

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
COMMERCIAL LIST**

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

**AND IN THE MATTER OF CERTAIN PROCEEDINGS TAKEN IN THE UNITED  
STATES BANKRUPTCY COURT WITH RESPECT TO HORSEHEAD HOLDING  
CORP., HORSEHEAD CORPORATION, HORSEHEAD METAL PRODUCTS, LLC,  
THE INTERNATIONAL METALS RECLAMATION COMPANY, LLC AND  
ZOCHEM INC. (collectively, the "Debtors")**

**APPLICATION OF ZOCHEM INC.  
UNDER SECTION 46 OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT***

**SECOND REPORT OF THE INFORMATION OFFICER  
RICHTER ADVISORY GROUP INC.**

**APRIL 11, 2016**

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**I. INTRODUCTION**

1. On February 2, 2016 (the "**Petition Date**"), Horsehead Holding Corp. ("**Horsehead Holding**"), Zochem Inc. ("**Zochem**"), Horsehead Corporation, Horsehead Metal Products, LLC and the International Metals Reclamation Company, LLC (collectively, the "**Debtors**") commenced voluntary reorganization proceedings (the "**Chapter 11 Proceedings**") in the United States Bankruptcy Court for the District of Delaware (the "**U.S. Court**") by each filing a voluntary petition for relief under chapter 11 of title 11 of the *United States Code*, 11 U.S.C. 101-1532 (the "**Bankruptcy Code**").

2. Also on the Petition Date, the Debtors filed various motions (the “**First Day Motions**”) for interim and/or final orders in the Chapter 11 Proceedings to permit the Debtors to continue to operate their business in the ordinary course. The First Day Motions included a motion for entry of an order authorizing Horsehead Holding to act as foreign representative on behalf of the Debtors for the within proceedings, which motion was amended at the hearing before the U.S. Court such that Zochem was appointed as the foreign representative of the Debtors for the within proceedings (in such capacity, the “**Foreign Representative**”).
3. Also on the Petition Date, Horsehead Holding, as the then proposed foreign representative, commenced these proceedings (the “**CCAA Recognition Proceedings**”) by notice of application pursuant to Part IV of the *Companies’ Creditors Arrangement Act* (R.S.C. 1985, c. C-36, as amended) (the “**CCAA**”). The Ontario Superior Court of Justice (Commercial List) (the “**Court**” and together with the U.S. Court, the “**Courts**”) granted an order in these proceedings providing certain interim relief to the Debtors, including an interim stay of proceedings in respect of the property, business and directors and officers of the Debtors in Canada, and providing for the continuation of services required by the Debtors in Canada.
4. Zochem is the only Debtor that is incorporated in Canada. The Debtors, excluding Zochem, are referred to herein as the “**U.S. Debtors**”.

5. On February 3, 2016, the U.S. Court entered various orders sought at the First Day Motions, and on February 4, 2016, the U.S. Court entered various amended Orders (together with the orders entered on February 3, 2016, the “**First Day Orders**”), including an Order authorizing Zochem to act as the Foreign Representative (the “**Foreign Representative Order**”).
6. On February 5, 2016, this Court granted an initial recognition order in these proceedings (the “**Initial Recognition Order**”) which, among other things, (i) declared that Zochem is a “foreign representative” pursuant to Section 45 of the CCAA; (ii) declared that the centre of main interest for the Debtors is the United States and the Chapter 11 Proceedings are recognized as a “foreign main proceeding” under the CCAA; and (iii) granted a stay of proceedings against the Debtors.
7. Also on February 5, 2016, this Court granted a supplemental order in these proceedings (the “**Supplemental Order**”), which, among other things, (i) appointed Richter Advisory Group Inc. (“**Richter**”) as the information officer in respect of this proceeding (the “**Information Officer**”); (ii) stayed any proceeding, rights or remedies against or in respect of the Debtors, the business and property of the Debtors, the directors and officers of the Debtors, and the Information Officer; (iii) restrained the right of any person or entity to, among other things, discontinue or terminate any supply of products or services to the Debtors; (iv) granted a super-priority charge up to a maximum amount of \$100,000 over the Debtors’ property in Canada in favour of the Information Officer and its counsel as security for their professional fees and disbursements incurred in respect of these proceedings (the “**Administration Charge**”); (v) granted a super-priority charge over the Debtors’ property in Canada in favour of the DIP Agent (as defined in the Supplemental

Order); and (vi) recognized and gave full force and effect in Canada to certain of the First Day Orders of the U.S. Court.

