

LEGAL NOTICE

WERE YOU A SUPERVISOR, SERVER, BARTENDER, ETC. WORKING FOR VIB EVENT STAFFING INC. BETWEEN JANUARY 1, 2010, AND DECEMBER 31, 2021?

THIS NOTICE IMPACTS YOUR LEGAL RIGHTS

You are receiving this notice because you have been identified as a potential class member in the VIB Event Staffing Inc. Class Action, described below.

READ THIS NOTICE CAREFULLY AS IT MAY AFFECT YOUR LEGAL RIGHTS

1. What is this lawsuit about?

A representative plaintiff, Nenad Suzic (the “**Plaintiff**”), commenced a proposed class proceeding against VIB Event Staffing Inc. (the “**Corporate Defendant**”), and Valerie Sideco (collectively with the Corporate Defendant, the “**Defendants**”). This action was certified as a class proceeding on June 28th, 2022.

In this proposed class action, the Plaintiff is seeking damages on behalf of all supervisors, servers, bartenders, etc., who worked in Ontario the Corporate Defendant between January 1, 2020, and December 31, 2021, for allegedly unpaid wages, overtime pay, vacation pay, public holiday pay, Canada Pension Plan contributions and Employment Insurance contributions. The Defendants have denied all these allegations. Monkhouse Law represents the proposed class (“**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 Justice Akbarali on June 28th, 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.

SHORT FORM NOTICE OF CERTIFICATION AND SETTLEMENT APPROVAL

3. Am I a member of the Class?

You are a proposed class member and are entitled to participate in the settlement by submitting a claims form if you fall within the following definition:

All supervisors, servers, waiters, bartenders identified as independent contractors who worked for VIB Staffing Inc. since the year 2010 to December 31, 2021, who have not filed a complaint with the Ministry of Labour relating to the matters in question unless it was properly withdrawn. This definition includes but is not limited to supervisors, bartenders, servers, wait-staff, event staff, and any other individuals providing (or who provided at any point during the Class Period) event staffing services to the Defendant on an independent contractor basis during the Class Period such as coat checkers, greeters, dishwashers, kitchen helpers. (“**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 \$105,000, inclusive of legal fees, disbursements, taxes, and/or settlement administration costs (the “**Settlement Amount**”). In exchange for the Settlement Amount, among other things, a full and final release of the claims against the Defendants shall be granted. The Settlement Amount shall be reduced by Class Counsel’s fees, HST, disbursements, and an honorarium of \$4,000 for the Representative Plaintiff. A \$3,000 disbursement for the Plaintiff’s mediation fees will also be paid from the Settlement Amount. 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, is \$47,546.00.

To be eligible to receive a payment under the Settlement, you must complete a Claims Form and return it to the Defendants by OCTOBER 3rd, 2022

Claims Forms can be submitted to the Class Counsel either by email or mail at the following:

VIB Staffing Inc. Class Action
220 Bay Street, Suite 900
Toronto ON
M5J 2W4
FAX: (888) – 501 – 7235
EMAIL: vibclassaction@monkhouselaw.com

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.monkhouselaw.com/vib-event-staffing-inc-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 \$50,454.50. This amount is comprised of \$34,650.00 for legal fees, \$4,504.50 for HST applicable to legal fees and \$11,300.00 for disbursements inclusive of HST.

6. Can I remove myself from the Class?

As a class member, 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 may want to 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.

7. Where can I get more information?

You may also contact the lawyers representing the Class Members and the representative plaintiff by calling 416-907-9249 or by emailing at vibclassaction@monkhouselaw.com .

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