1.1 1.104

July 9

	incorrectly completed proofs of claim forms; scan claims received via courier or mail.	
TOTAL - A	A. Sobot	38.5 hrs
U.S. Person	unel:	
W. Kosturos	<u>S</u>	
July 8	Call with A. Alt re: outstanding issues; call with T. Sandler regarding preparation for next week's meeting and plan issues; review of Goodman's summary plan issues memo; review of daily management report.	2.3
July 9	Call with D. McIntosh and J. Carfagnini regarding potential plan structures and process; review of weekly cash flow forecast; review of potential landlord claims ranges.	2.5
TOTAL – V	V. Kosturos	4.8 hrs
<u>M. Henry</u>		Hrs.
July 7	Correspondence and internal discussions on final reconciliation documentation; discussion with the Agent on the sale of various IT assets.	1.1
July 8	Correspondence with the purchaser of certain of the Calgary DC equipment on status and milestones.	0.2
July 9	Correspondence on the inventory liquidation process.	0.1
TOTAL – N	1. Henry	1.4 hrs
T. MacDiari	<u>nid</u>	Hrs.
July 6	Review and respond to emails regarding claims and the upcoming Monitor's report.	0.5

Input and log proofs of claim information into tracker and onto

server; follow-up with claimants who had questions or had



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96999 9 0, 543	Monitor's report; review and provide comments on RPPSP matrix in draft Monitor's report; follow-up on outstanding issues related to realty tax appeals; follow-up on outstanding questions relating to intercompany claims with B. Keane; review intercompany claims files; create list of questions relating to intercompany claims backup.
July 8	Call with B. Keane and G. Karpel to discuss outstanding questions on intercompany claims backup, provide feedback; review budget vs. actual package and provide comments; follow-up on outstanding items related to realty tax appeals; review and respond to emails regarding preliminary recovery analysis; review multiple versions of cash flow variance analysis in Monitor's report and provide feedback; review and respond to emails regarding lease transaction closings.
July 9	Follow-up on outstanding realty tax open items; review Monitor's report schedules and provide comments; review cure costs summary and provide comments; review reconciliation from Monitor's account to net proceeds from RPPSP and provide

Review and respond to emails regarding claims and the upcoming

July 10 Review updated version of schedules to the Monitor's report.

comments; review updated professional fees tracker.

TOTAL - T. MacDiarmid

M. Sidorenkov

July 7

July 6 Prepare weekly cash balance summary; actualize prior week's receipts and disbursements; revise weekly management dashboard with updated receipts, disbursements by vendor and lease status summary; review outstanding cheques for purposes of cash flow actualization; prepare preliminary week 25 and cumulative budget vs. actual summary schedules; prepare revised summary of real property portfolio sales process results with revised adjustment amounts and cure costs.

2.0

3.5

3.7

10.2 hrs.

0.5

<u>Hrs.</u>

6.3

July 7 Actualize prior day's receipts and disbursements; finalize and distribute week 25 and cumulative budget vs. actual summary package; update cure costs tracker for select locations; prepare revised summary of real property portfolio sales process results with revised adjustment amounts and cure costs for certain locations; update cure costs summary for final amounts per final agreements; prepare revised cash flow commentary for Monitor's report; prepare receipts and sales bridge; prepare preliminary cumulative budget variance schedule and supporting commentary for Monitor's report; assist in preparing Monitor's trust account net proceeds reconciliation summary.

- July 8 Actualize prior day's receipts and disbursements; finalize and distribute week 25 and cumulative budget vs. actual summary package; update cure costs tracker for select locations; prepare receipts and sales bridge; prepare revised cumulative budget variance schedule and supporting commentary for Monitor's Report; revise Monitor's trust account net proceeds reconciliation summary and internal discussions regarding same; prepare revised summary of real property portfolio sales process results with revised adjustment amounts and cure costs.
- July 9 Actualize prior day's receipts and disbursements; prepare revised summary of real property portfolio sales process results with revised adjustment amounts and cure costs; prepare revised Monitor's trust account net proceeds reconciliation summary.

TOTAL - M. Sidorenkov

R. Behrens

- July 6 Discuss treatment of HST and GST taxes as on certain expenses; revise settlement summary for tax updates; draft proceeds and expense roll-up summary; review JV wire requests; agree wire amounts to previously agreed settlement amounts. July 7 Discuss schedules needed for next Court filing; draft summary sale 3.1
- July 8 Draft and reconcile sale table of operating expenses, fees and 1.8 payments; review draft Monitor's report for accuracy of sale

reconcile summary sale schedule to detailed reconciliation.

schedule; discuss fixture chargebacks arrangement with TCC;

Total - R. Behrens

summary amounts.

11.2 hrs.



836

6.5

5.7

2.6

21.1 hrs.

6.3



1

Claims Process Support:

<u>J. Herriman</u>	3	Hrs.
July 6	Review updated claims summary reports and provide comments to M. Zeiss.	0.4
July 9	Review updated claims summary report and follow-up with M. Zeiss.	0.6
July 10	Review drafts of four new claims management summary reports and follow-up with M. Zeiss.	0.9
TOTAL – J.	Herriman	1.9 hrs
<u>M. Zeiss</u>		<u>Hrs.</u>
July 5	Review and submit reports.	2.5
July 6	Review comments from E. Allin; attend conference call with E. Allin and G. Karpel; prepare revised reports from new data sets with comments incorporated.	3.5
July 7	Attend conference call with E. Allin, G. Karpel and G. Grundtner to discuss claims reports; review claims report examples and begin drafting first claims summary report.	4.5
July 8	Complete first claims summary report and draft four additional claims reports and review.	9.5
July 9	Revise claims reports per E. Allin and G. Karpel's comments; further revise reports per E. Allin and G. Karpel's comments including printing.	8.5

TOTAL - M. Zeiss

28.5 hrs.