8. On March 1, 2016, the U.S. Court entered various orders sought by the Debtors at their “second day hearings”, and on March 3, 2016, the U.S. Court entered a Final Order (A) Authorizing the Debtors to Obtain Postpetition Secured Financing Pursuant to Section 364 of the Bankruptcy Code, (B) Authorizing The Debtors to Use Cash Collateral, (C) Granting Adequate Protection to the Prepetition Secured Parties and (D) Granting Related Relief (the “**Final U.S. DIP Order**”, collectively with the orders entered on March 1, 2016, the “**Second Day Orders**”).
9. On March 3, 2016, this Court granted an order in these proceedings, which, among other things, (i) approved the first report (the “**First Report**”) of the Information Officer dated March 2, 2016, including the actions and activities of the Information Officer as outlined therein; and (ii) recognized and gave full force and effect in Canada to the following Second Day Orders of the U.S. Court:
  - (a) Final Order (I) Authorizing, but not Directing, the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, Reimbursable Expenses, and Payroll Processing Fees, (B) Pay Withholding Obligations, (C) Continue Employee Benefits Programs, and (D) Continue Ordinary Course Incentive Programs for Non-Insiders, and (II) Granting Related Relief;

- (b) Final Order (I) Authorizing Debtors to Pay Certain Prepetition Claims of Critical Vendors and (II) Granting Related Relief;
  - (c) Final Order (I) Authorizing the Debtors to (A) Continue Insurance Coverage Entered into Prepetition, (B) Honor Their Prepetition Insurance Premium Financing Agreements, (C) Renew Their Premium Financing Agreements in the Ordinary Course of Business, and (II) Granting Related Relief;
  - (d) Final Order (I) Determining Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Services, (III) Establishing Procedures for Determining Adequate Assurance of Payment, and (IV) Granting Related Relief;
  - (e) Final Order (I) Approving Notification and Hearing Procedures for Certain Transfers of Common Stock and (II) Granting Related Relief; and
  - (f) the Final U.S. DIP Order.
10. On March 22, 2016, the U.S. Court entered an Order (A) Setting a Bar Date for Filing Proofs of Claim, Including Claims Arising Under Section 503(B)(9) of the Bankruptcy Code, (B) Setting a Bar Date for the Filing of Proofs of Claim By Governmental Units, (C) Setting a Bar Date for the Filing of Requests for Allowance of Administrative Expense Claims, (D) Setting an Amended Schedules Bar Date, (E) Setting a Rejection Damages Bar Date, (F) Approving the Form of and Manner for Filing Proofs of Claim, (G) Approving Notice of the Bar Dates, and (H) Granting Related Relief (the “**Claims Bar Date Order**”).

11. On March 30, 2016, the U.S. Court entered an Agreed Order on Motion of Traxys North America, LLC (“**Traxys**”) Compelling Debtors to Immediately Assume or Reject Executory Contracts (the “**Traxys Order**”).
12. This report is the Information Officer’s second report (the “**Second Report**”) to this Court. The First Report was filed with this Court to provide, among other things, an update with respect to the Debtors’ Chapter 11 Proceedings, an update on matters relating to Zochem, and other matters relevant to this Court’s determination of the Foreign Representative’s request for recognition of certain of the Second Day Orders. Richter, in its capacity as proposed Information Officer, also filed with this Court a report (the “**Pre-Filing Report**”) dated February 4, 2016, to provide this Court with information relating to the Debtors’ business and operations, their debt and capital structure, and other matters relevant to the Foreign Representative’s request for the Initial Recognition Order and Supplemental Order.

## **II. PURPOSE OF THIS REPORT**

13. The purpose of this Second Report is to provide the Court with information concerning:
  - (a) the motion of the Foreign Representative returnable April 13, 2016, for recognition in Canada of the Claims Bar Date Order and the Traxys Order;
  - (b) an update on other matters relating to the Chapter 11 Proceedings;
  - (c) an update on matters relating to Zochem; and
  - (d) the activities of the Information Officer since the First Report.



