

**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 NMC CANADA, INC. AND  
2515080 NOVA SCOTIA COMPANY**

Applicants

**SUPPLEMENTARY MOTION RECORD**

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# INDEX

**SUPPLEMENTARY MOTION RECORD - INDEX**

<b>Tab No.</b>	
<b>1</b>	<b>Affidavit of John Chen sworn May 29, 2009</b>
A	Exhibit "A" – Cash Flow Projection

# TAB 1

**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 NMC CANADA INC. AND  
2515080 NOVA SCOTIA COMPANY**

Applicants

**AFFIDAVIT OF JOHN CHEN**

I, **John Chen**, of the City of Birmingham, in the State of Michigan, U.S.A.

**MAKE OATH AND SAY:**

1. I am the President of the Applicant, NMC Canada Inc. ("NMC"), and as such have knowledge of the matters to which I hereinafter depose, except where otherwise stated to be on the information and belief of others, in which case I verily believe them to be true.
2. This Affidavit supplements my Affidavit sworn in this proceeding on May 28, 2009.

**CASH FLOW PROJECTION**

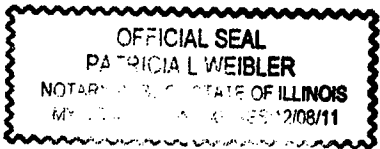
3. My Affidavit sworn May 28, 2009 indicated that, as a result of the request for the extension of the Stay Period to June 10, 2009, SKD Company was preparing cash flow projections for the period ending June 10, 2009 (the "**Cash Flow Projection**"), a copy of which would be filed with this Honourable Court prior to the hearing of the Applicants' motion

returnable May 29, 2009. The Cash Flow Projection has been prepared, and a true copy is attached hereto as Exhibit "A".

4. This affidavit is sworn in support of the motion of the Applicants for an order for the relief sought in the Notice of Motion, and for no other or improper purpose.

SWORN BEFORE ME at the )  
City of *Elk Grove Village* )  
in the State of *Illinois* )  
this *29th* day of May, 2009 )  
*Patricia L. Weibler* )  
Notary Public )

*John Chen*  
\_\_\_\_\_  
John Chen



# TAB A



This is Exhibit "A" referred to in the  
affidavit of John Chen  
sworn before me, this  
29th day of May, 2009

*Patricia L. Weibler*  
Notary Public



SKD Canada Consolidated CND\$  
Cash Flow Forecast

10-Day  
June 1 - 10

Receipts:

Total Receipts -

Disbursements

Accounts Payable - Trade 62

Payroll 52

Restructuring Fees 203

Management Fees to SKD AG 24

Administration (Troy) -

Total Disbursements 340

Net Cash Flow (340)

Notes:

Budget excludes expenses approved in May budget not yet paid

Budget excludes the following one-time costs in the first 10 days  
of June that will need to be paid in the remainder of the month

Troy facility costs

Mercor Pension Wind-up expenses

Phase 1 environmental assessment expenses

IN THE MATTER OF THE COMPANIES' CREDITORS  
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Court File No: 09-CL-7960

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at Toronto

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**ONTARIO**  
**SUPERIOR COURT OF JUSTICE**  
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Proceeding commenced at TORONTO

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**SUPPLEMENTARY MOTION RECORD**

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