	<u>Hours</u>	Rate	<u>Total</u>
U.S. Personnel:			(USD)
W. Kosturos, Managing Director	20.0	\$895	\$17,900.00
M. Zeiss, Director **	4.6	\$500	2,300.00
M. Sidorenkov, Senior Associate	7.7	\$475	3,657.50
	32.3		\$23,857.50
Add: HST @ 13%			3,101.48
Total due in US Funds			\$26,958.98

0.750

** Claims Process Support

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U.S. Personnel:

W. Kosturos

July 13	Review of Osler plan issues memo; review of potential convenience claim ranges; call with T. Sandler and A. Alt re: potential claims issues and review of plan issues; call with T. Sandler, A. Alt, J. Carfagnini, D. McIntosh and A. Hutchens re: plan and claims issues.	4.3
July 14	Review of potential claims issues; review of preliminary liquidation analysis; review of specific lease claims under different scenarios; review of Osler memo re: plan issues, meeting with A. Alt, T. Sandler, J. Carfagnini and D. McIntosh re: Corp meetings; travel time.	5.4
July 15	Meeting with Target Corp.; review of draft creditor letters; review of draft Monitor's Report; meeting with A. Alt, T. Sandler, J. Carfagnini and D. McIntosh re: outstanding issues, travel time; review of Bennett Jones' letters and discussion with J. Carfagnini, D. McIntosh and A. Alt.	8.2
July 17	Call with A. Alt re: follow-up to 7/15 meeting; call with D. McIntosh re: outstanding issues; call with T. Sandler re: follow-up to 7/15 meeting.	2.1
TOTAL -	W. Kosturos	20.0 hrs.
<u>M. Sidore</u>	nkov	<u>Hrs.</u>
July 13	Prepare weekly cash balance summary; actualize prior week's receipts and disbursements; revise weekly management dashboard with updated receipts, disbursements by vendor and lease status summary; review outstanding cheques for purposes of cash flow actualization; prepare preliminary week 26 and cumulative budget vs. actual summary schedules; prepare AP aging summary with pre and post-filing amounts by vendor.	4.9
July 14	Prepare revised summary of real property portfolio sales process results with revised adjustment amounts and cure costs.	1.5

July 15	Finalize and distribute week 25 and cumulative budget vs. actual summary package; prepare revised summary of real property portfolio sales process results with revised adjustment amounts and cure costs; internal discussion regarding transition of select weekly reporting responsibilities.	1.3
TOTAL – M. Sidorenkov		
Claims Pr	ocess Support:	
<u>M. Zeiss</u>		Hrs.
July 13	Revise claims report per G. Karpel; request draft and test NRDA exhibit.	3.5
July 17	Prepare weekly claims report.	1.1
TOTAL -	M. Zeiss	4.6 hrs.



840

ason from the

	Hours	Rate	Total
U.S. Personnel:			(USD)
W. Kosturos, Managing Director	0.0	\$895	\$0.00
T. MacDiarmid, Director	8.7	\$600	5,220.00
M. Zeiss, Director **	3.9	\$500	1,950.00
M. Sidorenkov, Senior Associate	5.8	\$475	2,755.00
	18.4		\$9,925.00
Add: HST @ 13%			1,290.25
Total due in US Funds			\$11,215.25

****** Claims Process Support

U.S. Personnel:

T. MacDiarmid

July 13*	Review and respond to emails regarding claims estimates; discuss final proceeds from lease transactions with D. Proskurniak at Lazard; prepare analysis on convenience claims class for plan discussion; prepare summary of items needed for Monitor's claims review and send to company; update recovery analysis based on comments from the working group; review BIA calculation of landlord claims and compare to recovery analysis; review budget vs. actual package and provide comments.	
July 14*	Discuss updated recovery analysis with B. Kosturos: update	

- July 14* Discuss updated recovery analysis with B. Kosturos; update analysis based on additional changes from the working group and send summary email; discuss recovery analysis with A. Hutchens; review and respond to emails regarding intercompany claims; review plan draft memo.
- July 15* Update lease transaction summary for H. Morehead; review and respond to emails regarding transition of treasury responsibilities.

TOTAL – T. MacDiarmid

*hours not previously billed on Inv. #27

M. Sidorenkov

- July 20 Prepare weekly cash balance summary; actualize prior week's receipts and disbursements; revise weekly management dashboard with updated receipts, disbursements by vendor and lease status summary; review outstanding cheques for purposes of cash flow actualization; prepare preliminary week 27 and cumulative budget vs. actual summary schedules; internal discussions regarding transitioning of weekly cash flow reporting responsibilities.
- July 22 Review select professional fee invoices; update professional fee accrual and payment tracker; internal discussion regarding transitioning of professional fee tracker updates.

TOTAL - M. Sidorenkov

Claims Process Support:

M. Zeiss

July 20 Revise weekly claims report drafts.

4.7

3.5

8.7 hrs.

0.5

Hrs.

4.8

1.0

5.8 hrs.

Hrs.

1.8



July 24 Prepare weekly claims report drafts.

TOTAL - M. Zeiss

2.1

3.9 hrs.

Target Canada Co. DETAILED SUMMARY – July 26 to August 1, 2015

	Hours	Rate	<u>Total</u>
U.S. Personnel:			(USD)
W. Kosturos, Managing Director	0.0	\$895	\$0.00
T. MacDiarmid, Director	3.0	\$600	1,800.00
M. Zeiss, Director **	1.1	\$500	550.00
M. Sidorenkov, Senior Associate	24.8	\$475	11,780.00
	28.9		\$14,130.00
Add: Out of pocket expenses - telephone			313.10
			\$14,443.10
Add: HST @ 13% *			1,836.90
Total due in US Funds			\$16,280.00

*Excludes HST exempt out of pocket expenses

****** Claims Process Support

Target Canada Co. DETAILED SUMMARY – July 26 to August 1, 2015

U.S. Personnel:

T. MacDiarmid

July 28	Review and respond to emails regarding cash flow forecast review and claims.	0.7
July 29	Review cash flow forecast and provide comments; review budget vs. actual package and provide comments; review and respond to emails regarding claims.	1.6
Aug 1	Review and respond to emails regarding preliminary recovery analysis and claims.	0.7
TOTAL -	T. MacDiarmid	3.0 hrs.

M. Sidorenkov

- July 27 Review weekly cash balance summary; review actualization of prior week's receipts and disbursements; review preliminary week 28 and cumulative budget vs. actual summary schedules; internal discussions to transition weekly cash flow reporting responsibilities; revise professional fee accrual and disbursement tracker; internal discussions regarding cash flow reforecast; actualize cash flow reforecast model for the prior month's activity.
- July 28 Revise professional fee accrual and disbursement tracker; internal discussion to transition professional fees tracking and reporting; internal discussions regarding reconciliation of unremitted real estate sales proceeds and final adjustment and cure cost amounts; update forecast receipt amounts and timing in the cash flow reforecast model; prepare preliminary cash flow reforecast ending cash bridge from prior version; review outstanding AP aging report for purposes of cash flow reforecast.
- July 29 Update select forecast disbursements in cash flow reforecast model; update professional fee summary schedules in cash flow reforecast package; update cash flow reforecast notes and assumptions in cash flow reforecast package; prepare preliminary cash flow reforecast package for internal review; discussions regarding review of cash flow reforecast package.

