

## AFFIDAVIT

I, the undersigned, John Hart, ex-worker of Wabush Mines, residing at 172, Foxtrap Access Road, Conception Bay South, Newfoundland and Labrador, A1X 7N5, solemnly affirm that


1. I am an ex-worker 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 June 26<sup>th</sup> 1976;
3. I was injured at work on December 26<sup>th</sup> 1983;
4. I continued working until January 24<sup>th</sup> 1984, when the pain forced me to stop working
5. After that date, I received Workers Compensation benefits, while my employment relationship was maintained with Wabush Mines;
6. In June 2006, I was unlawfully terminated by Wabush Mines and I have contested my termination through various forums;
7. A settlement was reached in 2008, confirming that I would maintain insurance coverage from Wabush for the rest of my life, as did any other retirees;
8. I thought my claim for these post-employment benefits was handled by the United Steelworkers (USW), as the USW did for retirees arguing in favor of their claim with the Monitor;
9. I first heard about my claim not being in USW's files when I heard that Wabush retirees had received money at a meeting in Gander in September 2018;
10. I would have manifested myself earlier if I could have known that my claim was not included with the other retirees' claims;
11. 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;

(T)

And I have signed

  
JOHN HART

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

  
Commissioner for oaths

TRACEY LAMBERT  
A Commissioner for Oaths in and for the  
Province of Newfoundland and Labrador  
My commission expires on  
December 31, 2021