

Court File No. CV-19-615862-00CL
Court File No. CV-19-616077-00CL
Court File No. CV-19-616779-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,
R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE
OR ARRANGEMENT OF **JTI-MACDONALD CORP.**

AND IN THE MATTER OF A PLAN OF COMPROMISE
OR ARRANGEMENT OF **IMPERIAL TOBACCO CANADA LIMITED**
AND **IMPERIAL TOBACCO COMPANY LIMITED**

AND IN THE MATTER OF A PLAN OF COMPROMISE
OR ARRANGEMENT OF **ROTHMANS, BENSON & HEDGES INC.**

Applicants

SUPPLEMENTAL MOTION RECORD

(PCC Representative Counsel's Motion for Injunctive Relief)
(Returnable on March 26, 2025)

March 25, 2025

WAGNERS

1869 Upper Water Street, Suite PH301
3rd Floor, Historic Properties
Halifax, NS B3J 1S9

Raymond F. Wagner, K.C.

Tel: 902 425 7330

Email: raywagner@wagners.co

Kate Boyle (LSO# 69570D)

Tel: 902 425 7330

Email: kboyle@wagners.co

PCC Representative Counsel

**TO: AIAG, LLC, carrying on business
as the Attorney Group**
610 President Clinton Ave
Suite 300
Little Rock, AR 72201

-and-

Anthony Johnson
Johnson Firm
610 President Clinton Ave
Suite 200
Little Rock, AR 72201

Email: anthony@yourattorney.com

-and-

Lyle D. Foster
Hyden, Miron & Foster, PLLC
901 N. University Avenue
Little Rock, AR 72207

Email: Lyle.Foster@hmflaw.net

-and-

THE COMMON SERVICE LIST

Court File No. CV-19-615862-00CL
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Applicants

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	Exhibit "C" – Email correspondence with Jonathan Kleiman dated March 24, 2025, including a copy of the Kleiman List

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Applicants

AFFIDAVIT OF DAYNA MACGILLIVRAY

I, Dayna MacGillivray, of the city of Halifax, in the Province of Nova Scotia, AFFIRM AND SAY:

1. I am a paralegal at The Law Practice of Wagner & Associates, Inc. ("**Wagners**").
2. On December 9, 2019, Wagners was appointed by the Ontario Superior Court of Justice (Commercial List) ("**CCAA Court**") to represent the Pan-Canadian Claimants ("**PCCs**") in the context of the present proceedings ("**CCAA Proceedings**") under the *Companies' Creditors Arrangement Act*, RSC 1985, c C-36, as amended ("**CCAA**").
3. Since December 9, 2019, PCC Representative Counsel has been representing the interests of the PCCs in the context of the CCAA Proceedings. As such, I have knowledge of the matters to which I hereinafter depose. Where I make statements about information that is not within my personal knowledge, I have stated the source of that information and believe it to be true.

4. Unless otherwise defined herein, all defined terms used in this affidavit have the meanings ascribed to them in the Third Amended and Restated Plans of Compromise and Arrangement dated February 27, 2025, in respect of each of the Applicants in these CCAA Proceedings (collectively, the “**CCAA Plans**”).
5. I affirm this affidavit in support of PCC Representative Counsel’s Motion for Injunctive Relief before the Honourable Chief Justice Geoffrey B. Morawetz presiding over the Commercial List on March 26, 2025, at 10:30 am EST, and for no other or improper purpose.

REMAINING ATTORNEY GROUP SOLICITATIONS

6. On March 21, 2025, I served Mr. Anthony Johnson, named principal of Attorney Group, and Mr. Lyle Foster, named incorporator, organizer, and registered agent of Attorney Group (collectively, “**Attorney Group**”), as well as all parties listed on the Email Service List, in accordance with the E-Service Guide of the Commercial List and the Common Service Protocol, with a copy of the Motion Record, Factum and Book of Authorities of the PCC Representative Counsel.
7. That same day, I confirmed that the remaining Attorney Group Solicitations consisting of three Facebook advertisements remained in “active” status on the Meta ad library.
8. On March 24, 2025, I confirmed that the remaining Attorney Group Solicitations had been removed.