### III. TERMS OF REFERENCE

14. In preparing this Second Report, Richter has relied solely on information and documents provided by the Debtors and their advisors and public filings in the Courts (the “**Information**”). Richter has not audited, reviewed or otherwise attempted to independently verify the accuracy or completeness of the Information. Accordingly, Richter expresses no opinion or other form of assurance in respect of the Information.
15. Unless otherwise stated, all monetary amounts contained herein are expressed in United States dollars.
16. The Information Officer has established a website at <http://www.richter.ca/en/folder/insolvency-cases/h/horsehead-holdings> to make available copies of the orders granted in the CCAA Recognition Proceedings as well as motion materials and reports of the Information Officer. In addition, there is a link on the Information Officer’s website to the Debtors’ restructuring website maintained by Epiq Bankruptcy Solutions, LLC, as Claims and Noticing Agent for the Debtors (the “**Claims Agent**”), which includes copies of the U.S. Court materials and orders, notices and additional information in respect of the Chapter 11 Proceedings.

### IV. ORDERS OF THE U.S. COURT FOR WHICH RECOGNITION IS SOUGHT

#### A. Claims Bar Date Order

17. The Information Officer understands that the Claims Bar Date Order was entered by the U.S. Court without a hearing because all formal objections filed, and all informal comments received, by the March 2, 2016 deadline were addressed to the satisfaction of the interested parties.

18. The Claims Bar Date Order provides for, *inter alia*, the following:
- (a) all creditors holding claims against the Debtors that arose before the Petition Date (including claims arising under section 503(b)(9) of the Bankruptcy Code) except for governmental units and certain other exceptions as noted below, must file a proof of claim with the Claims Agent by 5:00pm Eastern Time on April 25, 2016 (the “**Claims Bar Date**”);
  - (b) all governmental units holding claims against the Debtors that arose prior to the Petition Date must file a proof of claim with the Claims Agent by 5:00pm Eastern Time on August 1, 2016 at (the “**Governmental Bar Date**”);
  - (c) all claimants asserting an administrative expense claims against the Debtors that arose between the Petition Date and April 1, 2016, excluding claims for fees and expenses of professionals retained in the Chapter 11 Proceedings and claims asserting a priority pursuant to section 503(b)(9) of the Bankruptcy Code, are required to file a request for payment of such administrative expense claim (an “**Administrative Claim**”) with the U.S. Court by 5:00pm Eastern Time on April 25, 2016 (the “**Administrative Claims Bar Date**”). The Administrative Claims Bar Date does not, however, apply to claims entitled to administrative priority that arose on or after the Petition Date in the ordinary course of the Debtors’ business; and, to the extent that a governmental unit requests payment of an Administrative Claim arising between the Petition Date and April 1, 2016, such governmental unit must file a proof of claim with the Claims Agent by the Governmental Bar Date;

- (d) all parties asserting claims against the Debtors that are affected by a previously unfiled or amended schedule filed by the Debtors are required to file a proof of claim by the later of: (i) the Claims Bar Date or the Governmental Bar Date, as applicable; or (ii) 5:00pm Eastern Time on the date that is 21 days following the date on which the Debtors provide notice of such filing or amendment (the “**Amended Schedules Bar Date**”); and
  - (e) all parties asserting claims arising from the rejection of executory contracts and unexpired leases are required to file a proof of claim by the later of: (i) the Claims Bar Date or the Governmental Bar Date, as applicable; or (ii) 5:00pm Eastern Time on the date that is 21 days following the entry of an order approving the rejection of such executory contract or unexpired lease (the “**Rejection Damages Bar Date**”).
19. Pursuant to the Claims Bar Date Order, the following parties holding claims against the Debtors must file a proof of claim or an Administrative Claim prior to the applicable bar date: (i) any entity whose claim is not accurately reflected, listed, or classified in the schedules filed by the Debtors; (ii) a claimant with an Administrative Claim; or (iii) a party claiming a priority under section 503(b)(9) of the Bankruptcy Code.
  20. The Debtors’ Canadian counsel, Aird & Berlis LLP, provided a copy of the Claims Bar Date Order to the email service list in these CCAA proceedings on March 24, 2016.
  21. The Information Officer understands claims packages were mailed by the Claims Agent on March 25, 2016 to, among others, all known creditors of Zochem. Further, the Claims Agent published notice (the “**Publication Notice**”) of the Claims Bar Date Order in the

Globe & Mail, national edition, on March 31, 2016. A copy of the affidavit from the Claims Agent evidencing such service and the Publication Notice are attached as Exhibits “G” and “H”, respectively, to the affidavit of James M. Hensler sworn April 8, 2016 in support of this motion (the “**April 8 Hensler Affidavit**”).

