

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

BETWEEN:

THE CATALYST CAPITAL GROUP INC.

Plaintiff

- and -

BRANDON MOYSE and WEST FACE CAPITAL INC.

Defendants

**UNDERTAKINGS, UNDER ADVISEMENTS, AND REFUSALS
(Examination for Discovery of Gabriel de Alba held May 11, 2016)**

(Revised – June 2, 2016)

| No. | Category | Page No. | Question / Undertaking | Answer or precise basis for refusal |
|-----|----------|----------|--|--|
| 1. | U/A | 19 | To produce all emails concerning the 2013 negotiations between VimpelCom and Catalyst on which Mr. Moyse was copied. | There are no emails concerning the 2013 negotiations between VimpelCom and Catalyst on which Mr. Moyse was copied. |

| No. | Category | Page No. | Question / Undertaking | Answer or precise basis for refusal |
|-----|----------|----------|--|---|
| 2. | U/A | 19 | To produce all documents that were created, authored, or edited by Mr. Moyse regarding the 2013 negotiations between VimpelCom and Catalyst.* | <p>There are no documents that were created or authored by Moyse regarding the 2013 negotiations between VimpelCom and Catalyst.</p> <p>However, CCG0018472, CCG0018473, CCG0018474 and CCG0018475 appear to have been created by Andrew Yeh in response to negotiations between Catalyst and VimpelCom at the end of 2013. Catalyst cannot confirm or deny that Mr. Moyse edited these documents either at the time of their creation or anytime thereafter.</p> |
| 3. | U/A | 20 | To produce any other documentary evidence demonstrating Mr. Moyse's involvement in the Catalyst's negotiations, investigations, or discussions with VimpelCom in 2013. | CCG0018472, CCG0018473, CCG0018474 and CCG0018475 were created by Andrew Yeh in response to negotiations between Catalyst and VimpelCom at the end of 2013. Catalyst is unaware whether Mr. Moyse assisted in the preparation of these documents. |
| 4. | U/A | 21 | To produce all documents that demonstrate the involvement of Mr. Moyse in Catalyst's core WIND deal team and/or the mentorship or training of Mr. Moyse. | Catalyst has produced all relevant documents relating to this question. |
| 5. | U/T | 23 | To advise who was on Catalyst's core deal team for Mobilicity as of the end of 2013. | The team that was responsible for the Mobilicity file as at the end of 2013 was Newton Glassman, Gabriel de Alba, James Riley, Zach Michaud and Andrew Yeh. |

| No. | Category | Page No. | Question / Undertaking | Answer or precise basis for refusal |
|-----|----------|------------------|---|---|
| 6. | U/A | 26, 42-43, 54-55 | To produce all emails between Catalyst and VimpelCom exchanging terms and/or proposals for a proposed acquisition of WIND in the period: (i) before January 2, 2014; (ii) between January 2, 2014 and March 27, 2014; and (iii) between March 27, 2014 and May 6, 2014. | Catalyst has produced all relevant documents relating to this question. |
| 7. | U/A | 29, 36 | To produce all documentation demonstrating Mr. Moyses's involvement in the telecom file or on the core telecom file deal team prior to March 26, 2014. | Catalyst has produced all relevant documents in its possession and control relating to this question. |
| 8. | U/T | 33-34, 55 | To identify any documents demonstrating negotiations or discussions between Catalyst and VimpelCom, other than concerning the terms of a non-disclosure agreement, between December 30, 2013 and March 22, 2014, and between March 22, 2014 and May 6, 2014. | See CCG0025177, CCG0028626, CCG0028637, CCG0028638, CCG0028639, CCG0028640, CCG0028642, CCG0028644, CCG0028645, CCG0028646, CCG0028656, CCG0028657, CCG0028658, CCG0028659, CCG0028665, CCG0028666, CCG0028673, CCG0028674, CCG0028684, CCG0028686, and CCG0009410. |
| 9. | U/A | 34 | To produce any phone records of calls between Catalyst and VimpelCom during the period between December 30, 2013 and March 22, 2014. | This information is unavailable. |
| 10. | U/T | 34 | To review Mr. De Alba's calendar to determine whether Mr. De Alba had any in-person meetings with VimpelCom or anyone on its behalf in the period between December 30, 2013 and March 22, 2014. | Mr. de Alba has reviewed his calendar and produced all responsive calendar entries between December 30, 2013 to March 22, 2014. |

