Court File No. 03-CL-5145

*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 IVACO INC. AND THE APPLICANTS LISTED IN SCHEDULE "A"**

# ELEVENTH REPORT OF THE MONITOR
**JUNE 11, 2004**

## INTRODUCTION

1. On September 16, 2003 Ivaco Inc. ("Ivaco") and certain of its affiliates (collectively the "Applicants") filed for and obtained protection from their creditors pursuant to the *Companies' Creditors Arrangement Act* R.S.C. 1985 c. C-36, *as amended* (the "CCAA"). The terms of these proceedings are governed by an order of this Honourable Court dated September 16, 2003, as amended and restated (the "Initial Order"). Pursuant to the Initial Order, Ernst & Young Inc. was appointed as monitor (the "Monitor") of the Applicants during these CCAA proceedings.

2. The Applicants included in the Initial Order consist of, amongst others, Ivaco, Ivaco Rolling Mills Inc., Ifastgroupe Inc., IFC (Fasteners) Inc. ("IFC"), and Docap (1985) Corporation ("Docap") and the related limited partnerships Ivaco Rolling Mills Limited Partnership ("IRM") and Ifastgroupe and Company Limited Partnership ("Ifastgroupe").

3. This Eleventh Report of the Monitor (the "Report") is provided to this Honourable Court in support of the Applicants' request for approval of: (i) an extension of the stay of proceedings from June 18, 2004 to August 13, 2004; and (ii) a claims process.

4. The Report also serves as an update in respect of the activities of the Applicants and certain events occurring since the Ninth Report of the Monitor (the "Ninth Report"), the Supplement to the Ninth Report of the Monitor (the "Supplement to the Ninth Report") and the Tenth Report of the Monitor (the "Tenth Report"), including the following:

- Sales Process;
- Operational Update;
- Status of Non-Core Assets;
- Communication with Stakeholders;
- Claims Process;
- Financial Performance and Cash Flow Projections; and
- Debtor-in-Possession Financing.

**TERMS OF REFERENCE**

5. In preparing this Report, the Monitor has relied upon unaudited financial information, company records, company prepared financial information and discussions with management of the Applicants. The Monitor has not performed an audit or other verification of such information.

6. Unless otherwise stated, all monetary amounts contained herein are expressed in Canadian dollars. Capitalized terms not otherwise defined are as defined in the Initial Order and the Monitor's previous reports.

**SALES PROCESS**

7. The Second Round of the Sales Process being undertaken by the Applicants as described fully in the Eighth Report of the Monitor has continued in accordance with the Sales Process Memorandum.

Pursuant to this Honourable Court's direction, the Monitor has been actively involved throughout the Sales Process, attending all management presentations to bidders, facility tours and all material follow-up meetings with the bidders. The Applicants together with the Monitor have kept the Informal Advisory Committee apprised throughout the process.

8. In accordance with the Sales Process Memorandum and as requested by certain bidders, UBS advised all bidders in writing that the Bid Deadline was extended to May 14, 2004. Counsel for the Applicants also advised the Service List of the extension. This extension was reported to this Honourable Court in the Ninth Report.

9. On May 14, 2004, the Applicants received several potentially viable offers. The Applicants, their financial and legal advisors, the Monitor and the relevant members of the Informal Advisory Committee reviewed the bids.

10. On May 19, 2004 the Applicants, their financial and legal advisors, the Monitor and its legal counsel met with certain members of the Informal Advisory Committee to review the bids received by the Applicants. On May 25, 2004 the Applicants and the Monitor met with the remaining members of the Informal Advisory Committee to review the bids and to discuss next steps. With the Informal Advisory Committee's concurrence, the Applicants decided that they should move the Sales Process forward by providing the bidders with access to QIT and the USWA so that the bidders would be in a position to waive any closing conditions relating to supply agreements or union contracts, as applicable.

11. To that end, as described in the Tenth Report, on June 1, 2004, the Applicants together with the Monitor met with representatives of QIT to provide them with confidential information concerning the bids and to discuss the next phase of the Sales Process and in particular the protocol for facilitating meetings between QIT and the bidders.

12. Prior to this meeting, on April 28, 2004, QIT advised the Applicants in writing that it required that representatives of the Applicants, the CRO or the Monitor would not attend any meeting or part thereof if and to the extent that their absence was requested by QIT or a bidder. Following this correspondence, the CRO had continuing dialogue with QIT and its advisors to attempt to understand and address QIT's concerns in this regard. These discussions were still in process at the time of the June 1, 2004 meeting described above. After the meeting, QIT advised the Applicants, and later the Monitor, that as a condition to meeting with the bidders, they were not prepared to allow representatives of the Applicants, the CRO or the Monitor to be present. QIT also advised the Applicants that it is its position that its written supply contract with IRM cannot be disclosed to the bidders as to do so would breach confidentiality requirements. QIT takes the position that this written contract was terminated two months prior to the filing of the CCAA application. The Applicants take the position that there is no confidentiality restriction with the respect to the agreement, but in order to be cooperative have to date refrained from disclosing the agreement to bidders. The Applicants take the position that the written contract was not terminated prior to the filing of the CCAA application.

13. The Applicants, with the concurrence of the Monitor, advised QIT that its position on who could attend meetings involving QIT and bidders was unacceptable and would impair the Sales Process. QIT was of the view that the presence of the CRO and the Monitor would impair its discussions with bidders. The Applicants brought a motion returnable June 9, 2004 seeking an order confirming that the written supply agreement could be disclosed in its entirety and that the Applicants, CRO and Monitor could participate in all meetings between the bidders and QIT. Discussions ensued between counsel for the parties and the matter was largely settled prior to the hearing. The remaining issues were dealt with by this Honourable Court at the hearing. A final draft copy of the June 9, 2004 Court Order is attached as Appendix A. The decision establishes the principles upon which the balance of the discussions in the Sales Process will proceed.

14. The Applicants have also offered to meet with the USWA in order to share the proposals received with the appropriate representatives of the USWA (subject to appropriate confidentiality arrangements) and to assist the USWA in commencing discussions with the parties that submitted proposals.

