

**ONTARIO
SUPERIOR COURT OF JUSTICE**

THE HONOURABLE) FRIDAY, THE 29th
MR. JUSTICE BELOBABA) DAY OF APRIL, 2016

BETWEEN:

YEGAL ROSEN

Plaintiff

- and -

BMO NESBITT BURNS INC.

Defendant

Proceeding under the *Class Proceedings Act, 1992*

ORDER

ON READING the draft notices and on hearing submissions of counsel for the Plaintiff and Defendant this day at a case conference:

1. **THIS COURT ORDERS** that Crawford Class Action Services ("Crawford") shall be appointed to deliver the notice of the settlement approval and fee approval motions (the "Settlement Approval Hearing"), perform the addresses searches and to receive objections and opt outs.

2. **FOR THE PURPOSES OF THE ORDER**, the following definitions apply:

"Settlement Class" means all Ontario current and former Nesbitt employees who, between January 1, 2002 to June 1, 2016, held the position of Investment Advisor, or who performed the same or similar job functions under a different or previous Nesbitt job title, exclusive of any time period for which they:

- (i) Held the position of Branch Manager; or



- (ii) Held the position of Assistant Branch Manager; or
- (iii) Held the position of Divisional Manager.

“Settlement Class Member” means a member of the Settlement Class

3. **THIS COURT ORDERS** Settlement Class Members shall be notified of the Settlement Approval Hearing in the following manner:

- a. Crawford shall deliver written notices in substantially the same form as the long form notice attached hereto as **Schedule “A”** (the “Long Form Notice”) to be sent by regular mail;
- b. Crawford shall deliver a written electronic notice, substantially in the same form as the Long Form Notice (the “E-mail Notice”);
- c. Crawford shall publish a single written notice in the Business Section of the Thursday edition of the Globe and Mail, substantially in the same form as the notice attached hereto as **Schedule “B”** (the “Publication Notice”);
- d. Crawford shall maintain:
 - i. a toll free hotline that Settlement Class Members may call at 1-866-000-0000;
 - ii. an email address at 0000000000000000@Crawford.ca; and
 - iii. a webpage at www.0000000000000000.ca, on which the Long Form Notice shall be posted.
- e. Koskie Minsky LLP and Mr. Eli Karp shall maintain:
 - i. a toll free hotline at 1-866-777-6308;

- ii. an email address at nesbittclassaction@kmlaw.ca; and
 - iii. a webpage at www.kmlaw.ca/nesbittclassaction, on which the Long Form Notice shall be posted.
4. BMO Nesbitt Burns ("Nesbitt") shall provide to Class Counsel and the Administrator a list of Settlement Class Members (in Excel format), updated to April 29, 2016, listing the individuals' first name, middle name, last name, mailing address, phone number, E-mail, whether they are a former or current employee of BMO Nesbitt Burns Inc. and whether they commenced employment after January 26, 2015, with the exception of those Settlement Class Members who opted out of the proceeding in accordance with the affidavit of Terri Retzler, sworn July 28, 2015, by May 9, 2016 (the "**Class List**").
5. Nesbitt shall provide a supplemental list of Settlement Class Members (the "**Supplemental Class List**") to Class Counsel and the Administrator by June 8, 2016 in the same format as the Class List. The Supplemental Class List shall identify individuals who entered the Class between April 29, 2016 and June 1, 2016.
6. Class Counsel shall also provide the mailing addresses and email addresses for Settlement Class Members in its possession to the Administrator.
7. The Administrator shall take the following steps to locate Settlement Class Members for the purposes of delivery of the Settlement Approval Hearing Notice:
- (a) the Administrator shall cross-reference the addresses of all former employees of Nesbitt identified by Nesbitt pursuant to paragraphs [3] and [4] above (the "Former Employees") against the National Change of Address Database produced by Canada Post;
 - (b) the Administrator shall search the names of all Former Employees with the IIROC (Investment Industry Regulatory Organization of Canada) Advisor Report database to locate Former Employees' active and currently registered

business addresses, and given that the IIROC Advisor Report only provides current business mailing addresses for registrants, Crawford shall further search for Former Employees' current business E-mail addresses, if this is made available on the webpage of the Former Employee's currently registered employer;

