

**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 NARINDER NAGRA

I, Narinder Nagra, of Vancouver, British Columbia, make oath and say as follows:

Introduction

1. I am a Managing Partner employed by Sprott Private Resource Lending (Collector), LP ("**Lender**"), the applicant creditor herein and as such have personal knowledge of the matters deposed to, except where stated to be based on information and belief, in which case I verily believe the same to be true.
2. I have reviewed the business records of the Lender relevant to the Lender's application seeking the appointment of a receiver and manager over all of the assets, undertakings, and property of The Kami Mine Limited Partnership ("**Kami LP**"), Kami General Partner Limited ("**Kami GP**"), and Alderon Iron Ore Corp. ("**Alderon**", collectively with Kami LP and Kami GP, the "**Credit Parties**") and have satisfied myself that I am possessed of sufficient information and knowledge to swear this affidavit on behalf of the Lender. I am authorized by the Lender to make this affidavit.
3. I have had communications with Deloitte Restructuring Inc. ("**Deloitte**") regarding Deloitte acting as receiver ("**Receiver**") of the assets, properties, and undertakings of the Credit Parties.

4. I verily believe that Deloitte is capable and competent to act as Receiver and is willing to do so if so appointed by this Honourable Court.
5. My communications with Deloitte have reinforced my belief that it is necessary, just, and convenient for this Honourable Court to appoint a Receiver for the effective realization of the Lender's security interest, and that appointing a Receiver pursuant to a private appointment would not be sufficient to effectively safeguard the Credit Parties' assets and realize on the Lender's security.
6. As set out in my first affidavit, there is currently no management or oversight of the Credit Parties at present.
7. I verily believe that the absence of management, and in particular their knowledge regarding the Credit Parties', their assets, and operations, creates particular difficulties and complications in the Receiver securing and safeguarding the assets of the Credit Parties, and that an Order of this Honourable Court will be of assistance to the Receiver in completing its mandate in the absence of management of the Credit Parties.
8. Furthermore, based on the nature of the assets, not only are there potential concerns regarding environmental liability, but it is also possible that it will be necessary to liaise with governmental authorities regarding any transfer of assets in advance of such transfers occurring, and I believe that a Court-appointment will facilitate such discussions between the Receiver and such authorities.
9. Additionally, based on potential environmental liability, I verily believe that it is necessary, just, and convenient that any Order granted by this Honourable Court should, in addition to the protections contained in the template form of Receivership Order, specifically enumerate the protections provided to receivers by virtue of the *Bankruptcy and Insolvency Act*, RSC 1985 c B-3.
10. I make this affidavit in support of the Lender's application to appoint a receiver over the assets, properties, and undertakings of the Credit Parties, and for no improper purpose.

SWORN/AFFIRMED

at Vancouver, British Columbia, on the 3rd day
of June, 2020, before me

(signature)

Commissioner, notary public, etc.

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JENNIFER D.S. DEZELL
Barrister & Solicitor
DENTONS CANADA LLP
20th Floor, 250 Howe Street
Vancouver, B.C. V6C 3R8
Telephone (604) 687-4460

(Signature of affiant)

NARINDER NAGRA