

No. S-1510120
Vancouver Registry
Affidavit of D. Will #2
Sworn February 13, 2018

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT,
R.S.C. 1985, c. C-36, AS AMENDED, IN THE MATTER OF THE BUSINESS
CORPORATIONS ACT, S.B.C. 2002, c. 57, AS AMENDED

AND

IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF
WALTER ENERGY CANADA HOLDINGS, INC. AND
THE OTHER PETITIONERS LISTED ON SCHEDULE "A"

PETITIONERS
(APPLICANTS)

AND

THE UNITED STEEL, PAPER AND FORESTRY, RUBBER, MANUFACTURING,
ENERGY, ALLIED INDUSTRIAL AND SERVICE WORKERS
INTERNATIONAL UNION (UNITED STEELWORKERS), LOCAL 1-2017

APPLICATION RESPONDENT

AFFIDAVIT #2 OF DAN WILL

I, Dan Will, Union Staff Representative of 1777, Third Avenue Prince George, British Columbia, **MAKE OATH AND SAY AS FOLLOWS:**

1. I am a business agent and third Vice-President for the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, Local 1-2017 (the "Steelworkers") in Prince George, British Columbia and as such have personal knowledge of the facts hereinafter deposed to save and except where same are stated to be based on information and belief and where so stated I believe them to be true.

2. This Affidavit is made in support of the Steelworker's response to the Petitioner's stay application.

3. As part of my assignment as a business agent for the Steelworkers, I regularly communicate with the former employees of Wolverine who are creditors in this matter (the "Former Employees").

4. Many Former Employees have expressed frustration and disappointment over the series of stays in this matter which have delayed their distributions and prevented the resolution of their claims.

5. I receive frequent telephone calls from Former Employees inquiring about the timing of their distributions. On average, my office receives approximately twenty such calls a week. One Former Employee telephones my office constantly, often twice a week, to inquire about when he will receive his distribution.

6. Many of the Former Employees have expressed to me that they are in difficult circumstances with respect to employment, housing health, and family issues and that they require their distributions to deal with impending and significant matters.

7. For example, one Former Employee is looking to purchase a house but cannot make payment until he receives his distribution. The delay has caused his unpredictability for his housing situation.

8. Another Former Employee is on disability with no income and requires his distribution to supplement his payments.

9. The Steelworkers have not been able to provide the Former Employees with a clear explanation of why they have had to wait for so long to have their claims resolved. The Former Employees were made aware of the complications resulting from the involvement of the 1974 Plan, however they understand that this matter has been resolved. The Steelworkers are not a party to the current issues causing delay and for that reason I do not have sufficient knowledge to explain to the Former Employees why their distributions cannot be made at this time.

10. I believe that a clear explanation from the Monitor or the Petitioner to the Former Employees would assist the Steelworkers in explaining the delay to the distributions.

11. Based on my conversations and my knowledge of the financial circumstances of some of the Former Employees, I believe that any further delays in paying out the distributions will cause continued financial hardship for many of the Former Employees and their families.

SWORN BEFORE ME at Prince George,
BC, this 13th day of February, 2018.



A Commissioner for taking affidavits for
British Columbia

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DAN WILL
DL: 7167219

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"Witnessed as to
execution only; advice
neither sought nor given."