845

<u>Hrs.</u> 6.9

6.3

7.8



Target Canada Co. DETAILED SUMMARY – July 26 to August 1, 2015

10

1 - 48

July 30	Update cash flow reforecast model and reporting package for internal comments received; update forecast week 29 cash flow model amounts based on current week's actual cash flow activity; prepare final cash flow model ending cash balance bridge.	3.8
TOTAL -	- M. Sidorenkov	24.8 hrs.
<u>Claims Pr</u>	ocess Support:	
<u>M. Zeiss</u>		Hrs.
July 31	Prepare drafts of the weekly claims report.	1.1
TOTAL -	- M. Zeiss	1.1 hrs.



4: 48

	Hours	Rate	Total
U.S. Personnel:			(USD)
W. Kosturos, Managing Director	0.0	\$895	\$0.00
T. MacDiarmid, Director	13.5	\$600	8,100.00
M. Zeiss, Director **	4.1	\$500	2,050.00
M. Sidorenkov, Senior Associate	6.5	\$475	3,087.50
	24.1		\$13,237.50
Add: HST @ 13%			1,720.88
Total due in US Funds			\$14,958.38

** Claims Process Support



- Aug 6 Input and log proofs of claim information into tracker and onto server; input revised claims into system and communicate revised status with Target employees; respond to diligence requests from E. Allin and G. Karpel via email.
- Aug 7 Input and log proofs of claim information into tracker and onto server; follow-up on issues encountered in the claims tracker; upload logged proofs of claim and relevant support to Intralinks.

TOTAL - A. Sobot

U.S. Personnel:

T. MacDiarmid

- Aug 4 Review updated intercompany claims submissions, create summary of amounts and draft questions; review notice of crossexamination and follow-up on items; download and review updated backup information for shared services amounts; review and respond to emails regarding the updated cash flow forecast for the Monitor's report; call with G. Karpel and E. Allin to discuss claims review status.
- Aug 5 Review updated intercompany claims submissions; create summary of outstanding issues and amounts; provide review methodology to claims team; develop list of claims questions; review and respond to emails regarding cash flow forecast for the Monitor's report, provide risks and opportunities; call with B. Keane and G. Karpel regarding status of intercompany claims review.
- Aug 7 Call with Osler to discuss information requests in the notice of cross-examination; follow-up with A&M team on information request and review 30-day goods analysis for relevant responses; draft email to TCC regarding information requests; review and respond to emails regarding claims.

TOTAL - T. MacDiarmid

M. Sidorenkov

Aug 3 Review weekly cash balance summary dashboard; review preliminary week 29 cumulative budget vs. actual summary schedules; internal discussion regarding weekly reporting schedules.

9.0

9.5

33.9 hrs.

4.5

6.5

2.5

13.5 hrs.

Hrs.

1.5



Aug 5	Review revised cash flow reforecast and prepare for cash flow reforecast discussion; conference call regarding review of revised cash flow reforecast; discussion regarding transition of select reporting schedules related to the Monitor's reports.	2.9
Aug 6	Prepare and distribute professional fee estimate related to the real estate sale process.	0.8
Aug 7	Review and prepare comparison of final real estate sale process invoice from Lazard; update professional fees tracker; respond to various emails.	1.3
TOTAL -	M. Sidorenkov	6.5 hrs.
<u>Claims Pro</u>	cess Support:	
<u>M. Zeiss</u>		Hrs.
Aug 2	Revise claims report as per updated schedule from E. Allin.	1.2
Aug 4	Revise claims report as per comments from E. Allin.	0.6
Aug 5	Prepare new schedules 6 and 7 of claims report as per specifications provided by E. Allin.	2.3

TOTAL - M. Zeiss

4.1 hrs.



Hours	Rate	Total
		(USD)
2.4	\$895	\$2,148.00
41.6	\$600	24,960.00
1.1	\$500	550.00
45.1		\$27,658.00
		2,383.68
		\$30,041.68
		3,595.54
		\$33,637.22
	2.4 41.6 1.1	2.4 \$895 41.6 \$600 1.1 \$500

*Excludes HST exempt out of pocket expenses

** Claims Process Support

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U.S. Personnel:

W. Kosturos

Aug 10 Call with D. McIntosh re: plan issues; review of cash flow variance report, review of 30-day claims letter; review of claims reconciliation issues.

TOTAL - W. Kosturos

T. MacDiarmid

- Aug 9 Prepare email to Target summarizing certain information requests in the Notice of Cross Examination ("NCE"); review information on hand and prior analysis for crossover documents; review and respond to emails regarding information requests and claims.
- Aug 10 Call with G. Karpel and E. Allin regarding intercompany claims review and methodology; call with Target individuals regarding information requests in the NCE, follow-up with individuals on takeaways; prepare and email example data pulls; select samples of transactions for intercompany claims review and send to appropriate individuals at Target; review and tie out intercompany claims data; provide update on information requests to Osler; discuss EP involvement with Goodmans; discuss HST/GST claims with G. Karpel.
- Aug 11 Review and tie out intercompany claims data; discuss outstanding questions with individuals at Target; review and respond to emails regarding claims and information requests in the NCE; review draft claims summary workbook and provide feedback; provide questions on intercompany claims information based on initial review to Target; review and respond to emails regarding claims and information requests; call with G. Grove and J. Dacks regarding information requests in the NCE; call with Goodmans regarding intercompany claims review; review budget vs. actual package.
- Aug 12 Intercompany claims review update call with Target accounting group to discuss outstanding questions; prepare summary for employee related claims and tie out of amounts; review and respond to emails regarding follow-up questions on data pull for the NCE information requests; respond to questions regarding preliminary recovery analysis; review initial data pulls for information requests and provide feedback; summarize data pull information.



2.4 hrs.

