, per claim expenditures required to keep the Applicants' properties in good standing.

10. The Applicants have completed the relocation of their corporate offices in Toronto thereby reducing head office administrative expenses by approximately \$30,000 per month and have completed staff reductions to the minimum complement of essential personnel to preserve their assets and business on a care and maintenance basis.

11. The Applicant, Labrador Iron Mines Holdings Limited, has completed its audited Financial Statements and Management's Discussion and Analysis for its financial year ended March 31, 2015 and intends to file same with appropriate regulatory authorities by July 24<sup>th</sup>, 2015 to remain in full compliance with applicable securities law requirements.

12. The Applicants have met with their significant creditors and stakeholders (including local community leaders) and, in the case of stakeholders whose services are critical to the success of the Applicants' restructuring and the resumption of mining operations, on several occasions. At such meetings, the Applicants

- (a) informed such parties of the Applicants' current operational status and the progress and implications of these proceedings;
- (b) outlined their preliminary goals and plans for the restructuring of their business, future operational financing and the ultimate resumption of mining and shipping operations; and
- (c) explored and discussed, on a preliminary, conceptual basis, the elements of desired revisions to the future contractual relationships which the Applicants deem necessary for their restructuring and operational plans.

13. As at the date of the Initial Order, the price of iron-ore was approximately US\$48/tonne. Since the making of the Extension Order, the price of iron-ore has traded within a range of approximately US\$65/tonne in mid-June to below US\$45/tonne in July. On July 20, 2015 the spot price for iron ore was US\$52.75/tonne. These are the lowest

prices in approximately 10 years, and not at levels which would allow the Applicants to recommence operations. I believe the consensus view of analysts and other informed commentators is not positive for the price of iron ore in the near to medium term.

#### **Request for Extension of Stay Period to December 18, 2015**

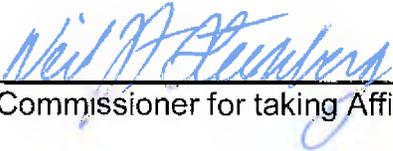
14. The Applicants require additional time to effect their restructuring. The Applicants are seeking an extension of the stay period to Friday, December 18, 2015. The Applicants believe that the length of the extension is necessary given that the pace of these proceedings is primarily driven by the price of iron ore, which is not likely to improve in the short term, based on expert forecasts. The Applicants' focus during this period will be to further engage with major stakeholders with a view to advancing their objectives of renegotiating their material contracts, and pursuing future exit financing arrangements; however, these discussions are likely to take time given the current price of iron ore and the forecasted period before any improvement is expected.

15. The Applicants have prepared a statement forecasting their cash flow for the period of the proposed stay extension, which indicates sufficient funding during the requested stay period. A copy of that statement has been provided to the Monitor for its review and comment, and I understand that the cash flow statement will be appended to the Monitor's report to the Court in respect of this requested stay extension, and will be addressed in that report.

16. The Applicants have acted, and will continue to act, in good faith and with due diligence in pursuing the restructuring.

17. I am not aware of any creditor that will suffer material prejudice if the Stay Period is extended, as requested.

SWORN BEFORE ME, at the City of  
Toronto, in the Province of Ontario, this  
20<sup>th</sup> day of July , 2015

  
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A Commissioner for taking Affidavits

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\_\_\_\_\_  
RICHARD PINKERTON

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---

**AFFIDAVIT OF RICHARD PINKERTON**

---

**PALIARE ROLAND ROSENBERG ROTHSTEIN LLP**

Barristers

155 Wellington St. W., 35<sup>th</sup> 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

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**PALIARE ROLAND ROSENBERG ROTHSTEIN LLP**  
Barristers  
155 Wellington St. W., 35<sup>th</sup> 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