



To Tracy Sandler and Alan Mark
From Lou Brzezinski
Date March 26, 2015
Re Target Canada Co. *CCAA* - Request for Documents

In light of the responses to the supplier questions contained in Ms. Sandler's letter dated March 16, 2015, and contained in the Fifth Report of the Monitor, also dated March 16, 2015, we request the following documentation:

1. All reports prepared by Bain & Company for TCC or Target Corporation between the Spring of 2014 and January 15, 2015 (Q#1, Overview)
2. All reports prepared by Goldman, Sachs & Co. for TCC or Target Corporation between the Spring of 2014 and January 15, 2015 (Q#1, Overview)
3. All reports prepared by Capgemini Consulting for TCC or Target Corporation between the Spring of 2014 and January 15, 2015 (Q#1, Overview)
4. All reports prepared by Northwest Atlantic (Canada) Inc. ("**Northwest**") for TCC or Target Corporation in relation to visits conducted by Northwest of every TCC retail store in Canada in the second half of 2014 (Q#1, Q#7, Overview)
5. All reports prepared by PricewaterhouseCoopers Inc. for TCC or Target Corporation in relation to the various strategic options under consideration between September 2014 and January 15, 2015 (Q#5(i))
6. All reports prepared by Ernst & Young Inc. ("**E&Y**") for TCC or Target Corporation, and all correspondence and communication between the parties, in relation to the various strategic options under consideration between October 2014 and January 15, 2015 (Q#5(i))
7. All reports prepared by Alvarez & Marsal in respect of TCC's restructuring options from September, 2014 to November, 2014, and all correspondence between Alvarez & Marsal and TCC/Target Corporation in respect to TCC's strategic options, including restructuring, from September, 2014 to November, 2014 (Q#5(i), Overview)

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8. All reports prepared by Alvarez & Marsal in respect of TCC's restructuring options from November, 2014 to January 15, 2015, and all correspondence between Alvarez & Marsal and TCC/Target Corporation in respect to TCC's strategic options, including restructuring, from November, 2014 to January 15, 2015 (Q#5(i), Overview)
9. All reports and proposals prepared by Hill + Knowlton Strategies and Target Corporation's communications department in the event that Target Corporation's board of directors resolved to cease funding of TCC in December, 2014 and January, 2015 (Q#5(k))
10. Memoranda, reports, minutes of meetings and other correspondence and communication between TCC, Target Corporation and their respective advisors with regards to preparing for the contingency of TCC filing under the CCAA from September, 2014 to December, 2014 (Overview)
11. Memoranda, reports, minutes of meetings and other correspondence and communication between TCC, Target Corporation and their respective advisors with regards to preparing for the contingency of TCC filing under the CCAA from December, 2014 to January 15, 2015 (Overview)
12. All reports or memoranda prepared by the third investment bank that TCC and its advisors contacted in December 2014 in connection with the strategic options being considered and the potential sale of TCC's lease and real property interests (Q#6)
13. All non-disclosure agreements signed by the 223 employees of TCC and Target Corporation who were made aware of the strategic options being considered on or before January 15, 2015 (Overview)
14. The status memorandum on TCC's performance provided to Target Corporation's board of directors in November, 2014 (Overview)
15. Internal memoranda or other documents drafted and/or circulated among TCC management with regards to forecasted improvements in TCC's performance, including an increase in same-store sales volumes during the last quarter of 2014 and an increase in same-store sales volumes in the first quarter of 2015 (Overview)
16. Any reports, memoranda, communication or other document in which TCC's or Target Corporation's internal legal department raised the concept of a Canadian insolvency filing, beginning in the summer of 2014 (Q#5(a))
17. Any reports, memoranda, correspondence, and other documents among executives of TCC and Target Corporation with respect insolvency options, including a filing under either the BIA or CCAA, from September, 2014 to January 15, 2015 (Overview)

18. Any internal reports, memoranda, documents and communications from Target Corporation's management to the board of directors with regards to the recommendations it made to the board of directors following an analysis of all the strategic options (Overview)
19. Correspondence or communication from Target Corporation to its lead bank in its banking syndicate on or about December 18, 2014, in which Target Corporation advises of the possibility of a CCAA filing and the need for waivers in such a filing (Q#5(g))
20. A copy of the waiver agreements entered into by Target Corporation with certain members of its banking syndicate (Q#5(g))
21. Any and all communications, including e-mails, voicemails, text messages etc., between Brian Cornell and the CFO of Target Corporation with regards to TCC sent or received on December 20, 2014 (Q#8)
22. Copies of the dishonoured cheques referred to at Q#58, including dates of the cheques

Thank you for your cooperation in this regard.