

LEGAL NOTICE

You have been identified as a potential Class Member in the CTS Class Action. The Court has approved a settlement. Please read this notice carefully.

Dear Former CTS Employees,

Notice of CTS Class Action Settlement

The Ontario Superior Court recently approved a settlement in a class action against CTS. You are receiving this notice because we believe you might be entitled to a payment under the settlement. Please read this notice carefully for details. The Ontario Superior Court authorized this notice. This is not a solicitation from a lawyer.

What Is the Class Action about?

Three former CTS employees, Claudette Wood, John Featherstone, and Bruce Cook (the "**Representative Plaintiffs**"), sued CTS on behalf of CTS employees employed at CTS when it shut down its Streetsville Plant. The class action lawsuit claimed that CTS violated sections of Ontario's *Employment Standards Act, 2000* and its obligation to give CTS employees proper notice before shutting down the plant. The lawsuit alleged that CTS owes some monies to affected Class Members as a result of these actions.

CTS denied all of these allegations. Many of the allegations were litigated in court and others were left to be dealt with later. After extensive litigation and settlement discussions, the Representative Plaintiffs and CTS reached a proposed a settlement that provides compensation to eligible employees. The Ontario Superior Court has approved this agreement.

Who is Entitled to Payment?

All Class Members are eligible for a payment. A person is a Class Member if they worked for CTS at their facility located at 80 Thomas Street, in Streetsville, Ontario, and received notice of termination of their employment at any time on or after April 17, 2014 until final closure of the facility. The class action does not include:

- a) employees who executed a full and final release in favour of the Defendants up to November 30, 2015;
- b) employees who were dismissed for just cause;
- c) employees who were absent due to disability; and,
- d) Ugo Baldassare.

Estates of Class Members may be eligible. A claim must be filed by the Estate Executor, or, if the Estate has been wound up, an immediate family member of a deceased class member.

All Class Members will be bound by the terms of the Settlement, and will be covered by the releases in the Settlement. As a result, they will not have the right to sue CTS for violating sections of Ontario's *Employment Standards Act, 2000* and its obligation to give CTS employees proper notice before shutting down the plant, and any related claims.

What Does the Settlement Provide? The settlement provides that:

- a) All Class Members are eligible for compensation;

- b) CTS will pay each Class Member an individualized payment whether they ask for it or not. The amount of payment has been pre-determined by Cavalluzzo LLP and CTS based on the detailed information available for each Class Member.

The full settlement agreement is available here: www.ctscanadasettlement.com

How Much Money Will I Get?

The Court approved a total payment of \$1,047,297.85. From these amounts, \$214,635.14 will be paid to Cavalluzzo LLP in legal fees, HST and disbursements. You do not need to pay Cavalluzzo LLP any additional money.

Each Class Member will receive an individualized payment, the amount of which has been pre-determined by CTS and Cavalluzzo LLP based on detailed information available for each Class Member.

You should know that the standard tax withholdings will be deducted for monies paid pursuant to any employment agreement. Class Members who receive any monies paid pursuant to contracts for services continue to be responsible for making any necessary remittances to the Canada Revenue Agency.

If you would like more information about your individualized payment, you may contact Trilogy Class Action Services by calling 1-877-400-1211 (Toll Free) or emailing claims@trilogyclassactions.ca.

The portal is found at <https://portal.ctscanadasettlement.com>

How Do I Get This Money?

All Class Members will be sent payment whether they ask for it or not and whether they help by providing an address or banking details to assist with payment.

We are encouraging you to contact Trilogy Class Action Services to provide your most recent contact details and your banking information. You can contact Trilogy Class Action Services by calling 1-877-400-1211 or by emailing claims@trilogyclassactions.ca. You can also send your information to:

Trilogy Class Action Services c/o CTS Canada Class Action Settlement,
117 Queen Street, P.O. Box 1000, Niagara-on-the-Lake, ON L0S 1J0

If you do not do this, you risk having a cheque with your payment sent to the wrong address

In the event that a cheque provided to any Class Member is uncashed after six (6) months, the cheque will be considered stale and the funds will be donated to the Workers' Action Centre as of the stale date.

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

In 2016, you were given a right to opt-out and you chose not to, which therefore means you are bound by the settlement. We strongly recommend you consult a lawyer for legal advice if you have any concerns.

Want More Information?

For further information about the settlement of the CTS Class Action, please contact Trilogy Class Action Services by calling 1-877-400-1211 or emailing claims@trilogyclassactions.ca. You may also visit www.ctscanadasettlement.com.

Do You Know Anyone Who May Be Part of the CTS Class Action? Please share this information with them.