

2022 01G 0994

COPY

IN THE SUPREME COURT OF NEWFOUNDLAND AND LABRADOR
GENERAL DIVISION

IN THE MATTER OF the receivership of
the Excluded AR of Canada Fluorspar (NL)
Inc. ("CFNI") pursuant to section 105 of the
Judicature Act, RSNL 1990, c J-4, as
amended and Rule 25.01 of the *Rules of
Supreme Court, 1986*

NOTICE OF MOTION

SUMMARY OF CURRENT DOCUMENT	
Court File Number(s):	2022 01G 0994
Date of Filing Document	December 6, 2023
Name of Party Filing or Person	Deloitte Restructuring Inc., in its capacity as Receiver of the Excluded AR of Canada Fluorspar (NL) Inc.
Application to which Document being filed relates:	Notice of Motion for Order authorizing and directing distribution to HSBC Bank Canada, discharge of Receiver, fee approval and related matters
Court Sub-file No.	n/a

TO the Supreme Court of Newfoundland and Labrador, General Division, or one of the Honourable Judges thereof:

Deloitte Restructuring Inc. ("Deloitte"), in its capacity as receiver, without security, of the Excluded AR (as defined herein) (the "Receiver") will make a motion (the "Motion") before the presiding judge on the 25 day of January 2024 at 10:30am or soon thereafter as the motion

can be heard at the courthouse located at 309 Duckworth Street in St. John's, Newfoundland and Labrador.

1. On the hearing of the Motion, the Receiver intends to seek the following Order (the “**Distribution and Discharge Order**”), attached as Schedule “A” hereto:
 - (a) abridging the time for service of this Notice of Motion and the Second Report of Receiver dated November 24, 2023 (the “**Second Report**”), so that the Motion is properly returnable on December ___, 2023, and dispensing with further service thereof;
 - (b) approving and authorizing a final distribution of funds in the Receiver's possession to HSBC Bank Canada (“**HSBC**”), as set out in the Final R&D (as defined herein below), after deducting the amount of USD57,772 on account of potential priority claims (the “**Priority Claim Reserve**”) and an amount equivalent to the professional fees secured by the receiver's charge, as set out in the Fee Affidavits (as defined herein) and the Second Report (the “**Final Distribution**”);
 - (c) approving and authorizing the holdback of the Priority Claim Reserve, and the distribution of the Priority Claim Reserve to a later date to satisfy any applicable *Wage Earner Protection Program Act* (Canada) claims and Canada Revenue Agency source payments, as described in the Second Report;
 - (d) approving the fees and disbursements of the Receiver and its legal counsel, Dentons Canada LLP (“**Dentons**”), as set out in the Second Report, the fee Affidavit of James Foran, sworn November 24, 2023 (the “**Foran Affidavit**”), and the fee Affidavit of Robert Kennedy, sworn December 4, 2023 (the “**Kennedy Affidavit**”) and together with the Foran Affidavit, the “**Fee Affidavits**”);
 - (e) approving the Second Report of the Receiver, dated November 24, 2023 and the activities of the Receiver as set out therein;

- (f) approving the Receiver's final statement of receipts and disbursements for the period ending October 31, 2023 ("**Final R&D**");
- (g) discharging Deloitte as Receiver effective upon the filing of the Receiver's discharge certificate, attached as Schedule "A" to the proposed Distribution and Discharge Order (the "**Receiver's Discharge Certificate**"), certifying that the Remaining Activities (as defined herein) have been completed to the satisfaction of the Receiver; and
- (h) such further and other grounds as counsel may advise and this Supreme Court of Newfoundland and Labrador General Division (the "**Court**") may permit.

