

CANADA

SUPERIOR COURT
(Commercial Division)

PROVINCE OF QUEBEC
DISTRICT OF MONTREAL
No: 500-11-038474-108

The Companies' Creditors Arrangement Act

IN THE MATTER OF THE PLAN OF
ARRANGEMENT AND COMPROMISE OF:

WHITE BIRCH PAPER HOLDING COMPANY

-and-

WHITE BIRCH PAPER COMPANY

-and-

STADACONA GENERAL PARTNER INC.

-and-

BLACK SPRUCE PAPER INC.

-and-

F.F. SOUCY GENERAL PARTNER INC.

-and-

3120772 NOVA SCOTIA COMPANY

-and-

ARRIMAGE DE GROS CACOUNA INC.

-and-

PAPIER MASSON LTÉE

Debtors

-and-

ERNST & YOUNG INC.

Monitor

-and-

STADCONA LIMITED PARTNERSHIP

-and-

F.F. SOUCY LIMITED PARTNERSHIP

-and-

F.F. SOUCY, INC. & PARTNERS LIMITED
PARTNERSHIP

Mis en Cause

-and-

SONOCO CANADA CORPORATION

Petitioner

***NUNC PRO TUNC* MOTION TO EXTEND THE CLAIMS BAR DATE TO
PERMIT THE FILING OF THE SONOCO CANADA CORPORATION PROOF
OF CLAIM DATED APRIL 29, 2011**

**TO THE REGISTRAR, OR ONE OF THE HONOURABLE JUDGES OF THE
SUPERIOR COURT, SITTING IN COMMERCIAL DIVISION, IN THE
DISTRICT OF MONTREAL, THE PETITIONER, SONOCO CANADA
CORPORATION, RESPECTFULLY SUBMITS AS FOLLOWS:**

1. On February 24, 2010, the Debtors filed a Motion for the issuance of an initial order which was granted on the same day by this Honourable Court.
2. The Initial Order has been extended from time to time, including most recently by way of a judgment dated March 13, 2015.
3. On May 6, 2010, this Honourable Court issued an Order Establishing the Claims Process, which *inter alia* set the Claims Bar Date as June 21, 2010, at 5 PM Eastern time (EDT).
4. According to paragraph 4 of the Order Establishing the Claims Process, the Monitor was ordered to send instructions (the "**Instructions**") by regular mail to each Known Creditor at their last known address according to the Debtors' books and records by no later than May 21, 2010.

5. The Petitioner, Sonoco Canada Corporation (“**Sonoco**”), is a creditor of the Debtors, and is listed on the Preliminary List of Creditors as at February 24, 2010, the whole as appears from a copy of such Preliminary List of Creditors, communicated herewith as **Exhibit R-1**.
6. Sonoco, however, has no record of receiving the Instructions either at its offices in Trois-Rivières, Quebec or at the offices of its parent company, Sonoco Products Company, in Hartsville, South Carolina, presumably due to the fact that such addresses are, in part, incorrectly transcribed on the Preliminary List of Creditors.
7. Consequently, Sonoco did not file its Proof of Claim by the Claims Bar Date.
8. After becoming aware that a Claims Bar Date had been set and missed, Sonoco, through its attorneys, prepared and filed a Proof of Claim with the Monitor on April 29, 2011, the whole as appears from a copy of the cover letter from Tara E. Naufel, Sonoco’s attorney, to the Monitor together with its Proof of Claim, communicated herewith *en liasse* as **Exhibit R-2**.
9. As appears from the cover letter communicated with Exhibit R-2, Sonoco advised the Monitor that it had no record of receiving any notice to file a proof of claim, and requested that the claim be allowed in spite of the fact that the claim was filed after the Claims Bar Date.
10. Sonoco did not hear anything from the Monitor with respect to its Proof of Claim until March 17, 2015, when it received a letter from the Monitor indicating that its Proof of Claim could not be considered as properly filed without an order from the Court authorizing the filing of the same, the whole as appears from a copy of such letter communicated herewith as **Exhibit R-3**.
11. It is in the interests of justice that the Claims Bar Date be extended with respect to Sonoco to permit the filing of the Sonoco Proof of Claim, given that Sonoco did not receive the Instructions, and filed its claim promptly upon learning of the Claims Bar Date.
12. Furthermore, the Monitor appears to have only begun reviewing claims in March, 2015, almost 5 years after the Claims Bar Date, and almost 4 years after the Sonoco Proof of Claim was filed, thus no prejudice would be caused to any party if the requested relief is granted.