| No. | Category | Page No. | Question / Undertaking | Answer or precise basis for refusal |
|-----|----------|----------|--|---|
| 11. | U/T | 38 | To produce all documents between March 27, 2014 and May 6, 2014 demonstrating Mr. Moyses's involvement in the WIND or Mobilicity files. | Catalyst has produced all relevant documents relating to this question. |
| 12. | U/T | 40 | To confirm that Catalyst had not executed a non-disclosure agreement with VimpelCom by March 27, 2014. | Catalyst and VimpelCom executed a non-disclosure agreement on March 21, 2014. This documents was produced by Catalyst at CCG0023894. |
| 13. | U/A | 42 | To produce all evidence of Catalyst's due diligence on WIND prior to March 27, 2014. | Catalyst has produced all evidence in its possession and control relating to this question. Catalyst's due diligence regarding WIND prior to March 27, 2014, included preparing pro-forma statements to demonstrate the value of a combined entity (see: CCG0018472, CCG0018473, CCG0018474, CCG0018475, and CCG0011536). |
| 14. | U/T | 71-72 | To advise if any drafts of the share purchase agreement being negotiated between Catalyst and VimpelCom contained a condition that the deal could not close unless Catalyst obtained certain regulatory concessions from the government. | The drafts of the share purchase agreement exchanged by Catalyst and VimpelCom contained certain regulatory conditions. None were expressly predicated on Catalyst obtaining regulatory concessions. |
| 15. | U/A | 83 | To produce the notebooks of all members of the Catalyst investment team relating to WIND. | Catalyst's investment team has reviewed all notebooks and notes and cannot locate any existing notebooks or notes concerning WIND. |
| 16. | U/A | 85 | To produce the public information that Catalyst had compiled in relation to WIND as of May 6, 2014. | Catalyst has produced all relevant documents in its possession and control relating to this question. |

| No. | Category | Page No. | Question / Undertaking | Answer or precise basis for refusal |
|-----|----------|----------|---|---|
| 17. | U/T | 86-87 | To identify and/or produce any evidence of Catalyst making a request of any of the three principals of Globalive that was not complied with, and to provide details of any oral requests that were made and not fulfilled as part of the due diligence process. | <p>Catalyst cannot find evidence of a request made of the three principals of Globalive that was not complied with. Catalyst has made inquiries of the relevant individuals and they cannot recall a specific oral request required during the due diligence process.</p> <p>However, see CCG0011207, an email from Catalyst's legal advisors during the WIND due diligence process in which Daniel Batista states to Zach Michaud about WIND's management:</p> <p>"We are maintaining a running list of further documentary requests to address deficiencies in the data room information. The list is already growing long given that the data room (or at any rate the portion we're reviewing) appears to be somewhat stale. I gathered from this morning's meeting that they're struggling to respond to informational requests already made, so we should consider if now is the time to be making further requests."</p> |
| 18. | U/T | 88 | To confirm that CCG0011325, the black line version of the draft share purchase agreement being negotiated between Catalyst and VimpelCom, is the last draft of the share purchase agreement that Mr. Moyse saw. | The share purchase agreement (CCG0011363) attached to CCG0011362 is the last draft of the agreement that was sent to Mr. Moyse. |
| 19. | U/T | 89 | To confirm that there is no evidence that anyone at Catalyst discussed any of the revisions set forth in CCG0011325 with Mr. Moyse. | There is no evidence that anyone at Catalyst discussed the revisions in CCG0011325 with Moyse. |
| 20. | R/F | 95-96 | To produce any document or evidence that can establish that Catalyst had sufficient cash on hand to fund the acquisition of WIND. | Refusal maintained. This question is irrelevant to the issues in the litigation. |

| No. | Category | Page No. | Question / Undertaking | Answer or precise basis for refusal |
|-----|----------|----------|--|--|
| 21. | U/T | 98 | To advise what measures Catalyst took to cut off Mr. Moyse's access to Catalyst's servers. | On May 26, 2014, Catalyst contacted its IT provider and asked that Mr. Moyse's permissions to access Catalyst's servers be revoked. Immediately thereafter Catalyst contacted Marty Musters to perform an investigation of Mr. Moyse's work computer. |
| 22. | U/T | 98 | To advise what evidence Catalyst has of confidential Catalyst information passing to Mr. Moyse after May 26, 2014. | Catalyst does not have evidence at this time of confidential Catalyst information passing to Mr. Moyse after May 26, 2014. Catalyst cannot identify any documents in the present productions as evidence that Moyse received Catalyst's confidential information after May 26, 2014. |