THE GROUNDS FOR THE MOTION ARE:

Background

2. On February 21, 2022, upon application by PricewaterhouseCoopers Inc. ("**PwC**"), in its capacity as Court-appointed receiver and manager of Bridging Finance Inc. and Bridging Income Fund LP, the Supreme Court of Newfoundland and Labrador General Division (the "**Court**") granted an order (the "**Interim Receivership Order**") appointing Grant Thornton Limited as the interim receiver (the "**Interim Receiver**") of the assets, properties and undertakings (save and except for the excluded property as described herein) of CFNI and Canada Fluorspar Inc. ("**CFI**").
3. On March 11, 2022, upon application by the Interim Receiver, the Court granted an order (the "**Initial Order**") commencing a court-supervised restructuring proceeding under the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "**CCAA Proceedings**") for CFNI, CFI and Newspar (a General Partnership).
4. The Initial Order, similar to the Interim Receivership Order, excluded specific assets of CFNI from the CCAA Proceedings including: any and all Receivables and/or Financed Receivables, as such terms are defined pursuant to the Trade Invoice Recourse Financing

Facility Agreement between HSBC and CFNI dated May 25, 2018 (as amended), together with all rights and remedies arising thereunder, insurance policies and proceeds resulting therefrom, and proceeds generally (collectively the “**Excluded AR**”).

5. On March 25, 2022, the Court issued an order appointing the Deloitte as receiver, without security, over the Excluded AR (the “**Receivership Order**”).
6. On October 12, 2022, the Court issued an Order (the “**Interim Distribution Order**”) which authorized and directed an interim distribution by the Receiver to HSBC in the amount of USD3,750,000.
7. Following further collection efforts of the Receiver as described in the Second Report, the Receiver is currently holding the amount of USD3,927,588, as set forth in the Final R&D.

Proposed Final Distribution, Reserve and Statutory Distribution

8. As previously reported, the Receiver obtained a legal opinion with respect to the validity and enforceability of HSBC’s security (the “**Security Opinion**”). The Security Opinion confirms that the security held by HSBC in respect of the Excluded AR is valid and enforceable.
9. As at June 30, 2023, HSBC is currently owed USD5,076,905 by CFNI (the “**HSBC Indebtedness**”).
10. The Receiver seeks Court approval and authorization to complete the Final Distribution, after deducting the Priority Claim Reserve and after payment of the professional fees. With respect to the Priority Claim Reserve, the Receiver respectfully requests that the Court permit it to distribute such reserve to satisfy any and all applicable *Wage Earner Protection Program Act* (Canada) claims and Canada Revenue Agency source payments (once such claims are finalized).
11. The Receiver is of the view that the proposed Final Distribution and Priority Claim Reserve are appropriate and reasonable in the circumstances. There will be insufficient funds in the receivership estate to fully repay the HSBC Indebtedness.

Fees and Disbursements

12. The Receiver has provided services and incurred disbursements during the period of August 2, 2022 to June 30, 2023 which are described in the Foran Affidavit. The Receiver also estimates additional fees and disbursements to complete the receivership proceeding in the amount of USD23,059.20 (the “**Receiver’s Estimated Fees**”).
13. The Receiver has also incurred legal fees of its legal counsel, Dentons, in respect of these proceedings, as more particularly set out in the Kennedy Affidavit.
14. The Receiver and Dentons have implemented reasonable measures to control the time spent and costs incurred in these proceedings.
15. The Receiver requests that this Court approve: (i) its interim accounts for the period ending June 30, 2023 in the amount of USD83,249.40 inclusive of disbursements and HST (the “**Receiver’s Fees**”), together with the Receiver’s Estimated Fees, and (ii) the interim accounts of its legal counsel for the period ending June 30, 2023 in the amount of USD91,199.83 inclusive of disbursements and HST (the “**Dentons Fees**”, and together with the Receiver’s Fees, the “**Professional Fees**”), together with estimated legal fees to complete the receivership proceeding in the amount of USD25,221 (the “**Dentons Estimated Fees**”, and together with the Receiver’s Estimated Fees, the “**Estimated Fees**”).
16. The Receiver submits that the Professional Fees and Estimated Fees, are reasonable in the circumstances and have been or will be validly incurred in accordance with the provisions of the Receivership Order.