OTHER UNAUTHORIZED SOLICITATIONS OF PCCS AND INQUIRIES BY OTHER ENTITIES REGARDING REPRESENTING PCCS

9. In the Affidavit of Kate Boyle affirmed on March 21, 2025, and filed in support of this motion (“**Boyle Affidavit**”), she provided information regarding other known unauthorized solicitations of PCCs at paragraphs 57 to 64. In addition to the unauthorized solicitations described therein, PCC Representative Counsel has become aware of other entities, lawyers and law firms seeking to represent PCCs in relation to the PCC Compensation Plan.
10. I am informed by Mr. Raymond Wagner, K.C., Partner and Founder of Wagners, and verily believe that on March 12, 2025, he was contacted via email by an agent acting on behalf of

a law firm based in Texas, U.S.A., inquiring about representing claimants in relation to the PCC Compensation Plan.

11. I am informed by Mr. Wagner and verily believe that, in response to this inquiry, he advised that third-party legal representation is not required for the Claims Process, as an Agent has been retained to assist claimants free of charge. He further advised that the sanctioned CCAA Plans expressly prohibit solicitation of PCCs and that the CCAA Court issued an injunction against such solicitation in December 2024. The Order and Endorsement issued by the CCAA Court in the Actis Injunction Motion, along with the Non-Solicitation Provision at Section 8.4 of the CCAA Plans, were provided to the agent.
12. I am further informed by Mr. Wagner and verily believe that on March 21, 2025, he was contacted via phone by a class action lawyer practicing in Canada, who similarly inquired about representing claimants in relation to the PCC Compensation Plan. Mr. Wagner advised this lawyer that the sanctioned CCAA Plans expressly prohibit solicitation of PCCs, and that the CCAA Court formerly issued an injunction against such solicitation in December 2024.
13. I have also been informed by Counsel to the Consortium of the Provinces and Territories that a law firm based in Texas, U.S.A., separately inquired with their firm via email about representing claimants in relation to the PCC Compensation Plan.
14. On March 24, 2025, I found the following website purporting to provide representation to PCCs after searching “tobacco claims” in google: <https://cancer-claims.com/> (“**Jonathan Kleiman Website**”). The Jonathan Kleiman Website appears to be operated by Jonathan Kleiman practicing out of Toronto, Ontario, and a partner firm, Danziger & Dellano, LLP, located in Houston, Texas. Attached hereto and marked as **Exhibit “A”** are screenshots of the Jonathan Kleiman Website accessed by me on March 24, 2025.
15. On March 24, 2025, I sent a letter from Mr. Wagner to Mr. Jonathan Kleiman, the owner of the Jonathan Kleiman Law Firm, to the email address posted on the Jonathan Kleiman Website. A copy of the March 24, 2025 letter, with enclosures omitted, is attached hereto and marked as **Exhibit “B”**.

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Dayna MacGillivray

This is Exhibit "A" referred to in the
Affidavit of Dayna MacGillivray affirmed
before me on the 25th day of
March, 2025.

A handwritten signature in black ink, appearing to read 'K. Boyle', written over a horizontal line.

Signature

KATE BOYLE
A Barrister of the Supreme
Court of Nova Scotia



Seeking Justice For Tobacco-Related Illness & Mesothelioma Victims

If you or a loved one was diagnosed with Lung Cancer, Throat Cancer, COPD, Emphysema after smoking, or Mesothelioma after asbestos exposure, you may be eligible to pursue compensation. The Ontario Superior Court approved a C\$32.5 billion tobacco settlement on March 7, 2025, and separate compensation programs exist for mesothelioma victims.

Time-Sensitive: Learn If You May Qualify For These Compensation Programs

- ✓ No lawsuit required
- ✓ No upfront costs
- ✓ Money paid to you

Free 60-Second Eligibility Check

Discover if you qualify for compensation. No obligation.

Who suffered from illness? *

Please select...

Primary Diagnosis: *

Please select...

When was the diagnosis received? *

Please select...

The Canadian Tobacco Settlement requires claimants to have smoked at least 87,600 cigarettes (12 pack-years) between 1950-1998. Please answer the following questions:

Approximately how many years did you smoke cigarettes? *

Please select...

On average, how many packs of cigarettes did you smoke per day? *

Please select...

Was the diagnosed person a resident of Canada? *

Please select...

CHECK YOUR ELIGIBILITY NOW

Your information remains 100% confidential and secure. By taking action today, you're taking the critical first step toward obtaining the justice and financial recovery you deserve.

Canadian Tobacco Settlement Claims Overview

After decades of litigation, a settlement has been established to address claims by those affected by tobacco-related illness. The settlement provides a framework for eligible Canadians to seek compensation through a court-supervised claims process.

