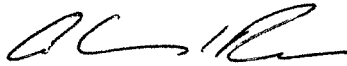


TAB G

*This is Exhibit "G"
referred to in the Affidavit of
Brian M. Denega
sworn before me this 13th
day of October, 2006*



A Commissioner for Taking Affidavits

Documents Subject to Privilege

<u>Date</u>	<u>Dctype</u>	<u>From</u>	<u>To</u>	<u>Cc</u>	<u>Subject</u>	<u>Basis for Privilege</u>
07/07/2004	Email	Benson, Randy (CRO, Ivaco)	MacNeill, Ashley (UBS)	Kramer, Andrew (UBS)	Status of Phase I Environmental Assessments for IRM and the 3 Quebec plants (attaching email from David Machina (Ivaco) to, amongst others, G. Taylor (Davies Ward Phillips & Vineberg LLP))	Solicitor Client Privilege
08/04/2004	Email	Benson, Randy (CRO, Ivaco)	Swartz, Jay A. (Davies Ward Phillips & Vineberg LLP)		Code of conduct pre-closing and post-closing	Solicitor Client Privilege
08/05/2004	Email	Benson, Randy (CRO, Ivaco)	Swartz, Jay A. (Davies Ward Phillips & Vineberg LLP)		Appropriate signatories and draft press release	Solicitor Client Privilege
	List (Attachment)	Massicotte, Guy-Paul (General Counsel, Ivaco)			Appropriate signatories to the Asset Purchase Agreements	Solicitor Client Privilege
08/06/2004	Draft Press Release (Attachment)	Ivaco			Announcement of execution of the Asset Purchase Agreements	Solicitor Client Privilege
08/05/2004	Email	Benson, Randy (CRO, Ivaco)	Tamilio, Natasha		Forwarding Executive Summary Agreement, Ifast Asset Purchase Agreement; Memo to Directors - August; UBS - Sale Process Report; UBS Heico Bid Analysis	Solicitor Client Privilege
08/04/2004	Memo (Attachment)	Davies Ward Phillips & Vineberg LLP	The Board of Directors of Ivaco Inc.		Draft - Executive Summary of Asset Purchase Transactions	Solicitor Client Privilege
00/00/2004	Agreement (Attachment)	Davies Ward Phillips & Vineberg LLP	The Board of Directors of Ivaco Inc.		Draft - Asset Purchase Agreement (Ifastgroupe Purchase Agreement)	Solicitor Client Privilege
08/04/2004	Memo (Attachment)	Massicotte, Guy-Paul (General Counsel, Ivaco)	All Directors: Cote, Pierre Cullens, William S. McNaughton, Donald Pelletier, Gaston Silverman, Gordon Ivanier, Paul Ivanier, Sydney		Materials for the August 6th, 2004 Board Meeting	Solicitor Client Privilege
	Report (Attachment)	UBS Investment Bank			Draft - Sale Process Report	Solicitor Client Privilege
08/00/2004	Report (Attachment)	UBS Investment Bank			Draft - Ivaco Inc. Ivaco Rolling Mills L.P. Ifastgroupe and Company, L.P. - Heico Bid Analysis	Solicitor Client Privilege
08/11/2004	Email	Benson, Randy (CRO, Ivaco)	Stacey, Gillian R. (Davies Ward Phillips & Vineberg LLP)		Ivaco call Wednesday (UBS Report)	Solicitor Client Privilege

Documents Subject to Privilege

DocId#	Date	From	To	Cc	Subject	Basis for Privilege
08/00/2004		Report (Attachment)	UBS		Ivaco Inc. Ivaco Rolling Mills L.P. Ifastgroupe and Company, L.P. - Heico Preliminary Recovery Analysis	Solicitor Client Privilege
08/19/2004	Email	Benson, Randy (CRO, Ivaco)	Swartz, Jay A. (Davies Ward Phillips & Vineberg LLP)		Plan of distribution and timetable	Solicitor Client Privilege
08/19/2004	Email	Benson, Randy (CRO, Ivaco)	Stacey, Gillian R. (Davies Ward Phillips & Vineberg LLP)		Baby books / lease issues	Solicitor Client Privilege
08/26/2004	Email	Benson, Randy (CRO, Ivaco)	Stacey, Gillian R. (Davies Ward Phillips & Vineberg LLP)		CapEx/Hydro One	Solicitor Client Privilege
08/26/2004	Email	Benson, Randy (CRO, Ivaco)	Stacey, Gillian R. (Davies Ward Phillips & Vineberg LLP)		Organizational issues in a restructuring	Solicitor Client Privilege
08/25/2004	Memo (Attachment)	Silverman, William (Hunton & Williams LLP) Heffner, Doug (Hunton & Williams LLP) Simoes, James (Hunton & Williams LLP)	Goldsmith, David Smith, Kevin		Consideration of Reorganized Heico Subsidiary as Successor in Interest to Ivaco Inc. and Ivaco Rolling Mills L.P.	Solicitor Client Privilege
09/22/2004	Email	Benson, Randy (CRO, Ivaco)	Blakely, Hugh W. (Ivaco)		Confirmation of receipt of letter from Bruce Leonard; forwarding correspondence from Gillian Stacey (Davies Ward Phillips & Vineberg LLP)	Solicitor Client Privilege
09/22/2004	Email	Benson, Randy (CRO, Ivaco)	Stacey, Gillian R. (Davies Ward Phillips & Vineberg LLP)		Draft GE Letter	Solicitor Client Privilege
09/00/2004	Draft Letter (Attachment)	GE Corporate Financial Services, Inc.	Ivaco Rolling Mills, Inc. Ifastgroupe Inc. Ivaco Inc.		Heico/Ivaco Acquisition	Solicitor Client Privilege
09/29/2004	Email	Benson, Randy (CRO, Ivaco)	Stacey, Gillian R. (Davies Ward Phillips & Vineberg LLP) Benson, Randy (CRO, Ivaco) Swartz, Jay A. (Davies Ward Phillips & Vineberg LLP) Gottlieb, Matthew, P. (Davies Ward Phillips & Vineberg LLP)	Newman, Rosemary	Capital Leases	Solicitor Client Privilege

Documents Subject to Privilege

Docdate	Datatype	From	To	Cc	Subject	Basis for Privilege
10/06/2004	Email	Benson, Randy (CRO, Ivaco)	Scarola, Anna		Forwarding email from Gillian Stacey (Davies Ward Phillips & Vineberg LLP) re: Draft Confidentiality Letter Agreement	Solicitor Client Privilege
10/06/2004	Draft Letter (Attachment)	Benson, Randy (CRO, Ivaco)	The Heico Companies, LLC Attention: Christopher B. Rogers		Draft Confidentiality Letter Agreement	Solicitor Client Privilege

IN THE MATTER OF the Companies' Creditors Arrangement Act, R.S.C. 1985, c.
C-36, as amended

Court File No. 03-CL-5145

AND IN THE MATTER OF a Plan or Plans of Compromise or Arrangement of Ivaco Inc.
and the Applicants listed in Schedule "A"

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

Proceeding commenced at Toronto

APPLICANTS' SECOND SUPPLEMENTAL MOTION
RECORD
(RETURNABLE NOVEMBER 7, 2006)

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