

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

In re:

Catalyst Paper Corp. *et al.*,

Debtors.

)
) Chapter 15

)
) Case No. 12-10221 (PJW)

)
) Jointly Administered

)
) Hearing Date: March 5, 2012 at 9:30 a.m.
) Objection Deadline: February 29, 2012 at 12:00 a.m.¹
)

**RESPONSE OF WILMINGTON TRUST, NATIONAL ASSOCIATION,
AS INDENTURE TRUSTEE, TO AMENDED MOTION
FOR FINAL RECOGNITION OF A FOREIGN PROCEEDING**

Wilmington Trust, National Association (“Wilmington Trust”), as Indenture Trustee for (i) the 11.00% Senior Secured Notes Due December 15, 2016 and (ii) the Class B 11.00% Senior Secured Notes Due December 15, 2016 issued by Catalyst Paper Corporation, by and through its counsel, Kelley Drye & Warren LLP, hereby submits this response to the above captioned debtors’ (the “Debtors”) *Amended Motion for Provisional Relief and Final Recognition of a Foreign Proceeding* (the “Amended Recognition Motion”) [Docket No. 38].

1. Wilmington Trust does not object to the relief requested in the Amended Recognition Motion. However, Wilmington Trust submits this response to ensure that its rights to seek adequate protection, as set forth in this Court’s *Order for Provisional Relief Enforcing Canadian Court Order in Connection With Debtor in Possession Financing* [Docket No. 60], are in no way adversely affected or impaired by any order granting the Amended Recognition Motion and are fully preserved.

¹ Extended by agreement with the Debtors.

2. Wilmington Trust is engaged in good-faith discussions with the Debtors with respect to adequate protection and hopes to resolve the issue prior to the hearing on the Amended Recognition Motion.

Dated: February 28, 2012
New York, New York

KELLEY DRYE & WARREN LLP

By: /s/ Craig A. Wolfe
Craig A. Wolfe
Pamela Bruzzese-Szczygiel
Benjamin D. Feder
Timothy B. Martin
101 Park Avenue
New York, New York 10178
Tel: (212) 808-7800
Fax: (212) 808-7897

Attorneys for Wilmington Trust,
National Association, as Indenture Trustee

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

In re:

Catalyst Paper Corp. *et al.*,

Debtors.

)
) Chapter 15
)

) Case No. 12-10221 (PJW)
)

) Jointly Administered
)
)

CERTIFICATE OF SERVICE

I, Timothy B. Martin, hereby certify I am not less than 18 years old and that today I have caused a true and correct copy of the *Response of Wilmington Trust, National Association, as Indenture Trustee, to Amended Motion for Final Recognition of a Foreign Proceeding* to be filed and served via the Court's CM/ECF notification system and the same shall be served on the parties on the attached service list by the method of delivery indicated therein.

Dated: February 28, 2012
New York, New York

/s/ Timothy B. Martin
Timothy B. Martin

SERVICE LIST

VIA FIRST CLASS MAIL:

Skadden, Arps, Slate, Meagher & Flom LLP
300 South Grand Avenue
Suite 3400
Los Angeles, California 90071
Attn: Van C. Durrer II, Esq.

Kasowitz, Benson, Torres & Friedman LLP
1633 Broadway
New York, NY 10019
Attn: David M. Friedman
Adam L. Shiff
Daniel A. Fliman

Akin Gump Strauss Hauer & Feld LLP
One Bryant Park
New York, NY 10036- 6745
Attn: Michael Stamer, Esq.
Stephen Kuhn, Esq.
Meredith Lahaie, Esq.

Pachulski Stang Ziehl & Jones LLP
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19899-8705
Attn: Laura Davis Jones, Esq.
Timothy P. Cairns, Esq.

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

Office of the United States Trustee
844 King Street, Suite 2207
Lockbox 35
Wilmington, DE 19801
Attn: David Buchbinder, Esq.

VIA FOREIGN FIRST CLASS MAIL:

Blake, Cassels & Graydon LLP
595 Burrard Street, Suite 2600
Three Bentall Centre
Vancouver, BC V7X 1L3
Canada
Attn: William C. Kaplan, Esq.

Goodmans LLP
Bay Adelaide Centre
333 Bay Street, Suite 3400
Toronto, ON M5H 2S7
Canada
Attn: Robert Chadwick, Esq.
Melaney Wagner, Esq.

McMillan LLP
Brookfield Place, Suite 4400
181 Bay Street
Toronto, ON M5J 2T3
Canada
Attn: R.D. Jeffrey Rogers, Esq.

JPMorgan Chase Bank, N.A. Toronto Branch
200 Bay Street
South Tower, Suite 1800
Toronto, Ontario M5J 2J2
Canada
Attn: Agostino Marchetti

PricewaterhouseCoopers
250 Howe Street, Ste 700
Vancouver, BC V6C 3S7
Canada

Fasken Martineau DuMoulin LLP
2900 - 550 Burrard Street
Vancouver, BC V6C 0A3
Canada
Attn: John Grieve, Esq.
Kibben Jackson, Esq.

Goodmans LLP
Bay Adelaide Centre
333 Bay Street, Ste 3400
Toronto, ON M5H 2S7
Canada
Attn: Robert Chadwick, Esq.
Melaney Wagner, Esq.