



GROSMAN, GROSMAN & GALE LLP
BARRISTERS & SOLICITORS

JEFF C. HOPKINS
E-mail: jhopkins@grosman.com

July 22, 2014

**COPY DELIVERED VIA ELECTRONIC MAIL
ORIGINAL VIA COURIER**

Mr. Andrew Winton
Lax O'Sullivan Scott Lisus LLP
Barristers and Solicitors
2750 - 145 King Street West
Toronto, ON M4H 1J8

Dear Mr. Winton:

Re: Catalyst Capital Inc. v. Moyses and West Face Capital Inc.

Please find enclosed a copy of Mr. Moyses's Affidavit of Documents, sworn July 22, 2014. We will be delivering copies of the Schedule "A" documents by USB device to your office later today.

We also note the following:

- Mr. Moyses did not store these documents on a USB device; this USB device and the documents contained within are a product of our office.
- Save the March 27, 2014 email from Mr. Moyses to West Face Capital, there has been no documentary disclosure or dissemination to any third-party.
- Many (and possibly most) of the enclosed documents are public documents (publicly available financials / presentations / research, etc.) with many being duplicates and various versions of the same document.

Please let me know if you have any questions or otherwise wish to discuss.

Yours very truly,

GROSMAN, GROSMAN & GALE LLP

For: Per: Jeff C. Hopkins

\cct

Enclosures

- c. Rocco Di Pucchio (by email to: rdipucchio@counsel-toronto.com)
Jeff Mitchell (by email to: jeff.mitchell@dentons.com)
Andy Pushalik (by email to: andy.pushalik@dentons.com)

T:\Client Files\MWoyse, Brandon\Letters\Winton 3 (07.22.14).doc

Court File No: CV-14-507120

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE CATALYST CAPITAL GROUP INC.

Plaintiff

- and -

BRANDON MOYSE and WEST FACE CAPITAL INC.

Defendants

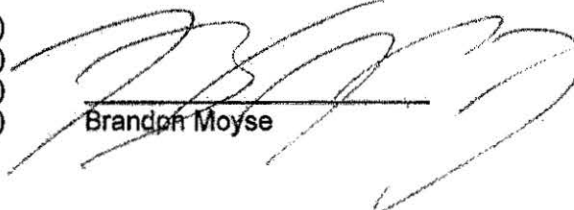
I, **BRANDON MOYSE**, of the City of Toronto, in the Province of Ontario, a Defendant in this action, **MAKE OATH AND SAY:**

1. I have conducted a diligent search of my records and have made appropriate enquiries of others to inform myself in order to make this affidavit. This affidavit discloses, to the full extent of my knowledge, information and belief, all documents relevant to any matter in issue in this action that are or have been in my possession, control or power.
2. I have listed in Schedule A those documents that are in my possession, control or power and that I do not object to producing for inspection.
3. I have listed in Schedule B those documents that are or were in my possession, control or power and that I object to producing because I claim they are privileged, and I have stated in Schedule B the grounds for each such claim.
4. I have listed in Schedule C those documents that were formerly in my possession, control or power but are no longer in my possession, control or power, and I have stated in Schedule C when and how I lost possession or control of or power over them and their present location.

5. I have never had in my possession, control or power any document relevant to any matter in issue in this action other than those listed in Schedules A, B and C.

SWORN before me at the City of Toronto)

on the 22 day of July, 2014)

) 
) _____
) Brandon Moyse


 Commissioner for taking Affidavits, etc.


LAWYER'S CERTIFICATE

I CERTIFY that I have explained to the deponent,

- (a) the necessity of making full disclosure of all documents relevant to any matter in issue in the action,
- (b) what kinds of documents are likely to be relevant to the allegations made in the pleadings, and
- (c) if the action is brought under the simplified procedure, the necessity of providing the list required under rule 76.03.

Date

July 22/14



 (Signature of Solicitor)

SCHEDULE A

Documents in my possession, control or power that I do not object to producing for inspection.

