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*Counsel to the Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
 DISTRICT OF NEVADA**

In re:

☒ NEVADA COPPER, INC.  
☒ NEVADA COPPER CORP.  
☒ NC DITCH COMPANY LLC  
☒ NC FARMS LLC  
☒ LION IRON CORP.  
☒ 0607792 B.C. LTD.

Debtors.<sup>1</sup>

Lead Case No.: 24-50566-hlb  
 Chapter 11

Jointly Administered with:

Case No. 24-50567-hlb  
 Case No. 24-50568-hlb  
 Case No. 24-50569-hlb  
 Case No. 24-50570-hlb  
 Case No. 24-50571-hlb

Hearing Date: March 13, 2025

Hearing Time: 1:30 p.m. PST

**DECLARATION OF GREGORY J. MARTIN IN SUPPORT OF DEBTORS'  
 OBJECTION TO CLAIM BY SMITH POWER PRODUCTS, INC.**

I, Gregory J. Martin, being duly sworn, hereby depose and declare under penalty of perjury:

1. I am the President and Chief Executive Officer of Nevada Copper, Inc. ("*NCT*"), and the President and Chief Executive Officer of its parent, Nevada Copper Corp. ("*NCU*"), and its subsidiaries Lion Iron Corp. and 0607792 B.C. Ltd., as well as a member of the board of directors of NCI. I am over the age of 18, and if called upon to testify as to the statements made

<sup>1</sup> The Debtors in these chapter 11 cases and the last four digits of their registration numbers in the jurisdiction in which they are organized are: Nevada Copper, Inc. (1157) (Nevada); Nevada Copper Corp. (5323) (British Columbia); 0607792 B.C. Ltd. (2524) (British Columbia); Lion Iron Corp. (2904) (Nevada); NC Farms LLC (0264) (Nevada); and NC Ditch Company LLC (4396) (Nevada).

1 herein, I could and would do so. I submit this declaration in support of the *Debtors' Objection to*  
2 *Claim by Smith Power Products, Inc. (the "Objection")*.<sup>2</sup>

3 2. In my roles with the Debtors, I have been involved in, or worked with the Debtors'  
4 other respective officers, executives, and senior management in connection with all aspects of the  
5 Debtors' business, as well as the Debtors' efforts to address their current financial difficulties, and  
6 now as debtors and debtors in possession, in the above-captioned chapter 11 cases (the "*Chapter*  
7 *11 Cases*"). In addition, I have extensive experience in the mining field, and have worked in  
8 various capacities with the Debtors and other companies in the field for over 28 years.

9 3. Except as otherwise indicated, all facts set forth in this declaration are based upon  
10 my personal knowledge, my review of relevant documents, information supplied to me by the  
11 Debtors' professionals and other parties in interest, or my opinion based upon experience,  
12 knowledge, and information concerning the operations of the Debtors. Except as otherwise  
13 indicated, references to the Bankruptcy Code, the chapter 11 process, and related legal matters are  
14 based upon my own understanding of such matters, as well as my reliance on explanations  
15 provided by other employees of the Debtors, consultation with the Debtors' financial advisors, and  
16 advice of counsel.

17 4. I, or members of my management team, review and work with the books and  
18 records of the Debtors, including their respective business plans, financial statements and  
19 projections, business analyses and reports, contracts and other legal documents, and similar items.  
20 Based upon that review and work, as well as my discussions with the Debtors' management team,  
21 board members, investors, and legal and financial advisors, I have developed a familiarity with:  
22 (i) the Debtors' books and records that have been maintained in the ordinary course of business  
23 under the control of the Debtors' executives and senior management; (ii) the Debtors' respective  
24 business and financial histories, and their current business and financial situations; and (iii) the  
25 financial and operational details of the Debtors' business operations.

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27 <sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Objection.  
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1                                   **Asserted Administrative Expense Claim**

2           5.       I, or employees of the Debtors working under my supervision, have reviewed the  
3 claims register maintained by Epiq, the relevant proofs of claim, and the supporting  
4 documentation, and have determined that the claim filed by Smith Power Products, Inc. (Claim  
5 Number 30002) in the amount of \$2,803.99 is invalid because the supporting documentation  
6 attached to the Asserted Administrative Expense Claim is an invoice dated April 3, 2024, well  
7 before the Petition Date, and is identical for both claim number 8 and claim number 30002.  
8 Therefore, it is apparent from the proofs of claim that the Asserted Administrative Expense Claim  
9 arises from a transaction occurring well before the Petition Date, and there is no basis to confer  
10 administrative priority status. I therefore respectfully request that the Court grant the relief  
11 requested in the Objection.

12                                   **Conclusion**

13           I hereby certify that the foregoing statements are true and correct to the best of my  
14 knowledge, information and belief, and respectfully request that all of the relief requested be  
15 granted, together with such other and further relief as is warranted and just.

16           Executed this 7<sup>th</sup> day of February, 2025

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18                                   /s/ Gregory J. Martin

19                                   Gregory J. Martin  
20                                   President and Chief Executive Officer  
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