

**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**

<b>UNDERTAKINGS</b>			
Undertakings given on the cross-examination of Alexander Singh on July 31, 2014 respecting his Affidavit sworn July 7, 2014			
	<b>Question No.</b>	<b>Undertaking</b>	<b>Answer</b>
1.	86	To making inquiries as to whether an email was sent to the Investment Team respecting the Confidentiality Wall, other than the email attached to Mr. Dea's Affidavit at Tab J.	There was no other email sent to the Investment Team in this regard. The email at Tab J dated June 19, 2014 provided notification.
	<b>Question No.</b>	<b>Under Advisement</b>	<b>Answer/Statement of Refusal</b>
2.	116	To advise whether staff who did not receive the Confidentiality Wall memo were walled off from WIND or not.	Staff who did not receive the Confidentiality Wall memo were not walled off from WIND. Non-Investment Team members were not involved with

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			WIND. Non-investment Team members generally do not access investment files.
3.	117	If the answer to Question 116 is "yes", to provide documents evidencing the creation of that Confidentiality Wall.	N/A – see above.

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