1.5

9.3

8.8

8.5



Aug 13	Review data provided by Target in response to NCE information requests, provide feedback and summarize information; follow-up meeting with J Madsen and K Heinrich regarding shared services claim; update employee reconciliation and prepare follow-up questions; provide comparison of data provided to Target to 30- day goods analysis, follow-up with appropriate individuals; review intercompany claims and summarize findings.	8.0
Aug 14	Review and respond to emails regarding cash flows; summarize information received for NCE data request; review and respond to questions on information request; call with Target IT team to discuss questions regarding data pulls; review intercompany claims and summarize findings.	5.5
TOTAL -	- T. MacDiarmid	41.6 hrs.
<u>Claims Pr</u>	ocess Support:	
<u>M. Zeiss</u>		Hrs.
Aug 10	Prepare weekly claims report from updated list of claims.	1.1
TOTAL -	- M. Zeiss	1.1 hrs.

852

A & M

Hours	Rate	<u>Total</u>
		(USD)
0.0	\$895	\$0.00
38.4	\$600	23,040.00
2.5	\$500	1,250.00
40.9		\$24,290.00
		3,157.70
		\$27,447.70
	0.0 38.4 2.5	0.0 \$895 38.4 \$600 2.5 \$500

****** Claims Process Support

Aug 18	Input and log proofs of claim information into tracker and onto
	server; upload logged proofs of claim and relevant support to
	Intralinks; input revised claims into system and communicate
	revised status with Target employees; follow-up with encountered
	issues in the claims tracker; internal discussions with G. Karpel,
	E. Allin and S. Glustein.

- Aug 19 Input and log proofs of claim information into tracker and onto server; follow-up with claimants who had questions or had incorrectly filled out proofs of claim forms; scan claims that are received via courier or mail; upload logged proof of claims and relevant support to Intralinks.
- Aug 20 Input and log proofs of claims information into tracker and onto server; upload logged proofs of claim and relevant support to Intralinks; input revised claims into system and communicate revised status with Target employees; follow-up with encountered issues in the claims tracker; internal discussions with G. Karpel, E. Allin, S. Glustein.
- Aug 21 Input and log proofs of claim information into tracker and onto server; follow-up with claimants who had questions or had incorrectly filled out proofs of claim forms; scan claims that are received via courier or mail; upload logged proofs of claim and relevant support to Intralinks; adjustments to the tracker based on the weekly committee review.

TOTAL - A. Sobot

U.S. Personnel:

T. MacDiarmid

Aug 17 Provide update to Osler on data requests; review information based on updated data pulls for goods receipts and inventory summaries, follow-up on outstanding questions; review claims documentation provided by Target and reconcile to support; review sample selection detail for claims review, summarize findings; review and respond to emails regarding claims; update sample selection and testing methodology summary; call with G. Karpel and E. Allin on intercompany claims status update.

50.3 hrs.

8.5

11.0

9.5

10.6

8.0

- Aug 18 Call with R. Nelson and K. Baltes regarding TTS financial budget for shared services; call with Goodmans to discuss intercompany claims report; call with J. Madsen to discuss shared services claim support provided, follow-up on outstanding questions; provide outstanding items summary to J. Madsen and K. Hinrichs on intercompany claims; review employee claims summary with J. Madsen; select employees for payment review for intercompany claims and provide to Company; update intercompany claims review summary document and status update; work on updating information request summaries related to cross-examination; review and respond to emails regarding information requests related to the cross-examination.
- Aug 19 Update first draft of documents for cross-examination information request and circulate to Osler; review and respond to emails regarding claims and cross examination information requests; call with S. Irving and G. Grove to discuss status of information requests and discuss responses; make further sample selections for claims review and provide to Company; provide Company with outstanding questions list on intercompany claims; download support for claims and information requests from shared site; update drafts of cross-examination documents based on further information provided.
- Aug 20 Call with G. Karpel and E. Allin regarding intercompany claims review documentation for Monitor's report; call with K. Hinrichs to discuss claims outstanding items, discussion on tie out; update cross-examination information request for goods received by supplier; review intercompany claim support; call with Goodmans and A&M to discuss first draft of the Monitor's report; review and respond to emails regarding claims; review first draft of the Monitor's report on intercompany claims.
- Aug 21 Finalize second drafts of the cross-examination information requests and provide to Company individuals for review; call with J. Madsen to discuss support for intercompany claims and tie out; update outstanding claims issues list and provide update to working group; tie out employee detail to other support provided; review and respond to emails regarding claims.

TOTAL - T. MacDiarmid

38.4 hrs.

855

9.5

8.3

7.0

5.1

Claims Process Support:

<u>M. Zeiss</u>		Hrs.
Aug 17	Prepare weekly claims report.	2.5
TOTAL -	- M. Zeiss	2.5 hrs.

	Hours	Rate	<u>Total</u>
U.S. Personnel:			(USD)
W. Kosturos, Managing Director	0.0	\$895	\$0.00
T. MacDiarmid, Director	15.1	\$600	9,060.00
M. Zeiss, Director **	2.1	\$500	1,050.00
	17.2		\$10,110.00
Add: HST @ 13%			1,314.30
Total due in US Funds			\$11,424.30

****** Claims Process Support

- Aug 26 Input and log proofs of claim information into tracker and onto server; follow-up with claimants who had questions or had incorrectly filled out proofs of claim forms; scan claims that are received via courier or mail; upload logged proofs of claim and relevant support to Intralinks; follow-up with claimants who required assistance or had incorrectly completed their proofs of claim forms.
- Aug 27 Input and log proofs of claim information into tracker and onto server; upload logged proofs of claim and relevant support to Intralinks; input revised claims into system and communicate revised status with Target employees; follow-up with encountered issues in the claims tracker; internal discussions with G. Karpel, E. Allin, S. Glustein; adjustments to the tracker based on the weekly committee review.

TOTAL – A. Sobot

U.S. Personnel:

T. MacDiarmid

- Aug 24 Discuss claims review with Economic Partners and follow-up on outstanding questions; review EY report on allocation methodology for shared services; review intercompany claims backup provided and tie out; follow-up on outstanding crossexamination information requests with the company; send summary of outstanding questions to J. Madsen on intercompany claim.
- Aug 25 Call with Justin Madsen to discuss intercompany claim backup and additional questions; review additional intercompany claim support provided, tie out and update summary for working group; select additional samples for claims review; discuss outstanding Blaney letter requests and status with J. Dacks at Osler; review excerpts of Wong cross examination; review and respond to emails regarding preliminary recovery analysis; clear comments on intercompany review summary.
- Aug 26 Call with Goodmans to discuss intercompany claims findings; download and review additional intercompany claim support provided, tie out, and update summary to provide to Goodmans for report generation; update employee review file with bonus information; review and respond to emails regarding claims review.

