

## **NOTICE OF SETTLEMENT APPROVAL AND CERTIFICATION**

**THIS NOTICE IS FOR ALL INDIVIDUALS WHO WORKED OR CONTINUE TO WORK FOR APPROVAL TEAM INC. BETWEEN JANUARY 1<sup>st</sup>, 2018 AND JULY 30<sup>th</sup>, 2020, AS SALESPERSONS AND SALES MANAGERS AS INDEPENDENT CONTRACTORS AND THOSE WHO WORKED AS EMPLOYEES, BETWEEN JANUARY 1<sup>st</sup> 2018 AND July 30<sup>th</sup>, 2018**

To Whom It May Concern:

You are receiving this notice because you have been identified as a potential class member in the Approval Team Class Action, described below.

**READ THIS NOTICE CAREFULLY AS IT MAY AFFECT YOUR LEGAL RIGHTS**

### **1. What is this lawsuit about?**

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**”). The two Classes are:

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

This action was certified as a class proceeding on July 7<sup>th</sup>, 2020 for the Certified Class, and on January 17<sup>th</sup>, 2022 for the Extended Class.

The Plaintiff is seeking compensatory damages for allegedly unpaid wages, overtime pay, vacation pay, public holiday pay, Canada Pension Plan contributions and Employment Insurance contributions, as well as for punitive damages. Monkhouse Law represents both classes (“**Class Counsel**”).

### **2. Why is this notice being given?**

The parties to this class action have reached a settlement (the “**Settlement**”) to resolve all claims in connection with any conduct alleged, or which could have been alleged, in this action. The

Settlement is a compromise of disputed claims against the Defendants without any admission of liability by the Defendants. The Settlement was approved by the Honourable Mr. Justice Glustein on January 17<sup>th</sup>, 2022.

The purpose of this document is to provide notice of the approval of the Settlement and Class Counsel's fees, and to advise you how to make a claim for compensation pursuant to the Settlement.

### **3. Am I a member of the Class?**

You are a proposed Class Member and are entitled to participate in the proceeding if you fall within one or both of the following definitions:

All salespersons and sales managers of Approval Team Inc. who, since January 1<sup>st</sup>, 2018 to July 30<sup>th</sup>, 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 1<sup>st</sup>, 2018 to July 30<sup>th</sup>, 2020,, worked or continue to work for Approval Team Inc., as employees. (the "**Extended Class Members**").

### **4. What settlement has been reached and how can I claim compensation?**

Under the Settlement, the Defendants shall pay an all-inclusive amount of \$850,000 (the "**Gross Settlement Funds**") in exchange for, among other things, a full and final release of the claims against the Defendants. The Gross Settlement Funds shall be reduced by Class Counsel's fees, HST, disbursements, settlement administration costs and/or an Honorarium. The remaining amount shall be available to be distributed in accordance with the Distribution Plan in the Settlement, including a distribution to eligible class members.

**To be eligible to receive a payment under the Settlement, you must complete a Claims Form and return it to the Defendants by APRIL 15<sup>th</sup>, 2022.**

Claims Forms can be submitted either by email, fax, or mail to the following:

Approval Team Class Action  
c/o Monkhouse Law, 220 Bay Street, Suite 900,  
Toronto, Ontario, M5J 2W4  
Email: ApprovalTeam.ClassAction@monkouselaw.com  
Fax: 888-501-7235

For a copy of the Claims Form and information on how to complete and submit it, or for more general information, please visit the following web page:

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

**5. How much will Class Counsel be paid?**

You will not have to pay any of the fees and expenses of Class Counsel. The Court has approved a contingency fee agreement and has fixed Class Counsel fees and disbursements in the amount of \$338,107.73. This amount is inclusive of all HST and disbursements.

**6. Can I remove myself from the Class?**

If you are **an Extended Class member only**, you also have the right to opt out of the class action. By **opting out**, you reserve the right to make your own claim against the Defendants, including for any allegedly unpaid wages, overtime pay, vacation pay, public holiday pay, Canada Pension Plan contributions and Employment Insurance contributions. The decision to opt out should not be taken lightly, as it means that you would have to start your own claim at your own expense if you wanted to pursue an individual claim against the Defendants. You should seek independent legal advice before choosing to take this step.

For more information on opting out, please visit the webpage listed in section 4, above.

**ANY OPT-OUT FORM MUST BE SUBMITTED BY APRIL 15<sup>th</sup>, 2022 TO BE VALID.**

**7. Where can I get more information?**

You may also contact Class Counsel by calling them at 416-907-9249 or by emailing them at: [ApprovalTeam.ClassAction@monkhouselaw.com](mailto:ApprovalTeam.ClassAction@monkhouselaw.com)

**The Ontario Superior Court of Justice has authorized distribution of this Notice.**