- (c) If the Administrator does not locate an active registration for a Former Employee through the search in (b) above, the Administrator shall search the name of the Former Employee with the Canadian Securities Administrators National Registration Search (CSANR) database to locate Former Employees' currently registered addresses, and given that the CSANR database only provides current business mailing addresses for registrants, the Administrator shall further search for Former Employees' current business E-mail addresses if they are made available on the webpage of the Former Employee's current employer;
- (d) If the Administrator does not locate an active registration for a Former Employee through the searches in (b) and (c) above, the Administrator shall search the name of the Former Employee with the Ontario Securities Commission Registration Database (the "OSC List"), and given that OSC List only provides employer names, the Administrator shall search the employer's webpage for specific contact information for any Former Employee who is registered with the OSC List, including current mailing address and E-mail address; and
- (e) The Administrator shall consult and use the addresses for any Settlement Class Members who have contacted the Administrator.

8. **THIS COURT ORDERS** that the distribution and publication of the Settlement Approval Hearing Notice shall be completed by June 16, 2016;

9. **THIS COURT ORDERS** that all of the costs in respect of the administration, publication and delivery of the notices (except for costs of Class Counsel at paragraph 2(e)) shall be paid by the defendant, subject to paragraph 11 and 12 of the Settlement Agreement.

10. **THIS COURT ORDERS** that the Administrator shall send a copy of the opt out form, attached as **Schedule "C"**, to all those Settlement Class Members identified pursuant to paragraph 3 and 4 above with an employment date commencing after January 26, 2015. The Administrator shall send the opt out form at the same time as the Notice of Settlement Approval Hearing.

11. **THIS COURT ORDERS** that a Settlement Class Member who commenced employment with Nesbitt after January 26, 2015 may opt out of the Action by mailing a signed opt-out form, in substantially the same form as attached at **Schedule "C"**, postmarked by August 19, 2016 (the "Second Opt Out Deadline"), to Crawford, at the following address:

CRAWFORD & COMPANY

3-505, 133 Weber St. N.

Waterloo, ON

N2J 3G9

Attention: BMO Nesbitt Burns Overtime Class Action

Any opt out received within 5 business days after the Second Opt Out Deadline, that does not contain a postmark, shall be treated as being received by the Second Opt Out Deadline.

12. **THIS COURT ORDERS** that Crawford shall serve on the parties and file with the court, within thirty (30) days after the expiry of the Second Opt Out Deadline, an affidavit listing:

- a. all persons who have opted out of the class proceeding, if any; and
- b. a list of all letter mail returned to Crawford as undeliverable and all E-mail returned as undeliverable, and a description of all steps taken to locate these Settlement Class Members in respect of those Settlement Class Members with a hire date after January 26, 2015.

13. **THIS COURT ORDERS** that a Settlement Class Member who wishes to make an objection to the settlement or class counsel fees must deliver a signed objection by July 14, 2016 (the "Objection Deadline") to Crawford at the following address:

CRAWFORD & COMPANY

3-505, 133 Weber St. N.

Waterloo, ON

N2J 3G9

Attention: BMO Nesbitt Burns Overtime Class Action

14. **THIS COURT ORDERS** that Crawford shall serve on the parties and file with the court by July 18, 2016, an affidavit including copies of all written objections received by the Objection Deadline.



Schedule "A" – Long Form Notice and Objection Form
Schedule "B" – Publication Notice
Schedule "C" – Opt Out Form

ENTERED AT / INSCRIT À TORONTO
ON / BOOK NO:
LE / DANS LE REGISTRE NO.:

APR 29 2016

PER / PAR:



SCHEDULE "A" – LONG FORM NOTICE AND OBJECTION FORM

April , 2016

Crawford Class Action Services
Direct Dial: 1-800- 000-000
Direct Fax: 416-000-000
0000000000@Crawford.ca**Re: NOTICE OF SETTLEMENT and FEE APPROVAL HEARING**
Rosen v. BMO Nesbitt Burns Inc. (the "Class Action")
Re: Overtime Pay

You are receiving this notice because you are a Settlement Class Member in a proposed settlement of the Class Action and may be entitled to receive compensation from the settlement, if the settlement is approved by the Court.

