

## **TAB B**

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
COMMERCIAL LIST**

**B E T W E E N:**

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 or Plans of  
Compromise or Arrangement of Ivaco Inc. and the  
Applicants listed in Schedule "A"

Applicants

**AFFIDAVIT OF JEAN BÉLANGER  
(Sworn October 13, 2006)**

I, **JEAN BÉLANGER**, of the City of St-Lambert, in the Province of Quebec, depose and declare:

1. I am a partner in the law firm of Lavery, de Billy, located in Montreal, Quebec, Canada. I was called to the Bar of Quebec in 1965 and I joined a predecessor firm of Lavery, de Billy in 1969. I practice law in the firm's Insurance and Litigation Group with trial and appellate experience in civil and commercial litigation in addition to liability, surety and insurance coverage issues. I was a lecturer in Insurance Law at the McGill University Faculty of Law from 1985 to 1994. As such, I am competent to testify to the following matters.

2. Attached and marked as Exhibit "1" to this my affidavit is an opinion letter dated October 13, 2006, which describes certain aspects of the law of professional privilege (secret professionnel) in the Province of Quebec. I verily believe that the opinions stated in such letter accurately and fairly set out the law of Quebec.

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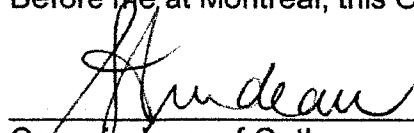
AND I HAVE SIGNED



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JEAN BÉLANGER

Solemnly declared and affirmed  
Before me at Montreal, this October 13, 2006



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Commissioner of Oaths  
for the District of Montreal