15. Since receipt of the offers the Applicants have responded to numerous information requests from the bidders to ensure the steady progress of the Sales Process. The Applicants are now involved in a detailed review of the draft Agreements of Purchase and Sale submitted by the bidders in order to clarify certain ambiguities contained in and aspects of the draft agreements to ensure that the agreements can be properly compared and to ensure that all conditions of closing can be met prior to granting one or more of the bidders exclusivity.

**OPERATIONAL UPDATE**

Overview:

16. The Applicants have cooperated with the Monitor and have allowed unrestricted access to their premises, books and records. As noted in previous reports, with the assistance of the Monitor, the Applicants report to stakeholders on the bi-weekly results for each entity. These reports include an analysis of actual cash flow performance compared to the most recent cash flow projections filed with this Honourable Court, a summary of DIP borrowings and a review of operations at each major entity.

17. Since the Initial Order was granted, the Monitor has been working closely with representatives of management, the Applicants' Canadian and US legal counsel and Mr. Randall Benson, CRO, on all matters relating to ongoing operations and restructuring activities. The Monitor has assisted the Applicants in all aspects of their restructuring and planning activities.

Banking:

18. As has been widely publicized in Canada, on the evening of May 31, 2004, the Royal Bank of Canada ("RBC") experienced a processing disruption during a routine programming update to one of their computer systems. This disruption resulted in some of the RBC client transactions, including deposits, withdrawals and payments, not being properly reflected in the RBC clients' account balances. Although the problem has been resolved, both IRM and Ifastgroupe are clients of RBC and experienced difficulties in their day-to-day operations since May 31, 2004.

19. On June 3, 2004, IRM's rod mill was shut down for approximately one hour due to a work stoppage that was initiated because the employees of IRM had not received their pay on that day (as the IRM payroll works through the ADP/ RBC system and transfers to the employees' accounts were not visible). In order to get the employees back to work, with the assistance of the Monitor, management quickly negotiated and implemented with the local labour union representative an arrangement whereby each employee would receive a $500 cheque, which would be offset against the following week's payroll. The employees returned to work on that basis.

20. In addition, IRM had to provide certain suppliers with wire-transfer confirmations for payments made during the week as these transfers did not appear in the suppliers' accounts.

21. Ifastgroupe experienced serious cash constraints on June 3 and 4, 2004 because RBC was unable to locate and identify incoming wire-transfers that were required to be swept from the RBC blocked account to GE. Ifastgroupe drew the maximum amount from its GE DIP facility on June 3, 2004 and as a result Ifastgroupe had to ration payments as insufficient funds were available for all suppliers. At the end of the day on June 4, 2004, Ifastgroupe was late in paying IRM (approximately $492,000) and Sivaco-Quebec (approximately $648,000).

22. On the afternoon of June 4, 2004 the Applicants, with the assistance of the Monitor, obtained partial value for the wire-transfers received by RBC from June 2 to June 4, 2004. Approximately $6 million was swept to GE for value on June 7, 2004. This sweep to GE will permit Ifastgroupe to fund not only its payroll for the week ending June 12, 2004 but also to settle the amounts owed to IRM and Sivaco-Quebec.

23. The Applicants' banking situation returned to normal on June 7, 2004. The Applicants are currently assessing the damages they have suffered from RBC's system interruption and are considering submitting a claim to RBC for compensation. The amount of such a claim remains to be determined.

Carriers:

24. Since the date of the Ninth Report, the carriers have cooperated fully with and provided uninterrupted service to the Applicants. A meeting has been arranged between the Applicants, representatives of the carriers and the Monitor to discuss various issues of concern to the carriers and to update the carriers with respect to the next steps in the restructuring process.

**STATUS OF NON-CORE ASSETS**

25. The following is an update on the status of non-core asset sales since the Ninth Report and the Supplement to the Ninth Report.

AISLIC Insurance Settlement

26. The Applicants have sought to recover approximately US$4.4 million under a Clean-Up Cost Cap insurance policy ("CCC") purchased from AISLIC in 1999. Under a CCC policy, the insurance company promises to reimburse the policyholder for cleanup cost at a site that exceed an estimated "Attachment Point". The Attachment Point is generally arrived at after the insurance company engineers have reviewed the remediation plan and the bids submitted by remediation vendors, among other information.

When Ivaco was negotiating the sale of the Atlantic Steel site (completed prior to the commencement of these CCAA proceedings), it was essential to secure a CCC policy. At the time of the closing, Ivaco had not been able to secure final contractor bids and AISLIC's computation of the Attachment Point was based upon estimates which had not been finalized. Because Ivaco believed that it would be possible to secure lower bids from some or all of the vendors, Ivaco negotiated a provision whereby AISLIC promised that upon favourable review of the lower contractor bids, the Attachment Point would be lowered accordingly.

27. Ivaco subsequently provided information in February 2000 demonstrating that lower contractor bids were in fact secured. Months went by between the time Ivaco provided the lower bids and the point when AISLIC's refusal to lower the Attachment Point was finally conveyed to Ivaco in the fall of 2000. During the same time, cost overruns emerged which resulted in cleanup costs exceeding the original Attachment Point.

28. Consequently, Ivaco contended that AISLIC should have lowered the Attachment Point based on the lower contractor bids and Ivaco's lawsuit sought to recover the amounts Ivaco expended in the cleanup of the site in excess of an Attachment Point based upon the lower contractor bids. This would have resulted in damages of approximately US$4.4 million, whereas AISLIC made representations that it was willing to pay US$375,000.

29. Further to numerous exchanges, the Applicants believe that if this dispute were not settled, the case would likely persist for many months or years with no certainty as to the verdict or the costs.

30. During 2004, the parties negotiated a settlement whereby both parties agreed on damages in the amount of US$1,350,000. In exchange for this consideration, Ivaco agreed to release any and all claims it has against AISLIC covered by the Clean-Up Cost Cap insurance policy and to dismiss its action.

31. The Applicants presented the settlement offer to the National Bank's financial advisors prior to signing the final Settlement Agreement and Release to obtain National Bank's concurrence in its capacity as the first ranking secured creditor of Ivaco.

32. Based on the factors described above, including the uncertainty of the outcome of the lawsuit and cost related thereto, it is the Monitor's view that the settlement offer of US$1,350,000 appears to be reasonable. The Applicants executed a Settlement Agreement and received the settlement funds in the amount of US$1,350,000. Pursuant to the Order of this Honourable Court dated May 11, 2004, the proceeds from the settlement will be paid to National Bank.