43.9 hrs.

3.1

3.5

2.8

11.6

9.2

Aug 27 Review claim summary for Monitor's Report and provide comments; call with Goodmans to discuss intercompany claims findings; review and respond to emails regarding claims; review additional intercompany claim support provided, tie out and update summary; review and respond to emails regarding claims review.	2.9
Aug 28 Review Monito'rs Report and provide comments where necessary; review remaining support material and tie out to detail; call with Treasury group to discuss movement of cash to new bank accounts; organize financial information and request files and backup; review and respond to emails regarding Monitor's Claims Report and outstanding claims support questions.	2.8
FOTAL – T. MacDiarmid	15.1 hrs.
Claims Process Support:	
<u>M. Zeiss</u>	Hrs.
Aug 24 Prepare weekly Claims Report.	2.1
ΓΟΤΑL – M. Zeiss	2.1 hrs.

2.9

A&M

Target Canada Co. DETAILED SUMMARY – August 30 to September 5, 2015

- 11

	Hours	Rate	Total
U.S. Personnel:			(USD)
W. Kosturos, Managing Director	2.2	\$895	\$1,969.00
T. MacDiarmid, Director	3.0	\$600	1,800.00
M. Zeiss, Director **	12.6	\$500	6,300.00
	17.8		\$10,069.00
Add: Out of pocket expenses - telephone			114.43
			\$10,183.43
Add: HST @ 13% *			1,308.97
Total due in US Funds			\$11,492.40

*Excludes HST exempt out of pocket expenses

** Claims Process Support



Target Canada Co. DETAILED SUMMARY – August 30 to September 5, 2015

Sept 2	Input and log proofs of claim information into tracker and onto server; follow-up with claimants who had questions or had incorrectly completed proofs of claim forms; scan claims received via courier or mail; upload logged proofs of claim and relevant support to Intralinks.	13.6
Sept 3	Input and log proofs of claim information into tracker and onto server; input revised claims into system and communicate revised status with Target employees; follow-up with issues encountered in the claims tracker.	12.3
Sept 4	Upload logged proofs of claim and relevant support to Intralinks; input revised claims into system and communicate revised status with Target employees; follow-up with issues encountered in the claims tracker; internal discussions with G. Karpel, E. Allin, S. Glustein on claims matters; adjust items in the tracker and troubleshoot reporting issues.	9.0
TOTAL -	- A. Sobot	67.1 hrs.
U.S. Perso	onnel:	
W. Kostur	<u>'05</u>	
Sep 1	Review of Monitor intercompany claims report and provide comments; review of updated cash flow forecast and weekly cash flow variance report.	2.2
TOTAL -	W. Kosturos	2.2 hrs.
<u>T. MacDia</u>	armid	
Aug 31	Review Monitor's Report and provide comments; review and respond to emails regarding claims and Monitor's Report.	2.5
Sep 2	Correspondence with G. Grove regarding information requests related to the Wong cross-examination; review and respond to emails regarding Treasury related items.	0.5
TOTAL -	T. MacDiarmid	3.0 hrs.



Target Canada Co. DETAILED SUMMARY – August 30 to September 5, 2015

Claims Process Support:

4. 7

<u>M. Zeiss</u>		Hrs.
Sept I	Prepare weekly claims report; prepare convenience class summary report.	2.2
Sept 3	Modify claims reports per G. Karpel's requests.	2.3
Sept 4	Claims reporting - additional reports, new drafts based on updated register.	8.1
TOTAL -	M. Zeiss	12.6 hrs.

Target Canada Co. DETAILED SUMMARY – September 6 to 12, 2015

	Hours	Rate	Total
U.S. Personnel:			(USD)
W. Kosturos, Managing Director	0.0	\$895	\$0.00
T. MacDiarmid, Director	1.9	\$600	1,140.00
M. Zeiss, Director **	6.2	\$500	3,100.00
	8.1		\$4,240.00
Add: HST @ 13%			551.20
Total due in US Funds			\$4,791.20

** Claims Process Support

A&M

	adjustments to the tracker based on the weekly committee review; adjust items in the tracker and troubleshoot issues that arise from reporting; scan hard copy claims received and input necessary information.	
TOTAL – A	A. Sobot	54.0 hrs.
U.S. Person	nel:	
<u>T. MacDiar</u>	mid	
Sept 8	Call with G. Grove regarding document requests from the Wong cross-exmanination and revisons to be made.	0.3
Sept 9	Update documents based on feedback from Goodmans; review and respond to emails regarding transition documents.	0.5
Sept 10	Review response letter to Blaney and provide comments; review and respond to emails regarding claims.	0.8
Sept 11	Review and respond to emails regarding shared services invoices; review documents for invoices submitted and download from shared site.	0.3
TOTAL – T	. MacDiarmid	1.9 hrs.
<u>Claims Proc</u>	ess Support:	
<u>M. Zeiss</u>		Hrs.
Sept 8	Attend conference call re: multi-debtor claims and reporting; review reporting samples.	0.6
Sept 10	Revise landlord and pharmacy claims reports.	5.6

Upload logged proofs of claim and relevant support to Intralinks;

follow-up with issues encountered in the claims tracker; internal discussions with E. Allin, S. Glustein on claims matters;

TOTAL - M. Zeiss

Sept 11

hrs.

864

A & M

6.2 hrs.

Target Canada Co. DETAILED SUMMARY – September 13 to 19, 2015

Hours	Rate	Total
		(USD)
0.0	\$895	\$0.00
5.0	\$600	3,000.00
4.9	\$500	2,450.00
9.9		\$5,450.00
		708.50
		\$6,158.50
	0.0 5.0 4.9	0.0 \$895 5.0 \$600 4.9 \$500

****** Claims Process Support



Target Canada Co. DETAILED SUMMARY – September 13 to 19, 2015

Prepare weekly Claims Report.

U.S. Personnel:

T. MacDiarmid

Sept 13

Sep 15	Review May, June and July shared services invoices and related support, provide comments and create summary of charges and employee staff count/payroll; prepare questions for Target and review and respond to emails regarding shared services.	2.9
Sep 16	Summarize full year employee staff count and payroll charges in shared services by function; review and respond to emails regarding shared services payments and charges.	1.6
Sep 17	Review and respond to questions on shared services charges and claims.	0.5
TOTAL – T. MacDiarmid		5.0 hrs.
<u>Claims Pr</u>	ocess Support:	
M. Zeiss		Hrs.

