

November 5, 2009

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Via E-mail

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Dear Sirs/Mesdames:

Re: Nortel Disabled Employees
Re: E-mail to Justice Morawetz Regarding Request For Public Disclosure Of
Legal Documents Related to Nortel Long Term Disability Benefits and the Health
and Welfare Trust
Our File No. 09/1329

Your e-mail to Justice Jeffrey Morawetz has been passed to us and to the Monitor for response. We trust that you have received a response from the Monitor.

As you know, Koskie Minsky LLP is Court-appointed Representative Counsel acting on behalf of Nortel's Disabled Employees in Nortel's insolvency proceedings. None of the judges to whom your email was sent, including Justice Morawetz, will respond to your inquiry. Justice Morawetz is the judge in charge of the proceedings and his role is to ensure the proper administration of those proceedings. As we have advised Mr. Clooney in the past, and as is posted clearly on our website, it is inappropriate and unproductive to contact the Judge directly.

Sue Kennedy is the Court-appointed representative. She is accountable to the Court and to the Disabled Employees, and provides us with instructions. We are counsel to both Ms. Kennedy and the group of Nortel Disabled Employees as a whole (other than those represented by the

CAW), and are responsible for representing your interests in the insolvency proceedings. None of you opted out of Ms. Kennedy's representation order though you had the opportunity to do so.

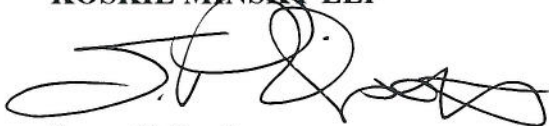
As you know, we are in possession of the documents that you request in your e-mail. They were provided to us under a Non-Disclosure Agreement, which we have signed, and which your Representative has signed. That Agreement obliges us to maintain the confidentiality of the documents and information to which we have access, and which is necessary to enable our representation of your interests. Without that access, it would be extremely difficult, if not impossible, to represent you in these proceedings. It is critical that we have access to that information, and that we are trusted to maintain its confidentiality when requested.

However, we have on a number of occasions requested the Monitor's agreement to broader disclosure of the documents you seek. The Monitor, for reasons that we must accept, is reluctant to disclose the documents at this time and has a plan for broader and more public disclosure in the context of the proceedings. We are working with the Monitor and the Company on a process to address the allocation of the funds in the Health and Welfare Trust and as part of that process, the relevant documents will be disclosed publicly. We understand that the Monitor intends to report on that process by November 30.

We urge you to work through your Representative and us if you have questions or issues that should be addressed. We cannot emphasize strongly enough how important it is not to contact the Judge or the Court directly. It does nothing but weaken your position and undercut the credibility of your group as a whole.

Yours truly,

KOSKIE MINSKY LLP



Susan Philpott

SP:mp

c Sue Kennedy
Lee Close (Ernst & Young Inc.)
Murray MacDonald (Ernst & Young Inc.)
Gale Rubenstein (Goodman's)
Mark Zigler
Andrea McKinnon