Docap:

33. As discussed in the Ninth Report, the Applicants and Continua are working with the National Bank and their financial advisors to review various alternatives with respect to Docap including the possibility of a stand-alone restructuring, a sale to the current management team or a liquidation of the business. The Monitor will report back to this Honourable Court as more information becomes available.

IMT Corporation:

34. The Applicants are in discussions with a party who wishes to purchase certain of IMT's assets and assume certain of its specified liabilities. Completion of a transaction is still subject to continued due diligence and a number of closing conditions, including financing and satisfactory arrangements with the Union. The Applicants will provide details of the transaction to this Honourable Court in due course.

**COMMUNICATIONS WITH STAKEHOLDERS**

General:

35. Since the date of the Initial Order, the Applicants with the assistance of the Monitor have responded to a significant number of requests for information from

the major stakeholders. The Monitor is working with the Applicants on a daily basis to ensure that any outstanding information requests are dealt with to the satisfaction of the stakeholders and as quickly as possible in the circumstances.

Labour Matters:

36. Pursuant to the Honourable Mr. Justice Farley's direction on March 2, 2004, the Monitor has reported bi-weekly to His Honour on the status of information exchange and discussions between the Applicants and the USWA.

37. Representatives of the USWA have sent detailed information requests to the Applicants. Management of the Applicants, with the assistance of the Monitor, have responded to these requests in as timely a manner as practicable.

38. In a letter dated May 26, 2004 to the CRO, the USWA responded to some of the comments and observations contained in the Monitor's bi-weekly reports. The USWA's comments dealt with the following issues:

- CCAA Discussions: The USWA indicated that it was available to meet with the Applicants to discuss the Applicants' business and restructuring plans. In addition to some apparent miscommunication concerning setting up a meeting, the parties have not reached agreement concerning the appropriate scope and confidentiality arrangements around any discussion of the CCAA and Sales Processes.

- Arbitration Process: The USWA advised that it rejected the possibility of having any arbitration process that would be contrary to the terms of the collective agreements; and

- Disclosure of Information: The USWA commented that disclosure of financial information by the Applicants has been intermittent and incomplete. The Applicants take the position that they have responded to the USWA's requests promptly and completely.

39. On May 31, 2004, the Applicants responded to the USWA's comments described above. The response was included in the Monitor's bi-weekly report dated June 7, 2004 to Mr. Justice Farley and copied to the Service List. The Monitor also responded to the USWA's comments directed at the Monitor and a copy of the Monitor's response was also included in the June 7, 2004 report to his Honour and copied to the Service List.

40. From the observations of the Monitor, the Applicants have attempted to be sensitive to the day-to-day issues of the USWA. The Applicants have provided the USWA with responses to recent information requests. In addition, both parties have indicated their availability to meet and engage in CCAA discussions.

## CLAIMS PROCESS

General:

41. The Applicants are seeking approval of a claims process whereby the Applicants will call for the claims of their creditors. These claims will then be determined for voting and distribution purposes under the Plan or Plans of Arrangement to be presented by the Applicants (the "Plan").

42. While the Applicants have not yet filed a Plan with the Court, the Applicants believe, and the Monitor agrees, that the establishment and commencement of a claims process for creditors will expedite the Applicants' restructuring process for the reasons set out below.

Benefits Of An Accelerated Claims Process:

43. The Applicants are pursuing the restructuring or sale of their businesses and in particular are now conducting the Second Round of the Sale Process.

In order to expedite the CCAA process, the Applicants wish to proceed with a claims process for their creditors in parallel with the Sales Process and the further development of a Plan.

44. In the Monitor's view, the fact that the Plan has not yet been formulated is not a reason to put off implementation of a claims procedure for creditors. The time between the filing of a Plan and the holding of a vote on the Plan may well be quite short and would not allow sufficient time for a claims process and resolution of disputes if the claims process were commenced after the filing of the Plan.

45. Whatever track of the dual track process is pursued, a claims process will be inevitable. Some creditors have also expressed the wish that a claims process be put in place sooner rather than later.

46. For reasons discussed below, the Applicants are not currently able to estimate with any reasonable degree of certainty the value of claims that will be filed. Numerous issues are expected to be encountered with respect to the nature and valuation of such claims. Proceeding with the claims procedure now will provide useful information to the Applicants in the development of the Plan and provide essential time for the claims to be adjudicated in advance of the Plan being voted on by the creditors.

Information With Respect To The Applicants' Creditors:

47. The purpose of the proposed claims process is to establish claims against the Applicants as at September 16, 2003 ("Pre-Filing Claims") as well as claims arising in connection with the renegotiation, repudiation or termination, etc. by an Applicant of a contract, lease or any other such agreement after September 16, 2003 ("Post-Filing Claims").

48. The Applicants expect that, in addition to possible claims relating to pension plan deficiencies, Pre-Filing Claims may be received from:

- *Trade Creditors* - Preliminary analysis conducted to date by the Applicants suggest that they owe the following approximate amounts to creditors who supplied goods and services to the Applicants before September 16, 2003:
    - IRM - $136.6 million;

- Ifastgroupe - $22 million; and
- Ivaco - $238.1 million.

- *Lenders / Bondholders* – The Applicants' records indicate that the approximate amount of outstanding bank, bond or other indebtedness is as follows:
    - IRM - $90.7 million;
    - Ifastgroupe - $69.4 million; and
    - Ivaco - $34 million (secured)
- *Equipment lenders* – The Applicants' records indicate that the approximate amount owing to equipment lenders is as follows:
    - IRM - $18.7 million;
    - Ifastgroupe - $6.9 million; and
    - Ivaco - $6.8 million
- *Employees* – There are a number of grievances filed by the Applicants' employees or unions relating to claims that existed or events that occurred prior to September 16, 2003. To date, the Applicants and their labour unions have not agreed on an alternative process to resolve these outstanding grievances. The Applicants' expectation is that grievances arising prior to September 16, 2003 will be treated similarly to other claims against the Applicants arising prior to September 16, 2003 and that Pre-Filing Claims will be filed in accordance with the proposed process detailed in this Report. However, in the event a consensual resolution of these issues is reached, there is adequate time to seek approval of such a settlement from this Court prior to the proposed claims bar date discussed below.