You May Qualify To Pursue Compensation If:

- ✓ You or your loved one was diagnosed with Lung Cancer, Throat Cancer, or severe COPD/Emphysema (GOLD Grade III or IV)
- ✓ Your diagnosis occurred between March 8, 2015, and March 8, 2019
- ✓ You smoked at least 87,600 cigarettes (equivalent to 12 pack-years) between 1950-1998
- ✓ You were a resident of Canada (excluding Quebec which has a separate program) at the time of diagnosis
- ✓ You were alive on March 8, 2019



If a qualified claimant has since passed away, their estate may still be eligible to seek compensation.



Mesothelioma Victims

- ✓ Diagnosed with mesothelioma within the last 3 years
- ✓ Exposed to asbestos at any point in your life
- ✓ Any Canadian resident may qualify

Even if your loved one has passed away, families can still recover compensation!

GET STARTED

Understanding Potential Compensation

Through this court-supervised settlement program, eligible claimants may receive compensation amounts that vary based on several factors, including:

- **Lung Cancer:** Compensation may be up to C\$60,000, depending on eligibility factors
- **Throat Cancer:** Compensation may be up to C\$60,000, depending on eligibility factors
- **COPD/Emphysema (GOLD Grade III or IV):** Compensation may be up to C\$18,000, depending on eligibility factors
- **Mesothelioma:** Compensation if you had work exposure with asbestos in the US may be over C\$ 1 Million and if the asbestos was solely in Canada it would be less.

Important Note: Actual compensation amounts will depend on meeting all eligibility requirements, providing sufficient documentation, the total number of claimants, and other factors outlined in the settlement plan. Results will vary.



Understanding The Claims Process



The claims process involves several important steps:

1. Determine if you meet the eligibility criteria outlined in the settlement plan
2. Gather required medical documentation proving diagnosis and timing
3. Complete claim forms accurately with all necessary information
4. Submit your claim within the court-established deadlines
5. Await review and determination by the Claims Administrator

Note: This is a court-supervised claims process with specific requirements for documentation and proof. Meeting all eligibility criteria does not guarantee compensation.

GET STARTED

How Our Legal Team Can Help

Skilled Navigation of Eligibility Requirements

- We ensure your claim meets all criteria before submission
- We help identify and assemble the strongest possible documentation
- We work to maximize your potential compensation based on settlement terms

Assistance with Complex Documentation

- We help locate and obtain necessary medical records
- We can assist with affidavits when documentation is incomplete
- We provide guidance for estate representatives filing on behalf of deceased loved ones



Avoiding Administrative Errors

- We complete all forms accurately and thoroughly
- We ensure timely submission before deadlines expire
- We manage all communication with the Claims Administrator

Advocacy if any Issues Arise

- We can appeal or challenge denied claims
- We provide representation through the entire claims process
- We fight for your rights under the settlement terms

Important Timeline Considerations



The claims process has specific timeframes that should be considered:

- Court approval was granted March 7, 2025
- Claim filing deadlines will be established by the court
- Medical records may become more difficult to obtain as time passes
- Documentation requirements are specific and detailed
- The claims process will proceed according to the court's schedule

Taking prompt action to understand your eligibility and gather documentation can help position your claim appropriately.

CALL (855) 223-3301 NOW to speak with a settlement specialist immediately!

Canada's Trusted Legal Team For Maximum Compensation



Why Trust Us

- ✓ No Fees Unless Compensation is Recovered
- ✓ Thorough Evaluation of Your Potential Claim
- ✓ Guidance Through the Entire Claims Process

Contact our team today to discuss your potential claim under the Canadian Tobacco Settlement program or if you have a mesothelioma claim.

GET STARTED

Every Hour You Wait Risks Losing Thousands Of Dollars You And Your Family Deserve!

Free 60-Second Eligibility Check

Discover if you qualify for compensation up to C\$75,000. No obligation.

Who suffered from illness? *

Please select... ▼

Primary Diagnosis: *

Please select... ▼

When was the diagnosis received? *

Please select... ▼

The Canadian Tobacco Settlement requires claimants to have smoked at least 87,600 cigarettes (12 pack-years) between 1950-1998. Please answer the following questions:

Approximately how many years did you smoke cigarettes? *

Please select... ▼

On average, how many packs of cigarettes did you smoke per day? *

Please select... ▼

Was the diagnosed person a resident of Canada? *

Please select... ▼

CHECK YOUR ELIGIBILITY NOW

Your information remains 100% confidential and secure. By taking action today, you're taking the critical first step toward obtaining the justice and financial recovery you deserve.