TOTAL – M. Zeiss 4.9 hrs.



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Target Canada Co. DETAILED SUMMARY – September 20 to 26, 2015

	Hours	Rate	Total
U.S. Personnel:			(USD)
W. Kosturos, Managing Director	0.0	\$895	\$0.00
M. Zeiss, Director **	1.8	\$500	900.00
	1.8		\$900.00
Add: HST @ 13%			117.00
Total due in US Funds			\$1,017.00

****** Claims Process Support

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Target Canada Co. DETAILED SUMMARY – September 20 to 26, 2015

Sept 24	Analysis of sector claim; sensitivity analysis on model ; research on credit card profit valuation.	5.0
TOTAL -	S. Murray	26.7 hrs.
* Time not inc	cluded in prior invoices	
<u>A. Sobot</u>		<u>Hrs.</u>
Sept 21	Input and upload revised proofs of claim and relevant support to Intralinks; follow-up with issues encountered in the claims tracker; adjust items in the tracker and troubleshoot issues that arise from reporting; answer questions and inquiries sent to the Target Canada Claims inbox; contact claimants with incorrectly completed forms or outstanding questions.	9.2
Sept 22	Upload logged proofs of claim and relevant support to Intralinks; follow-up with issues encountered in the claims tracker; scan hard copy claims received and input necessary information; contact claimants with incorrectly completed forms or outstanding questions.	8.0
Sept 23	Input and upload revised proofs of claim and relevant support to Intralinks; follow-up with issues encountered in the claims tracker; adjust items in the tracker and troubleshoot issues that arise from reporting; answer questions and inquiries sent to the Target Canada Claims inbox; contact claimants with incorrectly completed forms or outstanding questions.	8.2
Sept 24	Input and upload revised proofs of claim and relevant support to Intralinks; follow-up with issues encountered in the claims tracker; internal discussions with E. Allin, G. Karpel; adjust items in the tracker and troubleshoot issues that arise from reporting; answer questions and inquiries sent to the Target Canada Claims inbox.	7.8
Sept 25	Follow-up with issues encountered in the claims tracker; adjust items in the tracker and troubleshoot issues that arise from reporting; answer questions and inquiries sent to the Target Canada Claims inbox.	3.6
TOTAL – A	A. Sobot	36.8 hrs.



Claims Process Support:



Target Canada Co. DETAILED SUMMARY – September 20 to 26, 2015

<u>M. Zeiss</u>		Hrs.	
Sept 21	Prepare weekly claims report.	1.8	
TOTAL – M. Zeiss		1.8 hrs.	

Target Canada Co. DETAILED SUMMARY – September 27 to October 3, 2015

	Hours	Rate	Total
U.S. Personnel:			(US\$)
M. Zeiss, Director **	1.8	\$500	900.00
	1.8		\$900.00
Add: Out of pocket expenses - telephone			99.07
			\$999.07
Add: HST @ 13%			117.00
Total due in US Funds	÷.	,	\$1,116.07

****** Claims Process Support

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Target Canada Co. DETAILED SUMMARY – September 27 to October 3, 2015

Oct 1	Input and upload revised proofs of claim and relevant support to Intralinks; follow-up on issues encountered in the claims tracker; adjust items in the tracker and troubleshoot issues that arise from reporting; answer questions and inquiries sent to the Target Canada Claims inbox.	8.5
Oct 2	Follow-up on issues encountered in the claims tracker; adjust items in the tracker and troubleshoot issues that arise from reporting; answer questions and inquiries sent to the Target Canada Claims inbox; internal discussions with E. Allin and G. Karpel on claims matters.	7.5
TOTAL	– A. Sobot	25.0 hrs.
U.S. Pers	onnel:	
<u>Claims P</u>	rocess Support:	
<u>M. Zeiss</u>		Hrs.
Oct 2	Prepare weekly claims report.	1.8
TOTAL -	- M. Zeiss	1.8 hrs.

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Target Canada Co. DETAILED SUMMARY – October 11 to 17, 2015

Hours	Rate	<u>Total</u>
		(USD)
2.7	\$500	1,350.00
1.8		\$1,350.00
		175.50
	2	\$1,525.50
	2.7	2.7 \$500

*** Claims Process Support

Target Canada Co. DETAILED SUMMARY – October 11 to 17, 2015

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Oct 16	Discussions with G. Yee; continued verification of data used in model and preparation of narrative outline.	2.2
TOTAL -	S. Murray	17.5 hrs.
A. Sobot		Hrs.
Oct 13	Input and upload revised proofs of claim and relevant support to Intralinks; follow-up on issues encountered in the claims tracker; answer questions and inquiries sent to the Target Canada Claims inbox; contact claimants with incorrectly completed forms or outstanding questions.	10.0
Oct 14	Update the tracker after committee review; internal discussions with E. Allin, G. Karpel and S. Glustein; adjust items in the tracker and troubleshoot issues that arise from reporting.	9.2
Oct 15	Input and upload revised proofs of claim and relevant support to Intralinks; update the tracker after committee review; adjust items in the tracker and troubleshoot issues that arise from reporting; answer questions and inquiries sent to the Target Canada Claims inbox; review claim transfer agreements for assigned claims.	10.8
Oct 16	Update the tracker after committee review; internal discussions with E. Allin, G. Karpel and S. Glustein; adjust items in the tracker and troubleshoot issues that arise from reporting; respond to questions and inquiries sent to the Target Canada Claims inbox.	8.2
TOTAL – A	A. Sobot	38.2 hrs.
U.S. Person	nel:	
Claims Proc	ess Support:	
<u>M. Zeiss</u>	2	Hrs.
Oct 13	Prepare weekly claims report.	2.1
Oct 14	Revise weekly claims report.	0.6
TOTAL - M	1. Zeiss	2.7 hrs.

