



THOMPSON
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January 13, 2022

“VIA EMAIL TO fightwcb@gmail.com”

Paul Taylor

██████████
Hamilton, Ontario ██████████

Dear Sir:

Re: Ontario Superior Court of Justice
Statement of Charter Class Claim
Court File No. CV-21-00076781-00CP
Our Matter No. 0186799 GAM/SRP

We wrote to on September 23, 2021. At that time, we were representing 11 boards and tribunals. We have now been retained by three additional boards and tribunals. We are now representing the following 14 entities:

The Workers' Compensation Board of British Columbia (WorkSafeBC),
The British Columbia Workers' Compensation Appeal Tribunal,
The Workers' Compensation Board of Saskatchewan,
The Saskatchewan WCB Appeal Tribunal,
The Workers Compensation Board of Manitoba,
The Manitoba Appeal Commission,
The New Brunswick Workplace Health, Safety and Compensation Commission (WorksafeNB),
The New Brunswick Workers' Compensation Appeals Tribunal,
The Newfoundland and Labrador Workplace Health, Safety and Compensation Commission (WorkplaceNL),
The Newfoundland and Labrador Workplace Health, Safety & Compensation Review Division
The Yukon Workers' Compensation Health and Safety Board (YWCHSB),

The YWCHSB Appeal Tribunal,
The Northwest Territories/Nunavut Workers' Safety and Compensation Commission
(WSCC), and
The WSCC Appeals Tribunal.

When we wrote to on September 23, 2021, we were only aware of a Statement of Charter Class Claim that you filed on or about August 16, 2021, in the Ontario Superior Court of Justice (the "Ontario Action"). We have since become aware of:

1. a Notice of Civil Claim filed in the Supreme Court of British Columbia on or about August 25, 2021, (the "BC Action") and
2. a Statement of Claim filed in the Court of Queen's Bench of Alberta on or about October 28, 2021, under the Class Proceedings Act (the "Alberta Action").

The BC Action and the Alberta Action are substantially the same as the Ontario Action. All three actions purport to be class actions and all three actions name the same defendants.

The BC action names you as a "lead plaintiff" and George Kavallis is named as the "main contact for the Lead Plaintiffs".

The Alberta Action names Rodny Arnold Barrett as plaintiff and as the "address for service and contact".

We are writing to you, with a carbon copy to Mr. Kavallis and Mr. Barrett, to put you all on notice that we will be representing the above noted clients in the Alberta Action. With respect to the BC Action, we will be representing all of the same clients except for the British Columbia defendants who are represented by Reider Mogerman of Camp Fiorante Matthews Mogerman LLP.

As noted in our letter of September 23, 2021, the Ontario Action has not been properly served on any of our clients. To the best of our knowledge, the BC Action and the Alberta Action have also not been properly served on any of our clients.

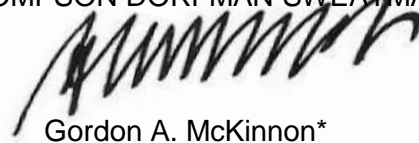
Please consider this letter to be notice that we take the position that the Ontario Superior Court of Justice, the Supreme Court of British Columbia and the Court of Queen's Bench of Alberta have no jurisdiction over our clients. We will be moving to have the actions dismissed.

Please confirm that you will not take any steps to the prejudice of our clients without providing us with reasonable notice of your intention to do so.

Yours truly,

THOMPSON DORFMAN SWEATMAN LLP

Per:



Gordon A. McKinnon*

GAM/gd

cc. Mr. George Kavallis

cc. Mr. Rodny Arnold Barrett

cc. WSIAT (Workplace Safety and Insurance Appeals Tribunal, c/o Paliare Roland Rosenberg Rothstein LLP, Attn: Andrew Lokan

cc. Camp Fiorante Matthews Mogerman LLP, Attn: Reidar Mogerman

cc. WSIB Ontario, Attn: Jean-Denis Belec

*Services provided through Gordon A. McKinnon Law Corporation