IMPORTANT LEGAL NOTICE

This website provides information about the Canadian Tobacco Settlement program approved by the Ontario Superior Court on March 7, 2025, as well as information regarding mesothelioma claims in the United States. The information contained herein is for informational and general guidance purposes only, and should not be construed as legal advice, nor does it establish a lawyer-client relationship.

The Tobacco Settlement establishes a court-supervised claims process known as the PCC Compensation Plan, with specific eligibility criteria, required documentation, and strict filing deadlines. Court-appointed Claims Administrator (Epiq) provides free assistance to eligible claimants, enabling them to file claims directly and without incurring legal fees.

Claimants are not required to hire independent legal representation to submit a claim. If a claimant chooses to hire independent legal counsel, including our firm, legal fees will be incurred, typically deducted from compensation on a contingency fee basis. Such fees will reduce the total compensation received by the claimant. You are advised to carefully consider the benefits of hiring independent counsel against the free resources already available through the court-appointed Claims Administrator.

While our firm provides dedicated representation designed to help you navigate complexities, maximize your eligibility, assist with obtaining and organizing medical and supporting documentation, and advocate on your behalf in the claims process, hiring us or any lawyer is entirely voluntary. Hiring counsel is optional and is not necessary to participate in or benefit from the Tobacco Settlement claims process.

Important Additional Disclaimers and Notices:

- *Eligibility criteria under the Tobacco Settlement are strictly defined, and meeting these criteria is essential to qualifying for compensation.*
- *Our representation does not guarantee results. Compensation amounts are determined by court-appointed administrators based upon the provisions of the settlement.*
- *This firm is not endorsed by, nor officially affiliated with, the Ontario Superior Court, the Claims Administrator (Epiq), or any official party responsible for administration of the Canadian Tobacco Settlement.*
- *All compensation is subject to court oversight and may vary depending on the number of eligible claimants, approved claims, and specific circumstances of each individual claimant.*
- *Filing deadlines are strictly enforced by the court. Missing deadlines may result in disqualification.*
- *This firm does not represent the Tobacco Companies, their affiliates, or any other parties involved in the litigation that gave rise to the settlement.*

If you have any questions about our legal representation, contingency fees, or your rights under the settlement, please contact our firm directly.



Jonathan Kleiman
1235 Bay Street, Suite 700
Toronto, Ontario M5R 3K4

Danziger & Dellano, LLP
440 Louisiana, Suite 1212
Houston, TX 77002

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© 2025 Cancer-Claims.com. We will not share your information.

Free 60-Second Eligibility Check

Discover if you qualify for compensation. No obligation.

Who suffered from illness? *

I was diagnosed



Primary Diagnosis: *

Lung Cancer



When was the diagnosis received? *

2014



When did smoking begin and end?

Smoking Started: *

Smoking Ended: *

1999



Still Smoking



The Canadian Tobacco Settlement requires claimants to have smoked at least 87,600 cigarettes (12 pack-years) between 1950-1998. Please answer the following questions:

Approximately how many years did you smoke cigarettes? *

10-20 years



On average, how many packs of cigarettes did you smoke per day? *

1/2 to 1 pack (10-20 cigarettes)



Was the diagnosed person a resident of Canada? *

Yes



What Province do they live in? *

Manitoba



CHECK YOUR ELIGIBILITY NOW

Your information remains 100% confidential and secure. By taking action today, you're taking the critical first step toward obtaining the justice and financial recovery you deserve.



You're Almost Done! Complete Your Information Below to Start Your Claim Review

75% Complete

Injured Person's Details

First Name *

Last Name *

Date of Birth *

Phone *

Email *

Address *

City *

Province/Territory *

Postal Code *

SUBMIT MY CLAIM FOR REVIEW

This is Exhibit "B" referred to in the
Affidavit of Dayna MacGillivray affirmed
before me on the 25th day of
March, 2025.

A handwritten signature in black ink, appearing to read 'KATE BOYLE', written over a horizontal line.

Signature

KATE BOYLE
A Barrister of the Supreme
Court of Nova Scotia



W A G N E R S

EST. 1982

Raymond F. Wagner, K.C.

raywagner@wagners.co

March 24, 2025

VIA EMAIL

Jonathan Kleiman

1235 Bay Street, Suite 700

Toronto, ON M5R 3K4

Jonathan@JKleiman.com

Dear Mr. Kleiman,

Re: Unauthorized Solicitation of Tobacco Claimants – Immediate Action Required

We write to you in our capacity as Representative Counsel for Canadian victims of tobacco harm - the Pan-Canadian Claimants (“PCCs”) - in the ongoing tobacco proceedings under the *Companies’ Creditors Arrangement Act*, RSC 1985, c C-36, as amended (“CCAA”), before the Ontario Superior Court of Justice (Commercial List) (“CCAA Court”).