You have been identified as someone who currently or previously worked as an Investment Advisor with BMO Nesbitt Burns Inc. (Nesbitt) at some point since January 1, 2002. This Class Action was certified in 2013, the plaintiff alleged that Nesbitt misclassified Investment Advisors (IAs), Associate Investment Advisors (AIAs) and IA Trainees as ineligible for overtime compensation. The Class Action sought a common determination that all IAs, AIAs and IA Trainees were eligible for overtime. Nesbitt defended the action and denies all liability.

The class of employees originally certified in 2013 excluded any time period for which an Investment Advisor was on a team that had one or more Associate IAs or Sales Assistants assigned to them (the "Team Exclusion"). As part of the settlement approval motion described in this notice, the plaintiff will be asking the court to amend the class definition for settlement purposes to remove the Team Exclusion and also to end the class period at June 1, 2016. That means that if you were an IA, AIA or IA Trainee at any time between January 1, 2002 and June 1, 2016, exclusive for any time period you held the position of Branch Manager, Assistant Branch Manager or Divisional Manager, you will be included in this Class Action as a Settlement Class Member, if the settlement is approved. As a Settlement Class Member you will therefore be able to participate in the settlement and will also be bound by the judgement and release of claims.

The Class Action has now settled, but the settlement must be approved by the court. If you have questions about this notice, you should contact Crawford Class Action Services, at the contact information provided at the end of this notice, or Class Counsel if you still have questions after speaking with Crawford.

You should read this notice carefully as it may affect your legal rights and you may need to take prompt action.

Important Deadlines

The court will hear submissions on whether this settlement and the legal fees and costs of Koskie Minsky LLP and Mr. Eli Karp should be approved on July 21, 2016. You can attend this hearing if you wish, but you do not need to. If the settlement is approved, payments to Settlement Class Members will be made in accordance with the terms of the settlement agreement.

If you wish to object to the settlement, you must notify Crawford Class Action Services in writing by using the enclosed objection form by July 14, 2016. Your objection will be filed with the Court.

Overview of Settlement

Nesbitt has agreed to pay an all-inclusive non-reversionary sum of \$12 million (inclusive of all claims, costs, interest, taxes and honorarium) (the “Settlement Fund”), as well as settlement administration costs of up to \$500,000. Subject to applicable deductions, the Settlement Fund will be distributed as follows:

- (a) by payment to each Settlement Class Member who participated in the IIROC initial close supervision period of the Nesbitt Trainee Program as an IA Trainee and who properly completes and returns a Distribution Confirmation Form or otherwise advises the Administrator of the information set out in the Distribution Confirmation Form; and
- (b) a Finality Contribution for all Settlement Class Members, of CAD 2 million (less deductions), to be divided and paid in equal amounts to each Settlement Class Member, who properly completes and returns a Distribution Confirmation Form or otherwise advise the Administrator of the information set out in the Distribution Confirmation Form, regardless of whether they are an IA Trainee.

BMO Nesbitt Burns Inc. denies the truth of the allegations in the Action and denies any liability whatsoever.

This settlement is the result of 8 years of litigation, production of over 2 million documents, extensive settlement discussions and a 2 day mediation conducted by the former Chief Justice of Ontario acting as mediator. Class Counsel conducted a detailed analysis of the risks of litigation. If this case had proceeded to trial, there was a very significant risk the class as a whole, or very significant portions of the class, would not be successful in a determination for overtime. If Class Counsel was successful at trial, the amount of money owed to each individual Settlement Class Member would require individual determinations and potentially individual proof of hours worked. The earliest date for a trial would be April, 2017, and a final disposition of any appeals would likely not be completed until at least 2019, or later. Even if the plaintiff was entirely successful at trial and on all appeals, individual damage determinations could only start in 2019 or 2020 at the earliest. This settlement is very beneficial as it provides certainty and immediate benefits relative to the alternative of proceeding to trial and lengthy uncertain individual determinations. Class Counsel recommends this settlement.

Class Counsel Fees

Class Counsel will be seeking a fee of 25% on the \$12 million settlement fund, plus HST and repayment of disbursements in accordance with the retainer agreement in this case. The 25% contingency fee in this case must be approved by court. Class Counsel has devoted over 3,000 hours to this case over the 8 years of litigation. The certification motion alone in this case involved 22 cross-examinations, 7 expert witnesses and was held over 3 days, not including a leave to appeal motion heard over 1 day. Over 2 million documents have been produced and an extensive investigation into the merits of the case has been conducted.

