



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

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

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

AND BETWEEN:

WEST FACE CAPITAL INC. and GREGORY BOLAND

Plaintiffs by Counterclaim

and

THE CATALYST CAPITAL GROUP INC., CALLIDUS CAPITAL
CORPORATION, NEWTON GLASSMAN, GABRIEL DE ALBA, JAMES
RILEY, VIRGINIA JAMIESON, EMMANUEL ROSEN, B.C. STRATEGY
LTD. D/B/A BLACK CUBE, B.C. STRATEGY UK LTD. D/B/A BLACK CUBE
and INVOP LTD. D/B/A PSY GROUP

Defendants to the Counterclaim

AND BETWEEN:

BRUCE LANGSTAFF

Plaintiff by Counterclaim

and

THE CATALYST CAPITAL GROUP INC. and CALLIDUS CAPITAL CORPORATION
Defendants to the Counterclaim

LETTER OF REQUEST

TO THE APPROPRIATE JUDICIAL AUTHORITY OF:

1. ISRAELI CENTRAL DISTRICT COURT, 3 Hazionut St. Lod 7127749, Israel

AND

2. THE INTERNATIONAL LAW UNIT IN THE ISRAELI ADMINISTRATION OF
COURTS, 22 Kanfey Nesharim St, Jersusalem 9546434, Israel

The Ontario Superior Court of Justice (Commercial List) presents its compliments to the Israeli Central District Court and the International Law Unit in the Israeli Administration of Courts and **respectfully requests international judicial assistance.**

A PROCEEDING IS PENDING IN THIS COURT at the City of Toronto, in the Province of Ontario, Canada, between, among other parties, West Face Capital Inc. and Gregory Boland as Defendants and Plaintiffs by Counterclaim, and Invop Ltd. d/b/a Psy Group (“**Invop**”) as Defendant to the Counterclaim.

IT HAS BEEN SHOWN TO THIS COURT that it appears necessary for the purpose of justice that all evidence potentially relevant to the proceeding that is in the

possession, control or power of Invop, its Court-appointed Special Administrator and/or the Israeli Official Receiver be immediately preserved.

YOU ARE REQUESTED, in furtherance of justice, to cause Invop, its Court-appointed Special Administrator and/or the Israeli Official Receiver, by the means ordinarily used in your jurisdiction, to immediately take steps to preserve all evidence potentially relevant to the proceeding, including all of the data on Invop's computers and other electronic devices (the "**Devices**"), that is in the possession, control or power of Invop, its Court-appointed Special Administrator and/or the Israeli Official Receiver.

IN PARTICULAR, YOU ARE REQUESTED, in furtherance of justice, to cause Invop, the Court-appointed Special Administrator and/or the Israeli Official Receiver, by the means ordinarily used in your jurisdiction, to:

- I. preserve all of the data on all of the Devices until the Ontario Superior Court of Justice orders otherwise;
- II. create forensic images of all of the data on all of the Devices in their possession, control and/or power, and to use a "write blocker" device in the imaging process ensuring that the imaging process itself does not alter any of the data or contents of the imaged Devices;
- III. certify, under oath, that all of the Devices have been forensically imaged;
and

- IV. deliver copies of the imaged Devices to an appointed officer of the Israeli Court. These copies should be preserved by the Israeli Court until the Ontario Superior Court of Justice orders otherwise.

- V. appoint a computer specialist, at the expense of West Face Capital Inc., that will create the forensic images as set forth in Section II above, and that will be in charge of the delivery of the copies of the imaged Devices as set forth in Section IV above.

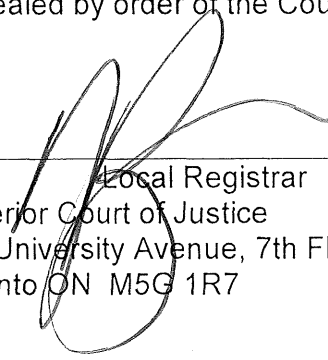
All of the required actions, as set forth above, will be made on the expense of the West Face Capital Inc.

AND WHEN YOU REQUEST IT, the courts of Ontario are ready and willing to do the same for you in a similar case.

THIS LETTER OF REQUEST is signed and sealed by order of the Court made on

Date **JUN 20 2018**

Issued by _____



**Natscha Brown
Registrar**

Local Registrar
Address of court office: Superior Court of Justice
330 University Avenue, 7th Floor
Toronto ON M5G 1R7

THE CATALYST CAPITAL GROUP -and- WEST FACE CAPITAL INC. et al. -and- CANACCORD GENUITY CORP.
INC. et al. Plaintiffs Defendants Third Party
WEST FACE CAPITAL INC. et al. -and- THE CATALYST CAPITAL GROUP
Plaintiffs by Counterclaim INC. et al. Defendants to the Counterclaim

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

ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST

PROCEEDING COMMENCED AT TORONTO

LETTER OF REQUEST

DAVIES WARD PHILLIPS & VINEBERG LLP
155 Wellington Street West
Toronto ON M5V 3J7

Kent E. Thomson (LSUC# 24264J)
Email: kentthomson@dwpv.com
Tel: 416.863.5566

Matthew Milne-Smith (LSUC# 44266P)
Email: mmilne-smith@dwpv.com
Tel: 416.863.5595

Andrew Carlson (LSUC# 58850N)
Email: acarlson@dwpv.com
Tel: 416.367.7437

Tel: 416.863.0900
Fax: 416.863.0871

Lawyers for the Defendants (Plaintiffs by Counterclaim),
West Face Capital Inc. and Gregory Boland