Tab	File Name
1.	14-02-11 NMFG-Piper Jaffray Meeting Notes.docx
2.	14-02-19 BCG meeting.docx
3.	14-02-19 Minutes from NMFG-BCG Meeting.docx
4.	14-02-26 BCG Thoughts.docx
5.	14-02-26 NMFG Real Estate Committee Call.docx
6.	14-02-26 Notes from NMFG Support Call.docx
7.	Additional WIND Due Diligence Questions.docx
8.	Advantage Agenda - Nov18.docx
9.	Avis-Budget Earnings Summary.docx
10.	Bonding Analysis.xlsx
11.	Book1.xlsx
12.	Cash Rec.xlsx
13.	Catalyst Press Release - Mar4.pdf
14.	Catalyst Press Release - Mar4.pdf.docx
15.	Comps.docx
16.	Consultants Grid.xlsx
17.	EWR.xlsx
18.	Facility Comparision.pptx
19.	Flash Reports.pdf
20.	Flash Reports.xlsx
21.	Forward looking to actual.xlsx
22.	Fresh Market Earnings.docx
23.	Geneba Call Notes.docx
24.	HFC Post-petition Facility - Court Order.pdf
25.	HFC Post-Petition Facility Terms.pdf
26.	III Analysis v79.xlsx
27.	HII Analysis v80.xlsx
28.	Natural Markets Restaurants Corp.docx
29.	NMFG Weekly Report - Week 8.pdf
30.	NMRC FAQs.docx
31.	NMRC Gant Chart.xlsx
32.	Notes for Auction.docx
33.	NYC-BWI Sensitivities.xlsx
34.	Preqin Data.xlsx
35.	Q1 2013 Letter V6.docx
36.	Sprouts Summary.docx
37.	What adjustments are in adjusted EBITDA each year.docx
38.	(Bonds) Updated RLI Insurance - General Indemnity Agreement 6-24-13 signed.PDF
39.	032014_AtlanticPower_DrewMallozzi_FINAL.pdf

40.	09-10-20 Credit Agreement (1st Amendment).pdf
41.	1- REC - Cover Pages 2.19.14.pdf
42.	11b 3376 Trends Brief 4Pass 110414.pdf
43.	12-01-01 Credit Agreement (1st A&R).pdf
44.	12-01-01 Trust Indenture (A&R).pdf
45.	121111 NOA Investment Memo v1.pdf
46.	13-01-04 Geneba News Tracker.xlsx
47.	13-01-25 DB Oil and Gas for Beginners.pdf
48.	13-02-09 Geneba News Tracker.xlsx
49.	13-02-16 Geneba News Tracker.xlsx
50.	13-02-23 Geneba News Tracker (1).pdf
51.	13-02-23 Geneba News Tracker.pdf
52.	13-02-23 Geneba News Tracker.xlsx
53.	13-04-30 Transaction Information Circular.pdf
54.	13-09-24 NMRC Presentation (2).pptx
55.	13-09-24 NMRC Presentation.pptx
56.	13-09-27 Funding Memo v2.docx
57.	13-10-11 Geneba News Tracker.xlsx
58.	13-10-25 Geneba News Tracker (1).xlsx
59.	13-10-25 Geneba News Tracker.xlsx
60.	13-11-01 Geneba News Tracker.xlsx
61.	13-11-15 Geneba News Tracker.xlsx
62.	13-11-28 MAG and Rent calculation.xlsx
63.	13-12-09 Geneba News Tracker.xlsx
64.	13-12-11 Concessions Analysis.xlsx
65.	13-12-14 Geneba News Tracker.xlsx
66.	13-12-16 Reservation Outlook.xlsx
67.	13-12-21 Geneba News Tracker.xlsx
68.	14-01-01 1st Supplemental Indenture.pdf
69.	14-01-01 Credit Agreement (2nd A&R).pdf
70.	14-01-06 Funding Memo.docx
71.	14-01-28 DIP Funding Request.xlsx
72.	14-02-08 NMRC Presentation Slide 2.pptx
73.	14-02-08 NMRC Presentation.pptx
74.	14-02-10 NMRC Presentation v10 (1).pptx
75.	14-02-10 NMRC Presentation v10 (2).pptx
76.	14-02-10 NMRC Presentation v10.pptx
77.	14-02-10 NMRC Presentation v12.pptx
78.	14-02-12 NMRC Presentation vF (1).PDF
79.	14-02-12 NMRC Presentation vF (2).PDF
80.	14-02-12 NMRC Presentation vF.PDF
81.	14-02-12 NMRC Presentation vF.pptx
82.	14-02-13 NMRC Presentation vF.pdf
83.	14-02-20 Airport Concessions.pdf
84.	14-02-20 Airport Concessions.xlsx