Compensation Fund Available to Settlement Class Members

After the deduction of fees for Class Counsel (including taxes on that fee), disbursements and the levy to the Class Proceedings Fund (who provided an indemnity in this case), the net compensation fund remaining for distribution to the class is expected to be approximately \$7.8 million (the "Compensation Fund").

The amount of the distribution you will receive from the Compensation Fund depends on whether you went through the BMO Nesbitt Burns Trainee program as a new IA, or whether you were already working as an IA when hired and did not have to participate in the Nesbitt IA trainee program. Settlement Class Members who opted out cannot receive any compensation. In order to receive the below distribution, evidence as to hours worked is not required.

Trainee Distribution

A total of \$10 million (less deductions and withholding tax) of the \$12 million Settlement Fund has been allocated to compensate those who participated in the Nesbitt Trainee program. Eligible Settlement Class Members who are currently a Trainee, or who were a Trainee anytime between January 1, 2002 and June 1, 2016, will receive an equal share of the \$10 million, after deductions for legal fees, HST, withholding taxes, disbursements and the Class Proceedings Fund levy described above. In order to receive a distribution, Settlement Class Members will have to respond to a distribution confirmation form if this settlement is approved.

Non-Trainee Distribution

A Finality Contribution totaling \$2 million (less deductions and withholding tax) of the \$12 million Settlement Fund has been allocated to compensate each Settlement Class Member in the action, including those who did not participate in the Nesbitt Trainee program. Each Settlement Class Member will receive an equal share of the \$2 million, after deductions for legal fees, taxes, disbursements and the Class Proceedings Fund levy described above. In order to receive a distribution, Settlement Class Members will have to respond to a distribution confirmation form if this settlement is approved.

A complete copy of the Settlement Agreement and other information about these lawsuits is available at: www.kmlaw.ca/nesbittclassaction.

Contact Information of Crawford Class Action Services

If you would like additional information, please contact Crawford Class Action Services, at the address, phone number or E-mail below.

Crawford Class Action Services
Re: Rosen v. BMO
180 King St S,
Waterloo, ON
N2J 1P8
Tel: 1-800-000-0000
Email: 0000000000@Crawford.ca

If you have additional questions and wish to speak with Class Counsel at Koskie Minsky LLP and Mr. Eli Karp, you may contact Class Counsel at nesbittclassaction@kmlaw.ca or at 1-866-777-6308.

Do not direct inquiries about this notice to the Court.

**DISTRIBUTION OF THIS NOTICE HAS BEEN AUTHORIZED
BY THE ONTARIO SUPERIOR COURT OF JUSTICE**

NOTICE OF OBJECTION

ONLY USE THIS FORM IF YOU DO NOT APPROVE OF SETTLEMENT

TO: Crawford Class Action Services
Re: Rosen v. BMO
180 King St S,
Waterloo, ON
N2J 1P8 Minsky LLP

Email: 0000000000@Crawford.ca

RE: Settlement in *Rosen v. BMO*

I _____, object to (please specify the type of objection):

the terms of settlement in *Rosen v. BMO*, for the reasons below.

the proposed fees and or disbursement of Class Counsel, for the reasons below.

I acknowledge that pursuant to the order of Mr. Justice Belobaba dated [INSERT DATE], persons wishing to object to the settlement are required to complete and deliver this Notice of Objection by no later than 5:00 p.m. (Eastern Time) on July 14, 2016.

I _____, object for the following reasons (please attach extra pages if you require more space):

I DO NOT intend to appear at the hearing of the motion to approve the settlement, and I understand that my objection will be filed with the court prior to the hearing of the motion at 10:00 a.m. on July 21, 2016.

I DO intend to appear, in person or by counsel, and to make submissions at the hearing of the motion to approve the settlement at 10:00 a.m. on July 21, 2016.

MY ADDRESS FOR SERVICE IS:

MY LAWYER'S ADDRESS FOR SERVICE IS (if applicable):

Name:

Name:

Address:

Address:

Tel.:

Tel.:

Fax:

Fax:

Email:

Email:

Date: _____

Signature: _____

SCHEDULE “B” – PUBLICATION NOTICE

If You Worked as an Investment Advisor for BMO Nesbitt Burns

A Class Action Settlement May Impact You

If you have worked as an Investment Advisor, Associate Investment Advisor, or Investment Advisor Trainee in Ontario at any time between January 1, 2002 and June 1, 2016, you may be a Settlement Class Member in this class action.