Receipts and Disbursements

17. The Final R&D reports net final receipts over disbursements, as at October 31, 2023, of USD3,927,588. The Receiver respectfully requests that the Court approve the R&D.

Discharging the Receiver

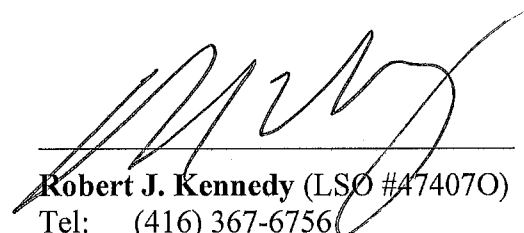
18. All of the Receiver's activities as set out in the Receivership Order will be completed upon (collectively, the "**Remaining Activities**"): (i) completing the Final Distribution, (ii) satisfying any applicable *Wage Earner Protection Program Act* (Canada) claims and Canada Revenue Agency source payments from funds contained in the Priority Claim Reserve, and (iii) finalizing any administrative matters incidental to the Receiver's appointment.
19. To the best of the Receiver's knowledge, following the completion of the Remaining Activities, the Receiver will have completed its administration of the receivership estate in accordance with the terms of the Receivership Order. The Receiver is not aware of its services being required for any further purpose other than as set out in this Second Report. Accordingly, the Receiver is seeking its discharge in accordance with the terms of the Distribution and Discharge Order.

THE FOLLOWING DOCUMENTARY EVIDENCE WILL BE USED AT THE HEARING OF THE MOTION:

20. The Second Report; and
21. Such further and other material as counsel may advise and this Honourable Court may permit.

DATED: December 4, 2023

DENTONS CANADA LLP
Toronto Dominion Centre
77 King St. W., Suite 400
Toronto, Ontario M5K 0A1



Robert J. Kennedy (LSO #474070)
Tel: (416) 367-6756
Fax: (416) 863-4592
robert.kennedy@dentons.com

Lawyers for the Receiver

TO: SERVICE LIST
(see attached Schedule "B")

SCHEDULE "A"
FORM OF DISTRIBUTION AND DISCHARGE ORDER

2022 01G 0994
SUPREME COURT OF NEWFOUNDLAND AND LABRADOR
GENERAL DIVISION

BETWEEN:

HSBC BANK CANADA

APPLICANT

AND:

CANADA FLUORSPAR (NL) INC.

RESPONDENT

DISTRIBUTION AND DISCHARGE ORDER

THIS MOTION made by Deloitte Restructuring Inc. ("**Deloitte**"), in its capacity as receiver (the "**Receiver**"), without security, of any and all Receivables and/or Financed Receivables, as such terms are defined pursuant to a Trade Invoice Recourse Financing Facility Agreement between HSBC Bank Canada ("**HSBC**") and Canada Fluorspar (NL) Inc. dated May 25, 2018, as amended, together with all rights and remedies arising thereunder, insurance policies and proceeds resulting therefrom, and proceeds generally (the "**Excluded AR**") for an Order,

- (a) abridging the time for service of the Notice of Motion, dated December 4, 2023 (the "**Notice of Motion**") and the Second Report of the Receiver, dated November 24, 2023 (the "**Second Report**"), so that this Motion is properly returnable on December ___, 2023, and dispensing with further service thereof;
- (b) approving and authorizing a final distribution of funds in the Receiver's possession to HSBC, as set out in the Final R&D (as defined herein), after deducting the amount of USD57,772 on account of potential priority claims (the "**Priority Claim Reserve**") and an amount equivalent to the professional fees secured by the receiver's charge, as set out in the Fee Affidavits (as defined herein) and the Second Report (as defined herein) (the "**Final Distribution**");