85.	14-02-21 NMFG Operating Model - BM version (1).xlsx
86.	14-02-21 NMFG Operating Model - BM version.xlsx
87.	14-02-25 NMFG Operating Model (1).xlsx
88.	14-02-25 NMFG Operating Model.xlsx
89.	14-04-04 SunTrust Presentation v10.pptx
90.	15939_PearsonAR12(1).pdf
91.	15939_PearsonAR12.pdf
92.	15939_Pearson_Per_sum12.pdf
93.	1644.pdf
94.	19-02-16 NMFG Operating Model - BM version.xlsx
95.	1st half on AUS Concession Agreement.PDF
96.	2- Mrs. Green's REC Presentation-Larchmont-2.19.14 - Larchmont.pdf
97.	2010 Q4.pdf
98.	2011 Initiating Coverage(1).pdf
99.	2011 Initiating Coverage.pdf
100.	2011 Q4.pdf
101.	2011 Results Presentation Slides.pdf
102.	2012 Initiating Coverage(1).pdf
103.	2012 Initiating Coverage.pdf
104.	2012 Q4 Investor Presentation.pdf
105.	2012 Q4.pdf
106.	2012-RESULTS-PRESENTATION-25-02-2013_WEB(1).pdf
107.	2012-RESULTS-PRESENTATION-25-02-2013_WEB(2).pdf
108.	2012-RESULTS-PRESENTATION-25-02-2013_WEB.pdf
109.	2013 Q1 (2).pdf
110.	2013 Q1.pdf
111.	2013 Q2 (2).pdf
112.	2013 Q2.pdf
113.	2013 Q3 (1).pdf
114.	2013 Q3 (2).pdf
115.	2013 Q3 Investor Presentation.pdf
116.	2013 Q3.pdf
117.	2013 Q4.pdf
118.	20130808_PMO_2013H1_PM_EN_final.pdf
119.	2013_11_30ADVNov_MTD_Flash_PL.pdf
120.	2013_12_05ADV_Dec_MTD_Flash_PL(1).pdf
121.	2013_12_05ADV_Dec_MTD_Flash_PL.pdf
122.	2013_Summer_Conferences_vFINAL(2).pdf
123.	2013_Summer_Conferences_vFINAL.pdf
124.	2014 03 26 - Therapure payroll wire for approval - Cda (1).pdf
125.	2014 03 26 - Therapure payroll wire for approval - Cda.pdf
126.	2014 03 26 - Therapure payroll wire for approval - US (1).pdf
127.	2014 03 26 - Therapure payroll wire for approval - US.pdf
128.	2014 NMFG Pricing Overview[2].pptx
129.	2014 Operating Plan v5.pptx