This Class Action was certified in 2013 and is known as *Yegal Rosen v. BMO Nesbitt Burns Inc.*, Court File CV-10-39668500CP.

The plaintiff alleged that BMO Nesbitt Burns misclassified Investment Advisors (IAs), Associate Investment Advisors (AIAs) and IA Trainees as ineligible for overtime compensation. BMO Nesbitt Burns defended the action and denies all liability.

THE SETTLEMENT

The class action has now settled, but the settlement must be approved by the court. BMO Nesbitt Burns has agreed to pay an all-inclusive non-reversionary sum of \$12 million:

- (a) by payment to each Settlement Class Member who participated in the IIROC initial close supervision period of the Nesbitt Trainee Program as an IA Trainee and who properly completes and returns a Distribution Confirmation Form or otherwise advises the Administrator of the information set out in the Distribution Confirmation Form (“**Gross Trainee Fund**”); and
- (b) a Finality Contribution for all Settlement Class Members, of CAD 2 million (less deductions), to be divided and paid in equal amounts to each Settlement Class Member, who properly completes and returns a Distribution Confirmation Form or otherwise advise the Administrator of the information set out in the Distribution Confirmation Form, regardless of whether they are an IA Trainee (“**Gross Finality Fund**”).

Class Counsel will be requesting a fee of approximately \$2.8 million. After the deduction of fees, taxes on the fee, disbursements and a statutory levy to the Class Proceedings Fund, the net compensation remaining is expected to be approximately \$7.8 million. All fees and costs must be approved by the Court.

Individual compensation will depend on whether a Settlement Class Member participated in the Nesbitt Burns' IA trainee program or whether they were already working as an IA when hired.

Settlement Class Members who are currently a Trainee, or who were a Trainee any time from January 1, 2002 to June 1, 2016, will receive an equal share of \$6.5 million, which reflects deductions for legal fees, taxes, disbursements and the statutory levy described above. Settlement Class Members, including those who did not go through the Trainee program, will receive an equal share of approximately \$1.3 million, which reflects deductions for legal fees, taxes, disbursements and the statutory levy described above. The final distribution amount will depend on how many Settlement Class Members respond to a distribution confirmation form, if the settlement is approved.

The class of employees originally certified in 2013 excluded any time period for which an Investment Advisor was on a team that had one or more Associate IAs or Sales Assistants assigned to them (the "Team Exclusion"). As part of the settlement approval motion described in this notice, the plaintiff will be asking the court to amend the class definition for settlement purposes to remove the Team Exclusion and also to end the class period at June 1, 2016. That means that if you were an IA, AIA or IA Trainee at any time between January 1, 2002 and June 1, 2016, exclusive for any time period you held the position of Branch Manager, Assistant Branch Manager or Divisional Manager, you will be included in this Class Action as a Settlement Class Member, if the settlement is approved. As a Settlement Class Member you will therefore be able to participate in the settlement and will also be bound by the judgement and release of claims.

The court hearing regarding the settlement will be heard on July 21, 2016 in Toronto. If you wish to object to the settlement, you must submit an objection form, by July 14, 2016.

A copy of the Settlement Agreement and objections forms can be obtained at www.kmlaw.ca/NesbittClassAction.

BMO Nesbitt Burns Inc. denies the truth of the allegations in the Action and denies any liability whatsoever.

GETTING MORE INFORMATION

You can get more information about the class action or submit an objection to the settlement by contacting Crawford Class Action Services:

Tel: 1-800-000-0000
Email: 000000000@Crawford.ca

If you have additional questions and wish to speak with Class Counsel at Koskie Minsky LLP and Mr. Eli Karp, you may contact Class Counsel at nesbittclassaction@kmlaw.ca or at 1-866-777-6308.

