



**Workplace Safety
& Insurance Board**

**Commission de la sécurité
professionnelle et de l'assurance
contre les accidents du travail**

VIA E-MAIL at fightwcb@gmail.com

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September 15, 2021

Paul Taylor


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Dear Mr. Taylor:


Re: Taylor et al. v. Workplace Safety & Insurance Board et al.
Court File No. CV-21-00076781-00CP

I represent the Workplace Safety and Insurance Board ("**WSIB**") in the above-noted matter.

Please find enclosed the Notice of Intent to Defend of the WSIB, which is served on you at this time pursuant to the *Rules of Civil Procedure*. We reserve the right to request particulars from you prior to the delivery of any Statement of Defence in this matter and this will be provided to you shortly.

In addition, I would like to provide you with advance notice that the WSIB intends to bring a motion pursuant to Rule 21, prior to any certification motion under the Class Proceedings Act, seeking to have this action dismissed in its entirety. It is possible that the WSIAT will also do the same and Mr. Lokan will advise further in that regard. We will coordinate hearing dates for the return of the motion with you and Mr. Lokan and any other parties that may wish to participate. Our motion materials will follow.

Sincerely,


Jean-Denis Bélec
JDB/db
Encl.

cc: Andrew Lokan, *Paliare Roland Rosenberg Rothstein LLP*

Gordon McKinnon, *Thompson Dorfman Sweatman LLP*
Alberta Workers Compensation Board
Alberta Appeals Commission
Saskatchewan Board Appeal Tribunal
Commission des normes, de l'équité, de la santé et de la sécurité du travail
WorkSafeNB
New Brunswick Workers' Compensation Appeals Tribunal
Workers Compensation Board of PEI
Workers' Compensation Appeal Tribunal of PEI
Workers' Compensation Board of Nova Scotia
Workers' Compensation Appeal Tribunal of Nova Scotia
Attorney General of Ontario, Constitutional Law Branch
Attorney General of Canada, Department of Justice