130.	2014 Operating Plan v6 (1).pptx
131.	2014 Operating Plan v6.pptx
132.	2014 Operating Plan v7.pptx
133.	2014 Q2.pdf
134.	20140204 Natural Markets Food Group.pdf
135.	2014 Marketing_CA[2].pptx
136.	2014 Marketing_CA[4].pptx
137.	2014 Marketing_CA[6].pptx
138.	2137550F-1D01-4C36-A33B-4B42CC461E99.png
139.	2nd half of AUS Concession Agreement.PDF
140.	3- Mrs. Green's REC Presentation -Brooklyn-2.19.2014.pdf
141.	3.15.14 Payroll (FSNA).pdf
142.	4- Mrs. Green's REC Presentation - Chelsea-2.19.2014.pdf
143.	4-12-12 Current Report- A-E Notes Closing final.pdf
144.	5- Mrs. Green's REC Presentation - 475 Sixth Ave.pdf
145.	515857-FY12 Statistical Report - FINAL.pdf
146.	517522-CY2012 Stat Report - Final.pdf
147.	584059_folio19124641.pdf
148.	6- Mrs. Green's REC Presentation -1231 3rd Ave-2.19.14.pdf
149.	64695_2013_M09.pdf
150.	7- Mrs. Green's REC Presentation - Winnetka-2.19.14 - Winnetka.pdf
151.	7.JPG
152.	8- Mrs. Green's REC Presentation -Arlington - 2.19.14.pdf
153.	9- Mrs Green's REC Presentation - 289 Columbus Ave. - NY, NY - 2.19.14.pdf
154.	9.26.13 MKM Ent & Leisure Conf NYC FINAL.pdf
155.	ABQ Monthly Revenue Report & CFC.pdf
156.	ABS deals.xlsx
157.	ACEC InfrastructureReport_EN_Final.pdf
158.	Adelphia Communications Corp.'s Bankruptcy.pdf
159.	ADV - Feb 2014 sold days.xlsx
160.	ADV - Feb 2014 Stmt.pdf
161.	Advantage - Business Plan Model (11-15-13) DRAFT - 38 locations v20 (1).xlsx
162.	Advantage - Business Plan Model (11-15-13) DRAFT - 38 locations v20 (2).xlsx
163.	Advantage - Business Plan Model (11-15-13) DRAFT - 38 locations v20.xlsx
164.	Advantage - Business Plan Model (11-15-13) DRAFT.xlsx
165.	Advantage - DIP Funding Borrowing Certificate 3-13-2014.pdf
166.	Advantage - Fleet Planning Template 1.23.2014 v2.xlsx
167.	Advantage - FP - Master Copy 2 4 14 PM.xlsx
168.	Advantage - FP - Master Copy 2.4.14 PM.xlsx
169.	Advantage - Funding Request #9 3-13-2014.xlsx
170.	Advantage - Interest Rate Rider.pptx
171.	Advantage - Memo 10 2013 v15.docx
172.	Advantage - Memo 10 2013 v3.docx
173.	Advantage - Updated Business Plan Model - 1.16.2014 DRAFT for Mgmt.xlsx
174.	Advantage - Updated Business Plan Model - DRAFT - v3.xlsx

175.	Advantage - Updated Business Plan Model - DRAFT - v5 (1).xlsx
176.	Advantage - Updated Business Plan Model - DRAFT - v5.xlsx
177.	Advantage - Updated Business Plan Model - DRAFT - v6.xlsx
178.	Advantage - Updated Business Plan Model - DRAFT - v7.xlsx
179.	Advantage Catalyst Presentation March 2014 vF.PDF
180.	Advantage corporate budget - FY2014 (1-24-14) DRAFT.xlsx
181.	Advantage Data.xlsx
182.	Advantage Model.xlsx
183.	Advantage Overview Presentation 2-11-14.pdf
184.	Advantage PPA (Concessions Summary) Updated.xlsx
185.	Advantage PPA FINAL Report (05-03-2013).pdf
186.	Advantage Preliminary Budget Review.pptx
187.	Advantage Rent A Car - 2014 Budget 2015 Projection (1-22-14) DRAFT.xlsx
188.	Advantage Rent A Car - 2014 Budget 2015 Projection (1-25-14) DRAFT.xlsx
189.	Advantage Rent A Car - 2014 Budget 2015 Projection (1-26-14) DRAFT (1).xlsx
190.	Advantage Rent A Car - 2014 Budget 2015 Projection (1-26-14) DRAFT (2).xlsx
191.	Advantage Rent A Car - 2014 Budget 2015 Projection (1-26-14) DRAFT.xlsx
192.	Advantage Rent A Car - 2014 Budget 2015 Projection (1-29-14) DRAFT v3.xlsx
193.	Advantage Rent A Car - 2014 Budget 2015 Projection (2-11-14) (1).xlsx
194.	Advantage Rent A Car - 2014 Budget 2015 Projection (2-11-14) DRAFT - Updated.xlsx
195.	Advantage Rent A Car - 2014 Budget 2015 Projection (2-11-14) DRAFT.xlsx
196.	Advantage Rent A Car - 2014 Budget 2015 Projection (2-11-14).xlsx
197.	Advantage Rent A Car - 2014 Budget 2015 Projection (2-4-14) DRAFT.xlsx
198.	Advantage Rent A Car - Additional Hertz KPI and Revenue Data (1).xlsx
199.	Advantage Rent A Car - Additional Hertz KPI and Revenue Data.xlsx
200.	Advantage Rent A Car - Bid Summary v1 (1).xlsx
201.	Advantage Rent A Car - Bid Summary v1.xlsx
202.	Advantage Rent A Car - Hertz Discussion Materials (10-22-13).pdf
203.	Advantage Rent A Car - Operating Data Template For Review (11-30-13).xlsx
204.	Advantage Rent A Car - Reforecast DIP Budget (Through 4-5-14) v2 - Net Exposure.pdf
205.	Advantage Rent A Car - Reforecast DIP Budget (Through 4-5-14) v2 - Net Exposure.xlsx
206.	Advantage Rent A Car - Reforecast DIP Budget (Through 4-5-14) v5 - Net Exposure (1).xlsx
207.	Advantage Rent A Car - Reforecast DIP Budget (Through 4-5-14) v5 - Net Exposure (2).xlsx
208.	Advantage Rent A Car - Reforecast DIP Budget (Through 4-5-14) v5 - Net Exposure.xlsx
209.	Advantage Term Sheet 2-21-14 v2.docx
210.	AGS-FSNA Master Services Agreement (MSA) FINAL EXECUTED COPY.pdf
211.	AGS-FSNA SOW2 (Advantage) Amendment 1.pdf
212.	AIF - 2012.pdf
213.	Airport Agreements (1).xlsx
214.	Airport Agreements.xlsx
215.	Airport Concessions.xlsx

