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February 20, 2015

SENT VIA E-MAIL (rdipucchio@counsel-toronto.com)

Rocco Di Pucchio
Lax O'Sullivan Scott Lisus LLP
Suite 2750, 145 King Street West
Toronto ON M5H 1J8EXHIBIT No. 2
ON THE EXAMINATION OFJames A. Riley IN
The Catalyst Capital Group v. Moyses et. alHELD ON May 13, 2015
NEESON & ASSOCIATES COURT REPORTING
& CAPTIONING INC. TORONTO, ONT.

Dear Mr. Di Pucchio:

RE: **The Catalyst Capital Group Inc. v. Brandon Moyses and West Face Capital Inc. (Court File No. CV-14-507120)**

We acknowledge receipt of your client's motion record along with a copy of the ISS' final report by email late Wednesday evening.

We reiterate our previous requests that you immediately produce all written interactions with the ISS, including but not limited to all communications in any way relating to the search process and any documents summarizing, minuting or confirming telephone interactions. Particularly given the nature of the allegations raised by Mr. Riley in his affidavit in respect of the ISS, the interaction between Catalyst, Mr. Moyses and the ISS are clearly relevant, and there is no basis to refuse to disclose same.

In addition, Mr. Riley in his affidavit specifically gives evidence relating to Catalyst's negotiations with VimpelCom Ltd. respecting the potential purchase of Wind Mobile. Given the allegations made in the motion materials, Catalyst's negotiations with VimpelCom Ltd. are of central relevance. As such, please produce the documentation substantiating Mr. Riley's assertion that Catalyst and VimpelCom Ltd. were able to negotiate all of the terms of the potential sale of Wind Mobile to Catalyst, with the sole exception that the sale be conditional on obtaining regulatory concessions from Industry Canada. Such documentation would include but not be limited to the communications back and forth between Catalyst and VimpelCom Ltd., which substantiates the assertion that Catalyst and VimpelCom Ltd. reached agreed-upon terms (with the exception of the regulatory concessions), and what those terms were.

As we have previously noted, we undertake not to use any of the information disclosed for any purposes other than this litigation.

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With respect to the timetable for this motion, your materials were due to the Responding Parties on February 16, 2015. As such, we reserve all rights to challenge this late service.

Yours truly,
Dentons Canada LLP

A handwritten signature in cursive script that reads "Jeffrey Mitchell JPM".

Jeffrey P. Mitchell

JPM/agp

c.c. Robert Centa, Paliare Roland Rosenberg Rothstein LLP

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