Target Canada Co. DETAILED SUMMARY – October 18 to 24, 2015

	Hours	Rate	<u>Total</u>
U.S. Personnel:			(USD)
M. Zeiss, Director ***	3.2	\$500	\$1,600.00
Add: HST @ 13%			208.00
Total due in US Funds			\$1,808.00

*** Claims Process Support

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Target Canada Co. DETAILED SUMMARY – October 18 to 24, 2015

Oct 22

	Intralinks; update the tracker after committee review; adjust items in the tracker and troubleshoot issues that arise from reporting; answer questions and inquiries sent to the Target Canada Claims inbox.	
Oct 23	Update the tracker after committee review; internal discussions with G. Karpel and S. Glustein; adjust items in the tracker and troubleshoot issues that arise from reporting; calculate claims reporting amounts; answer questions and inquiries sent to the Target Canada Claims inbox.	8.5
TOTAL	– A. Sobot	44.4 hrs.
U.S. Pers	onnel:	
<u>Claims P</u>	rocess Support:	
<u>M. Zeiss</u>		Hrs.
Oct 22	Prepare weekly claims report.	0.8
Oct 23	Prepare updated claims reports.	2.4
TOTAL -	- M. Zeiss	3.2 hrs.

Input and upload revised proofs of claim and relevant support to

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7.5

Target Canada Co. DETAILED SUMMARY – November 1 to 7, 2015

	Hours	Rate	Total
U.S. Personnel:			(USD)
M. Zeiss, Director ***	3.4	\$500	\$1,700.00
Add: Out of pocket expenses - telephone			8.64
			\$1,708.64
Add: HST @ 13% *			221.00
Total due in US Funds			\$1,929.64

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*Excludes HST exempt out of pocket expenses *** Claims Process Support

Target Canada Co. DETAILED SUMMARY – November 1 to 7, 2015

<u>A. Sobot</u>		Hrs.
Nov 2	Input and upload revised proofs of claim and related support to Intralinks; follow-up with issues encountered in the Claims Tracker; answer questions and inquiries sent to the Target Canada Claims inbox.	4.0
Nov 3	Input and upload revised proofs of claim and related support to Intralinks; answer questions and inquiries sent to the Target Canada Claims inbox; update the claims tracker after committee review.	4.5
Nov 4	Input and upload revised proofs of claim and related support to Intralinks; update the tracker after committee review; adjust items in the tracker and troubleshoot issues that arise from reporting; answer questions and inquiries sent to the Target Canada Claims inbox.	7.1
Nov 5	Update the tracker after committee review; input and upload revised proofs of claim and related support to Intralinks; adjust items in the tracker and troubleshoot issues that arise from reporting; create a base presentation regarding the claim analysis; compile certain claims information into a schedule for Goodmans to review.	7.3
Nov 6	Update the tracker after committee review; internal discussions with G. Karpel and S. Glustein on claims; compile certain claims information into a schedule for Goodmans to review.	5.5
TOTAL – A	. Sobot	28.4 hrs.
U.S. Person	nel	
Claims Proc	ess Support:	
<u>M. Zeiss</u>		<u>Hrs.</u>
Nov 2	Prepare weekly claims report.	1.6
Nov 6	Prepare updated claims reports.	1.8
TOTAL - N	1. Zeiss	3.4 hrs.



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Target Canada Co. DETAILED SUMMARY – November 8 to 14, 2015

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	Hours	Rate	Total
U.S. Personnel:			(USD)
M. Zeiss, Director ***	1.6	\$500	\$800.00
Add: HST @ 13%		ŝ	104.00
Total due in US Funds			\$904.00

*** Claims Process Support

Target Canada Co. DETAILED SUMMARY – November 8 to 14, 2015

U.S. Personnel

<u>Claims Pr</u>		
<u>M. Zeiss</u>		Hrs.
Nov 11	Prepare weekly claims report.	1.6
TOTAL – M. Zeiss		1.6 hrs.



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Target Canada Co. DETAILED SUMMARY – November 15 to 21, 2015

	Hours	Rate	<u>Total</u>
U.S. Personnel:			(USD)
M. Zeiss, Director ***	1.4	\$500	\$700.00
Add: HST @ 13%			91.00
Total due in US Funds			\$791.00

*** Claims Process Support

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Target Canada Co. DETAILED SUMMARY – November 15 to 21, 2015

Nov 18	Review and verify data in the	claim model.	1.5
TOTAL -	- A. Milchina		13.3 hrs.
U.S. Perso	onnel		
<u>Claims Pr</u>	ocess Support:		
<u>M. Zeiss</u>			Hrs.
Nov 21	Prepare weekly claims report.		1.4
TOTAL -	M. Zeiss		1.4 hrs.

Target Canada Co. DETAILED SUMMARY – December 6 to 12, 2015

	Hours	Rate	Total
U.S. Personnel:			(USD)
M. Zeiss, Director ***	5.2	\$500	\$2,600.00
Add: Out of pocket expenses			2.72
			\$2,602.72
Add: HST @ 13% *			338.00
Total due in US Funds		14	\$2,940.72

*Excludes HST exempt out of pocket expenses *** Claims Process Support



Target Canada Co. DETAILED SUMMARY – December 6 to 12, 2015

U.S. Personnel

0.00

Claims Process Support:

TOTAL	– M. Zeiss	5.2 hrs.	
Dec 8	Revise weekly claims report.	2.1	
Dec 7	Prepare weekly claims report.	3.1	
<u>M. Zeiss</u>		Hrs.	

Target Canada Co. DETAILED SUMMARY – December 13 to 19, 2015

	Hours	Rate	Total
U.S. Personnel:			(USD)
M. Zeiss, Director ***	6.3	\$500	\$3,150.00
Add: HST @ 13%			409.50
Total due in US Funds			\$3,559.50

*** Claims Process Support

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Target Canada Co. DETAILED SUMMARY – December 13 to 19, 2015

<u>A. Sobot</u>		<u>Hrs.</u>		
Dec 13	Update the claims tracker for Notices of Revision and Disallowance sent to vendors; update claim amounts for vendors' NRDAs; update Intralinks for issued NRDAs; review Notices of Revision and Disallowance for vendors; compile information for vendor NRDAs and send NRDAs to vendors.	7.4		
Dec 14	Update the claims tracker for Notices of Revision and Disallowance sent to vendors; review Notices of Revision and Disallowance for vendors; compile information for vendor NRDAs and send NRDAs to vendors.	14.2		
Dec 15	Review Notices of Revision and Disallowance for vendors; compile information for vendor NRDAs and send NRDAs to vendors.	6.1		
Dec 16	Respond to questions and inquiries received in the Target Canada claims inbox; update claim amounts for vendors' NRDAs.	6.2		
Dec 17	Respond to questions and inquiries received in the Target Canada claims inbox; update claim amounts for vendors' NRDAs; update Intralinks for issued NRDAs; update claims tracker for Notices of Dispute and deemed acceptances.	8.8		
Dec 18	Respond to questions and inquiries received in the Target Canada 7.0 claims inbox; update claims tracker for Notices of Dispute and deemed acceptances; compile and provide supporting documentation for claim discrepancies requested by vendors.			
TOTAL – A	. Sobot	49.7 hrs.		
<u>U.S. Person</u>	nel			
<u>Claims Proc</u>	ess Support:			
<u>M. Zeiss</u>		<u>Hrs.</u>		
Dec 16	Prepare weekly claims report.	2.2		
Dec 17 Review and revise weekly claims report				
TOTAL - M	I. Zeiss	6.3 hrs.		