216.	Airport Data.xlsx
217.	Airport Schedule 11022013 (1).xlsx
218.	Airport Schedule 11022013.xlsx
219.	Airport Tracking.xlsx
220.	alerts.csv
221.	Alex Reznikov Case Submission (1).pdf
222.	Alex Reznikov Case Submission (2).pdf
223.	Alex Reznikov Case Submission.pdf
224.	Alphatec Electronics Pcl.pdf
225.	american apparel (1).xlsx
226.	american apparel writeup (1).docx
227.	american apparel writeup (2).docx
228.	american apparel writeup.docx
229.	american apparel.xlsx
230.	Annual Report For The Fiscal Year Ended June 30 2011(1).pdf
231.	Annual Report For The Fiscal Year Ended June 30 2011(2).pdf
232.	Annual Report For The Fiscal Year Ended June 30 2011.pdf
233.	Annual Report For The Fiscal Year Ended June 30 2012.pdf
234.	AR2006(1).pdf
235.	AR2006.pdf
236.	AR2007.pdf
237.	AR2008.pdf
238.	ARAC Purchases 2013 -Mar 2014 8-31 v2.xlsx
239.	Arch Wireless, Inc..pdf
240.	AT Kearney Qualifications for Catalyst Capital Group - Jan2014.pdf
241.	attachment (1).pdf
242.	attachment.pdf
243.	AUS Monthly Revenue Report & CFC.pdf
244.	Balduccis-Kings backup.xlsx
245.	Balduccis-Kings Summary v3.pptx
246.	BCG Grocery credentials 1-7-14 vF.pptx
247.	BCG NMFG - Economic proposal v3 (1).pptx
248.	BCG NMFG - Economic proposal v3.pptx
249.	BCG NMFG Proposal Jan 30 (1).pptx
250.	BCG NMFG Proposal Jan 30.pptx
251.	BOS Monthly Revenue Report & CFC2.pdf
252.	Breakfast with Dave 2012 10 26 FULL.pdf
253.	Breakfast with Dave 2012 10 29 FULL.pdf
254.	Breakfast with Dave 2012 10 31 FULL.pdf
255.	BTV Monthly Revenue Report & CFC.pdf
256.	Buenos Aires Embotelladora S.A. (BAESA).pdf
257.	BUR Monthly Revenue Report.pdf
258.	Capital Call Section of LPA Fund III.pdf
259.	Cash Out Form.pdf
260.	Catalyst - funds to be remitted March 19.xlsx

