

Court File No. CV-17-587463-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

**THE CATALYST CAPITAL GROUP INC. and CALLIDUS CAPITAL
CORPORATION**

Plaintiffs

and

**WEST FACE CAPITAL INC., GREGORY BOLAND, M5V ADVISORS INC.
C.O.B. ANSON GROUP CANADA, ADMIRALTY ADVISORS LLC,
FRIGATE VENTURES LP, ANSON INVESTMENTS LP, ANSON CAPITAL
LP, ANSON INVESTMENTS MASTER FUND LP, AIMF GP, ANSON
CATALYST MASTER FUND LP, ACF GP, MOEZ KASSAM, ADAM
SPEARS, SUNNY PURI, CLARITYSPRING INC., NATHAN ANDERSON,
BRUCE LANGSTAFF, ROB COPELAND, KEVIN BAUMANN, JEFFREY
MCFARLANE, DARRYL LEVITT, RICHARD MOLYNEUX and JOHN DOES**

#1-10

Defendants

and

CANACCORD GENUITY CORP.

Third Party

**DEMAND FOR PARTICULARS AND REQUEST TO INSPECT
DOCUMENTS IN THE THIRD PARTY DEFENCE AND
COUNTERCLAIM**

The Plaintiff to the Third Party Claim (Defendant by Third Party Counterclaim), Bruce Langstaff ("Langstaff"), hereby demands that the Defendant to the Third Party Claim (Plaintiff by Third Party Counterclaim), Canaccord Genuity Corp. ("Canaccord"), provide particulars of the following allegations in the Third Party Defence and Counterclaim:

1. Particulars of the “repeated incidents of misconduct” allegedly committed by Langstaff as referred to in paragraph 12.

2. With regard to paragraph 22, particulars:
 - (a) as to alleged “conduct that fell below the reasonable performance standards expected of Langstaff...” which Canaccord pleads and relies upon in support of its decision to terminate Langstaff’s employment; and
 - (b) as to the manner in which Langstaff’s alleged conduct put Canaccord’s business interests at risk.

3. With regard to paragraph 29, particulars:
 - (a) as to the “repeated incidents of inappropriate and unprofessional conduct that breached the terms of [Langstaff’s] employment with Canaccord...”; and
 - (b) as to the “other business considerations” relied upon in support of the decision by Canaccord to terminate Langstaff’s employment.

4. With regard to paragraph 31, particulars of the “inappropriate behaviour” relied upon by Canaccord;

5. Langstaff further requests inspection and production of copies of the following documents referred to in the Third Party Defence and Counterclaim:
 - (a) The Disciplinary Letter dated August 9, 2017 referred to in paragraph 21, including a hard copy and an electronic copy showing the creation date of the document;

- (b) The Employment Agreement referred to in paragraphs 15 and 16; and
- (c) The Acknowledgment(s) signed and the Confidentiality & Non-Disclosure Policy referred to in paragraph 19.
- (d) Any documentation related to the forgivable loan referred to in paragraph 50.

March 19, 2018

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Defendant

THE CATALYST CAPITAL GROUP INC. et al.
Plaintiffs

-and-
Defendants

WEST FACE CAPITAL INC. et al.

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SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

PROCEEDING COMMENCED AT
TORONTO

**DEMAND FOR PARTICULARS AND REQUEST TO
INSPECT DOCUMENTS IN THE THIRD PARTY
DEFENCE AND COUNTERCLAIM**

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