

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

	-X	:	
In re	:	:	Chapter 15
	:	:	
CATALYST PAPER CORP., <u>et al.</u> ,	:	:	Case No. 12-10221 (PJW)
	:	:	
Debtors. ¹	:	:	Jointly Administered
	:	:	
	-X		

**NOTICE OF FILING AND HEARINGS UNDER CHAPTER 15
OF THE UNITED STATES BANKRUPTCY CODE**

PLEASE TAKE NOTICE, that on January 17, 2012, Catalyst Paper Corporation (“CPC”), as the authorized foreign representative for itself and its above-captioned affiliates (collectively, the “Debtors”), in a proceeding under the *Canada Business Corporations Act*, R.S.C. 1985, c. C-44, and *Business Corporations Act*, S.B.C. 2002, c.57, before the Supreme Court of British Columbia (the “CBCA Proceeding”), filed petitions under chapter 15 of title 11 of the United States Code commencing the Debtors’ chapter 15 cases ancillary to the CBCA Proceeding. CPC has filed its *Motion for Provisional and Final Relief in Recognition of a Foreign Main Proceeding* (“Recognition Motion”), seeking recognition of such foreign

¹ The last four digits of the United States Tax Identification Number or Canadian Business Number of the Debtors, as applicable, follow in parentheses: (i) 0606890 B.C. Ltd. (2214); (ii) Catalyst Paper Corporation (1171); (iii) Catalyst Paper Energy Holdings Inc. (3668); (iv) Catalyst Paper General Partnership (6288); (v) Catalyst Pulp and Paper Sales Inc. (2085); (vi) Catalyst Pulp Operations Ltd. (4565); (vii) Catalyst Pulp Sales Inc. (4021); (viii) Elk Falls Pulp and Paper Ltd. (9493); (ix) Pacifica Poplars Ltd. (6048); (x) Catalyst Paper Holdings Inc. (7177); (xi) Pacifica Papers U.S. Inc. (7595); (xii) Pacifica Poplars Inc. (9597); (xiii) Pacifica Papers Sales Inc. (7594); (xiv) Catalyst Paper (USA) Inc. (6890); (xv) Catalyst Paper (Recycling) Inc. (8358); (xvi) Catalyst Paper (Snowflake) Inc. (7015); (xvii) The Apache Railway Company (0017) (Catalyst Paper Holdings Inc., Pacifica Papers U.S. Inc., Pacifica Poplars Inc., Pacifica Papers Sales Inc., Catalyst Paper (USA) Inc., Catalyst Paper (Recycling) Inc., Catalyst Paper (Snowflake) Inc. and The Apache Railway Company, collectively, the “U.S. Debtors”). The Debtors’ executive headquarters’ addresses are 2nd Floor, 3600 Lysander Lane, Richmond, BC V7B 1C3, Canada; 2101 Fourth Avenue, Suite 1950, Seattle, WA 98121; and Spur 277 N., Snowflake, AZ 85937.

proceeding and relief in aid of the CBCA Proceeding in the United States Bankruptcy Court for the District of Delaware (the “Court”) with respect to the Debtors.

PLEASE TAKE FURTHER NOTICE, that copies of the verified Chapter 15 Petitions, along with **(A)** the list required to be filed with the Chapter 15 Petitions pursuant to Bankruptcy Rule 1007(a)(4); **(B)** the *Statement of Foreign Representative* of the foreign proceeding required to be filed pursuant to Bankruptcy Code section 1515; **(C)** CPC’s *Motion for Provisional and Final Relief in Recognition of a Foreign Main Proceeding* and *Memorandum of Law* in support thereof; **(D)** the *Declaration of Brian Baarda*; **(E)** the *Declaration of William Kaplan*; **(F)** CPC’s *Motion to Authorize Debtors to File Consolidated List of Foreign Proceeding Administrators, Litigation Parties, and Entities Against Whom 11 U.S.C. § 1519 Provisional Relief is Sought*; and **(G)** the *Scheduling Order*, (as defined below) (collectively, the “Supporting Documents,” which were filed in support of and contemporaneously with the Chapter 15 Petitions), are available by (i) contacting the office of CPC’s Counsel at 300 South Grand Avenue, Los Angeles, California 90071, Attention: Annie Li; or (ii) accessing the electronic case filing (“ECF”) website maintained by the federal judiciary (<https://ecf.deb.uscourts.gov/>).

PLEASE TAKE FURTHER NOTICE, that pursuant to CPC’s *Motion for Provisional and Final Relief in Recognition of a Foreign Main Proceeding*, CPC seeks, among other things, to stay proceedings and actions against the Debtors, and make any provision of the type described in 11 U.S.C. § 365(e) unenforceable against the Debtors until such time as an order is entered on the Recognition Motion. The Court has scheduled a hearing on January 19, 2012 at 10:30 a.m. Eastern Time before the Honorable Peter J. Walsh in Room 2 of the United States Bankruptcy Court, 824 North Market Street, Wilmington, Delaware 19801 to consider any unresolved objections to the foregoing Motion (the “Provisional Relief Hearing”).