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THIS IS EXHIBIT "C" TO THE AFFIDAVIT OF DOUGLAS R. MCINTOSH SWORN BEFORE ME ON JULY 18, 2016

2001

Commissioner for Taking Affidavits Melaney Wagner

Staff Member	Title	Total Hours	Rate (\$CAD) ⁽¹⁾	Amount Billed (SCAD)
Doug McIntosh	Managing Director	1,843.3	\$795 - 825	\$1,469,719.50
Alan Hutchens	Managing Director	2,505.0	735 - 750	1,850,617.50
John Williams (2)	Managing Director	34.0	600	20,400.00
Steve Ferguson	Senior Director	1,412.7	625 - 650	888,682,50
Amanda Favot	Director	239.0	525 - 550	128,525.00
Greg Karpel	Director	3,124.1	525 - 550	1,660,895.00
Elese Allin	Director	1,799.2	525 - 550	944,580.00
Galvin Yee (2)	Senior Director	38,3	500	19,150.00
Chad Artem	Senior Associate	445.3	425 - 450	192,610.00
Steve Glustein	Senior Associate	3,268,6	400 - 425	1,329,462.50
Jamal Jomaa	Senior Associate	21.0	400	8,400.00
Matt Brouwer	Senior Associate	263.2	375 - 400	98,735.00
Ryan Gruneir	Associate	1.5	375	562.50
Cynthia Li (2)	Senior Associate	6.3	365	2,299.50
C. Kroach	Associate	9,0	300	2,700.00
Stephanie Murray (2)	Senior Associate	222.3	285	63,355.50
Audrey Singels-Ludvik	Associate	63.0	275	17,335.50
Aleks Sobot	Analyst	1,237.5	275 - 325	347,382.50
Alexanda Milchina (2)	Associate	28.1	225	6,322.50
Total Fees (excl. Disb		16,561.4	Avg Rate \$546.56	\$9,051,735.00

EXHIBIT "C" ALVAREZ & MARSAL CANADA INC., COURT-APPOINTED MONITOR OF THE TARGET CANADA ENTITIES (January 15, 2015 to July 2, 2016)

(1) Includes hourly rate increase effective January 24, 2016

(2) A&M Canada Forensic/Valuations personnel that assisted in the review of certain proofs of claim

(January 15, 2015 to December 19, 2015)

Staff Member	Title	Total Hours	Rate (\$USD)	Amount Billed (\$USD)
William Kosturos	Managing Director	743.3	\$895	\$665,253.50
Robert Montgomery	Senior Director	965.1	675	651,442.50
Matthew Henry	Senior Director	905.3	650	588,445.00
Jay Herriman	Managing Director	4.8	650	3,120.00
Tanner MacDiarmid	Director	1,054.9	600	632,940.00
Mark Zeiss	Director	147.4	500	73,700.00
Mark Sidorenkov	Senior Associate	1,123.4	475	533,615.00
Rich Behrens	Associate	955.7	425	406,172.50
Total Fees (excl. Disl	bursements and HST)	5,899.9	Avg Rate \$602.5	\$3,554,688.50

IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF TARGET CANADA CO., TARGET CANADA HEALTH CO., TARGET CANADA MOBILE GP CO., TARGET CANADA PHARMACY (BC) CORP., TARGET CANADA PHARMACY (ONTARIO) CORP., TARGET CANADA PHARMACY CORP., TARGET CANADA PHARMACY (SK) CORP., and TARGET CANADA PROPERTY LLC

Court File No. CV-15-10832-00CL

ONTARIO SUPERIOR COURT OF JUSTICE COMMERCIAL LIST

Proceeding commenced at Toronto

AFFIDAVIT DOUGLAS R. MCINTOSH

(sworn July 18, 2016)

GOODMANS LLP

Barristers and Solicitors Bay Adelaide Centre 333 Bay Street, Suite 3400 Toronto, Canada M5H 2S7

Alan Mark LSUC#: 21772U amark@goodmans.ca

Jay Carfagnini LSUC#: 22293T jcarfagnini@goodmans.ca

Melaney Wagner LSUC#: 44063B mwagner@goodmans.ca

Jesse Mighton LSUC#: 62291J jmighton@goodmans.ca

Tel: 416.979.2211 Fax: 416.979.1234

Lawyers for the Monitor

IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF TARGET CANADA CO., TARGET CANADA HEALTH CO., TARGET CANADA MOBILE GP CO., TARGET CANADA PHARMACY (BC) CORP., TARGET CANADA PHARMACY (ONTARIO) CORP. TARGET CANADA PHARMACY CORP., TARGET CANADA PHARMACY (SK) CORP., AND TARGET CANADA PROPERTY LLC.

Court File No.: Court File No.: CV-15-10832-00CL

ONTARIO SUPERIOR COURT OF JUSTICE COMMERCIAL LIST Proceeding commenced at Toronto

MOTION RECORD (motion returnable July 26, 2016)

VOLUME I OF II

GOODMANS LLP

Barristers & Solicitors Bay Adelaide Centre 333 Bay Street, Suite 3400 Toronto, Canada M5H 2S7

Alan Mark LSUC#: 21772U amark@goodmans.ca

Jay Carfagnini LSUC#: 22293T jcarfagnini@goodmans.ca

Melaney Wagner LSUC#: 44063B mwagner@goodmans.ca

Jesse Mighton LSUC#: 62291J jmighton@goodmans.ca

Tel: 416.979.2211 Fax: 416.979.1234

Lawyers for the Monitor