

AFFIDAVIT

I, the undersigned, Harry Button, retiree and ex-worker of Wabush Mines, residing at 47, Swan Avenue, Clarenville, Newfoundland and Labrador, A5A 1Y1, solemnly affirm that:

- I am an ex-worker and retiree from Wabush Mines, directly concerned by the *Amended Motion seeking a declaratory relief/for leave to file a late claim*;
- I began working for Wabush Mines on October 5th 1976;
- I was injured at work as a production truck driver in 1988 and have received Worker's Compensation from that time until 2015, while my employment relationship was maintained with Wabush Mines;
- I retired from Wabush Mines on June 5th 2015, as required under the *Workplace Health, Safety and Compensation Act* because I had reached 65 years old;
- During these years, I maintained insurance coverage under Wabush Mines' Insurance Plan until the inception of the CCAA proceedings and the termination of the insurance of the retirees;
- I was entitled to life and health insurance coverage upon my retirement from Wabush Mines;
- I thought my claim for these post-employment benefits was handled by the United Steelworkers (USW), as the USW did for other retirees arguing in favor of their claim with the Monitor;
- I first heard about my claim not being in USW's files in the days following my email of July 4th 2018 to Mike Clark to inform him of my new address, when I requested the value of my entitlements;
- I would have manifested myself earlier if I could have known that my claim was not included with the other retirees' claims;
- If my claim is not recognized, I will suffer from additional hardship, on top of the current financial difficulties caused by the unexpected termination of my health insurance and my medical condition;
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And I have signed

Harry Button
HARRY BUTTON

Solemnly declared before me at
Eastport, on this 18 th day of
September 2018

Kimberly M. Tucker
Commissioner for oaths

KIMBERLY M. TUCKER
A Commissioner for Oaths in and for
the Province of Newfoundland and Labrador.
My commission expires December 31, 2019