13. Consequently, Sonoco respectfully requests that this Honorable Court extend the Claims Bar Date to permit the filing of its Proof of Claim dated April 29, 2011, communicated as part of Exhibit R-2.
14. The present Motion is well-founded in fact and in law.

WHEREFORE, MAY IT PLEASE THE COURT TO:

GRANT the present Motion;

EXTEND the Claims Bar Date to permit the filing of the Sonoco Canada Corporation Proof of Claim dated April 29, 2011;

THE WHOLE without costs, save in the event of contestation;

MONTREAL, this 30 day of March, 2015


FISHMAN FLANZ MELAND PAQUIN LLP

Attorneys for the Petitioner, Sonoco Canada Corporation

AFFIDAVIT

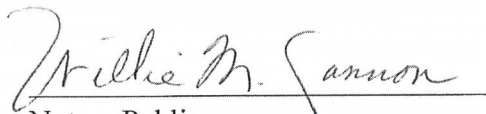
I, **CHRISTOPHER HOPPER**, Corporate Credit and Collections Manager, doing business at 1 N. Second St., Hartsville, SC 29550, do solemnly declare as follows:

1. I am a duly authorized representative of the Petitioner, Sonoco Canada Corporation.
2. All of the facts alleged in the attached Nunc Pro Tunc *Motion to Extend the Claims Bar Date to Permit the Filing of the Sonoco Canada Corporation Proof of Claim dated April 29, 2011* are true and correct.

AND I HAVE SIGNED


CHRISTOPHER HOPPER

SOLEMNLY AFFIRMED before me in Hartsville, South Carolina
this 30 day of March, 2015


Notary Public

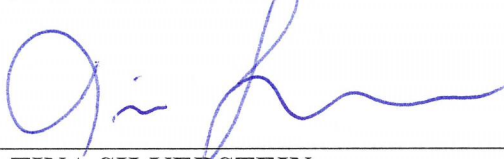
My Commission Expires
January 28, 2021

AFFIDAVIT OF AUTHENTICITY

I, **TINA SILVERSTEIN**, attorney, practicing my profession in the law firm of Fishman Flanz Meland Paquin LLP at 1250 Rene-Levesque Boulevard West, Suite 4100, Montreal, Quebec, H3B 4W8, do hereby declare under my oath of office that:

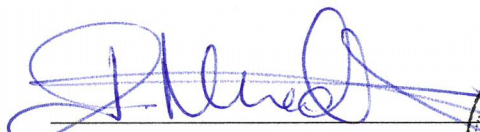
1. On March 30, 2015, Fishman Flanz Meland Paquin LLP received by email at 5:07 PM the Affidavit of Christopher Hopper signed on March 30, 2015;
2. The copy of the Affidavit attached hereto is an authentic copy of the Affidavit that was received by Fishman Flanz Meland Paquin LLP as set forth in paragraph 1.