49. The Applicants expect that Post-Filing Claims may be received from numerous creditors including the following:

- *Trade Suppliers / Lessors* - Paragraph 18 of the Initial Order provides that the Applicants may terminate premises leases or terminate arrangements or agreements in the course of their restructuring and deal with the consequences thereof in the Plan. The Applicants are reviewing all of their existing contracts, leases, and agreements etc. in order to identify opportunities to reduce their costs. The Applicants have terminated some contracts and renegotiated others. This review process is still ongoing. The Applicants are unable at present to estimate the amounts of Post-Filing Claims which may be filed in connection with these terminations and renegotiations; and
- *Employees* – The Applicants may receive Post-Filing Claims from certain of their employees as a result of this restructuring. If such claims are filed, the Applicants and the Monitor will review the claims to determine their validity and appropriate value.

Notice To File Claims:

50. The Applicants propose that any creditor asserting a Pre-Filing Claim or asserting a Post-Filing Claim which arose on or before June 18, 2004 (collectively, the "Claims") be required to file a proof of claim with the Monitor prior to 5:00 p.m. on August 6, 2004 (the "Claims Bar Date"). An order which establishes a bar date for Post-Filing Claims arising after June 18, 2004 will be sought from this Honourable Court at a later date. Known creditors will be notified of the requirement to file proofs of claim before June 23, 2004 by the following means:

- The Monitor will distribute proofs of claim and related instructions and filing information (the "Proof of Claim Document Package") by regular mail to all known creditors, other than unionized employees, no later than June 23, 2004. The package proposed by the Applicants to be sent to potential creditors is attached as Appendix B;
- The Monitor will send a copy of the Proof of Claim Package to counsel to each of the Applicants' unions no later than June 23, 2004. Each union shall then co-ordinate the copying, distribution, and completion of the Proof of

Claim Package to each employee and the filing of a Proof of Claim on behalf of each represented employee;

- The Monitor will place notices addressed to all potential creditors in major newspapers including The Globe and Mail (National Edition), La Presse (a French translation) and The Wall Street Journal (National Edition) on two separate days approximately one week apart. The first of these two notices shall run in all three publications no later than June 23, 2004. The proposed form of the notices is attached as Appendix C;

- The Monitor will post a copy of the Proof of Claim Package on its website from June 23, 2004 until the first date approved by this Honourable Court for meetings of creditors; and

- The Monitor will send a copy of the Proof of Claim Package, by ordinary mail, as soon as practicable following receipt of a request for a package, to any person claiming to be a creditor and requesting such material prior to the Claims Bar Date.

51. The Monitor considers that the identification of known creditors, mailing and newspaper advertisements noted above will provide potential creditors with sufficient and timely notification in order for them to submit their proofs of claim prior to the Claims Bar Date.

<u>Submission And Review Of Claims:</u>

52. Creditors will be asked to submit their proofs of claim to the Monitor. Each creditor will be required to file a separate proof of claim for each Applicant against which it has a claim. The Monitor will supervise the receipt, collection and examination of claims with the assistance of the Applicants.

53. In consultation with the Applicants and their counsel, the Monitor may: (i) admit any claim in its entirety; (ii) revise the claim for voting and/or distribution purposes; or, (iii) disallow the claim for voting and/or distribution purposes.

Creditors whose claims have been revised or disallowed will receive a "Notice of Revision or Disallowance" advising them of this fact and the reasons on which the Monitor relies. The proposed form of Notice of Revision or Disallowance is attached at Appendix D. Notices of Revision or Disallowance with respect to Pre-Filing Claims and Post-Filing Claims arising on or before June 18, 2004 are to be distributed by the Monitor no later than twenty-one days prior to the first date set for the meetings of creditors.

54. Creditors who intend to dispute a Notice of Revision or Disallowance must deliver a Notice of Dispute to the Monitor within seven calendar days of receipt of the Notice of Revision or Disallowance. The proposed form of Notice of Dispute is attached at Appendix E. Upon receipt of a Notice of Dispute, the Monitor, in consultation with the Applicants, may attempt to consensually resolve the issue with the creditor. Unless the issue is resolved consensually in advance, the Monitor shall, within seven calendar days of receipt, deliver a copy of the Creditor's Notice of Dispute to the Claims Officer.

Claims Officer:

55. The Applicants propose that they will appoint Gordon Marantz as the claims officer (the "Claims Officer"). Mr. Marantz is a retired partner of Osler, Hoskin & Harcourt LLP and is currently associated with the Osler ADR Centre, an independent group of three retired judges.

56. The Claims Officer will review and determine all claims filed prior to the claims bar dates (as defined below) for voting and/or distribution purposes which are in dispute for any reason and have not been consensually resolved between the creditor and the Monitor. The Claims Officer will co-ordinate the hearing of all disputed claims within twenty calendar days from the date of the Notice of Dispute or such later time as the Claims Officer determines.

57. The Applicants propose that the Applicants or the Creditor may appeal the Claims Officer's determination of voting or distribution rights by appealing such

determination to this Honourable Court within seven business days of receipt of such determination, with notice to the Monitor, the Applicant and the Creditor.

Bar Dates:

58. The Applicants propose a Claims Bar Date for Pre-Filing Claims and Post-Filing Claims arising on or before June 18, 2004 of August 6, 2004. The Monitor believes this date is reasonable in that it provides 44 calendar days from the initiation of the notification process described above during which potential claimants may evaluate any claims against the Applicants and submit their claims.

59. The Monitor must issue any Notice of Revision or Disallowance no later than twenty-one days prior to the first date set for the meetings of creditors, except in the case of Post-Filing Claims arising after June 18, 2004 (as discussed below).

60. Creditors who wish to dispute a Notice of Revision or Disallowance must file a Notice of Dispute with the Monitor no later than seven calendar days from the receipt of the Notice of Revision or Disallowance. The Monitor believes that this period of time is reasonable given that creditors will in most cases have performed their own evaluation of their claim prior to submitting the original proof of claim and, therefore, should be in a position to respond quickly.

61. For Post-Filing Claims arising after June 18, 2004, ("Subsequent Claims") the Applicants propose to seek a further order of this Honourable Court with respect to bar dates for the filing of proofs of claim, issuance of Notices of Revision or Disallowance and filing of Dispute Notices. However, the Applicants propose that all other aspects of the claims process as set out with respect to Pre-Filing Claims and Post-Filing Claims arising on or before June 18, 2004 will remain the same.

