

SCHEDULE C - LONG FORM NOTICE OF SETTLEMENT

LONG FORM NOTICE OF SETTLEMENT APPROVAL
WERE YOU A DOCUMENT REVIEWER OF DELOITTE MANAGEMENT SERVICES LP OR DELOITTE & TOUCHE LLP BETWEEN JANUARY 16, 2014 AND JANUARY 16, 2018?

READ THIS NOTICE CAREFULLY AS IT MAY AFFECT YOUR LEGAL RIGHTS

The representative plaintiff, Tarrie Phillip (the “**Plaintiff**”), commenced a class proceeding against the Corporate Defendants, Deloitte Management Services LP and Deloitte & Touche LLP (collectively, the “**Defendants**”).

The Court has approved a settlement reached on behalf of those individuals who fit into the following definition:

All persons having performed document review or e-discovery services at Deloitte pursuant to an independent contractor agreement between January 16, 2014 and January 16, 2018, exclusive of any person who only ever performed the duties of a project manager (collectively the “**Class Members**”).

Note that the Class Action has been certified on January 16, 2018 and the settlement concerns only those in the initially certified class period (January 16, 2014 to January 16, 2018) for their work from January 16, 2014 to March 16, 2020.

Notice of Class Action Settlement

The Ontario Superior Court of Justice has recently approved a settlement (the “**Settlement**”) in a class action against the Defendants.

You are receiving this notice because you may be entitled to a payment under the Settlement. The Settlement is a compromise of disputed claims against the Defendants without any admission of liability by the Defendants and will resolve all claims in connection with any conduct alleged, or which could have been alleged, in this action.

Please read this notice carefully for details.

The Ontario Superior Court of Justice authorized the distribution of

this notice. This is not a solicitation from a lawyer.

What Is the Class Action about?

In this class action, the Plaintiff is seeking damages on behalf of document reviewers who worked for Deloitte between January 16, 2014, and January 16, 2018, for allegedly misclassifying the workers as independent contractors. Monkhouse Law represents the proposed class (“**Class Counsel**”).

The Defendants have denied all allegations made against them in this proceeding.

Am I Eligible?

You are a Class Member and are entitled to participate in the proceeding if you fall within the following definition:

All persons having performed document review or e-discovery services at Deloitte pursuant to an independent contractor agreement between January 16, 2014 and January 16, 2018, exclusive of any person who only ever performed the duties of a project manager.

Note that the Class Action has been certified on January 16, 2018 and the settlement concerns only those in the initially certified class period (January 16, 2014 to January 16, 2018) for their work from January 16, 2014 to March 16, 2020.

Estates of Class Members may also be eligible for compensation under the Settlement.

What Does the Settlement Provide?

The Settlement provides that:

- To receive payment, Class Members **must** fill out a claims form that details, to the best of their abilities, the dates which they worked for the Corporate Defendants, and their current contact information.
- Monkhouse Law will receive these claims forms and will review their records to corroborate the information contained therein.
- Monkhouse Law will send a notification letter to each Class Member who submits a claims form and explain what they have concluded regarding the Class Member’s work history, and the value of their claim.

- If a Class Member disagrees with Monkhouse Law’s assessment, they can file an appeal.
- Once all appeals are resolved, Monkhouse Law will calculate the estimated amount each Class Member is entitled to receive under the settlement using a pre-determined formula.

The Court has approved a global, all-inclusive settlement payment amount of \$2,400,000.00 (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 Protocol in the Settlement Agreement, including a distribution to eligible Class Members, as described in greater detail below.

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 \$966,845.63. This amount is inclusive of legal fees, HST, and disbursements.

Full details of the settlement are available in the Settlement Agreement found at: <https://www.monkhouselaw.com/deloitte-document-reviewer-class-action/>.

How Much Money Will I Get?

The amount each Class Member will receive will depend on few factors:

- (1) The number of Class Members that apply for payment;
- (2) The number of hours you worked for the Defendants; and,
- (3) When you worked for the Defendants.

Monkhouse Law will review the Defendants’ records to determine when each Class Member worked for the Defendant, as well as each Class Member’s position with the Defendant. That calculation will be used to determine what share of the settlement amount the Class Member will receive. The total payment will also be dependent on the number of Class Members who apply for compensation under the Settlement.

These figures will be applied to a pre-determined formula to calculate what share of the settlement amount each Class Member will receive.

Settlement funds will generally be distributed as follows as follows:

- (1) Monkhouse Law will consult the records provided by the Defendants regarding the Class Member's hours of work;
- (2) Monkhouse Law will assign 4% of the amounts received by the Class Members as vacation pay, will calculate the relevant holiday pay and overtime pay for weeks where the records show that the Class Member worked in excess of 44 hours.

All the above figures are **estimates only**: the total payment you receive will be dependent on the number of Class Members who apply for compensation under the Settlement Agreement and the total costs incurred in administering the settlement.

Importantly, the entirety of the settlement is for a fixed amount, meaning that the Defendants and Class Counsel do not "save" money by denying claims.

If you want to see the formulae being applied in detail, you will have to read the Settlement Agreement found at

<https://www.monkouselaw.com/deloitte-document-reviewer-class-action/>.

The Defendants will make the payments as damages and will not be making tax deductions. If you have questions regarding the tax consequences, it is recommended that you call the Canada Revenue Agency at **1-800-959-8281**.

How Do I Get This Money?

To be eligible to receive a payment under the Settlement, you must complete a Claims Form and return it to Monkhouse Law by May 18, 2023. If you do not submit a complete and valid Claims Form by this deadline, you may be ineligible to receive a payment under the Settlement. Claims Forms filed on behalf of the estate of a Class Member must be submitted by the executor or administrator of the estate. Claims Forms must be submitted to Monkhouse Law either by email or mail at the following:

Deloitte Class Action
c/o Monkhouse Law, 220 Bay Street,
Suite 900,
Toronto, Ontario, M5J 2W4
Email: deloitte.classaction@monkouselaw.com

A copy of the Claims Form is attached to this notice. Copies are also available at <https://www.monkouselaw.com/deloitte-document-reviewer-class-action/>.

Want More Information?

Visit, call, or email Class Counsel at:

Website: <https://www.monkouselaw.com/deloitte-document-reviewer-class-action/>

Email: Alexandra@monkouselaw.com

Telephone: 416-907-9249 ext 211