SCHEDULE "C" – OPT OUT FORM

April , 2016

Crawford Class Action Services
Direct Dial: 1-800- 000-000
Direct Fax: 416-000-000
0000000000@Crawford.ca

Re: OPT OUT FORM
Rosen v. BMO Nesbitt Burns Inc. (the "Class Action")

You are receiving this opt out form because you commenced employment with BMO Nesbitt Burns Inc. after January 26, 2015. Notice to Settlement Class Members of certification of this case as a class action occurred on May 14, 2015(the "Certification Notice"). The Certification Notice advised Settlement Class Members of their right to opt out of the case if they chose to do so. If an individual did not opt out, they would be automatically included in the class action.

Because you commenced employment after the notice of certification was delivered, you are now able to choose whether you wish to opt out of this class action. If you opt out, you will be unable to be receive any benefits from a proposed settlement. Details of the proposed settlement are contained in the notice of settlement and fee approval hearing you have received. An opt out form is enclosed with this letter. Completing this opt out form is the only way you may opt out. You must submit the opt out form by August 19, 2016 if you wish to remove yourself from this lawsuit.

If you would like additional information, please contact Crawford Class Action Services, at the address, phone number or E-mail below.

Crawford Class Action Services
Re: Rosen v. BMO
180 King St S,
Waterloo, ON
N2J 1P8
Tel: 1-800-000-0000
Email: 0000000000@Crawford.ca

If you have additional questions and wish to speak with Class Counsel at Koskie Minsky LLP or Mr. Eli Karp, you may contact Class Counsel at nesbittclassaction@kmlaw.ca or at 1-866-777-6308.

Do not direct inquiries about this notice to the Court.

**DISTRIBUTION OF THIS NOTICE HAS BEEN AUTHORIZED
BY THE ONTARIO SUPERIOR COURT OF JUSTICE**

OPT OUT FORM

TO: CRAWFORD & COMPANY
3-505, 133 Weber St. N. Waterloo, ON N2J 3G9
Attention: BMO Nesbitt Burns Overtime Class Action

This is NOT a claim form.

Completing this OPT OUT COUPON will EXCLUDE you from receiving any compensation arising out of any settlement or judgment in the class proceeding named below:

Court File No. CV-10-396885CP

YEGAL ROSEN

Plaintiff

- and -

BMO NESBITT BURNS INC.

Defendant

I do not want to participate in the class action styled as **Yegal Rosen v. BMO Nesbitt Burns Inc.**, alleging a wrongful denial of overtime compensation to eligible employees by the Defendant.

The Class Action has now been settled, but the settlement must be approved by the Court. BMO Nesbitt Burns Inc. has agreed to pay an all-inclusive non-reversionary sum of \$12 million allocated as follows:

- (a) by payment to each Settlement Class Member who participated in the IIROC initial close supervision period of the Nesbitt Trainee Program as an IA Trainee and who properly completes and returns a Distribution Confirmation Form or otherwise advises the Administrator of the information set out in the Distribution Confirmation Form; and
- (b) a Finality Contribution for all Settlement Class Members, of CAD 2 million (less deductions), to be divided and paid in equal amounts to each Settlement Class Member, who properly completes and returns a Distribution Confirmation Form or otherwise advise the Administrator of the information set out in the Distribution Confirmation Form, regardless of whether they are an IA Trainee.

I understand that by opting out of this class proceeding, I am confirming that I do not wish to participate in this class proceeding and will not be entitled to share in any money recovered in the action. I confirm that if I opt out, and if I wish to make a claim against the defendant, I will be responsible to hire my own counsel, at my own expense, and pursue the claim on my own.

I understand that any individual claim I may have against the Defendant must be commenced within a specified limitation period or it will be legally barred. I understand that the certification of this class proceeding suspended the running of the limitation period from the time the class proceeding was filed. The limitation period will resume running against me if I opt out of this class proceeding. I understand that by opting out, I take full responsibility for the resumption of the running of any relevant limitation period and for taking all necessary legal steps to protect any claim I may have.

Dated: _____

Signature

Print Name

Address

City, Province, Postal Code

Telephone

Email

This Notice must be delivered on or before August 19, 2016 to be effective.

YEGAL ROSEN
Plaintiff

and
BMO NESBITT BURNS INC.
Defendant

Court File No: CV-10-396685CP

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at Toronto

Proceeding under the *Class Proceedings Act, 1992*

**ORDER
(NOTICE)**

KOSKIE MINSKY LLP
20 Queen Street West, Suite 900, Box 52
Toronto, ON M5H 3R3

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Lawyers for the Plaintiffs