

# EXHIBIT B

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re: QUEBECOR WORLD (USA) INC., et al,  
Debtors

Chapter 11  
Case No. 08-10152 (JMP)  
Jointly Administered

**AFFIDAVIT OF LUCKY ADDEH IN SUPPORT OF RESPONSE TO  
OBJECTION TO CLAIM NO. 5714**

Now comes the undersigned, Lucky Addeh, who does depose and say as follows:

1. On December 23, 2007, I was employed by KPB Staffing, Inc., a temporary employment agency, and I was assigned to work in the printing plant of Quebecor, Inc., located in Taunton, Massachusetts;
2. I had been working there for a short time, and I was assigned to a printing machine that would print advertisements on newsprint;
3. The machine pushed out stacks of printed material approximately six to twelve inches high;
4. The stacks of material would frequently jam up in the part of the printing machine where they were pushed out, and as part of my job, I was required to reach into the machine to clear jams;
5. There was no instruction from Quebecor about safety with respect to reaching into the machine, and there were no controls that I was made aware of that would stop the machine from operation while the jams were being cleared;
6. On December 23, 2007 I reached into the machine to clear a jam, and part of the mechanism inside the machine came down on my left hand, causing a slicing wound to my third finger;

7. I went to Morton Hospital in Taunton where I received stitches, however, the wound that I received resulted in significant scarring to third finger of my left hand;
8. Because it failed to provide any safety instruction or any safeguards on the machine on which I was working, I believe that Quebecor was negligent in maintaining that machine and operating that machine when it knew or should have know that workers like myself would be injured trying to clear paper jams.
9. The foregoing information is based on my own personal knowledge, information or belief, and insofar as based on information or belief, I believe that the factual allegations contained herein are true.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on December       , 2010.



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Lucky Addeh