

This is the 1st affidavit
of Deborah Hamann-Trou in this case
and was made on June 12, 2012

No. S-120712
Vancouver Registry



**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 CATALYST PAPER CORPORATION
AND THE PETITIONERS LISTED IN SCHEDULE "A"**

PETITIONERS

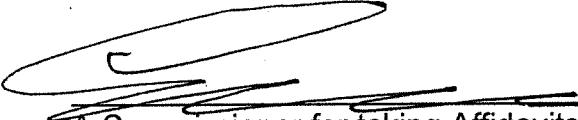
AFFIDAVIT

I, DEBORAH HAMANN-TROU, legal assistant, of 20th Floor, 250 Howe Street,
Vancouver, B.C., V6C 3R8, SWEAR THAT:

1. I am a legal assistant with the law firm of Fraser Milner Casgrain LLP, solicitors for the Ad Hoc 2016 Noteholder Group, and as such, I have personal knowledge of the matters herein deposed to, except where stated to be based on information and belief, in which case I do verily believe the same to be true.

2. Now produced and shown to me and attached as **Exhibit "A"** to my Affidavit is a copy of a chain of emails from Jim Schmidt of Fraser Milner Casgrain LLP, the applicants in this application, to Randy Kaardal and Andrew Hatnay, as well to and from Bill Kaplan, counsel to Catalyst.

SWORN (OR AFFIRMED) BEFORE ME
at Vancouver, British Columbia, on June
12, 2012.


A Commissioner for taking Affidavits
within British Columbia


DEBORAH HAMANN-TROU

CHRISTOPHER J. RAMSAY
Barrister & Solicitor
FRASER MILNER CASGRAIN LLP
20th Floor, 280 Howe Street
Vancouver, B.C. V6C 3R8
Telephone (604) 687-4460

This is Exhibit "A" referred to in the affidavit
of Deborah Hamann-Trou sworn before me at
Vancouver this 12 day of June, 2012.



A Commissioner for taking Affidavits
for British Columbia

2

Hamann-Trou, Deborah

From: Schmidt, Jim
Sent: Tuesday, June 12, 2012 9:42 AM
To: rkaardal@litigationchambers.com; ahatnay@kmlaw.ca
Cc: KAPLAN, BILL; Sandrelli, John
Subject: Deemed Trust Litigation

Randy/Andrew -

Could I please get a response from you on this right away?

As you'll appreciate, if your clients will not consent, we'll need to seek a production order from Judge Sewell. Given the limited time we have, we'll be submitting a request for an appearance before the judge as soon as possible to deal with the production issue. I expect that request will be in circulation later this morning (Vancouver time). So if you can get back to us beforehand, I'd appreciate it.

Jim

From: Schmidt, Jim
Sent: Monday, June 11, 2012 4:53 PM
To: 'rkaardal@litigationchambers.com'; 'ahatnay@kmlaw.ca'
Cc: KAPLAN, BILL; Sandrelli, John
Subject: Deemed Trust Litigation

Randy/Andrew -

This is further to my voicemails to each of you earlier this afternoon.

There are some documents we are seeking from Catalyst to assist us in developing response evidence on the applications set for hearing on June 25. We understand Catalyst will not produce the documents without your consent.

The documents we are seeking are as follows:

- the correspondence between Catalyst and the Superintendent (FICOM) from about January 2010 to date concerning the funding of the plan;
- the current plan member booklet and any previous versions of the booklet over the last 10 years;
- the current trust agreement for the assets of the pension;
- the most recent audited financial statements of the pension plan; and,
- sample member statements over the last 10 years (we recognize that some of these, but perhaps not all representative ones, are in your clients' materials).

We would propose that these materials be released to all parties.

Would you please confirm your consent to this as soon as possible as we are as you know facing an impending deadline for delivering our response materials.

Thanks,

Jim Schmidt

3

Jim Schmidt, Partner

Fraser Milner Casgrain LLP | www.fmc-law.com

T 604 622 5168 | F 604 683 5214

E jim.schmidt@fmc-law.com

20th Floor, 250 Howe Street, Vancouver BC, V6C 3R8

[Bio](#) | [vCard](#)

We have moved! Please update your records with our new address.

This message and any attachments are intended only for the addressee(s) and may contain privileged or confidential information. Any unauthorized disclosure is strictly prohibited. If you have received this message in error, please notify us immediately so that we may correct our internal records. Please then permanently delete the original message and any attachments and destroy any copies. Thank you.

Schmidt, Jim

From: KAPLAN, BILL [BILL.KAPLAN@blakes.com] on behalf of KAPLAN, BILL
Sent: Friday, June 08, 2012 2:38 PM
To: 'Schmidt, Jim'
Cc: Sandrelli, John
Subject: RE: Pension litigation evidence

I have your request and will consider it. As you know the company is both Plan Sponsor and Plan Administrator and therefore has duties in respect to these matters. We will assess your request for documents specifically in that context.



Blake, Cassels & Graydon LLP | Vancouver
Tel: 604-631-3300 Fax: 604-631-3309
blakes.com | [Twitter](#)

Blake, Cassels & Graydon LLP | Barristers & Solicitors | Patent & Trade-mark Agents

This email communication is CONFIDENTIAL AND LEGALLY PRIVILEGED. If you are not the intended recipient, please notify me at the telephone number shown above or by return email and delete this communication and any copy immediately. Thank you.

L'information paraissant dans ce message électronique est CONFIDENTIELLE. Si ce message vous est parvenu par erreur, veuillez immédiatement m'en aviser par téléphone ou par courriel et en détruire toute copie. Merci.

From: Schmidt, Jim [<mailto:Jim.Schmidt@fmc-law.com>]
Sent: Friday, June 08, 2012 1:34 PM
To: KAPLAN, BILL
Cc: Sandrelli, John
Subject: RE: Pension litigation evidence

Bill -

Further to John's note just before lunch, what we expect we'll need to do is put before the court in an affidavit the following material:

1. the correspondence between Catalyst and the Superintendent (FICOM) from about January 2010 to date concerning the funding of the plan;
2. the current plan member booklet and any previous versions of the booklet over the last 10 years;
3. the current trust agreement for the assets of the pension; and,
4. sample member statements over the last 10 years (some of these, but perhaps not all representative ones, are in the applicants' materials).

As you'll appreciate, we'll need to source this material from your client. Can you please let us know what can be done to facilitate this as we need to get this in an affidavit very quickly.

Thanks,

Jim Schmidt

Schmidt, Jim

From: Schmidt, Jim
Sent: Monday, June 11, 2012 4:17 PM
To: KAPLAN, BILL
Cc: Sandrelli, John
Subject: Catalyst - Documents

Bill -

We've decided to try to get the consent of the applicant groups for release of the documents as I understand from our talk earlier that Catalyst is only prepared to release the documents if the applicant groups (i.e. those represented by Koskie and Hunter) consent and if the documents are generally released or made available to each of the parties. I've left messages with Andrew Hatnay and Randy Kaardal and will try to get positions from them by the end of the day today, if possible.

Jim

Jim Schmidt, Partner

Fraser Milner Casgrain LLP | www.fmc-law.com
T 604 622 5168 | F 604 683 5214
E jim.schmidt@fmc-law.com
20th Floor, 250 Howe Street, Vancouver BC, V6C 3R8
[Bio](#) | [vCard](#)

This message and any attachments are intended only for the addressee(s) and may contain privileged or confidential information. Any unauthorized disclosure is strictly prohibited. If you have received this message in error, please notify us immediately so that we may correct our internal records. Please then permanently delete the original message and any attachments and destroy any copies. Thank you.