PLEASE TAKE FURTHER NOTICE, that pursuant to the Order (I) Specifying Form and Manner of Service of Notice of Filing of Petitions and Other Pleadings Pursuant to Chapter 15 of the Bankruptcy Code and (II) Scheduling a Hearing on Chapter 15 Petitions for Recognition, dated January 19, 2012 (the “Scheduling Order”) the Bankruptcy Court has scheduled a hearing on February 16, 2012 at 2:00 p.m. Eastern Time before the Honorable Peter J. Walsh in Room 2 of the United States Bankruptcy Court, 824 North Market Street, Wilmington, Delaware 19801 to consider the recognition of the CBCA Proceeding (as further described in the Supporting Documents) (the “Recognition Hearing,” and with the Provisional Relief Hearing, the “Hearings”).

PLEASE TAKE FURTHER NOTICE, that any party in interest wishing to submit a response or objection to the Chapter 15 Petitions, the relief sought in the Recognition Motion, must do so pursuant to the Bankruptcy Code and the Local and Federal Rules of Bankruptcy Procedure, including, without limitation, Rule 1011 of the Federal Rules of Bankruptcy Procedure, in writing and setting forth the bases therefore and the nature and extent of the respondent’s interests in the Debtors’ estates, and such response or objection must be filed with the Office of the Clerk of the Court, 824 Market Street, Third Floor, Wilmington, Delaware 19801, and served upon: (A) counsel for CPC as foreign representative: Skadden, Arps, Slate, Meagher & Flom LLP, 300 South Grand Avenue, Suite 3400, Los Angeles, CA 90071, Attn: Van C. Durrer, II, Esq.; (B) counsel for the Debtors: Blake, Cassels & Graydon LLP, 595 Burrard Street, P.O. Box 49314, Suite 2600, Three Bentall Centre, Vancouver, BC V7X 1L3, Canada, Attn: William C. Kaplan, Esq.; (C) counsel for certain 2016 Noteholders²: Akin Gump

² Representing an unaffiliated group of holders of 2016 Notes who have executed the Restructuring Support Agreement (attached as Exhibit C to the Baarda Declaration).

Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036-6745, Attn: Michael Stamer, Esq., Stephen Kuhn, Esq., Meredith Lahaie, Esq.; (D) counsel for certain 2014 Noteholders³: Goodmans LLP, Bay Adelaide Centre, 333 Bay Street, Suite 3400, Toronto, ON M5H 2S7, Canada, Attn: Robert Chadwick, Esq., Melaney Wagner, Esq.; (E) JPMorgan Chase, as ABL facility agent: (i) McMillan LLP, Brookfield Place, Suite 4400, 181 Bay Street, Toronto, ON M5J 2T3, Canada, Attn: R.D. Jeffrey Rogers, Esq., (ii) JPMorgan Chase Bank, N.A., Toronto Branch, c/o JPMorgan Chase Bank, N.A., 3 Park Plaza, Suite 900, Irvine, CA 92614, Attn: Annaliese Fisher, (iii) JPMorgan Chase Bank, N.A., Toronto Branch, 200 Bay Street, South Tower, Suite 1800, Toronto, Ontario M5J 2J2, Canada, Attn: Agostino Marchetti; (F) the Office of the United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801, Attn: David Buchbinder, Esq., so as to be received by them no later than 4:00 p.m. Eastern time, February 5, 2012.

PLEASE TAKE FURTHER NOTICE, that all parties in interest opposed to the Chapter 15 Petitions, the Provisional Relief Motion, or the Recognition Motion must be at and appear at the Hearings at the time and place set forth above.

PLEASE TAKE FURTHER NOTICE, that the Hearings may be adjourned from time to time without further notice other than an announcement in open court at the Hearings of the adjourned date or dates or any further adjourned hearing.

PLEASE TAKE FURTHER NOTICE, that if no response or objection is timely filed and served as provided above the Bankruptcy Court may grant the relief requested by CPC without further notice or hearing. Copies of the Chapter 15 Petitions and the Supporting

³ Representing a group of 2014 Noteholders who have executed the Restructuring Support Agreement (attached as Exhibit C to the Baarda Declaration).

Documents will be made available upon request at the office of CPC's Counsel at 300 South Grand Avenue, Los Angeles, California 90071, Attention: Annie Li.

Dated: January 19, 2012
Los Angeles, CA

/s/ Van C. Durrer, II
Van C. Durrer, II (I.D. No. 3827)
SKADDEN, ARPS, SLATE, MEAGHER
& FLOM LLP
300 South Grand Avenue
Los Angeles, California 90071
(213) 687-5000

Counsel for Catalyst Paper Corporation