

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)**

B E T W E E N :

**IN THE MATTER OF THE *BANKRUPTCY AND INSOLVENCY ACT*,  
R.S.C. 1985, c. B-3, AS AMENDED**

- and -

**AND IN THE MATTER OF THE PROPOSAL OF FOODORA INC.  
OF THE CITY OF TORONTO, IN THE PROVINCE OF ONTARIO**

**NOTICE TO NON-CUPW COURIERS**

On April 27, 2020, Foodora filed a Notice of Intention to Make a Proposal ("**NOI**") pursuant to section 50.4(1) of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3. On that date, firm of Grant Thornton LLP ("**GT**") was appointed proposal trustee in the NOI proceedings.

**TAKE NOTICE THAT**, pursuant to Order of the Court dated July 8, 2020:

The law firm of Koskie Minsky LLP ("**KM**") was appointed as Representative Counsel of all individuals who were contracted by Foodora Inc. to provide courier services and who were actively providing services as of February 3, 2020, and who are not represented by the Canadian Union of Postal Workers. A copy of the Order is enclosed for your reference. Contact Information for Representative Counsel is below:

**Website:** [kmlaw.ca/foodorarepcounsel](http://kmlaw.ca/foodorarepcounsel)

**Email:** [foodorarepcounsel@kmlaw.ca](mailto:foodorarepcounsel@kmlaw.ca)

**Toll-free Hotline:** 1-844-819-8528

Koskie Minsky has reached an agreement in principle with Foodora Inc. and its parent company Delivery Hero SE to settle your claim on favourable terms.

The settlement, should it be finalized, is not a payment on account of termination pay and vacation pay under provincial employment standards legislation that is applicable to employees, but it will result in you receiving an amount of money that approximates what an employee, with your length of service, would be entitled to for termination pay and vacation pay under that legislation for the period immediately prior to Foodora's commencement of the bankruptcy process.

**IF YOU DO NOT WISH TO BE REPRESENTED in the proceeding by KM as Representative Counsel and wish to represent yourself or be represented by another lawyer at your own cost, you must, before July 29, 2020, provide notice in writing (by letter or email) to both KM and GT indicating that you wish to opt-out of such representation:**

Koskie Minsky LLP  
20 Queen Street West  
Suite 900, Box 52  
Toronto, ON M5H 3R3

Attention: Foodora Inc.  
Employee Representative Counsel

E-mail: [foodorarepcounsel@kmlaw.ca](mailto:foodorarepcounsel@kmlaw.ca)

Grant Thornton LLP  
200 King Street West, 11<sup>th</sup> Floor  
Toronto, Ontario, M5H 3T4

Attention: Rob Stelzer  
Trustee of Foodora Inc.

E-mail: [rob.stelzer@ca.gt.com](mailto:rob.stelzer@ca.gt.com)