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**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.¹

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 WALKER RIVER MECHANICAL CORP.'S SECTION 503(b)(9) CLAIM**

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., 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 herein, I

¹ 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 could and would do so. I submit this declaration in support of the *Debtors' Objection to Walker*
2 *River Mechanical Corp.'s Section 503(b)(9) Claim* (the "**Objection**").²

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.

26
27 ² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Objection.
28

Asserted 503(b)(9) Claim

5. I, or employees of the Debtors working under my supervision, have reviewed the claims register maintained by Epiq, the Asserted 503(b)(9) Claim (Claim Number 10039) and supporting documentation, and have determined that the Asserted 503(b)(9) Claim is not entitled to administrative expense priority. According to the Debtors' books and records, Walker River Mechanical Corp.'s work pertains to services provided under a 2023 Service Agreement and does not pertain to the delivery of goods. Specifically, the Asserted 503(b)(9) Claim arises from repair services for a fan motor that were completed in April 2024. Lastly, Walker River Mechanical Corp.'s claim attaches no supporting documentation to its proof of claim, rendering it impossible for the Debtors to ascertain any administrative expense liability. Accordingly, the claim should be reclassified as a general unsecured claim, and I therefore respectfully request that the Court grant the relief requested in the Objection.

Conclusion

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

Executed this 7th day of February, 2025

/s/ Gregory J. Martin

Gregory J. Martin
President and Chief Executive Officer