

Court File No. CV-14-507120

**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

**AFFIDAVIT OF ALEXANDER SINGH
(Sworn July 7, 2014)**

I, Alexander Singh, of the City of Toronto, in the Province of Ontario,

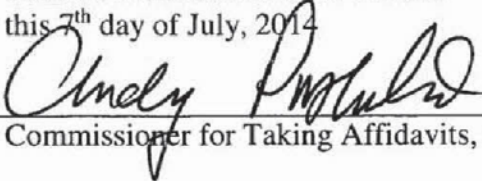
MAKE OATH AND SAY:

1. I am the General Counsel and Secretary of the Defendant, West Face Capital Inc. ("**West Face**") and as such, I have knowledge of the matters to which I hereinafter depose. Where this Affidavit is based on information and belief, I have stated the source of that information or belief and verily believe it to be true.
2. In making this Affidavit, I have also had the opportunity to review the Affidavit sworn by James A. Riley, Chief Operating Officer for The Catalyst Capital Group Inc., ("**Catalyst**") on June 26, 2014, as well as the Affidavit sworn by Thomas Dea, Partner of West Face, on July 7, 2014.

Discussion with Brandon Moyse

3. On or about May 16, 2014, one of West Face's partners, Thomas Dea, asked me to prepare an employment contract for Brandon Moyse. Mr. Dea told me that West Face had decided to extend Brandon an offer of employment as an Associate. Mr. Dea also asked that I speak with Brandon to remind him of the confidentiality obligations that he owed to his former employer, The Catalyst Capital Group Inc. ("Catalyst").
4. On or about May 22, 2014, the same day that West Face provided a written offer of employment to Brandon, I spoke with Brandon and advised him that West Face takes matters of confidentiality very seriously and that he was not to disclose any information belonging to Catalyst. I pointed out to Brandon that this obligation was also included as part of his employment contract with West Face, which states that he must not use any property in the course of his employment with West Face which is confidential or proprietary information of any other person, company, group or organization, which I told him would include Catalyst.
5. Brandon assured me that he understood the obligations that he owed to Catalyst and West Face, and that he would abide by them.
6. After speaking with Brandon, I told Mr. Dea that I had spoken with Brandon and that Brandon understood his obligations of confidentiality, and would not engage in any behaviour that would result in a violation of those obligations.

7. I make this Affidavit in response to Catalyst's motion for an interim injunction
and for no other purpose.

SWORN before me at the City of)
Toronto in the Province of Ontario)
this 7th day of July, 2014)
)
Commissioner for Taking Affidavits, etc)



ALEXANDER SINGH

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PROCEEDING COMMENCED AT
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AFFIDAVIT OF ALEXANDER SINGH
(Sworn July 7, 2014)

DENTONS CANADA LLP
77 King Street West, Suite 400
Toronto-Dominion Centre
Toronto, ON M5K 0A1

Lawyer: Jeff Mitchell/Andy Pushalik
LSUC#: 40577A/54102P
Telephone: (416) 863-4660/(416) 862-3468
Facsimile: (416) 863-4592

Lawyers for the Defendant/Responding Party,
West Face Capital Inc.