

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

**IN THE MATTER OF THE *COURTS OF JUSTICE ACT* (ONTARIO)
R.S.O 1990, c.C.43, AS AMENDED**

**THE HONOURABLE MR.) WEDNESDAY, THE 17th
)
JUSTICE C.L. CAMPBELL) DAY OF APRIL, 2013**

BETWEEN:

RSM RICHTER INC., in its capacity as Court-Appointed Receiver of NORSHIELD ASSET MANAGEMENT (CANADA) LTD., NORSHIELD INVESTMENT PARTNERS HOLDINGS LTD., OLYMPUS UNITED FUNDS HOLDINGS CORPORATION, OLYMPUS UNITED FUNDS CORPORATION, OLYMPUS UNITED BANK AND TRUST SCC, OLYMPUS UNITED GROUP INC., NORSHIELD CAPITAL MANAGEMENT CORPORATION AND HONEYBEE SOFTWARE TECHNOLOGIES INC. and with no corporate or personal liability

Applicant

- and -



AMT INTERNATIONAL MINING CORPORATION

Respondent

CLAIMS PROCESS ORDER

THIS MOTION, made by RSM Richter Inc. (now Richter Advisory Group Inc.) in its capacity as receiver (the “**Receiver**”), without security, of all of the assets, undertakings and properties of AMT International Mining Corporation (the “**Debtor**”) was heard this day at 330 University Avenue, Toronto, Ontario.

ON READING the Second Report of the Receiver dated April 15, 2013 (the “**Second Report**”) and the Exhibits attached thereto, and on hearing the submissions of counsel for the Receiver and any other party properly appearing:

1. **THIS COURT ORDERS** that capitalized terms not otherwise defined herein shall have the meanings ascribed thereto in the Second Report.
2. **THIS COURT ORDERS** that the time for service of the Notice of Motion and the Motion Record herein be and it is hereby abridged such that this motion is properly returnable today and hereby dispenses with further service thereof.
3. **THIS COURT ORDERS AND DECLARES** that the Second Report and the conduct and activities of the Receiver, as described in the Second Report, be and they are hereby approved.
4. **THIS COURT ORDERS AND DECLARES** that the claims process described in the Second Report (the “**Claims Process**”) be and is hereby approved.

CLAIMS PROCESS

5. **THIS COURT ORDERS** that the Receiver is hereby authorized and directed to administer and implement the Claims Process and the Receiver may take any steps which it believes are incidental or necessary for the implementation of the Claims Process. The Receiver may seek advice and directions from the Court in respect of any aspect of the Claims Process. Without limiting the foregoing, it is hereby ordered and directed that:
 - (a) On or before May 3, 2013 or such later date as may be required as determined by the Receiver, the Receiver shall:
 - (i) send by regular mail to all known creditors (collectively, the “**Creditors**” and individually, a “**Creditor**”) of the Debtor, based on the Debtor’s records in the possession of the Receiver, a proof of claim form (a “**Proof of Claim**”) substantially in the form attached as Schedule “**A**” to this Order;

- (ii) publish a notice to Creditors in *The Globe and Mail* (national edition) and *La Presse* (in French) substantially in the form attached as Schedule “B” to this Order; and
 - (iii) post the Proof of Claim form and notice to Creditors on its website, the English version being www.richter.ca/en/insolvency-cases, and the French version being www.richter.ca/fr-ca/insolvency%20cases.
- (b) All Creditors must complete and forward to the Receiver a completed Proof of Claim form by June 3, 2013 (the “**Claims Bar Date**”).
 - (c) Any Creditor who does not receive a Proof of Claim form and who wishes to prove a claim against the Debtor is entitled to obtain a Proof of Claim form from the Receiver and must complete and forward to the Receiver a completed Proof of Claim form by the Claims Bar Date.

CLAIMS BAR DATE

- (d) Any Creditor who does not deliver a completed Proof of Claim to the Receiver by the Claims Bar Date shall be forever barred, estopped and enjoined from asserting a claim against the Debtor and such claim shall be forever barred, released and extinguished, unless otherwise allowed by this Court.