| No. | Category | Page No. | Question / Undertaking | Answer or precise basis for refusal |
|-----|----------|----------|--|--|
| 23. | U/T | 105-106 | To advise what evidence Catalyst has of Mr. Moyse passing confidential information to West Face, in writing, orally, or in any other form, with the exception of the contents of the March 27, 2014 email and the four attached writing samples. | <p>Catalyst understands that Moyse was in near constant email and phone conversation with West Face between March 26 and June 20, 2014 (while still an employee of Catalyst).</p> <p>Moyse clearly did not demonstrate an appreciation of confidential information. He was eagerly looking to leave Catalyst. He was aware that West Face was competing with Catalyst with regard to Wind. He possessed confidential information concerning positions that Catalyst was taking vis a vis VimpelCom and the federal government regarding a potential purchase of WIND.</p> <p>By as earlier as June 4, 2014, the confidential information that Moyse possessed concerning Catalyst's positions with VimpelCom and the federal government had passed to one or more of the partners at West Face, including Anthony Griffin. Mr. Griffin had this information when he said on June 4, 2014 that Catalyst's proposal to VimpelCom "seems to be a lot of air".</p> <p>West Face used the confidential information communicated by Moyse as a springboard to craft a proposal that would block Catalyst and cause VimpelCom to prefer its proposal.</p> |
| 24. | U/T | 106 | To the extent that there is an allegation of confidential information of Catalyst being transmitted to West Face in any way whatsoever, to advise when and how it was transmitted and to whom at West Face it was transmitted. | Catalyst alleges that between March 26 and June 20, 2014, that through oral conversations and other forms of communication that have since been deleted, Mr. Moyse transmitted to the partners of West Face, including Tom Dea and Anthony Griffin, the confidential positions that Catalyst was taking vis a vis VimpelCom and the federal government regarding a potential purchase of WIND. |

| No. | Category | Page No. | Question / Undertaking | Answer or precise basis for refusal |
|-----|----------|------------------|---|--|
| 25. | U/T | 107 | To advise what evidence is going to be relied on that confidential Catalyst information transmitted by Mr. Moyse was used by West Face, and how that alleged use caused harm to Catalyst. | Catalyst relies on the following evidence in this proceeding: affidavit evidence given by Mr. Moyse, cross-examination evidence of Mr. Moyse, affidavit evidence given by Mr. Dea, cross-examination evidence of Mr. Dea, affidavit evidence given by Mr. Griffin, cross-examination evidence of Mr. Griffin, discovery evidence of Mr. Griffin, affidavit evidence of Simon Lockie, affidavit evidence of Hamish Burt, affidavit evidence of Michael Leitner, documents produced in this litigation the demonstrate the use of Catalyst's confidential negotiating positions with VimpelCom and the federal government that were used to formulate an offer seen by VimpelCom as more attractive than the offer made by Catalyst. |
| 26. | U/T | 107-108 | To advise of the date that Mr. De Alba had a discussion with Mr. Griffin in relationship to West Face's Mobilicity holdings in the period prior to June 4, 2014. | Mr. de Alba has reviewed his email and calendar but he cannot recall the precise date on which he had a conversation with Mr. Griffin regarding West Face's Mobilicity holdings. |
| 27. | U/T | 108-109 | To the extent not covered by solicitor-client privilege, to advise why Catalyst's counsel made a specific warning to West Face about a "telecom file". | When Moyse accepted a position with West Face, a direct competitor, Catalyst was concerned about the confidential information Mr. Moyse possessed concerning telecom files, specifically Mobilicity. Catalyst knew at the time that West Face had debt in Mobilicity. |
| 28. | U/T | 113-114, 116-117 | To the extent that Catalyst is going to allege that Mr. Moyse was on or participated in any calls between May 16 and May 25, 2014 while he was on vacation in South East Asia, to advise on what evidentiary basis such an allegation will be made. | Catalyst does not allege that Mr. Moyse participated in any Catalyst calls concerning WIND between May 16 and May 25, 2014. |