22. On April 4, 2016, the Information Officer posted a copy of the Claims Bar Date Order, along with the relevant notice and blank proof of claim form, to its website in order to provide additional notice to creditors in Canada of the claims process and applicable bar dates, in advance of the Foreign Representative’s motion returnable on April 13, 2016 for recognition of the Claims Bar Date Order.

**B. Traxys Order**

23. Prior to the Petition Date, Traxys and Zochem had entered into a series of hedging contracts (the “**Contracts**”) whereby Traxys sold zinc to Zochem, and agreed to periodically repurchase such zinc at designated intervals and at defined amounts based upon future average prices established by the London Metal Exchange. Zochem’s performance under the Contracts was guaranteed by Horsehead Corporation.
24. On February 19, 2016, Traxys filed a motion with the U.S. Court for an order compelling the Debtors to immediately assume or reject the Contracts. As at the date of filing its motion, Zochem and Traxys were parties to 41 executory contracts.
25. As noted in the preamble to the Traxys Order, the Debtors determined in their business judgement that the assumption of the Contracts was in their best interest and so the Debtors agreed to the entry of the Traxys Order and the assumption of the Contracts. In

order to cure certain defaults under the Contracts, Zochem is required to pay Traxys \$13,817.80, which payment may be satisfied through set-off.

**V. UPDATE ON CERTAIN OTHER MATTERS IN THE CHAPTER 11 PROCEEDINGS**

**A. Defaults under DIP Facility**

26. On March 22, 2016, the Debtors notified the agent to the lenders (the “**DIP Lenders**”) under the debtor-in-possession credit facility (the “**DIP Facility**”) of the existence of an event of default under the DIP Facility as a result of Zochem’s failure to comply with the minimum required EBITDA-R covenant under the DIP Facility due to a miscalculation in establishing appropriate covenant thresholds. In addition, the Debtors failed to file an acceptable plan and disclosure statement within 55 days of the Petition Date as required by the DIP Facility and the Final U.S. DIP Order. On April 11, 2016, the DIP Lenders delivered a notice to the Debtors electing to have interest accrue on advances under the DIP Facility at the default rate of interest (being an additional 2.00% per annum). Counsel to the Debtors has advised the Information Officer that the DIP Lenders have confirmed an extension for the filing of an acceptable plan and disclosure statement to April 11, 2016, and that the Debtors are engaging in discussions with the DIP Lenders to obtain a waiver of the existing events of default under the DIP Facility.

**B. Motion for Appointment of an Equity Committee**

27. On March 21 and March 25, 2016, Aquamarine Capital and Rule One Capital, LLC, respectively, each filed an application with the U.S. Court for a *pro se* motion for the entry of an Order Appointing an Equity Committee (collectively the “**Equity Committee Motion**”) in the Chapter 11 Proceedings.

28. As at April 8, 2016, approximately 91 additional shareholders of Horsehead Holding have each filed a joinder to the Equity Committee Motion. The Equity Committee Motion is scheduled to be heard by the U.S. Court at the next omnibus hearing on May 2, 2016.

**C. Omnibus Hearing on April 6, 2016**

29. On April 6, 2016, the U.S. Court heard the motion of the Official Committee of Unsecured Creditors of the Debtors (the “**Creditors’ Committee**”) for an Order to Extend Milestone Deadlines Established in Final U.S. DIP Order (the “**DIP Milestone Extension Motion**”) for a period of 30 days. The Debtors and the DIP Lenders each filed objections on April 4, 2016 to the DIP Milestone Extension Motion. The U.S. Court denied the DIP Milestone Extension Motion on the basis that the Final U.S. DIP Order had been negotiated and agreed to by the Creditors’ Committee and there has not been a sufficient change in circumstances to warrant extending the timeline already negotiated and agreed to by the Debtors, the DIP Lenders and the Creditors’ Committee.
30. The Debtors’ motion for a Final Order (I) Authorizing The Debtors to (A) Continue to Operate their Cash Management Systems, (B) Honor Certain Prepetition Obligations related Thereto, (C) Maintain Existing Business Forms and (D) Continue to Perform Intercompany Transactions, and (II) Granting Related Relief (the “**Final U.S. Cash Management Order**”), previously scheduled to be heard on April 6, 2016, has been adjourned to the next omnibus hearing on May 2, 2016.
31. Prior to the April 6, 2016 hearing, the U.S. Court entered orders without hearings (as no objections had been raised by the applicable deadline) in connection with the following:

- (a) applications of the Debtors for the retention, *nunc pro tunc* to the Petition Date, of various professional advisors and agents to the Debtors, including RAS Management Advisors, LLC, Lazard Freres & Co. LLC and Lazard Middle Market LLC, Pachulski Stang Ziehl & Jones LLP, Aird & Berlis LLP, Kirkland & Ellis LLP, and Epiq Bankruptcy Solutions, LLC;
- (b) applications of the Creditors' Committee for the retention, *nunc pro tunc* to February 16, 2016, of various professional advisors and agents to the Creditors' Committee, including FTI Consulting, Inc., Lowenstein Sandler LLP, and Drinker Biddle & Reath LLP;
- (c) a motion of the Creditors' Committee for an Order Establishing Procedures for Compliance with 11 U.S.C. 1102(b)(3) and 1103(c); and
- (d) a motion of the Debtors for an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and Reimbursement of Creditors Committee Member Expenses, and (II) Granting Related Relief.

**D. Upcoming Matters in the Chapter 11 Proceedings**

32. The current deadline for the Debtors to file a restructuring plan in the Chapter 11 Proceedings is April 11, 2016 and the Information Officer understands that the Debtors are presently engaged in discussions/negotiations with various interested parties in connection with same. As stated by the Debtors in the April 8 Hensler Affidavit, it is expected that any such restructuring plan would not seek to compromise pre-petition trade creditor claims against Zochem, which are expected to be paid in full.

**VI. UPDATE ON CERTAIN MATTERS RELATING TO ZOICHEM**

33. Subsequent to the granting of the Supplemental Order, the Debtors have provided weekly reporting to the Information Officer with respect to the cash flows of Zochem. For the nine (9) weeks ended April 2, 2016, Zochem had total cash receipts of approximately \$18.4 million as compared to forecast cash receipts of \$20.7 million, and total operating disbursements (i.e. excluding financing cash flows) of \$19.6 million as compared to forecast operating disbursements of \$21.9 million, for a net operating cash outflow of \$1.2 million over the period.
34. As at April 2, 2016, the Information Officer understands that the Debtors collectively had approximately \$22.3 million of cash on hand, of which \$1.2 million was related to Zochem. Based on the information provided to the Information Officer, Zochem is projected to have a cash outflow of approximately \$0.5 million during the period from April 2016 to July 2016.

**VII. ACTIVITIES OF THE INFORMATION OFFICER**

35. The activities of the Information Officer since the First Report include:
- (a) responding to creditor inquiries regarding the Chapter 11 Proceedings and CCAA Recognition Proceedings;
  - (b) communicating with the Debtors' advisors and the Information Officer's counsel regarding the status of matters related to the Chapter 11 Proceedings and the CCAA Recognition Proceedings;



- (c) reviewing the Zochem weekly cash flow reporting packages prepared by the Debtors;
- (d) reviewing materials filed by various parties in the Chapter 11 Proceedings; and
- (e) preparing this Second Report.

36. The Foreign Representative is seeking approval of this Second Report and the activities of the Information Officer set out herein in respect of this proceeding.

**VIII. INFORMATION OFFICER'S RECOMMENDATION**

37. Based on the Information received and reviewed to date, the Information Officer is of the view that it is reasonable to recognize the Claims Bar Date Order and the Traxys Order, and respectfully recommends that this Court grant the recognition order sought by the Foreign Representative.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED** at Toronto, Ontario this 11<sup>th</sup> day of April, 2016.

**RICHTER ADVISORY GROUP INC.**  
**in its capacity as Information Officer**  
**of Horsehead Holding Corp. and Zochem Inc. *et al.***  
**and not in its personal capacity**

Per:



Adam Sherman, MBA, CIRP  
Senior Vice President



Pritesh Patel, MBA, CFA, CIRP  
Vice President

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Court File No. CV-16-11271-00CL

***ONTARIO***  
**SUPERIOR COURT OF JUSTICE**  
**COMMERCIAL LIST**

Proceeding commenced at Toronto

**SECOND REPORT OF THE  
INFORMATION OFFICER**

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