

**LONG FORM NOTICE OF CERTIFICATION AND SETTLEMENT**  
**APPROVAL**  
**WERE YOU AN EMPLOYEE OF SOS (SUDBURY) INC. OR WORKFORCE**  
**INC. BETWEEN JANUARY 1, 2011 AND DECEMBER 31, 2022**

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

On September 29, 2021, Jordan Lock (the “**Plaintiff**”), commenced a proposed class action seeking to represent current and former employees who worked for Workforce Inc. and/or SOS (Sudbury) Inc. (the “**Defendants**”) who are allegedly owed compensation as a result of receiving unpaid training by, or on behalf of, the Defendants or others. The Defendants have denied all the plaintiff’s allegations.

Monkhouse Law represents the proposed class (“**Class Counsel**”).

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

All non-salaried employees of Workforce Inc. or SOS (Sudbury) Inc. from January 1, 2011 to December 31, 2022 who received unpaid training from or at the direction of the Defendants.

***Notice of Class Action Settlement***

The Ontario Superior Court of Justice has recently certified and approved a settlement (the “**Settlement**”) in the 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?***

On September 29, 2021, Jordan Lock (the “**Plaintiff**”), commenced a proposed class action

seeking to represent current and former employees who worked for Workforce Inc. and/or SOS (Sudbury) Inc. (the “Defendants”) who are allegedly owed compensation as a result of receiving unpaid training by, or on behalf of, the Defendants or others. The Defendants have denied all the plaintiff’s allegations.

Monkhouse Law represents the proposed class (“Class Counsel”).

### ***Am I Eligible?***

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

All non-salaried employees of Workforce Inc. or SOS (Sudbury) Inc. from January 1, 2011 to December 31, 2022 who received unpaid training from or at the direction of the Defendants.

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

All Class Members, except those members who validly "opt out" of this class action, as described below, will be bound by the terms of the Settlement and will be bound by the releases in the Settlement. As a result, they will automatically release, and will not be able to pursue, any claims they may have against the Defendants relating to any conduct alleged, or which could have been alleged, in this class action.

### ***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 Defendants, and their current contact information.
- These claims forms and available records will be reviewed to corroborate the information contained therein.
- Class Counsel will send a notification letter to each Class Member who submits a claim 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 the assessment, they can file an appeal with a designated referee.
- Once all appeals are resolved, the Defendants will calculate the estimated amount each Class Member who submitted a claim is entitled to receive under the settlement using a pre-determined formula.

The Court has approved a global, all-inclusive settlement payment amount of \$650,000 (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 will be reduced by Class Counsel’s fees, HST, disbursements, settlement administration costs and an honorarium for the Plaintiff. The remaining amount will be available to be distributed in accordance with the Distribution Plan 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 \$267,232.00. This amount is inclusive of legal fees, HST, and disbursements.

Full details of the settlement are available in the formal settlement agreement found at:

<https://www.monkouselaw.com/workforce-and-sos-unpaid-training-class-action/>

### ***How Much Money Will I Get?***

The amount each Class Member will receive will depend on several factors. These factors include:

- (1) The number of Class Members that apply for payment;
- (2) When each class member worked for the Defendants; and
- (3) The positions each Class Member held with the Defendants (i.e., labourer, attendant, rescuer or coordinator).

The records will be reviewed to determine when each Class Member worked for the Defendants, as well as each Class Member’s positions with the Defendants. This information will be used to perform a calculation that will be used to determine what share of the net total settlement amount each Class Member will receive. The total payment will also depend on the total costs incurred in administering the settlement.

For each year when you worked for the Defendants, the highest position you held will be determined and the following assumed amounts will be assigned for each applicable year:

- 1) Coordinator: \$2,610
- 2) Rescue: \$1,825
- 3) Attendant: \$1300
- 4) Labourer: \$700

For example, if a Class Member worked as Labourer and Attendant in 2020 and as Attendant and Coordinator in 2021, they will be assigned \$1300 for 2020 and \$2,610 for 2021. The total claim amount would be \$3,910.

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.

The total of all assessment amounts will be added up. If the total amount is greater than the Settlement Fund, everyone’s actual amount paid will be less than stipulated above, proportionate to each assessment.

If you have questions regarding the tax consequences of the payment you are to receive, 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 Class Counsel by June 10, 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 Class Counsel either by email or mail at the following:

[Workforce.classaction@monkhouselaw.com](mailto:Workforce.classaction@monkhouselaw.com)

Workforce Class Action  
c/o Monkhouse Law, 220 Bay Street, Suite  
900,  
Toronto, Ontario, M5J 2W4

A copy of the Claims Form is attached to this notice. Copies are also available at <https://www.monkhouselaw.com/workforce-and-sos-unpaid-training-class-action/>

If you choose to opt out of the class action, as described below, you will not be eligible for any compensation under the Settlement.

### ***What If I Do Not Want to Be Bound by the Settlement?***

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 training. 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 must also abide by any applicable limitation periods. We advise that you consult a lawyer about any limitations issues before making the decision to opt out.

If you wish to opt-out of this class action, you must submit a complete and valid Opt-Out Form to Class Counsel by email, mail or fax no later than **May 10, 2023** at the following:

Workforce Class Action  
c/o Monkhouse Law, 220 Bay Street, Suite  
900, Toronto, Ontario, M5J 2W4  
Email: [workforce.classaction@monkouselaw.com](mailto:workforce.classaction@monkouselaw.com).  
Fax: 888-501-7235

An Opt-Out Form will only be valid if it contains the following:

1. The full name of this proceeding (*Jordan Lock v. Workforce Inc. and SOS (Sudbury) Inc.*, or similar identifying words);
2. Your full name, current mailing address, email address and telephone number;
3. Your signature or the signature of a legal agent acting with your instruction; and
4. A brief statement:
  - (i) That you understand that you will be excluded from the class action and any benefits under the Settlement; and
  - (ii) Setting out the reason(s) for your decision to opt-out of the class action.

If you opt out of this class action, you will not be entitled to any compensation under the class action settlement.

A copy of the Opt-Out Form is available at:  
<https://www.monkouselaw.com/workforce-and-sos-unpaid-training-class-action/>

***Want More Information?***

Visit, call, or email Class Counsel at:

Website: [www.monkouselaw.com](http://www.monkouselaw.com)  
Email: [workforce.classaction@monkouselaw.com](mailto:workforce.classaction@monkouselaw.com).  
Telephone: 416-907-9249 ext 211