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File No: 13094

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**Via Email**

May 21, 2015

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Dear Counsel:

**Re: The Catalyst Capital Group Inc. v. Brandon Moyse et al.**  
**Court File No. CV-14-507120**

One question (#161) was taken under advisement at Mr. Musters' cross-examination. In response to that question:

- Mr. Musters cannot recall or re-create the search terms used which led to the publicly available information referred to in paragraph 8 of his April 30, 2015 affidavit; and
- Enclosed please find the publicly available information to which Mr. Musters was referring.

In addition to these documents, Mr. Musters also notes that the publicly available information is available on YouTube at <https://www.youtube.com/watch?v=PyjjADzw6z0> and <https://www.youtube.com/watch?v=lpmdMdu4L7M>.

Mr. Musters wishes to correct an error in his testimony. At question 162, Mr. Musters stated that it was incorrect the information he was referring to provided advice as on the removal of the entire ASO program and not simply removal of the remnant files. Upon reviewing the publicly available information, Mr. Musters notes that the information includes advice on the removal of the entire ASO program and his answer to question 162 was incorrect.

Mr. Musters will not re-attend for further cross-examination. None of the other witnesses are re-attending following answers to undertakings or under advisements and we see no reason to proceed any differently with Mr. Musters.

Yours truly,

A handwritten signature in black ink, appearing to be 'A. Winton', with a long horizontal flourish extending to the right.

Andrew Winton

c. Rocco DiPucchio