



July 22, 2014

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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

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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)

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