## FINANCIAL PERFORMANCE AND CASH FLOW PROJECTIONS

62. The Applicants are in the process of finalizing their actual receipts and disbursements for the period from April 24, 2004 to June 4, 2004 together with

their analysis of variances from the cash flow projections filed with the Monitor's previous reports. The Monitor will include this analysis in its Supplement to this Report, which at present, it expects to file on or before June 16, 2004.

63. The Applicants filed cash flow projections for the period ending August 13, 2004 with the Supplement to the Ninth Report. These projections cover the proposed extension to the Stay Period.

## DIP FINANCING

64. On a bi-weekly basis the Applicants prepare and distribute a report that provides the parties on the Service List with, among other information, a summary of the amounts outstanding under the DIP facilities at the end of each two-week period.

65. The table below shows the Applicants' net cash balances as at the close of business on June 4, 2004. Net cash balances include the balance in the operating bank account less any outstanding cheques, the deposits at the RBC blocked bank account, the balance of the GE DIP facility and any outstanding letters of credit.

| Entity In Millions | Net Cash (DIP) Balance |
|---|---|
| **IRM** | $15.8 |
| **Ifastgroupe** | $5.0 |
| **Ivaco** | $(0.9) |
| **Docap** | $1.1 |
| **Total** | $21.0 |

Note 1: Balances are net of outstanding letters of credit in respect of IRM and Ifastgroupe in the amounts of $4.7 million and $0.1 million respectively.

66. The Applicants have operated within their DIP loan limits. In fact, IRM, Ifastgroupe and Docap have positive net cash positions as at the close of business on June 4, 2004. The Ivaco Sub DIP has remained at $4.0 million (on a 50% / 50% basis from IRM and Ifastgroupe) since the Ninth Report but is offset by $3.1

million of cash in its operating bank account leaving a net exposure of $0.9 million. The Docap DIP remains unutilized.

## REQUEST FOR AN EXTENSION TO THE STAY OF PROCEEDINGS

67. Pursuant to the Order of this Honourable Court dated May 11, 2004, the stay period expires June 18, 2004. The Applicants are seeking an extension of the stay period to August 13, 2004.

68. An extension to the stay period is necessary for the Applicants to properly advance the Sales Process and related matters and in particular to allow the bidders to engage in discussions with QIT and the USWA.

## MONITOR'S CONCLUSIONS AND RECOMMENDATIONS

69. Since the commencement of these CCAA proceedings, the Applicants have taken appropriate steps to realize on their non-core assets and businesses for the benefit of their stakeholders. The settlement of the AISLIC insurance claim represents some of the fruit of these efforts.

70. A claims process will be necessary in all likely eventualities. The Monitor believes that the proposed process is fair and reasonable and will permit the development of the Plan and the valuation of creditors' claims to proceed in parallel. This will enable the Applicants to establish a timetable for voting on a Plan that provides a reasonable opportunity for the creditors and other stakeholders to review and discuss the Plan as required while avoiding undue delay. In addition, having this information available to the Applicants earlier in the process of developing their Plan will allow a more refined Plan to be developed. Accordingly, the Monitor recommends that this Honourable Court approve the Applicants' proposed claims process.

71. The Applicants are working diligently and in good faith in pursuit of the restructuring or sale of their businesses. In order to advance the Sales Process, the Applicants require an extension of the Stay Period so that the bidders have an opportunity to enter into meaningful discussions with the USWA and QIT. Accordingly, the Monitor recommends that this Honourable Court grant the Applicants an extension of the Stay Period to August 13, 2004.

All of which is respectfully submitted this 11th day of June 2004.

**ERNST & YOUNG INC.**
In its capacity as Court-Appointed Monitor of
Ivaco Inc. and certain of its affiliates

Per:

Brian M. Denega
Senior Vice-President

## SCHEDULE "A"

## Applicants Filing for CCAA

1. Ivaco Inc.
2. Ivaco Rolling Mills Inc.
3. Ifastgroupe Inc.
4. IFC (Fasteners) Inc.
5. Ifastgroupe Realty Inc.
6. Docap (1985) Corporation
7. Florida Sub One Holdings, Inc.
8. 3632610 Canada Inc.

# APPENDIX A

Court File No. 03-CL-5145

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

| | | |
|---|---|---|
| **THE HONOURABLE** | ) | **WEDNESDAY, THE 9th** |
| | ) | |
| **MR. JUSTICE CUMMING** | ) | **DAY OF JUNE, 2004** |

**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 IVACO INC. AND THE APPLICANTS LISTED IN SCHEDULE "A"**

# ORDER

**THIS MOTION**, made by the Applicants for directions with respect to the sales process in respect of discussions involving QIT Fer et Titane Inc. ("QIT"), was heard this day at 393 University, Toronto.

**ON READING** the Notice of Motion, the Tenth Report of the Monitor, Ernst & Young Inc., the Affidavit of Randall C. Benson, the Affidavit of Gary A. O'Brien, and the Supplementary Affidavit of Randall C. Benson, and on hearing the submissions of counsel for the Applicants, the Monitor, QIT, the Informal Committee of Noteholders, the United Steelworkers of America, the Bank of Nova Scotia, the National Bank of Canada and UBS Securities LLC:

1. **THIS COURT ORDERS** that the time for service of the Notice of Motion and the Motion Record herein is abridged so that the motion is properly returnable today, and that any requirement for service of the Notice of Motion and of the Motion Record upon any party not served is dispensed with.

2. **THIS COURT ORDERS** that the sales process in respect of discussions involving QIT shall be governed by the following procedure:

   (a) QIT shall have seven days from the date of this Order to meet with the bidders who have submitted final proposals in the second round of the sales process authorized by order of this court dated March 22, 2004. The Monitor and CRO shall have the right to attend and participate in all such meetings. At the conclusion of the seven day period, QIT shall inform the Monitor of those bidders with whom it is prepared to conduct further negotiations. After considering the views of QIT and the Applicants, the Monitor shall identify to the Applicants and QIT the bidders with whom further negotiations shall occur (the "Bidders"). If either QIT or the Applicants disagree with the Monitor then they may apply to the court for directions.