| No. | Category | Page No. | Question / Undertaking | Answer or precise basis for refusal |
|-----|----------|----------|---|---|
| 29. | U/T | 114 | To produce any evidence that the notion of the "outside date" was discussed with Mr. Moyse between May 6 and May 15, 2014. | Mr. de Alba's and Mr. Glassman's recollection is that the issue of a need for regulatory conditions in the share purchase agreement was discussed at length and often with the deal team, which Moyse was part of, between May 6-15, 2014. |
| 30. | U/T | 117 | To advise of any evidence that Mr. Moyse participated in a call prior to May 6, 2014. | <p>See CCG0011561. Mr. Moyse was invited to participate in a call with Johanne Lemay by Zach Michaud on March 26, 2014. Mr. Moyse said the following during his discovery about the call:</p> <p>266 Q. Okay. Did you participate in the call?</p> <p>A. I might have but I don't remember.</p> <p>267 Q. You don't recall having any discussion with Johanne Lemay?</p> <p>A. I don't remember but I'm not discounting that I may have been on the call.</p> |
| 31. | R/F | 119 | To advise when Catalyst had discussions with Quebecor and the nature of such discussions. | Refusal maintained. This question is irrelevant to the issues in the litigation. |
| 32. | U/T | 123-124 | To advise whether, since Mr. Moyse's departure, anyone at Catalyst told him anything about the WIND deal, Catalyst's strategies, or the course of Catalyst's negotiations with VimpelCom. | Catalyst is not aware of anyone at Catalyst communicating to Moyse anything about the WIND deal since his departure. |

| No. | Category | Page No. | Question / Undertaking | Answer or precise basis for refusal |
|-----|----------|----------|---|--|
| 33. | U/T | 126-127 | To advise whether Mr. Creighton disclosed any of Catalyst's confidential information regarding WIND to Mr. Moyse after Mr. Moyse left Catalyst. | Catalyst is not aware whether Mr. Creighton disclosed Catalyst's confidential information regarding WIND to Mr. Moyse after Mr. Moyse was asked to leave Catalyst's offices on May 26, 2014. |
| 34. | U/T | 136 | To confirm that Catalyst is not pursuing a claim in this proceeding that AAL Telecom Holdings Incorporated, any of its subsidiaries or any of its three principals (Mr. Scheschuk, Mr. Lacavera or Mr. Lockie) have breached any kind of legal duty or obligation to Catalyst in respect of their discussions with West Face. | Confirmed. |
| 35. | U/T | 143-144 | To produce any evidence in the public domain as of May 26, 2014 as to what the content of the set-aside spectrum auction would be. | Catalyst has been unable to find such information. |
| 36. | U/T | 156 | To advise if Catalyst asked for any regulatory concessions from the government, other than those outlined in its March 27, 2014 and May 12, 2014 presentations to the government. | No. The presentations outline the concessions sought by Catalyst from the federal government. |
| 37. | U/T | 160 | To advise if there were any discussions between Catalyst and the government between July 25 and August 18, 2014, other than as referenced in CCG0025843. | Yes. On August 11, 2014, Catalyst and VimpelCom had a conference call with the government during which the parties told the federal government that the "deal was done". |
| 38. | U/T | 165-166 | In reference to CCG0026625, to confirm that this version of the share purchase agreement being negotiated between Catalyst and VimpelCom contained the final draft of clause 6.3(d) and that there were no further negotiations on this topic from August 1, 2014 forward. | Confirmed. |

