

**From:** [Mavridis, John](#)  
**To:** [Michel Gaucher](#); [Normand Champigny](#)  
**Subject:** Fwd: Eco-Niobium Resources Inc. and Niocan Inc.  
**Date:** Wednesday, March 23, 2016 3:56:37 PM

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Copy of demand letter sent out at 3:52 PM.

----- Forwarded message -----

**From:** **Mavridis, John** <[jmavridis@newhousecounsel.com](mailto:jmavridis@newhousecounsel.com)>  
**Date:** Wed, Mar 23, 2016 at 3:52 PM  
**Subject:** Eco-Niobium Resources Inc. and Niocan Inc.  
**To:** [louis.dumont@dentons.com](mailto:louis.dumont@dentons.com)  
**Cc:** Dominique Pion <[pion.dominique@bell.net](mailto:pion.dominique@bell.net)>

WITHOUT PREJUDICE

Dear confrere,

We refer to the Press Release issued by your client dated March 17th, 2016.

While its contents are objectionable for various reasons, Niocan makes an explicit attempt to discredit and defame Eco-Niobium Resources Inc., and falsely accuses our clients of making statements which are "false and misleading and are aimed at deceiving the municipality"..

All statements made by our client are truthful. There is no intention or attempt to deceive any party on the part of Eco-Niobium, its directors, officers or representatives.

The actions of your client are deplorable and constitute a fault that is intended to injure our client. This is a formal demand that your client cease and desist from continuing to make any such defamatory statements.

We hereby demand that your client withdraw such statements, by publishing a press release by the same means as the original release. However, if your client fails to do so, our client reserves its rights and recourses for any claims in damages or any other claim permitted by law in regards to the defamatory statements of your client.

Please advise your clients that they act accordingly.

John Mavridis, Attorney

c.c. MM. Michel Gaucher, Normand Champigny, Kerry Sparkes, Dominique Pion,  
Claude Dufresne et John W.W. Hick

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d'affaires | 2500 - 1155 bl. René-Lévesque ouest, Montréal, QC, Canada, H3B 2K4

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