- (c) approving and authorizing the holdback of the Priority Claim Reserve, and the distribution of the Priority Claim Reserve to a later date to satisfy any applicable *Wage Earner Protection Program Act* (Canada) claims and Canada Revenue Agency source payments, as described in the Second Report;
- (d) approving the fees and disbursements of the Receiver and its legal counsel, Dentons Canada LLP ("**Dentons**"), as set out in the Second Report, the fee Affidavit of James Foran, sworn November 24, 2023 (the "**Foran Affidavit**"), and the fee Affidavit of Robert Kennedy, sworn December 4, 2023 (the "**Kennedy Affidavit**" and together with the Foran Affidavit, the "**Fee Affidavits**");
- (e) approving the Second Report and the activities of the Receiver as set out therein;
- (f) approving the Receiver's final statement of receipts and disbursements for the period ending October 31, 2023 ("**Final R&D**");
- (g) discharging Deloitte as Receiver effective upon the filing of the Receiver's discharge certificate, attached as Schedule "A" hereto (the "**Receiver's Discharge Certificate**"), certifying that the Remaining Activities (as defined therein) have been completed to the satisfaction of the Receiver; and
- (h) such further and other grounds as counsel may advise and this Supreme Court of Newfoundland and Labrador General Division (the "**Court**") may permit.

was heard this day ●.

ON READING the Notice of Motion and Second Report and on hearing the submissions of counsel for the Receiver, and any such other counsel as were present, no one appearing for any other person on the service list, although properly served as appears from the Affidavit of _____ sworn December _____, 2023, filed:

SERVICE

1. **THIS COURT ORDERS** that the time for service of the Notice of Motion and Second Report is abridged and validated such that this Motion is properly returnable today, and further service of the Notice of Motion and Second Report is hereby dispensed with.

DISTRIBUTIONS AND RESERVE

2. **THIS COURT ORDERS** that the Final Distribution is hereby approved and authorized.

3. **THIS COURT ORDERS** that the Priority Claim Reserve is hereby approved and authorized, and that distributions to satisfy any applicable and proven *Wage Earner Protection Program Act* (Canada) claims and Canada Revenue Agency source payments, are hereby approved and authorized.

RECEIVER'S ACTIVITIES

4. **THIS COURT ORDERS** that the Second Report, and the activities described therein, are hereby approved.

5. **THIS COURT ORDERS** that the fees and disbursements of the Receiver and Dentons, as set out in the Second Report and the Fee Affidavits, are hereby approved, together with the Estimated Fees (as defined in the Second Report).

6. **THIS COURT ORDERS** that the Final R&D is hereby approved.

RECEIVER'S DISCHARGE

7. **THIS COURT ORDERS** that, upon the Receiver filing the Receiver's Discharge Certificate, Deloitte shall be discharged as Receiver, provided however that notwithstanding its discharge herein: (a) Deloitte shall remain Receiver for the performance of such incidental duties as may be required to complete the administration of the receivership herein, and (b) Deloitte shall continue to have the benefit of the provisions of all Orders made in this proceeding, including all approvals, protections and stays of proceedings in favour of Deloitte in its capacity as Receiver.

8. **THIS COURT ORDERS** that, upon the filing of the Receiver's Discharge Certificate, Deloitte is hereby released and discharged from any and all liability that Deloitte now has or may hereafter have by reason of, or in any way arising out of, the acts or omissions of Deloitte while acting in its capacities as Receiver, save and except for any gross negligence or wilful misconduct on the Receiver's part. Without limiting the generality of the foregoing, upon the filing of the Receiver's Discharge Certificate, Deloitte is hereby forever released and discharged from any and all liability relating to matters that were raised, or which could have been raised, in the receivership, save and except for any gross negligence or wilful misconduct on the Receiver's part.

DATED at St. John's, in the Province of Newfoundland and Labrador, this • day of December, 2023.

Schedule "A"
Receiver's Discharge Certificate

2022 01G 0994
SUPREME COURT OF NEWFOUNDLAND AND LABRADOR
GENERAL DIVISION

BETWEEN:

HSBC BANK CANADA

APPLICANT

AND:

CANADA FLUORSPAR (NL) INC.

