

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

**IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,
R.S.C. 1985, c. c-36, AS AMENDED**

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT
OF NORTEL NETWORKS CORPORATION, NORTEL NETWORKS LIMITED,
NORTEL NETWORKS GLOBAL CORPORATION, NORTEL NETWORKS
INTERNATIONAL CORPORATION AND NORTEL NETWORKS
TECHNOLOGY CORPORATION**

**APPLICATION UNDER THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,
R.S.C. 1985, c. C-36, AS AMENDED**

**AFFIDAVIT OF JOSEE MARIN
(Sworn March 2, 2010)**

I, JOSEE MARIN, of the City of Vankleek Hill, in the Province of Ontario,
SOLEMNLY AFFIRM AS FOLLOWS:

1. I am an employee of Nortel Networks Corporation, am currently on long-term disability benefits ("LTD"), am directly affected by the outcome of the proceedings herein, and as such, I have direct knowledge of the matters to which I hereinafter depose, except those I state to be based on information and belief. All these matters, I do verily believe to be true.

Introduction

2. I am an employee of Nortel Networks Limited ("Nortel") and am currently not working due to illness in respect of which I receive long term disability ("LTD") income benefits. I have been receiving LTD income benefits from Nortel since the fall of 2005 although I have been disabled since March 13, 2002.

3. I am part of the Canadian Nortel Employees on Long Term Disability ("CNELTD") internet group which had the purpose of organizing all non-unionized employees receiving or entitled to receive disability income benefits by or through Nortel ("The LTD Beneficiaries") and who are represented by Koskie Minsky LLP ("KM"). This internet Yahoo! group was deemed to be the only official channel through which to receive legal information and to discuss and submit our questions or concerns.

4. I am also a member of RFNDE (Rights for Nortel Disabled Employees) which is a different internet group born of the need to discuss and share information freely in order to get answers about our situation and its possible solutions. The creation of this second group was necessary because we felt that the CNELTD was being censored and controlled by our Court-appointed representative, Sue Kennedy, and the Legal Steering Committee ("LSC"), rendering impossible any open communication between members.