| No. | Category | Page No. | Question / Undertaking | Answer or precise basis for refusal |
|-----|----------|------------------|---|--|
| 39. | U/T | 176-177 | To advise if Catalyst's understanding of the government's position (that the government would not be opposed to Catalyst buying WIND, but that it would not provide any of the concessions outlined in Catalyst's May 2014 presentation), had changed by August 18, 2014. | The federal government's official position that it would not be opposed to Catalyst buying WIND but that it would not provide any of the concessions had not changed by August 18, 2014. However, Catalyst believed that this was simply positioning and would likely change once a buyer had completed a deal and had a list of specific demands. |
| 40. | U/T | 184-185 | In reference to CCG0024550, to advise what "additional consents" Catalyst was trying to add as preconditions to the deal. | Mr. de Alba cannot recall the specific consents being referred to in CCG0024550. Catalyst disagrees that this email refers to adding additional consents as "preconditions to the deal". In Mr. Levin's email contained in the chain, he states that "[i]f any consents are not obtained that are individually or in the aggregate material, we should ideally have the right to walk" (emphasis added). Mr. de Alba agrees with this position. Ms. Catton indicates that she expected that VimpelCom would include the "quite long" list of consents that had been listed in Schedule 4.6 in Schedule 3.2(i). |
| 41. | U/A | 186-187, 193-194 | To advise what evidence Catalyst has that either the VimpelCom board or finance committee became aware of the offers made by Mr. Leitner on behalf of the consortium at any time before August 18, 2014. | Catalyst cannot point to a document that reflects that Mr. Leitner's offer was provided to the VimpelCom board or finance committee. |
| 43. | R/F | 196 | To advise whether the Harvard Endowment was an investor in Catalyst funds 3 and 4. | Refusal maintained. This question is irrelevant to the issues in the litigation. |
| 44. | R/F | 197 | To advise who were the members of the advisory panel referred to in CCG0024640. | Refusal maintained. This question is irrelevant to the issues in the litigation. |

| No. | Category | Page No. | Question / Undertaking | Answer or precise basis for refusal |
|-----|----------|----------|---|--|
| 45. | R/F | 197 | To advise whether the advisory panel referred to in CCG0024640 was comprised of Catalyst investors. | Refusal maintained. This question is irrelevant to the issues in the litigation. |
| 46. | R/F | 197 | To advise what the timing of the WIND deal and ensuring it got into the public domain had to do with the advisory panel meeting referred to in CCG0024640. | Refusal maintained. This question is irrelevant to the issues in the litigation. |
| 47. | U/A | 202-204 | To advise who at Catalyst was consulted in answering the undertaking "To advise whether VimpelCom ever asked for a break fee" given at the cross-examination of Mr. Riley on May 13, 2015. | Mr. Riley asked Zach Michaud however Mr. Riley recalls that he asked Mr. Michaud whether there was a break fee in the transaction (not whether VimpelCom asked for a break fee) and Mr. Michaud advised that there was not. Additionally, Mr. Riley answered the undertaking to the best of his recollection and did not recall that VimpelCom asked for a break fee. At the time that VimpelCom proposed the break fee, Mr. de Alba was principally negotiating for Catalyst. |
| 48. | U/A | 208-209 | To the extent that Catalyst intends to lead evidence at trial concerning a breach of exclusivity by VimpelCom, to advise what this evidence will be, including identifying which communications between West Face and VimpelCom Catalyst alleges were in breach of exclusivity. | Catalyst does not intend to lead evidence concerning a breach of the exclusivity agreement between Catalyst and VimpelCom in this proceeding. |
| 49. | U/T | 210 | To advise whether VimpelCom asked or proposed that Catalyst sign a deal along the lines of the offer made by Mr. Leitner on behalf of the consortium, at any time between August 7 and September 16, 2014. | VimpelCom never asked Catalyst to sign a deal along the lines of the offer made by Mr. Leitner on behalf of the consortium, at any time between August 7 and September 16, 2014. |

| No. | Category | Page No. | Question / Undertaking | Answer or precise basis for refusal |
|-----|----------|----------|--|---|
| 50. | R/F | 213 | To advise whether Catalyst undertook further efforts after exclusivity expired to acquire WIND. | Catalyst is answering this question pursuant to Rule 34.12 and maintains its objection on the ground that the question is irrelevant. Yes. |
| 51. | R/F | 213 | To advise whether Catalyst had any communications with VimpelCom between August 25 and September 16, 2014. | Catalyst is answering this question pursuant to Rule 34.12 and maintains its objection on the ground that the question is irrelevant. Yes. |
| 52. | R/F | 213-214 | To advise whether Catalyst contacted Globalive after August 18, 2014, about using the Globalive capital structure in the same way that the West Face consortium did in structuring its offer. | Catalyst is answering this question pursuant to Rule 34.12 and maintains its objection on the ground that the question is irrelevant. No. |
| 53. | R/F | 214 | To advise whether AAL, Mr. Lacavera, Mr. Scheschuk or Mr. Lockie contacted Catalyst about WIND after August 18, 2014. | Catalyst is answering this question pursuant to Rule 34.12 and maintains its objection on the ground that the question is irrelevant. No. |
| 54. | U/T | 218 | To advise whether Mr. Moyse, as an investment professional at Catalyst, would have been obliged to put up money in connection with each deal that Catalyst does, including the WIND transaction if it had closed while he was still a Catalyst employee, and if so, to advise whether that obligation was pursuant to an employment agreement or anything else in writing. | From time to time, investment professionals are required to put up money in the event of a capital call pursuant to the employment agreement. |