261.	Catalyst - NMFG Proposal 140130 (1).pdf
262.	Catalyst - NMFG Proposal 140130 (2).pdf
263.	Catalyst - NMFG Proposal 140130.pdf
264.	Catalyst Capital - Grocery Assessment Proposal 1_6_14.pdf
265.	Catalyst Capital - PwC Intro 011014vf.pdf
266.	Catalyst Capital Intro to Kurt Salmon 1-8-2014.pptx
267.	Catalyst Final Offer.pdf
268.	Catalyst FTC Presentation v1.pptx
269.	Catalyst FTC Presentation v12 (1).pptx
270.	Catalyst FTC Presentation v12.pptx
271.	Catalyst FTC Presentation v2.pptx
272.	Catalyst FTC Presentation v3.pptx
273.	Catalyst Overview (1).pptx
274.	Catalyst Overview (2).pptx
275.	Catalyst Overview.pptx
276.	Catalyst Sig Page.PDF
277.	catalyst.txt
278.	Catalyst Advantage -- Consent Missing Information Checklist(1777867_4_CH....xlsx
279.	ca en insolv Homburg Contestation of Statoil Canada Ltd 2011-11-11.pdf
280.	ca en insolv Homburg Motion Authztn Sale VO KaiTowers 20131107.PDF
281.	ca en insolv Homburg ThirtyFirst Monitors Report 20140116.pdf
282.	ca en insolv Homburg Twenty Eighth Monitors Report 20131108.pdf
283.	ca en insolv Homburg Twenty Fifth Monitors Report 20130710.PDF
284.	ca en insolv Homburg Twenty Fourth Monitors Report 20130604.pdf
285.	CBRE Netherlands Industrial MV 2013 H2.pdf
286.	CBRE Netherlands Office MV 2013 H2.pdf
287.	CCGI Candidate Package.pdf
288.	Cengage Current Report Entry into a Material Definitive Agreement July 5 2012(1).pdf
289.	Cengage Current Report Entry into a Material Definitive Agreement July 5 2012.pdf
290.	Cengage Learning Short Form Report Final.pdf
291.	CFLP III Limited Partnership Agreement June 22 2010(1).pdf
292.	CFLP III Limited Partnership Agreement June 22 2010.pdf
293.	CH-1692782-v6 CatalystAdvantage -- Asset Purchase Agreement.docx
294.	Charting Excel Export Mar-17-2014 4_59 PM.xls
295.	Charting Excel Export Mar-17-2014 5_09 PM.xls
296.	Charting Excel Export Mar-17-2014 5_25 PM (1).xls
297.	Charting Excel Export Mar-17-2014 5_25 PM.xls
298.	CHS Monthly Revenue Report.pdf
299.	CLE Monthly Revenue Report.pdf
300.	CLT Monthly Revenue Report & CFC.pdf
301.	Commissions Detail (Feb 14).xlsx
302.	Company+Overview+Q1%2714.pdf
303.	Competitive Pricing Survey Methodology[2].docx
304.	Comps Initiating Coverage Reports.pdf
305.	Concessions Overview (1).pptx

306.	Concessions Overview.pdf
307.	Concessions Overview.pptx
308.	Concessions v2.xlsx
309.	Concessions.xlsx
310.	Consolidated Forecast 2013-10-21 - Business Plan.xlsx
311.	Copy of 12-27 New Fleet Available as discussed.xlsx
312.	Copy of Fleetjan1CATCAP.xlsx
313.	Copy of Map of the United States.jpg
314.	Copy of Master Bond List Projected Bonds In-Force as of 11-5-2013 (2).xls
315.	Copy of P11 Funding Sources and Uses.xlsx
316.	Copy of P4 MDA Backupv5 LINKS BROKEN.xlsx
317.	COS Monthly Revenue Report & CFC.pdf
318.	Countrywide plc.pdf
319.	current report3 21 13.pdf
320.	CVG Monthly Revenue Report & CFC.pdf
321.	CY12CommercialServiceEnplanements.xlsx
322.	DAL Monthly Revenue Report.pdf
323.	Data Group Research.pdf
324.	Davide Mitchell EXECUTED Employment Agreement (August 9, 2013).PDF
325.	DAZ_GB2012_E.pdf
326.	DAZ_Q2_2013_E.pdf
327.	DAZ_UC_Q2_2013.pdf
328.	DCA Monthly Revenue Report.pdf
329.	DE0007231326-JA-2012-EQ-E-00.pdf
330.	Delaware Worldwide Corporation.pdf
331.	Delphi Corp. and the Credit Derivatives Market (A).pdf
332.	DEN Monthly Revenue Report & CFC.pdf
333.	DFW Monthly Revenue Report & CFC & CTC.pdf
334.	DIP Balance to December 19.xlsx
335.	DIP Balance v8.xlsx
336.	DOCS-#12997174-v1-29th Monitor s Report (1).PDF
337.	DOCS-#12997174-v1-29th Monitor s Report.PDF
338.	DOCSTOR-#2992220-v1-Motion_Record_-_Plan_Filing_and_Meeting_Order_-_April_2014.PDF
339.	DOOR Comps.xlsx
340.	dpny-23799263-v1-Blue Amended and Restated Purchase Agreement - Dec. 10....pdf
341.	DRAFT Bridge Term Sheet 20140311.pdf
342.	DSM - Monthly Revenue Report & CFC.pdf
343.	E. I. du Pont de Nemours and Company - The Conoco Split-off (A).pdf
344.	EL-The Catalyst Capital Group Inc.pdf
345.	Employee List v2.xls
346.	Employee List.xls
347.	enpaxbrk-072013.xls
348.	EPRA Global REIT Survey 2013 - Netherlands 1378975424293(1).pdf
349.	EPRA Global REIT Survey 2013 - Netherlands 1378975424293.pdf