AND I HAVE SIGNED



TINA SILVERSTEIN

SOLEMNLY AFFIRMED before me in Montreal, Quebec
this 30th day of March, 2015


Commission of Oaths for Quebec

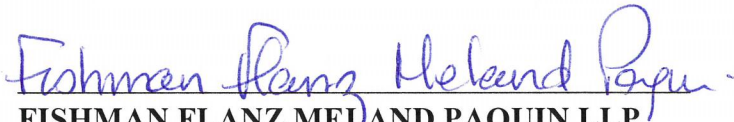
NOTICE OF PRESENTATION

TO: Service List

TAKE NOTICE that the attached Nunc Pro Tunc *Motion to Extend the Claims Bar Date to Permit the Filing of the Sonoco Canada Corporation Proof of Claim dated April 29, 2011* will be presented for adjudication on **April 9, 2015** in Room 16.10 of the Montreal Courthouse located at 1 Notre-Dame Street East in Montreal, Quebec, H2Y 1B6 at **9 AM** or so soon thereafter as counsel may be heard, save in the event of contestation, in which case it will be presented before the Honourable Robert Mongeon of the Superior Court sitting in Commercial Division in the judicial District of Montreal, in a room and at a date and time to be determined by the Court.

DO GOVERN YOURSELVES ACCORDINGLY

MONTREAL, this 30 day of March, 2015


FISHMAN FLANZ MELAND PAQUIN LLP

Attorneys for the Petitioner, Sonoco Canada Corporation

CANADA

**SUPERIOR COURT
(Commercial Division)**

**PROVINCE OF QUEBEC
DISTRICT OF MONTREAL
No: 500-11-038474-108**

The Companies' Creditors Arrangement Act

**IN THE MATTER OF THE PLAN OF
ARRANGEMENT AND COMPROMISE OF:**

**WHITE BIRCH PAPER HOLDING COMPANY
ET AL.**

Debtors

-and-

ERNST & YOUNG INC.

Monitor

-and-

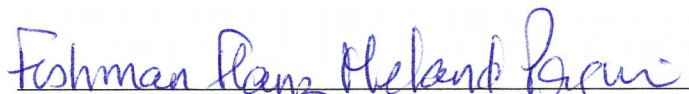
STADCONA LIMITED PARTNERSHIP ET AL.

Mis en Cause

APPEARANCE

The undersigned attorneys FISHMAN FLANZ MELAND PAQUIN LLP appear on behalf of SONOCO CANADA CORPORATION, under all legal reserves.

MONTREAL, this 30th day of March, 2015



FISHMAN FLANZ MELAND PAQUIN LLP

Attorneys for the Petitioner, Sonoco Canada Corporation

SUPERIOR COURT (Commercial Division)	
The Companies' Creditors Arrangement Act IN THE MATTER OF THE PLAN OF ARRANGEMENT AND COMPROMISE OF: WHITE BIRCH PAPER HOLDING COMPANY ET AL. -and- ERNST & YOUNG INC. -and- STADCONA LIMITED PARTNERSHIP ET AL.	Debtors Monitor Mis en cause
APPEARANCE	
COPY FOR SERVICE LIST (ATTACHED)	
O/F: SONOCO-1	
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Service list as of September 26, 2014, as provided by the attorney representing the debtor companies. The Monitor does not make any representation whatsoever regarding the completeness or accuracy of this list. For any modification to the list after the above-mentioned date, the reader is invited to contact the attorney for the debtor, to obtain an updated version of the service list.

La liste pour fins de signification en date du 26 septembre 2014 a été fournie par l'avocat représentant les sociétés débitrices. Le contrôleur ne fait aucune représentation quelle qu'elle soit quant à l'exactitude de cette liste. Pour toute modification à la liste après la date susmentionnée, le lecteur est invité à communiquer avec l'avocat du débiteur, pour obtenir une version à jour de la liste

CANADA

SUPERIOR COURT
(Commercial Division)
The Companies' Creditors Arrangement Act

PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL
No.: 500-11-038474-108

IN THE MATTER OF THE PLAN OF
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-and-

F.F. SOUCY, INC. & PARTNERS, LIMITED
PARTNERSHIP

Mises en Cause

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(Updated as of September 26, 2014)

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