REVIEW OF PROOFS OF CLAIM BY RECEIVER

- (e) The Receiver shall review all Proofs of Claim received by the Receiver on or before the Claims Bar Date and may accept, revise or disallow any Proof of Claim. If a Proof of Claim is disputed in whole or disputed in part, the Receiver, prior to any distribution of funds to Creditors, shall issue a notice of disallowance (“**Notice of Disallowance**”) indicating the reasons for the disallowance.
- (f) The Receiver may determine in its own discretion if a Proof of Claim has been properly executed and the Receiver may, if it is satisfied that a Proof of Claim has

been adequately completed, waive strict compliance with the requirements of this Claims Process as to completion and execution of Proofs of Claim and any other notices to be provided herein.

- (g) The Receiver may attempt to resolve any disputed Proof of Claim with the Creditor, prior to accepting, revising or disallowing such Proof of Claim.

OBJECTIONS

- (h) If a Creditor objects to a Notice of Disallowance the Creditor must notify the Receiver by delivering a written objection (a “**Notice of Objection**”) by registered mail, courier service or facsimile within twenty (20) days following the date of issuance by the Receiver of the applicable Notice of Disallowance. Unless otherwise agreed by the Receiver in writing, the Creditor shall thereafter serve on the Receiver a Notice of Motion in the Ontario Superior Court of Justice (Commercial List), Judicial District of Toronto, returnable not less than thirty (30) days after the service of the Notice of Objection for determination of the claim in dispute.
- (i) A Creditor who fails to deliver a Notice of Objection by the deadline set forth in subparagraph (h) above shall be deemed to accept the determination of its claim by the Receiver as set out in the Notice of Disallowance and any revised claim as set out in such Notice of Disallowance shall constitute a Proven Claim (as defined below).
- (j) The amount and status of a claim by a Creditor against the Debtor finally determined in accordance with the forms and procedures authorized by this Order (“**Proven Claim**”), including any determination as to nature, amount, value, priority or validity thereof, shall be final for all purposes. Without limiting the foregoing, the Claims Process shall be binding upon any trustee in bankruptcy appointed in respect of the Debtor.

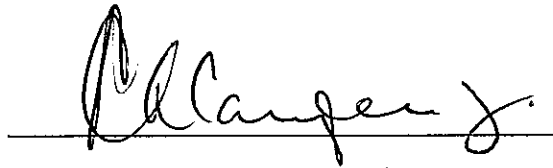
DISTRIBUTIONS

- (k) The Receiver shall not distribute any funds to Creditors holding Proven Claims prior to the approval by this Court of a distribution methodology to be proposed by the Receiver in a subsequent report to the Court.
6. **THIS COURT HEREBY REQUESTS** the aid and recognition of any court, tribunal, regulatory or administrative body having jurisdiction in Canada (including, without limitation, the Superior Court of Quebec), the United States or any other nation or state (including, without limitation, the Commonwealth of The Bahamas and Barbados) to act in aid of and give effect to this Order and to assist the Receiver and its agents in carrying out the terms of this Order.
7. **THIS COURT ORDERS** that the costs of the Receiver in preparation of this motion and of these proceedings, up to and including the hearing of this motion and the entry of this Order (including applicable Goods and Services Tax), be paid to the Receiver from the estate herein and all costs incurred by the Receiver in carrying out the terms of this Order be paid to the Receiver from the estate herein.