RESPONDENT

DISCHARGE CERTIFICATE

RECITALS

- A. Pursuant to an Order of Justice MacDonald of the Supreme Court of Newfoundland and Labrador – General Division (the "**Court**") dated March 25, 2022, Deloitte Restructuring Inc. ("**Deloitte**") was appointed as receiver (in such capacity, the "**Receiver**"), over any and all Receivables and/or Financed Receivables, as such terms are defined pursuant to the Trade Invoice Recourse Financing Facility Agreement between HSBC and CFNI dated May 25, 2018 (as amended), together with all rights and remedies arising thereunder, insurance policies and proceeds resulting therefrom, and proceeds generally.
- B. Pursuant to an Order of the Court dated December ___, 2023 (the "**Distribution and Discharge Order**"), Deloitte was discharged as Receiver, effective upon the filing by the Receiver with the Court of a certificate certifying that Deloitte has completed the Remaining Activities (as defined in the Receiver's Second Report dated November 24, 2023), provided however that, notwithstanding its discharge: (a) Deloitte shall remain Receiver for the

performance of such incidental duties as may be required to complete the administration of the receivership herein, and (b) Deloitte shall continue to have the benefit of the provisions of all Orders made in this proceeding, including all approvals, protections and stays of proceedings in favour of Deloitte, in its capacity as Receiver.

THE RECEIVER CERTIFIES the following:

1. The Receiver has paid all amounts, fees, and disbursements required to be paid pursuant to the Distribution and Discharge Order; and
2. The Receiver is satisfied that all Remaining Activities have been completed to the satisfaction of the Receiver.

THIS CERTIFICATE was delivered by the Receiver on _____ [TIME] on _____ [DATE].

Deloitte Restructuring Inc., solely in its capacities as the Court-appointed Receiver of the Excluded AR of Canada Fluorspar (NL) Inc., and not in any other capacity

Per:

Name:

Title:

SCHEDULE "B"
SERVICE LIST

TO:	<p>MARTIN WHALEN HENNEBURY STAMP PLC INC. 15 Church Hill PO Box 5910 St. John's, NL A1C 5X4 Geoffrey Davis-Abraham Tel: 709-754-1828 gdavis-abraham@mwhslaw.com</p> <p>DENTONS CANADA LLP 77 King Street West, Suite 400 Toronto, ON M5K 0A1 Dennis R. Wiebe Tel: 416-863-4475 dennis.wiebe@dentons.com Robert J. Kennedy Tel: 416-367-6756 robert.kennedy@dentons.com <i>Counsel for Deloitte Restructuring Inc., in its capacity as Receiver of Canada Fluorspar (NL) Inc.</i></p>
AND TO:	<p>COX AND PALMER 235 Water Street, Suite 1100 St. John's, NL A1C 1B6 Darren O'Keefe Tel: 709-570-5509 dokeefe@coxandpalmer.com Allison Philpott Tel: 709-570-5591 aphilpott@coxandpalmer.com <i>Counsel for the Respondent</i></p>

AND TO:	<p>DELOITTE RESTRUCTURING INC. 1741 Lower Water Street, Suite 800 Halifax, NS B3J 0J2</p> <p>James Foran Tel : 902-721-5661 jforan@deloitte.ca</p> <p>Phil Reynolds Tel: 416-956-9200 philreynolds@deloitte.ca</p> <p>Kurt Macleod Tel: 902-721-5602 kmacleod@deloitte.ca</p> <p><i>The Receiver</i></p>
AND TO:	<p>MCINNES COOPER 5th Floor, 10 Fort Williams Place PO Box 5939 St. Johns, NL A1C 5X4</p> <p>Geoffrey Spencer Tel: 709-724-5675 geoffrey.spencer@mcinnescooper.com</p> <p>Meghan King Tel: 709-724-8228 meghan.king@mcinnescooper.com</p> <p><i>Counsel for Grant Thornton</i></p>
AND TO:	<p>GRANT THORNTON Nova Centre, North Tower, Suite 1000 Halifax, NS B3J 0E9</p> <p>Phil Clarke Phil.Clarke@ca.gt.com</p> <p>Sean MacNeil Sean.MacNeil@ca.gt.com</p> <p><i>The Monitor / Interim Receiver</i></p>

