

NOTICE

To: ALL INDIVIDUALS WHO WORKED AS SALES REPRESENTATIVES FOR SOLAR BROKERS CANADA CORP.

NOTICE OF CERTIFICATION AS A CLASS ACTION

This Notice may affect your rights. Please read it carefully.

PURPOSE OF THIS NOTICE: A class proceeding has been certified by the Ontario Superior Court of Justice.

On **November 26, 2019**, *Morris v Solar Brokers Canada Corp., et al* was certified as a class proceeding, and Will Morris was appointed as the representative plaintiff on behalf of the Class (the “**Class Action**”).

Who this Notice is for: You are a member of the Class if you fit this description:

THE CLASS

All non-managerial sales representatives who, since 2016, worked or continue to work for Solar Brokers Canada Corp. and who were classified as Independent Contractors.

The class is divided into two subclasses:

- 1) all class members who, since 2016, worked or work for Solar Brokers Canada Corp. as lead generators; and
- 2) all class members who, since 2016, worked or work for Solar Brokers Canada Corp. as appointment bookers.

What the Action is About: The Class Action alleges, among other things, that all non-managerial sales representatives who, since 2016, worked or continue to work for Solar Brokers Canada Corp. and who were classified as Independent Contractors were employees under the applicable provincial standards and owed their entitlements as employees under the law, such as Vacation Pay, Public Holiday Pay, Overtime Pay, damages for pay under Minimum Wage etc.

A copy of the Statement of Claim and the Order certifying this action as a class proceeding can be reviewed at <https://www.monkouselaw.com/wp-content/uploads/2019/03/SOCSBC-Morris-W.pdf>

The Defendants: The Defendants are: Solar Brokers Canada Corp., Jean Claude Awwad, and Joseph Barker.

HOW THIS CLASS ACTION AFFECTS YOU:

If you are a Class member, and you wish to participate in the proceeding, then you do not need to do anything more at this stage. You are automatically included in the Class.

No Cost to You

There is no cost to you to participate in the class action. You will have no responsibility to pay any legal fees. Class Counsel will only be paid in the event that the action succeeds at trial or there is a settlement. Class Counsel have entered into a contingency fee agreement with the representative plaintiff. The agreement provides for a contingency fee of the amount recovered in the Class Action to be paid to Class Counsel, along with reimbursement of all disbursements and taxes. The court must first approve Class Counsel's legal fees before they will be paid.

You will be Bound by a Judgment or Settlement in the Action

Each Class member who does not opt out of the Class Action will be bound by the terms of any judgment or any settlement approved by the Court. Each Class member may be entitled to share in the amount of any judgment awarded or settlement reached in the Class Action.

HOW TO OPT OUT OF THE CLASS ACTION

If you DO NOT WANT TO PARTICIPATE in this proceeding, then you must say so in writing by delivering a letter to Class Counsel, including your full name and address on or before February 26, 2020 at 5:00 pm EST to the following address:

If you do not want to participate in the Action

Address for Sending Your Notice of Opt Out:

SBC Class Action
Monkhouse Law
220 Bay St. Suite 900
Toronto, Ontario, Canada
M5J 2W4

Fax: 888-501-7235

Opt Out Deadline:

If you decide to opt out, you will not be bound by the terms of any judgment or settlement. However, you also will not be eligible for any of the benefits of any settlement or judgment if the action is successful.

No Class member will be permitted to opt out after February 26, 2020.

ADDITIONAL INFORMATION

Any questions about the matters in this notice should be addressed to Class Counsel.

The certification order and other information regarding the Class Action is available on the website:

<https://www.monkouselaw.com/solar-brokers-canada-misclassification-class-action/>

or may be obtained by calling: **416-907-9249**

Requests for information or questions for Class Counsel should be directed to:

SBC Class Action
Monkhouse Law
220 Bay St. Suite 900
Toronto, Ontario, Canada
M5J 2W4

e-mail: sbc.classaction@monkouselaw.com

INTERPRETATION

This notice is a summary of the terms of the certification order. If there is a conflict between the provisions of this notice and the terms of the certification order, the certification order prevails. The certification order can be viewed at the web addresses referenced above.

This notice was approved by the Ontario Superior Court of Justice
