

VANCOUVER  
APR 05 2012  
COURT OF APPEAL  
REGISTRY

FORM 3 (RULE 7 (1) (A) (I) )

Court of Appeal File No. CA39754  
Supreme Court Action No. Action No. S120712  
Vancouver Registry

COURT OF APPEAL  
IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,  
R.S.C. 1985, c. C-36, AS AMENDED

- AND -

IN THE MATTER OF THE *CANADA BUSINESS CORPORATIONS ACT*,  
R.S.C. 1985, c. C-44

- AND -

IN THE MATTER OF THE *BUSINESS CORPORATIONS ACT*,  
S.B.C. 2002, c. 57

- AND -

IN THE MATTER OF THE CATALYST PAPER CORPORATION  
AND THE PETITIONERS LISTED IN SCHEDULE "A"

NOTICE OF MOTION FOR LEAVE TO APPEAL

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**And to its solicitor:**

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**To the respondent(s):** *JPMorgan Chase Bank, N.A.*  
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**To the respondent(s):** *A Representative Group of 2014 Unsecured Noteholders  
and certain 2016 Noteholders*  
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**To the respondent(s):** *CEP Unions - Locals 1, 76 (Powell River), 592, 686 (Port Alberni),  
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**To the respondent(s):** *Asten Johnson, Inc.*  
**And to its solicitor:** **Stikeman Elliott LLP**

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**To the respondent(s):** *HMTQ as represented by the Superintendent of Pensions*  
**And to its solicitor:** **Ministry of Justice**

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**To the respondent(s):** *Arrow Transportation*  
**And to its solicitor:** **Bernard & Partners**

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**To the respondent(s):** *United Steelworkers International and USW Local 2688*  
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**And to its solicitor:** **Stikeman Elliott LLP**

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**To the respondent(s):** *International Forest Products, Western Forest Products Inc.  
and Seaspan Marine Corporation*  
**And to its solicitor:** **Bull Houser & Tupper LLP**

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**To the respondent(s):** *HMTQ in Right of the Province of British Columbia*  
**And to its solicitor:** **Ministry of Attorney General, Legal Services Branch**

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**To the respondent(s):** *Board of Directors of Catalyst*  
**And to its solicitor:** **Lawson Lundell LLP**

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**To the respondent(s):** *Canexus Chemicals Canada LP*  
**And to its solicitor:** **Stikeman Elliott LLP**

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**And to its solicitor:** **GE Railcar Services Canada**

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**To the respondent(s):** *The CIT Group/Equipment Financing, Inc., CIT Railcar Funding Company, LLC, C.I.T Leasing Corporation and Flex Leasing I, LLC*  
**And to its solicitor:** **Dickinson Wright LLP**

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**To the respondent(s):** *Powell River Energy Inc., Quadrant Investments Ltd. and Timber West Forest Corp.*

**And to its solicitor:** **Davis LLP**

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**To the respondent(s):** *Retired Members of the Retirement Plan for Salaried Employees of Catalyst Paper Corporation*

**And to its solicitor:** **Koskie Minsky LLP**

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**And to its solicitor:**

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**And to its solicitor:**

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**To the respondent(s):** *Catalyst Timber West Retired Salaried Employees Association*  
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**To the respondent(s):** *Catalyst Paper Corporation Pension Administration Committee*  
**And to its solicitor:** **Spectrum HR Law**

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**To the respondent(s):** *Canada Revenue Agency*  
**And to its solicitor:** **Department of Justice Canada**

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**To the respondent(s):** *Lysander Holdings Ltd.*  
**And to its solicitor:** **SDM Realty Advisors Ltd.**

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**To the respondent(s):** *Wells Fargo*  
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**To the respondent(s):** *HMTQ in Right of Canada*  
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**To the respondent(s):** *Computershare Trust Company of Canada*  
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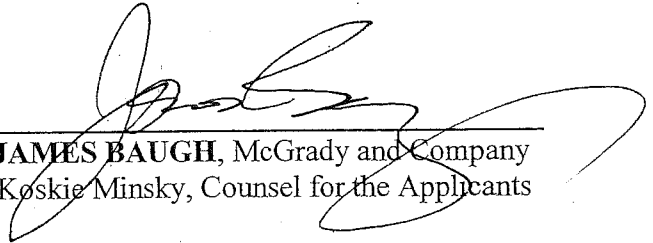
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TAKE NOTICE THAT AN APPLICATION will be made by the Catalyst Salaried and Employees Pensioner Group to the presiding justice at 800 Smithe Street, Vancouver, British Columbia, at 9:30 a.m. on April 18th, for leave to appeal the orders of the Honourable Mr. Justice Sewell of the Supreme Court of British Columbia pronounced the 14<sup>th</sup> day of February 2012 and the 9<sup>th</sup> day of March 2012. The Applicants also make application to abridge the time required between filing this Notice and the hearing of the matter. The CCAA Petitioner has requested that we expedite this matter.

**Dated: April 5, 2012**



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**G. JAMES BAUGH**, McGrady and Company  
for Koskie Minsky, Counsel for the Applicants

This application will take no more than 30 minutes to be heard.

Court of Appeal File No. CA39754  
Action No. S120712  
Vancouver Registry

**COURT OF APPEAL**

BETWEEN:

IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT,  
R.S.C. 1985, c. C-36, AS AMENDED

AND:

IN THE MATTER OF THE CANADA BUSINESS CORPORATIONS ACT, R.S.C.  
1985, c. C-44

AND:

IN THE MATTER OF THE BUSINESS CORPORATIONS ACT, S.B.C. 2002, c. 57

AND:

IN THE MATTER OF THE CATALYST PAPER CORPORATION AND THE  
PETITIONERS LISTED IN SCHEDULE "A"

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**NOTICE OF MOTION FOR LEAVE TO APPEAL**

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