

**SUPREME COURT OF NEWFOUNDLAND AND LABRADOR
IN BANKRUPTCY AND INSOLVENCY**

IN THE MATTER OF The Kami Mine
Limited Partnership, Kami General
Partner Limited, and Alderon Iron
Ore Corp.

AND IN THE MATTER of the
Bankruptcy and Insolvency Act, RSC
1985, c B-3, as amended

Estate No.
Court No.

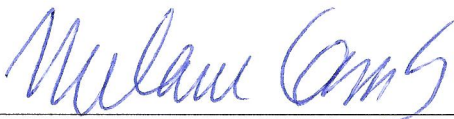
AFFIDAVIT OF DARREN O'KEEFE

I, Darren D. O'Keefe, partner at Cox & Palmer, make oath and say as follows:

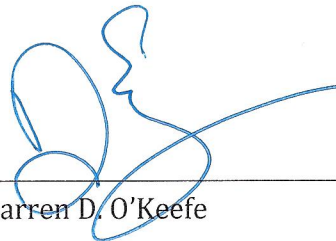
1. I am a Partner of Cox & Palmer and agency counsel for Dentons Canada LLP with respect to the within matter.
2. To the best of my knowledge and belief, and based solely on my instructions from Dentons Canada LLP as agency counsel, the facts contained within the attached application are complete and accurate.
3. I make this affidavit for the purpose of grounding the within application, and for no other or improper purpose.

SWORN/AFFIRMED

At St. John's, Newfoundland and Labrador,
on the 5th day of June, 2020, before me



Commissioner, notary public, etc.



Darren D. O'Keefe

MELANIE LAMB

A Commissioner for Oaths in and for
the Province of Newfoundland and Labrador.
My commission expires on December 31, 2022.