

NOTICE OF SETTLEMENT AND FEE APPROVAL HEARING

THIS NOTICE IS FOR ALL INDIVIDUALS WHO WORKED OR CONTINUE TO WORK FOR APPROVAL TEAM INC. BETWEEN 2018 AND JULY 30th, 2020, AS SALESPERSONS AND SALES MANAGERS AS INDEPENDENT CONTRACTORS AND THOSE WHO WORKED AS EMPLOYEES.

READ THIS NOTICE CAREFULLY AS IT MAY AFFECT YOUR LEGAL RIGHTS

The representative plaintiff, Tom Rallis (the “**Plaintiff**”), commenced a class proceeding against the Corporate Defendants, Approval Team Inc., Sergey Barandich, Patrick Jardine, and Aleksandar Savic (collectively, the “**Defendants**”).

In this certified class action, the Plaintiff is seeking damages on behalf of all salespersons and sales managers who worked in Ontario for one or more of the Defendants between January 1, 2018 and July 30th, 2020. The proceeding is seeking damages for allegedly unpaid vacation pay, public holiday pay, Canada Pension Plan contributions, Employment Insurance Contributions, overtime pay, and failing to pay the statutory minimum wage. The Defendants have denied all of these allegations. Monkhouse Law represents the certified class (“**Class Counsel**”).

The parties to this proposed class proceeding have reached a settlement (the “**Proposed Settlement**”). The Proposed Settlement is a compromise of disputed claims against the defendants without any admission of liability by the defendants. You may be entitled to compensation under the Proposed Settlement if you fall within the following definition:

All salespersons and sales managers of Approval Team Inc. who, since January 1st, 2018 to July 30th, 2020, worked or continue to work for Approval Team Inc., as independent contractors. (the “**Certified Class Members**”).

All salespersons and sales managers of Approval Team Inc. who, since January 1st, 2018 to the date of certification, worked or continue to work for Approval Team Inc., as employees. (the “**Extended Class Members**”).

The Proposed Settlement is subject to Court approval. The Proposed Settlement, if approved, will conclude the class proceeding. The purpose of this document is to provide notice to class members that a motion will be heard on **January 10th, 2022 at 10 AM** by Zoom to approve the Proposed Settlement and Class Counsel’s fees. Zoom log-in details will be available from Class Counsel one week before the motion.

There are steps to be taken if you wish support or oppose the proposed settlement, and both Class Counsel and the Courts appreciate your input.

Additional information regarding the Proposed Settlement and the options available to you can be found below.

The Ontario Superior Court of Justice has authorized distribution of this Notice, but please direct questions to Monkhouse Law (Class Counsel).

1. When/where will the Court decide whether to approve the Proposed Settlement and/or the legal fees?

The Ontario Superior Court of Justice will hold the Approval Hearing via Zoom on **January 10th, 2022**. Zoom log-in details will be available from Class Counsel one week before the motion.

This is a public hearing, and you may attend if you wish. As a Class Member, you may also ask to speak, but you do not have to.

The hearing date could be moved to a different date or time without additional notice. If you plan to attend the hearing, we recommend you check Class Counsel website at <https://www.monkouselaw.com/approval-team-employment-standards-class-action/> , email approvalteam.classaction@monkouselaw.com or call 416-907-9249 ext 259 .

At the hearing, the Court will consider whether the Proposed Settlement is fair, reasonable, and in the best interests of the Class. If there are objections, the Court will listen to the people who submitted an Objection Form and asked to speak at the hearing.

2. Who is included in the Proposed Settlement?

You are a Class Member and may be entitled to compensation under the Proposed Settlement if you fall within the following definition:

All salespersons and sales managers of Approval Team Inc. who, since January 1st, 2018 to July 30th, 2020, worked or continue to work for Approval Team Inc., as independent contractors. (the “**Certified Class Members**”).

All salespersons and sales managers of Approval Team Inc. who, since January 1st, 2018 to the date of certification, worked or continue to work for Approval Team Inc., as employees. (the “**Extended Class Members**”).

Estates of Certified Class Members may be eligible. A claim must be filed under the Proposed Settlement by the Executor or Administrator of the Estate of the Certified Class Member.

3. What does the Proposed Settlement provide?

If approved, the Proposed Settlement provides that Certified Class Members are eligible for compensation.

The Proposed Settlement is for a for a global, all-inclusive amount of \$850,000 inclusive of legal fees, disbursements, taxes, settlement administration costs and/or an honorarium for the representative plaintiff.

The amount available for distribution to the class members will be \$499,035, provided that the requested legal fees and disbursements and honorarium for the representative plaintiff are approved by the Court. This amount will be distributed according to a pre-determined formula based upon the payments made to each class member and assumptions of the number of hours worked and resulting hourly rates.

Class Counsel is asking for the approval of fees and disbursements in the amount of \$340,965.00 This amount will be paid directly by the Defendants from the total amounts set aside to settle the class action.

A honorarium of \$10,000 is requested for the representative plaintiff.

A full copy of the agreement entered into by the parties in connection with the Proposed Settlement (the “**Settlement Agreement**”) will be available at: <https://www.monkouselaw.com/approval-team-employment-standards-class-action/>.

4. How will I receive a payment?

To be eligible to receive a payment under the Proposed Settlement, all Certified Class Members and Extended Class Members will be required to complete and submit a Claim Form.

Before anyone can file the Claim Form or have their eligibility to receive payment under the Proposed Settlement assessed, the Ontario Superior Court of Justice must decide whether to grant final approval of the Proposed Settlement at the Settlement and Fee Approval Hearing (see the “**Approval Hearing**”, below).

If the Proposed Settlement is approved, you will receive additional information about the claims process, including the Claim Form, in a further notice.

5. Participating in the Proposed Settlement and Fee Approval Hearing

You may participate in the hearing to voice your support for the proposed settlement, you may object to the proposed settlement if you disagree with all or part of it, and you may also voice support or disapproval of the proposed legal fees payments. The Court will consider your views.

- a. If you support the settlement you may write a letter to Class Counsel using the information at the bottom of this notice.
- b. If you do not support the settlement, you may either write a letter to using the information below OR make an oral objection at the Settlement and Fee Approval Hearing on January 10th, 2022.

6. How do I get more information?

This notice summarizes the proposed settlement. For full details, a copy of the Settlement Agreement will be available here:

<https://www.monkouselaw.com/approval-team-employment-standards-class-action/>

If you have any questions, please contact us by letter or e-mail:

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