   (b) After the Bidders have been identified, QIT shall disclose relevant portions of the long-term supply agreement dated April 15, 1999 between QIT and Ivaco Rolling Mills Limited Partnership ("IRM") which QIT claims has been terminated and which the Applicants claim has not been terminated (the "Agreement") to the Bidders, under appropriate confidentiality arrangements. QIT and the Monitor shall have discussions to determine what portions of the Agreement are relevant and to determine appropriate confidentiality arrangements. If they cannot agree, they shall seek further directions from the court. Further, if the Applicants do not agree with the determination of QIT and the Monitor as to what portions of the Agreement are relevant, they shall be at liberty to apply to the court for further directions regarding the disclosure of the Agreement. This order shall be without prejudice to the Applicants' position that the Agreement is not confidential and that it may disclose the entire Agreement.

(c) QIT shall then undertake negotiations with the Bidders. The Monitor and CRO shall be entitled to attend and participate in these negotiations so as to be in a position to report to the court on the outcome of them. No other parties shall participate in the negotiations, except that at the request of either QIT or a Bidder technical personnel from the Applicants will be entitled to participate in order to give necessary technical assistance. If the parties cannot agree on the appropriate participation of additional persons they shall seek further directions from the court. At the request of QIT and a Bidder, the Monitor may in its discretion absent itself from parts of negotiations which it considers best to proceed privately. If the Monitor refuses such request, QIT or the Bidder may apply to the court for directions. At the request of QIT or a Bidder, the CRO may in his discretion absent himself from parts of negotiations which he considers best to proceed privately. If the CRO refuses such request, QIT or the Bidder may apply to the court for directions.

(d) The negotiations and meetings referred to shall be conducted under appropriate confidentiality arrangements.

SCHEDULE “A”

APPLICANTS FILING FOR CCAA

1. Ivaco Inc.
2. Ivaco Rolling Mills Inc.
3. Ifastgroupe Inc.
4. IFC (Fasteners) Inc.
5. Ifastgroupe Realty Inc.
6. Docap (1985) Corporation
7. Florida Sub One Holdings, Inc.
8. 3632610 Canada Inc.

BETWEEN:

Court File No. 03-CL-5145

**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 IVACO INC. AND THE APPLICANTS LISTED IN SCHEDULE "A"**

**ONTARIO**
**SUPERIOR COURT OF JUSTICE**

Proceeding Commenced at Toronto

**ORDER**

**McCarthy Tétrault LLP**
Box 48, Suite 4700
Toronto Dominion Bank Tower
Toronto, ON  M5K 1E6

Michael E. Barrack
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Law Society No. 34701O

Solicitors for the Responding Party
QIT-Fer et Titane Inc.

#3918374 v. 4

# APPENDIX B

## INSTRUCTION LETTER FOR THE CLAIMS PROCEDURE OF IVACO INC. AND THE OTHER APPLICANTS LISTED HEREIN (hereinafter referred to as the "Applicants")

### A. – Claims Procedure

By order of the Honourable Mr. Justice Farley dated June 18, 2004 (the "Order") under the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36 (the "CCAA"), the Applicants have been authorized to conduct a claims procedure (the "Claims Procedure"). The Applicants are as follows:

(a) Ivaco Inc.;

(b) Ivaco Rolling Mills Inc., on its own behalf or on behalf of Ivaco Rolling Mills Limited Partnership;

(c) Ifastgroupe Inc., on its own behalf or on behalf of Ifastgroupe and Company, Limited Partnership;

(d) IFC (Fasteners) Inc.;

(e) Ifastgroupe Realty Inc.;

(f) Docap (1985) Corporation;

(g) Florida Sub One Holdings, Inc.; and

(h) 3632610 Canada Inc.

This letter provides instructions for responding to or completing the Proof of Claim. For your information, there is currently no proposed plan under the CCAA. Defined terms which are not defined herein shall have the meaning ascribed thereto in the Order, a copy of which is provided herewith.

The Claims Procedure is intended for any Person with any claim of any kind or nature whatsoever, other than an Excluded Claim, against any or all of the Applicants arising on or prior to September 16, 2003, unliquidated, contingent or otherwise and any claim arising after September 16, 2003 as a result of the restructuring, repudiation or termination of any contract, lease, employment agreement or other agreement. Please review the enclosed material for the complete definition of Claim and Excluded Claim.

If you have any questions regarding the Claims Procedure, please contact the Court-appointed Monitor at the address provided below.

All notices and enquiries with respect to the Claims Procedure should be addressed to:

Ernst & Young Inc., Court-appointed Monitor of Ivaco and the other Applicants

By Mail:

Ernst & Young Inc.
C.P. 4500, succ. B
Montreal, QC H3B 5J3

Attention: Michel Marleau

By Courier:

Ernst & Young Inc.
Suite 2400
1, Place Ville Marie
Montreal, QC H3B 3M9

Attention: Michel Marleau

Telephone: 1-866-259-1420

Fax: (514) 395-4933

**B. – For Creditors Submitting a Proof of Claim**

If you believe that you have a Claim against any of the Applicants, you will have to file a Proof of Claim with the Monitor. **Claims relating to amounts owing to an Applicant as of September 16, 2003 or Claims arising out of the restructuring, repudiation or termination of contracts, leases or other agreements on or before June 18, 2004 must be received by 5:00 p.m. (Toronto Time) on August 6, 2004, unless the Monitor and the Applicant agree in writing or the Court orders that the Proof of Claim be accepted after that date. If you are asserting a Claim against more than one of the Applicants, please provide a separate Proof of Claim for each of the Applicants against which you have a claim.**

Additional Proof of Claim forms can be found on the Monitor's website at www.ey.com/ca/ivaco or obtained by contacting the Monitor at the telephone and fax numbers indicated above and providing particulars as to your name, address, facsimile number and e-mail address. Once the Monitor has this information, you will receive, as soon as practicable, additional Proof of Claim forms.