350.	eTextbook2012report.pdf
351.	Europcar Agreement v2.pdf
352.	Europcar Cooperation Agreement dated 6-3-2013.pdf
353.	EV-EBITDA.xls
354.	EWR-Newark Monthly Revenue Report.pdf
355.	EWR-Wyndham Monthly Revenue Report.pdf
356.	Executed engagement letter.pdf
357.	Expensive-Perceptions-in-Social[1].pptx
358.	External Research Links 2012.xlsx
359.	Fairfax KVI's - Complete List vs whole foods31[1].xlsx
360.	February Candidates.pdf
361.	file.rtf
362.	FinalMaster presentation vF.pdf
363.	Financing Facilities Comparison.pdf
364.	Financing Facilities Comparison.pptx
365.	First Quarter 2011 Supporting Schedules.pdf
366.	First Quarter Investor Call Presentation.pdf
367.	Fiscal 2009 Year End Investor Call Presentation.pdf
368.	Fiscal 2010 Year End Investor Call Presentation.pdf
369.	Fleet Analysis 1-27-14.xlsx
370.	Fleet Composition Plan v3.xlsx
371.	Fleet Composition Plan v4.xlsx
372.	Fleet Composition Plan v5 (1).xlsx
373.	Fleet Composition Plan v5 (2).xlsx
374.	Fleet Composition Plan v5.xlsx
375.	Fleet Plan - 39 Locations.xlsx
376.	FLL Monthly Revenue Report & CFC.pdf
377.	Flow of funds v47_2_DRAFT_catalyst version (1).xlsm
378.	Flow of funds v47_2_DRAFT_catalyst version (2).xlsm
379.	Flow of funds v47_2_DRAFT_catalyst version.xlsm
380.	Flow of funds v48_7.xlsm
381.	Forward looking to actual v3 (1).xlsx
382.	Forward looking to actual v3.xlsx
383.	Friday September 13, 2013(1).pdf
384.	Friday September 13, 2013.pdf
385.	Friday, December 13, 2013.pdf
386.	Friday, September 20, 2013.pdf
387.	Friday, September 27, 2013.pdf
388.	FSNA Memo v1.docx
389.	FSNA Memo v2.docx
390.	FullInventory (2).xlsx
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SCHEDULE B

Documents that are or were in my possession, control or power that I object to producing on the grounds of privilege.

Letters, memoranda and other similar documents passing between Brandon Moyse and his solicitor or between solicitors for Brandon Moyse and West Face Capital Inc, either in the anticipation of this action, or since the commencement thereof, all of which are privileged communications passing between solicitor and client or attract litigation and/or common interest privilege.

SCHEDULE C

Documents that were formerly in my possession, control or power but are no longer in my possession, control or power.

Documents transferred to Brandon Moyse's personal accounts or devices in the normal course of business during his employment with The Catalyst Capital Group Inc. and deleted prior to litigation, a list of which is not available.