AND TO:	<p>STEWART McKELVEY PO Box 5038 11th Floor, Cabot Place 100 Bew Gower Street St. Johns, NL A1C 5V3</p> <p>Joe Thorne Tel: 709-570-8850 joethorne@stewartmckelvey.com</p> <p>Liam Murphy Tel: 902.629.4558 mmurphy@stewartmckelvey.com</p> <p><i>Counsel for PricewaterhouseCoopers, on behalf of Bridging Finance Inc.</i></p>
AND TO:	<p>PRICEWATERHOUSE COOPERS INC., on behalf of Bridging Finance Inc. 18 York Street, Suite 2600 Toronto, ON M5J 0B2</p> <p>Graham Page graham.page@pwc.com</p> <p>Michael McTaggart michael.mctaggart@pwc.com</p>
AND TO:	<p>GOODMANS LLP Bay Adelaide Centre – West Tower 333 Bay Street, Suite 3400 Toronto, ON M5H 2S6</p> <p>Brendan O’Neill Tel: 416-849-6017 boneill@goodmans.ca</p> <p><i>Counsel for Golden Gate Capital</i></p>

AND TO:	<p>GOVERNMENT OF NEWFOUNDLAND AND LABRADOR Department of Industry, Energy and Technology Natural Resources Building 50 Elizabeth Avenue PO Box 8700 St. John's, NL A1B 4J6</p> <p>David Rodgers davidrodgers@gov.nl.ca</p> <p>Julia Thomson juliethomson@gov.nl.ca</p>
AND TO:	<p>ACOA John Cabot Building, 11th Floor PO Box 1060, Station C St. John's, NL M1C 5M5 bonnie.christie@acoa-apeca.gc.ca</p>
AND TO:	<p>KOMATSU INTERNATIONAL (CANADA) INC. 3755 blvd Matte Suite E Brossard, QC J4Y 2P4 Judy.langlais@global.komatsu.com</p>
AND TO:	<p>HICKMAN LEASING LIMITED 85 Kenmount Road St. John's, NL A1B 3P8</p> <p>Sonya Warren (Credit Manager) swarren@hickmanmotors.ca</p>
AND TO:	<p>FORD CREDIT CANADA LEASING, DIVISION OF CANADIAN ROAD LEASING COMPANY PO Box 2400 Edmonton, AB T5J 5C7 bbanktup@ford.ca</p>
AND TO:	<p>CATERPILLAR FINANCIAL SERVICE LIMITED 3457 Superior Court, Unit 2 Oakville, ON L6L 0C4 nabc.customerservice@cat.com</p>

AND TO:	<p>DE LAGE LANDEN FINANCIAL SERVICES CANADA INC. 3450 Superior Court, Unit 1 Oakville, ON L6L 0C4 corporateca@gllgroup.com</p>
AND TO:	<p>BENSON BUFFET 215 Water Street St. John's, NL A1C 5N8 Sean Pittman Tel: 709-570-7225 spittman@bensonbuffet.com <i>Counsel for Equipment SMS Inc.</i></p>
AND TO:	<p>TORYS LLP 79 Wellington Street West, 30th Floor, Box 270 TD South Tower Toronto, ON M5K 1N2 Scott Bomhof Tel: 416-865-7370 sbomhof@torys.com <i>Counsel for Arkema France</i></p>
AND TO:	<p>MCINNES COOPER 10 Fort Williams Place 5th Floor, Baine Johnston Centre St. Johns, NL A1C 5X4 Beth McGrath Tel: 709-570-7342 beth.mcgrath@mcinnescooper.com <i>Counsel for Newfoundland Power</i></p>
AND TO:	<p>WESTERN PETROLEUM NEWFOUNDLAND LIMITED PO Box 1167 7 Main Street Corner Brook, NL A2H 6T2 David L. Hounsell david@hounsell.ca</p>