**PROOF OF CLAIM OF IVACO INC. AND**
**THE OTHER APPLICANTS LISTED HEREIN**
**(hereinafter referred to as the "Applicants")**

**Please read carefully the enclosed Instruction Letter for completing this Proof of Claim.**

**A. – Particulars of Creditor**

1. Full Legal Name of Creditor ______________________________ (the "Creditor"). (*Full legal name should be the name of the original Creditor of the Applicants, notwithstanding whether an assignment of a Claim, or a portion thereof, has occurred prior to or following September 16, 2003.)*

2. Full Mailing Address of the Creditor (the original Creditor, not the Assignee): ______________________________

______________________________

1. Telephone Number: ____________________________________

   Facsimile Number: ____________________________________

   Attention (Contact Person): ______________________________

2. Has the Claim been sold or assigned by the Creditor to another party?

   Yes: [___]

   No: [___]

**B. – Particulars of Assignee(s) (If Any):**

1. Full Legal Name of Assignee(s): ______________________________ (*If Claim has been assigned, insert full legal name of assignee(s) of Claim (If all or a portion of the claim has been sold). If there is more than one assignee, please attach a separate sheet with the required information.*)

2. Full Mailing Address of Assignee(s): ________________________________

3. Telephone Number of Assignee(s): __________________________________

   Facsimile Number of Assignee(s): __________________________________

   Attention (Contact Person): ________________________________________

**C. – Proof of Claim:**

I, ______________________________ [name of Creditor or Representative of the Creditor], of ______________________________ do hereby certify:

(a) that I *[tick one]*

[___] am the Creditor of one or more of the Applicants; OR

[___] am ______________________________ (*state position or title*) of ______________________________ (*name of creditor*)

(b) that I have knowledge of all the circumstances connected with the Claim referred to below;

(c) the Creditor asserts its claim against:

Ivaco Inc. [___]

Ivaco Rolling Mills Inc. or Ivaco Rolling Mills Limited Partnership [___]

Ifastgroupe Inc. or Ifastgroupe and Company, Limited Partnership [___]

IFC (Fasteners) Inc. [___]

Ifastgroupe Realty Inc. [___]

Docap (1985) Corporation [___]

Florida Sub One Holdings, Inc. [___]

3632610 Canada Inc. [___]

(*If you are asserting a Claim against more than one of the Applicants, please provide a separate Proof of Claim for each of the Applicants.*)

(d) The Applicant(s) was/were and still is/are indebted to the Creditor as follows;

(i) CLAIM ARISING ON OR BEFORE SEPTEMBER 16, 2003:

$______________________________ [insert $ value of claim] CAD

(ii) CLAIM ARISING AFTER SEPTEMBER 16, 2003:

$______________________________ [insert $ value of claim] CAD (Claim against the Applicant(s) arising out of the restructuring, repudiation or termination of any contract, lease, employment agreement or other agreement after September 16, 2003)

(iii) TOTAL CLAIM:

$______________________________

*(Note: Claims in a foreign currency are to be converted to Canadian Dollars at the Bank of Canada noon spot rate as at September 16, 2003.* Exchange rate conversions on such date were US $1 = $1.3690; 1 Euro = $1.5289; 1¥ = $0.011773; 1£ = $2.1732; 1 SFr = $0.9820).

**D. – Nature of Claim:**

*(check and complete appropriate category)*

[___] A. UNSECURED CLAIM OF $__________________. That in respect of this debt, I do not hold any assets of the debtor as security and *(Check appropriate description)*

[___] Regarding the amount of $__________________, I do not claim a right to priority.

[___] Regarding the amount of $__________________, I claim a right to a priority under section 136 of the *Bankruptcy and Insolvency Act* (Canada) (the "BIA") or would claim such a priority if this Proof of Claim was being filed in accordance with that Act.

*(Set out on an attached sheet details to support priority claim.)*

[___] B. SECURED CLAIM OF $__________________.

That in respect of this debt, I hold assets of the debtor valued at $__________________ as security, particulars of which are as follows:

*(Give full particulars of the security, including the date on which the security was given and the value at which you assess the security, and attach a copy of the security documents.)*

**E. – Particulars of Claim:**

Other than as already set out herein, the Particulars of the undersigned's total Claim are attached.

*(Provide all particulars of the Claim and supporting documentation, including amount, description of transaction(s) or agreement(s) giving rise to the Claim, name of any guarantor which has guaranteed the Claim, and amount of invoices, particulars of all credits, discounts, etc. claimed, description of the security, if any, granted by the affected Applicant to the Creditor and estimated value of such security, particulars of any restructuring claim.)*

**F. – Filing of Claim:**

This Proof of Claim must be received by the Monitor by no later than 5:00 p.m. (Toronto Time) on August 6, 2004, by delivery, courier or facsimile at the following address:

Ernst & Young Inc., Court-appointed Monitor of Ivaco and the other Applicants

By Mail:

Ernst & Young Inc.
C.P. 4500, succ. B
Montreal, QC H3B 5J3

Attention: Michel Marleau

By Courier:

Ernst & Young Inc.
Suite 2400
1, Place Ville Marie
Montreal, QC H3B 3M9

Attention: Michel Marleau

Telephone: 1-866-259-1420

Fax: (514) 395-4933

Failure to file your proof of claim as directed by 5:00 p.m. (Toronto Time) on August 6, 2004 will result in your claim being barred and you will be prohibited from making or enforcing a Claim against the Applicants and shall not be entitled to further notice in, and shall not be entitled to participate as a creditor in these proceedings.

**G. – Excluded Claims:**

The following are Excluded Claims and no person needs to file any claim in respect thereof at this time: (a) Claims by the Monitor, UBS Securities LLC (the "Advisor"), the Chief Restructuring Officer, counsel to the Monitor, counsel to the Advisor, counsel to the Independent Board of Directors of Ivaco Inc. and counsel to the Applicants and Ifastgroupe and Company, Limited Partnership and Ivaco Rolling Mills Limited Partnership for fees and disbursements payable in accordance with paragraph 45 and 57 of the Initial Order; (b) Claims by a director or officer of the Applicants that would be secured by the Directors' Charge (as defined in paragraph 52(a) of the Initial Order); (c) Claims by the DIP Lenders that would be secured by the DIP Lenders' Charges (as defined in paragraph 39 of the Initial Order); and (d) Claims with respect to goods and/or services provided to the Applicants after the Valuation Date.

Dated at ____________________ this _____ day of ____________________, 2004.

