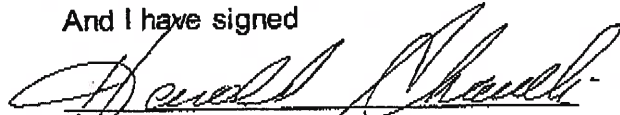


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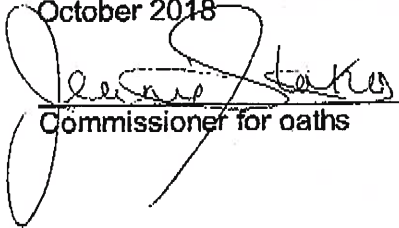
I, the undersigned, Harold Chaulk, retiree and ex-worker of Wabush Mines, residing at P.O. Box 12, Deadman's Bay, Newfoundland and Labrador, A0G 1B0, solemnly affirm that:

1. I am an ex-worker and retiree from Wabush Mines, directly concerned by the *Amended Motion seeking a declaratory relief/for leave to file late claims*;
2. I began working for Wabush Mines on May 13th 1981;
3. I was injured at work on July 1988 and have received Workers Compensation benefits from that time until 2016, while my employment relationship was maintained with Wabush Mines;
4. I retired from Wabush Mines on December 1st 2016;
5. 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;
6. I was entitled to life and health insurance coverage upon my retirement from Wabush Mines;
7. 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;
8. I first heard about my claim not being in USW's files in the days following receipt of an interim distribution by other retirees from Wabush, in September 2018;
9. I would have manifested myself earlier if I could have known that my claim was not included with the other retirees' claims;
10. 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;

And I have signed


HAROLD CHAULK

Solemnly declared before me at
Lumsden, on this 29th day of
October 2018


Commissioner for oaths

JEANIE STOKES
A Commissioner for Oaths in and
for the Province of Newfoundland
and Labrador. My commission
expires on December 31, 2018.