ENTERED AT / INSCRIT A TORONTO
ON / BOOK NO:
LE / DANS LE REGISTRE NO.:



APR 17 2013



SCHEDULE "A"

PROOF OF CLAIM (CREDITOR)

[RSM RICHTER LETTERHEAD]

April ►, 2013

TO: All Creditors of AMT International Mining Corporation

Dear Madam or Sir:

**Re: AMT International Mining Corporation (the "Debtor")
Court File No. 07-CL-6955**

**NOTICE: This document contains very important information
which requires your immediate attention.**

The undersigned, RSM Richter Inc. (now Richter Advisory Group Inc.) (the "**Receiver**"), is the Court-appointed Receiver of the Debtor pursuant to an Order dated April 24, 2007 rendered by the Ontario Superior Court of Justice (Commercial List) (the "**Court**") in the above-noted proceeding (the "**Receivership Proceeding**"). The present documentation is delivered to you pursuant to the Order of the Court dated April 17, 2013 (the "**Claims Process Order**") to permit the Receiver to establish the identity of all creditors and the details of all claims against the Debtor.

We enclose herewith a proof of claim form (the "**Proof of Claim**"). Pursuant to the Claims Process Order, you are required to complete and return the Proof of Claim to the Receiver **on or before June 3, 2013**, failing which your claim against the Debtor will be forever barred, released and extinguished, subject to further order of the Court.

If the Receiver disputes, in whole or in part, your completed Proof of Claim, the Receiver shall send to you a Notice of Disallowance indicating the reasons for such dispute prior to distributing any funds to you or to other creditors of the Debtor.

If you have any questions regarding the completion of the Proof of Claim form, please contact the Receiver as follows:

RSM Richter Inc. (now Richter Advisory Group Inc.)
Receiver of AMT International Mining Corporation

Tel. No.: 1-866-869-9679
Fax No.: 514-934-8603
E-mail: claims@richter.ca

We thank you in advance for your timely cooperation in this matter.

Yours very truly,

**RSM RICHTER INC. (now Richter Advisory Group Inc.)
solely in its capacity as the Court-appointed Receiver
of AMT International Mining Corporation, and
without personal or corporate liability**

RSM RICHTER INC. (now Richter Advisory Group Inc.), solely in its capacity as the Court-appointed Receiver of AMT International Mining Corporation, and without personal or corporate liability • • • Telephone: 1-866-869-9679 Telecopier: 514-934-8603 Email: claims@richter.com		OFFICE USE ONLY
		O/F _____
		C/N _____
		Date _____

Court File No.: 07-CL-6955

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

**IN THE MATTER OF THE *COURTS OF JUSTICE ACT* (ONTARIO)
R.S.O 1990, c.C.43, AS AMENDED**

BETWEEN:

RSM RICHTER INC., in its capacity as Court-Appointed Receiver of NORSHIELD ASSET MANAGEMENT (CANADA) LTD., NORSHIELD INVESTMENT PARTNERS HOLDINGS LTD., OLYMPUS UNITED FUNDS HOLDINGS CORPORATION, OLYMPUS UNITED FUNDS CORPORATION, OLYMPUS UNITED BANK AND TRUST SCC, OLYMPUS UNITED GROUP INC., NORSHIELD CAPITAL MANAGEMENT CORPORATION AND HONEYBEE SOFTWARE TECHNOLOGIES INC. and with no corporate or personal liability

Applicant

- and -

AMT INTERNATIONAL MINING CORPORATION

Respondent

PROOF OF CLAIM AGAINST AMT INTERNATIONAL MINING CORPORATION

Name of person asserting a claim against the Debtor: _____
(hereinafter the "Claimant")

Individual: Corporation: Other: Specify: _____

If individual, Claimant's Social Insurance Number: _____

If corporation, Business Identification Number: _____

Address of Claimant: _____

Telephone number of Claimant: _____

E-mail address of Claimant: _____

Fax number of Claimant: _____

I, _____, of _____, do hereby certify:
(Name) (City and province)

1. That I am a Claimant of the Debtor
or that I am _____ of _____
(State position or title) (Name of Claimant)
a Claimant of the Debtor.

2. That I have knowledge of all the circumstances connected with the claim referred to in this form.

3. (Check and complete appropriate category:)

That, as at April 24, 2007, the Claimant had and still has an **unsecured claim** against the Debtor in the sum of CAD\$ _____, as shown by the statement (or affidavit or solemn declaration) attached hereto and marked **Annex "A"**, after deducting any counterclaims to which the Debtor may be entitled. (The attached statement, affidavit or solemn declaration must specify and attach the evidence in support of the claim.) (Give full particulars of the claim with all necessary supporting documentation.)