| No. | Category | Page No. | Question / Undertaking | Answer or precise basis for refusal |
|-----|----------|----------|--|---|
| 55. | U/A | 218 | To advise whether the Catalyst investment professionals who had been obliged to invest in a deal that Catalyst had done would be entitled to withdraw their investments at any particular time or whether it was expected that the money would stay in as long as Catalyst's investment stayed on. | Refused. This question is irrelevant to the issues in the litigation. |
| 56. | U/T | 220 | To produce or identify any documents suggesting Mr. Moyses's participation in analyzing the wireless market at Catalyst prior to May 6, 2014. | Catalyst has produced all relevant documents relating to this question. See: CCG0006320, CCG0006323, CCG0009114, CCG0009115, CCG0009116, CCG0009117, CCG0009441, CCG0009443, CCG0009459, CCG0009460, CCG0009461, CCG0009462, CCG0009463, CCG0009464, CCG0009465, CCG0002203, CCG0011410, CCG0011506, CCG0011509, CCG0011513, CCG0011514, CCG0011515, CCG0011519, CCG0011520, CCG0011521, CCG0011522, CCG0011526, CCG0011530, CCG0011531, CCG0011535, CCG0011536, and CCG0011564. |

| No. | Category | Page No. | Question / Undertaking | Answer or precise basis for refusal |
|-----|----------|----------|---|--|
| 57. | U/T | 222-223 | To advise whether, following Mr. Moyse's resignation from Catalyst, any instructions were given to the people who were working closely on the WIND deal on behalf of Catalyst and to Mr. Moyse that they should not be speaking to one another as to the specifics of the WIND transaction as it developed. | Following Mr. Moyse's removal from Catalyst's Toronto office on May 26, 2014, Catalyst's partners explained to the investment professionals that Mr. Moyse had been asked to leave and reminded of the non-competition clause in his employment contract. Catalyst's investment professionals were told that Catalyst intended to enforce this clause if necessary. Catalyst's investment professionals were informed about the steps that Catalyst was taking against Mr. Moyse and West Face as they happened. |
| 58. | U/T | 223-224 | To advise whether Catalyst can determine whether Mr. Moyse logged onto the Catalyst server remotely while not in the Catalyst office, and if so to produce any evidence that Mr. Moyse did log in remotely to the Catalyst server either during his vacation or in the month following his resignation. | This information is unavailable. |
| 59. | U/T | 226-228 | To advise what information Catalyst has that suggests Mr. Creighton passed Mr. Moyse information pertaining to WIND in the period after Mr. Moyse resigned from Catalyst but before his employment terminated. | Catalyst has no knowledge of information pertaining to WIND that Mr. Creighton passed to Mr. Moyse after he resigned from Catalyst but before his employment terminated. |
| 60. | U/T | 228-229 | To advise whether Mr. Creighton alleges he had any discussions about WIND with Mr. Moyse following the termination of Mr. Moyse's employment, and, if so, to provide the details of such discussions. | Mr. Creighton only recalls a discussion with Mr. Moyse on or about June 20, 2014 but only to the effect that Mr. Moyse warned Mr. Creighton and other Catalyst employees not to discuss the Mobilicity file. |

| No. | Category | Page No. | Question / Undertaking | Answer or precise basis for refusal |
|-----|----------|----------|---|---|
| 61. | U/T | 229 | To advise whether Mr. Creighton ever passed any confidential information pertaining to WIND to Mr. Moyse in the period following his resignation on May 24, 2014. | Catalyst has no knowledge that Mr. Creighton passed confidential information to WIND to Mr. Moyse after May 24, 2014. |
| 62. | U/T | 241 | To ask others at Catalyst whether anybody has any information from Mr. Moyse that he passed along confidential information about WIND to West Face. | No one at Catalyst has any information other than what is set out above. |