Per: ________________________________ *[Name of Creditor]*

# APPENDIX C

**NOTICE TO CREDITORS OF IVACO INC.**
**AND THE OTHER APPLICANTS LISTED HEREIN**
**(hereinafter referred to as the "Applicants")**

**RE: NOTICE OF CLAIMS PROCEDURE FOR THE APPLICANTS (LISTED BELOW) PURSUANT TO THE COMPANIES' CREDITORS ARRANGEMENT ACT ("CCAA")**

*PLEASE TAKE NOTICE* that this notice is being published pursuant to an order of the Superior Court of Justice of Ontario dated June 18, 2004 (the "Order"). The Court has ordered that the Monitor send Proof of Claim forms to the known Creditors of the Applicants. Any person who believes that it has a Claim against any of the Applicants which arose prior to September 16, 2003, or has a Claim which arose after September 16, 2003 as a result of the restructuring, repudiation or termination on or before June 18, 2004 of any contract, lease, employment agreement or other agreement, whether unliquidated, contingent or otherwise, should send a Proof of Claim for each Applicant against which it has a Claim to the Monitor to be received by **5:00 p.m.** ***(Eastern Standard Time)*** **on August 6, 2004** ***(the "Claims Bar Date").***

**CLAIMS WHICH ARE NOT RECEIVED BY THE CLAIMS BAR DATE WILL BE BARRED AND EXTINGUISHED FOREVER.**

Proofs of Claims were mailed to all known Creditors on June 23, 2004. Creditors who do not receive a Proof of Claim from the Applicants or the Monitor should contact the Monitor, c/o Ernst & Young Inc., Court-appointed Monitor of Ivaco and the other Applicants **(Telephone: 1-866-259-1420 and Fax: (514) 395-4933)** to obtain a Proof of Claim Document Package.

Dated at ____________________ this _____ day of ____________________, 2004.

**Applicants:**

(a) Ivaco Inc.;
(b) Ivaco Rolling Mills Inc., on its own behalf or on behalf of Ivaco Rolling Mills Limited Partnership;
(c) Ifastgroupe Inc., on its own behalf or on behalf of Ifastgroupe and Company, Limited Partnership;
(d) IFC (Fasteners) Inc.;
(e) Ifastgroupe Realty Inc.;
(f) Docap (1985) Corporation;
(g) Florida Sub One Holdings, Inc.; and
(h) 3632610 Canada Inc.

# APPENDIX D

**NOTICE OF REVISION OR DISALLOWANCE OF IVACO INC. AND THE OTHER APPLICANTS LISTED HEREIN**
**(hereinafter referred to as the "Applicants")**

Name of Creditor: ____________________________

Reference #: _________________________________

Pursuant to paragraph 14 of the Court Order dated June 18, 2004, Ernst & Young Inc. in its capacity as Monitor of the Applicants, hereby gives you notice that it has reviewed your Proof of Claim against **[insert name of relevant Applicant]** and has revised or rejected your Claim as follows:

| | Proof of Claim as Submitted | Revised Claims as Accepted |
|---|---|---|
| Pre-Filing Claim | | |
| Post-Filing Claim | | |
| Total Claim | | |

*Reason for the Revision or Disallowance:*

___________________________________________________________________________

If you do not agree with this Notice of Revision or Disallowance please take notice of the following:

1. If you intend to dispute a Notice of Revision or Disallowance, you must, within seven (7) Calendar Days of the date of this Notice of Revision or Disallowance, deliver a Notice of Dispute by personal service, facsimile or courier to the addresses or fax numbers indicated hereon. The Form of Notice of Dispute is attached to this Notice.

2. If you do not deliver a Notice of Dispute, the value of your Claim shall be deemed to be as set out in this Notice of Revision or Disallowance.

*Address for Service of Dispute Notices:*

Ernst & Young Inc., Court-appointed Monitor of Ivaco and the other Applicants

By Mail:

Ernst & Young Inc.
C.P. 4500, succ. B
Montreal, QC  H3B 5J3

Attention:  Michel Marleau

By Courier:

Ernst & Young Inc.
Suite 2400
1, Place Ville Marie
Montreal, QC  H3B 3M9

Attention:  Michel Marleau

Telephone:  1-866-259-1420

Fax:  (514) 395-4933

**IF YOU FAIL TO TAKE ACTION WITHIN THE PRESCRIBED TIME PERIOD, THIS NOTICE OF REVISION OR DISALLOWANCE WILL BE BINDING UPON YOU FOR VOTING AND/OR DISTRIBUTION PURPOSES UNDER THE PLAN.**

Dated at ____________________ this _____ day of ____________________, 2004.

ERNST & YOUNG INC.

In its capacity as Court Appointed Monitor of the Applicants.

Per: ____________________________________

Encl.

# APPENDIX E

**NOTICE OF DISPUTE OF IVACO INC.**
**AND THE OTHER APPLICANTS LISTED HEREIN**
**(hereinafter referred to as the "Applicants")**

Pursuant to paragraph 15 of the Court Order dated June 18, 2004, we hereby give you notice of our intention to dispute the Notice of Revision or Disallowance bearing Reference Number _______ and dated __________________________ issued by Ernst & Young Inc. in its capacity as Monitor of the Applicants in respect of our Claim.

*Name of Creditor:* __________________________

*Reasons for Dispute* (attach additional sheet and copies of all supporting documentation if necessary):

_____________________________________________________________________________

*Signature of Individual:* _______________________________________________________

*Date:* ____________________________________________________________________

*(Please print name):* __________________________________________________________

Telephone Number: (____) ______________ Facsimile Number: (____) ______________

Full Mailing Address: ___________________________________________________________

**THIS FORM AND SUPPORTING DOCUMENTATION TO BE RETURNED BY PERSONAL SERVICE, FACSIMILE OR COURIER TO THE ADDRESS INDICATED HEREIN AND TO BE RECEIVED WITHIN SEVEN (7) CALENDAR DAYS OF THE DATE OF THE NOTICE OF REVISION OR DISALLOWANCE BY:**

*Address for Service of Dispute Notices:*

Ernst & Young Inc., Court-appointed Monitor of Ivaco and the other Applicants

By Mail:

Ernst & Young Inc.
C.P. 4500, succ. B
Montreal, QC H3B 5J3

Attention: Michel Marleau

By Courier:

Ernst & Young Inc.
Suite 2400
1, Place Ville Marie
Montreal, QC H3B 3M9

Attention: Michel Marleau

Telephone: 1-866-259-1420

Fax: (514) 395-4933