

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N :

THE CATALYST CAPITAL GROUP INC.

Plaintiff

- and -

BRANDON MOYSE and WEST FACE CAPITAL INC.

Defendants

UNDERTAKINGS GIVEN ON THE CROSS-EXAMINATION OF THOMAS DEA ON JULY 31, 2014 RESPECTING HIS AFFIDAVIT SWORN JULY 7, 2014

	Page/ Question No.	Undertaking	Answer
1.	30/106	To provide a copy of the email from Mr. Singh to Mr. Moyse dated May 22, 2014 in which Mr. Singh provides a draft employment agreement.	See attached.
2.	41/156	To advise how many funds in total West Face has.	PENDING.
3.	98/433	To advise of the date on which the WIND Confidentiality Wall IT protections were established.	June 20, 2014 at approximately 9:35AM. See the email at Tab 25 of West Face's Document Brief, which is an email dated June 20, 2014 from Chap Chau confirming that the restricted access was put in place.

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4.	112/490	To provide a copy of the email from Mr. Moyses to Mr. Dea dated May 28th in which Mr. Moyses provides a redacted copy of the Catalyst employment contract.	See attached.
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