

May 1, 2017

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 et al.

Court File No. 09-CL-7950

May 1, 2017

The relief sought today is requested in light of the intention of Mr. M. Eury and Ms. Holley to seek leave to appeal the decision of the Ontario Court of Appeal to the Supreme Court of Canada. The relief is appropriate in the circumstances. Mr. M. Eury and Ms. Holley agree with the relief sought by the Monitor and agree with the form of the order.

This insolvency has lasted far too long at far too much expense, which in the end comes out of the pockets of the retirees and other creditors including the long term disability claimants. I would urge the Supreme Court of Canada to deal with any leave to appeal as quickly as possible.

Ernst

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

Proceeding commenced at Toronto

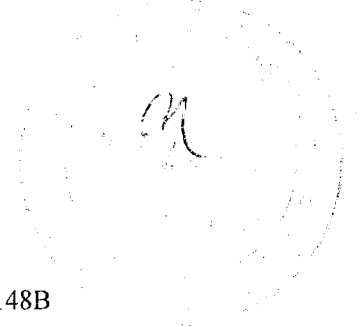
MOTION RECORD
(Waiver and Reserve Agreement)

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