



No. S-120712
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

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

AND:

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

AND:

IN THE MATTER OF THE *BUSINESS CORPORATIONS ACT*,
SBC 2002, c.-57

AND:

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

PETITIONERS

APPLICATION RESPONSE

Application response of: The Communications, Energy and Paperworkers' Union of Canada, Locals 1, 76, 592, 630, 686, 1123 and 1132 (the "Application Respondents").

To: Service List

THIS IS A RESPONSE TO the Notice of Application of Ronald Gary McCaig, Jeff Whitaker, Janice Young, Peter Flynn, Patricia Dwornik, and Francesca Pomeroy, acting on their own behalf and on behalf of the Catalyst Salaried Employees and Pensioners Group ("CSEP") filed April 13, 2012.

Part 1: ORDERS CONSENTED TO

1. None.

Part 2: ORDERS OPPOSED

1. All orders sought by the CSEP.

Part 3: ORDERS ON WHICH NO POSITION IS TAKEN

1. None.

Part 4: FACTUAL BASIS

1. The pleadings and Affidavits as filed herein. No additional facts are alleged by the Application Respondents.

Part 5: LEGAL BASIS

1. No deemed trust is created or has priority over secured claims in the circumstances of this case.
2. The Application Respondents rely upon:
 - (a) *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended;
 - (b) *Pension Benefits Standards Act*, R.S.B.C. 1996, c. 352, and the Regulations thereto;
 - (c) The common law;
 - (d) The inherent and equitable jurisdiction of this Court; and
 - (e) Such further and other legal bases as counsel may advise.

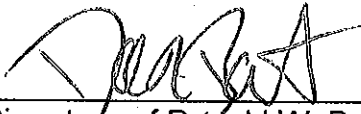
Part 6: MATERIAL TO BE RELIED ON

1. The pleadings and materials filed to date;
2. Written argument, to be provided; and
3. Such further material as counsel may advise and this Court may permit.

The Application Respondents estimate that the application will take: 2 to 3 days.

- The Application Respondents have filed in this proceeding a document that contains the Application Respondents' address for service.
- The Application Respondents have not filed in this proceeding a document that contains an address for service. The Application Respondents' ADDRESS FOR SERVICE is:

Date: June 13, 2012



Signature of Donald W. Bobert
 Lawyer for the Application Respondents

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