AND TO:	PENNECON GRAND BANKS WATERHOUSING INC. 1309 Topsail Road Paradise, NL A1L 1N8 penneconlimited@pennecon.com
AND TO:	PARDY'S WASTE MANAGEMENT AND INDUSTRIAL SERVICES LIMITED West End Industrial Park 25 Stentafor Avenue Pasadena, NL A01 1K0 Derek Pardy derekpardy@pardyswaste.com
AND TO:	VALMIN FIRE PROTECTION LIMITED 1338 Random Island Road Weybridge, NL A5A 3A1 info@valminfireprotection.com
AND TO:	HITECH COMMUNICATIONS LTD. 15 Glencoe Drive, Mount Pearl NL c/o MURPHY & WATTON 17 West Street, PO Box 815 Corner Brook, NL A2H 2Y6 Tel: 709-634-3231 bmurphy@monmar.nf.net dwatton@monmar.nf.net
AND TO:	EPIROC CANADA 1025 Tristar Drive Mississauga, ON L5T 1W5 raluca.pop@epiroc.com
AND TO:	BROWNE FITZGERALD MORGAN AVIS & WADDEN Terrace on the Square, Level 2 P.O. Box 23135 St. John's, NL A1B 4J9 Keith Morgan Tel: 709-724-3800 Fax: 709-754-3800 kmorgan@bfma-law.com <i>Lawyers for TrajectorE Engineering Inc.</i>

AND TO:	CANADA REVENUE AGENCY Sudbury Tax Centre Post Office Box 20000, Station A Sudbury, ON P3A 5C1 Fax: 705-671-3994
AND TO:	WORKPLACE NL PO Box 9000 St. John's, NL A1A 3B8 Fax: 709-738-1714
AND TO:	BANK OF MONTREAL 100 King Street West, 11 th Floor Toronto, ON M5X 1A1
AND TO:	BANK OF MONTREAL TRANSPORT FINANCE 5750 Explorer Drive 2 nd Floor, Mississauga, ON L4W 0A9
AND TO:	MERIDIAN ONECAP CREDIT CORP. Suite 1500, 4710 Kingsway Burnaby, BC V5H 4M2 Fax: 1-604-646-2222
AND TO:	MITSUBISHI HC CAPITAL CANADA LEASING, INC. 301-3390 South Service Rd. Burlington, ON L7N 3J5
AND TO:	TOROMONT INDUSTRIES LTD./INDUSTRIES TOROMONT LTEE 3131 Highway 7 West Concord, ON L4K 1B7 Jeffrey S. Chisholm Fax: 1-416-667-5555
AND TO:	DORMODY ENGINEERING INCORPORATED 47 Veitch Crescent St. John's, NL A1A 0B8

Email List

dennis.wiebe@dentons.com; robert.kennedy@dentons.com; gdavis-abraham@mwhslaw.com;
dokeefe@coxandpalmer.com; aphilpott@coxandpalmer.com; jforan@deloitte.ca;
philreynolds@deloitte.ca; kmacleod@deloitte.ca; geoffrey.spencer@mcinnescooper.com;
meghan.king@mcinnescooper.com; Phil.Clarke@ca.gt.com; Sean.MacNeil@ca.gt.com;
joethorne@stewartmckelvey.com; graham.page@pwc.com; michael.mctaggart@pwc.com;
boneill@goodmans.ca; juliethomson@gov.nl.ca; bonnie.christie@acoa-apeca.gc.ca;
Judy.langlais@global.komatsu.com; swarren@hickmanmotors.ca; bbanktup@ford.ca;
nabc.customerservice@cat.com; corporateca@gllgroup.com; spittman@bensoibuttet.com;
sbomhof@torys.com; beth.mcgrath@mcinnescooper.com; david@hounsell.ca;
penneconlimited@pennecon.com; derekparady@pardyswaste.com;
info@valminfireprotection.com; bmurphy@monmar.nf.net; dwatton@monmar.nf.net;
raluca.pop@epiroc.com; mmurphy@stewartmckelvey.com; dauidrodgers@gov.nl.ca;
kmorgan@bfma-law.com