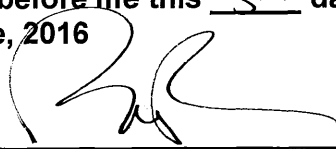


This is Exhibit "14" referred to in
the Affidavit of Thomas Dea
sworn before me this 3rd day
of June, 2016

A handwritten signature in black ink, appearing to be 'R. L.', written over a horizontal line.

A Commissioner, etc.

3251

DAVIES

155 Wellington Street West
Toronto ON M5V 3J7
dwpv.com

March 13, 2015

Matthew Milne-Smith
T 416.863.5595
F 416.863.0871
mmilne-smith@dwpv.com

File No. 250486

DELIVERED

Mr. Rocco DiPucchio
Lax O'Sullivan Scott Lisus LLP
Suite 2750,
145 King Street West
Toronto, ON M5H 1J8

EXHIBIT No. 1
ON THE EXAMINATION OF
James A. Riley IN
The Catalyst Capital v. Moyse et al
Group Inc.
HELD ON May 13, 2015
NEESON & ASSOCIATES COURT REPORTING
& CAPTIONING INC. TORONTO, ONT.

Dear Mr. DiPucchio:

West Face Capital Inc.

Enclosed please find a Notice of Change of Solicitors and the Responding Motion Record of West Face Capital Inc., both served upon you pursuant to the *Rules of Civil Procedure*. The former reflects that Davies Ward Phillips & Vineberg LLP is now co-counsel with Dentons Canada LLP.

The Affidavit of Anthony Griffin included in West Face's Responding Motion Record refers to negotiations with VimpelCom in 2013 and 2014. Those negotiations are subject to a non-disclosure agreement (NDA) entered into in December 2013. Should Catalyst seek further disclosure in respect of those negotiations, it will need to obtain either the consent of VimpelCom or a Court order, on notice to VimpelCom, relieving West Face of its obligations in that regard. West Face undertakes not to oppose a motion to relieve it of its non-disclosure obligations to VimpelCom under the 2013 NDA.

In addition to the foregoing, I enclose a pair of USB drives that contain a copy of non-privileged, non-confidential emails sent to or from Mr. Moyse's West Face email account or known personal email accounts, and which were found on West Face's servers. The manner in which these emails were collected is described in the affidavit of Harold Burt-Gerrans, which forms part of the Responding Motion Record. For the sake of completeness, we have also included various emails from Mr. Moyse's personal email address that predated the date range of Mr.

Burt-Gerrans' search. These emails were preserved pursuant to West Face's document preservation efforts as a result of the "litigation hold" in this matter.

The emails on the USB drive have been redacted for reasons of privilege. They have also been redacted for reasons of confidentiality, but only to the extent the redacted content is not relevant to the matters in issue.

West Face is also willing to produce to the ISS those documents on West Face's file servers that can reasonably be identified as having been created, modified or accessed by Brandon Moyse that could be retrieved from Mr. Moyse's desktop computer or West Face's computer servers. West Face will do so provided the parties can agree on a protocol whereby the ISS will review and produce to the other parties only those documents, if any, relating to WIND, the AWS-3 spectrum auction or Callidus. I look forward to hearing from you in that regard. Any such protocol will need to provide appropriate protections for confidential West Face information, and confidential third-party information in West Face's possession.

Yours very truly,



Matthew Milne-Smith

MMS/nt

Enclosures

cc: Andrew Winton
Jeff Mitchell, Andy Pushalik, *Dentons Canada LLP*

TAB 