-or-

That, as at April 24, 2007, the Claimant had and still has a **secured claim** against the Debtor in the sum of CAD\$ _____, as shown by the statement (or affidavit or solemn declaration) attached hereto and marked **Annex "A"**, after deducting any counterclaims to which the Debtor may be entitled. (The attached statement, affidavit or solemn declaration must specify and attach the evidence in support of the claim and the security held in respect of the claim, including copies of all security.) (Give full particulars of the claim and security with all necessary supporting documentation.)

4. That to the best of my knowledge and belief, I am (or the above-named Claimant is) (or am not or is not) related to the Debtor within the meaning of section 4 of the *Bankruptcy and Insolvency Act*.

I. ATTESTATION

I hereby attest that, to the best of my knowledge, the information in this document is and any and all annexes hereto are truthful and accurate in all material respects.

SIGNED this _____ day of _____, 20

(Signature of Claimant)

(Signature of witness)

(Name of Claimant in block letters)

(Name of witness in block letters)

(Address of witness in block letters)

ANNEX "A"

DETAILS OF CLAIM

SCHEDULE "B"

RECEIVERSHIP OF AMT INTERNATIONAL MINING CORPORATION

NOTICE OF THE DEADLINE TO FILE PROOFS OF CLAIM

By Order dated April 17, 2013 (the "Order"), the Ontario Superior Court of Justice (Commercial List) (the "Court") has approved a claims process (the "Claims Process") in respect of AMT International Mining Corporation (the "Debtor") to be administered by RSM Richter Inc. (now Richter Advisory Group Inc.) in its capacity as the Court-appointed receiver of the Debtor (the "Receiver"). Capitalized terms in this notice are as defined in the Order, a copy of which can be found on the Receiver's website in English at www.richter.ca/en/insolvency-cases, and in French at www.richter.ca/fr-ca/insolvency%20cases.

In accordance with the Claims Process, on or before May 3, 2013, the Receiver shall mail to all known creditors (each, a "Creditor") of the Debtor a Proof of Claim form.

Any Creditor who does not receive a Proof of Claim form may obtain this form on the website referred to above or by contacting the Receiver directly as follows:

- (i) by email: claims@richter.ca;
- (ii) by mail: **Richter Advisory Group Inc.**
1981 McGill College, 11th Floor
Montréal QC H3A 0G6; or
- (iii) by facsimile: **(514) 934-8603.**

All Creditors must forward to the Receiver a completed Proof of Claim form on or before **June 3, 2013** (the "Claims Bar Date").

Any Creditor who does not deliver a completed Proof of Claim to the Receiver by the Claims Bar Date shall be forever barred, estopped and enjoined from asserting a claim against the Debtor and such claim shall be forever barred, released and extinguished, unless otherwise allowed by the Court.

A Proof of Claim which is disputed by the Receiver will be addressed in the manner set out in the Order.

Proofs of Claim may be delivered to the Receiver by mail, messenger, facsimile or e-mail, provided that such Proof of Claim must be received by the Receiver by **no later than the Claims Bar Date at the following address:**

Richter Advisory Group Inc.
1981 McGill College, 11th Floor
Montréal QC H3A 0G6
Email: claims@richter.ca
Fax: 514.934.8603

**RSM RICHTER INC., in its capacity as Court-
Appointed Receiver of NORSHIELD ASSET
MANAGEMENT (CANADA) LTD. et al**
Applicant

and

AMT INTERNATIONAL MINING CORPORATION
Respondent

Court File No.:07-CL-6955

ONTARIO

SUPERIOR COURT OF JUSTICE
(Commercial List)

Proceeding commenced in Toronto

CLAIMS PROCESS ORDER

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Lawyers for RSM Richter Inc. (now Richter
Advisory Group Inc.), in its capacity as
Receiver of AMT International Mining
Corporation