

ONTARIO
SUPERIOR COURT OF JUSTICE
Commercial List

B E T W E E N:

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 or Plans of Compromise or Arrangement of Ivaco Inc. and the Applicants listed in Schedule "A"

Applicants

APPLICANTS' MOTION RECORD
(RETURNABLE MAY 26, 2006)

May 12, 2006

STIKEMAN ELLIOTT LLP
5300 Commerce Court West
199 Bay Street
Toronto, Ontario M5L 1B9

Peter F.C. Howard LSUC#22056F
Tel: (416) 869-5613
Fax: (416) 861-0445

Solicitors for the Applicants/Monitor

TO: CASSELS BROCK & BLACKWELL LLP
2100 Scotia Plaza
40 King Street West
Toronto, ON M5H 3C2

E. Bruce Leonard
Tel: (416) 869-5757
David S. Ward
Tel: (416) 869-5960
Fax: (416) 360-8877

Solicitors for the Respondents

ONTARIO
SUPERIOR COURT OF JUSTICE
Commercial List

B E T W E E N:

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 or Plans of Compromise or Arrangement of Ivaco Inc. and the Applicants listed in Schedule "A"

Applicants

I N D E X

1.	Notice of Motion returnable May 26, 2006	1
2.	Affidavit of Brian Denega sworn May 12, 2006	6
Exhibits		
A.	Order of Justice Farley dated January 16, 2006	12
B.	KPMG Protocol	33
C.	Reasons for Decision dated June 2, 2005	37
D.	Reasons for Decision dated August 4, 2005	46
E.	Transcripts of Interview of Hugh Blakely	51
F.	Letter dated April 27, 2006	133
G.	Letter dated May 1, 2006	136
H.	Bank of Nova Scotia Proofs of Claim	139
I.	Initial Submissions of Ivaco	154

J.	Initial Submissions of Heico	175
K.	Transcript of Interview of Randy Benson.....	196
L.	Transcript of Interview of Jon Hicks	306

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' MOTION RECORD (RETURNABLE MAY 26, 2006)
STIKEMAN ELLIOTT LLP Barristers & Solicitors 5300 Commerce Court West 199 Bay Street Toronto, Ontario M5L 1B9 Canada	Peter F.C. Howard LSUC#22056F Tel: (416) 869-5613 Fax: (416) 861-0445 Solicitors for the Applicants/Monitor