On December 9, 2019, we were appointed by the CCAA Court to act as Representative Counsel for the PCCs in the context of these CCAA proceedings. Since that time, we have been actively representing the interests of PCCs, ensuring that their rights are properly protected and advanced within the court-approved process.

It has come to our attention that you are operating a website – <https://cancer-claims.com> – and are soliciting claimants to sign up for legal representation in relation to the “Canadian Tobacco Settlement”.

This conduct is expressly prohibited by the CCAA Plans of Compromise and Arrangement sanctioned by Chief Justice Morawetz of the CCAA Court. Specifically, Section 8.4 of the CCAA Plans (the “Non-Solicitation Provision”) states:

8.4 No Solicitation of Pan-Canadian Claimants

No Persons other than the PCC Representative Counsel, their agent Epiq, the Claims Administrator, or any Person specifically authorized by any of the foregoing Persons or by the CCAA Court, shall solicit Pan-Canadian Claimants in order to assist them with the preparation or submission of their PCC Claim Packages under the PCC Compensation Plan.

P.O. BOX 756 CENTRAL RPO, HALIFAX, NOVA SCOTIA B3J 2V2

SUITE PH301, 1869 UPPER WATER STREET, HALIFAX, NOVA SCOTIA B3J 1S9

OFFICE: (902) 425-7330 TOLL-FREE: 1-800-465-8794 FAX: (902) 422-1233

www.wagners.co

This restriction is not discretionary. Your solicitation of Pan-Canadian Claimants and operation of the aforementioned website is in breach of the Non-Solicitation Provision.

In December 2024, when another firm falsely held itself out as representing PCCs, the CCAA Court issued an injunction prohibiting such conduct. Copies of the related Endorsement and Order are enclosed for your reference. Specifically, the Court made clear that:

- Soliciting claimants for legal representation creates confusion and risks undermining claimants' rights. Claimants may mistakenly believe they must retain an outside firm to access compensation when, in fact, the PCC Compensation Plan provides for their claims to be processed without additional legal fees.
- Unauthorized actors interfere with claimants' ability to receive accurate and timely information. This is particularly harmful given the complexity and duration of these proceedings.
- Such conduct disrupts the orderly resolution of the CCAA Proceedings. The Court determined that allowing unauthorized third parties to interject could cause irreparable harm.

Given that your conduct mirrors the actions already enjoined by the CCAA Court, we anticipate that the Court will impose the same restrictions should you fail to immediately cease and desist solicitation of Pan-Canadian Claimants.

In addition, since the December 2024 injunction, on March 6, 2025, the CCAA Court sanctioned the CCAA Plans. The related Sanction Order can be accessed here: <https://cfcanada.fticonsulting.com/ImperialTobacco/courtOrders.htm> and the Court's Endorsement is reported at *Imperial Tobacco Canada Limited*, [2025 ONSC 1358](#).

Please also note that on Friday March 21, 2025, we filed a motion before the CCAA Court seeking a further injunction against such conduct by another law firm operating out of Arkansas, and an Order that prohibits such conduct to any person or entity with knowledge or notice of the Order, to enforce the Non-Solicitation Provision sanctioned by the CCAA Court as part of the CCAA Plans. The motion will be heard by Chief Justice Morawetz via Zoom on **March 26, 2025, at 10:30 am EST**.

Accordingly, we require that you:

1. Immediately remove all solicitations related to the tobacco settlement and tobacco claims process, including but not limited any information relating to the ongoing tobacco proceedings under the CCAA on the website <https://cancer-claims.com>, any associated domains, social media posts, online advertisements, and any other public communications encouraging claimants to seek representation. You must confirm in writing once all such solicitations have been successfully removed.
2. Provide us with the list of all persons who signed up or provided information through the website <https://cancer-claims.com> or any other platform operated by you, including all contact and other information obtained and/or collected by you ("Kleiman List");

3. Permanently destroy all copies of the Kleiman List in your possession, whether in electronic or paper form; and
4. Confirm in writing that you will immediately cease and desist from any further solicitation of Pan-Canadian Claimants through any medium – including websites, social media, direct outreach, or advertising – and that you will refrain from any such solicitations until the completion of the Claims Process under the Pan-Canadian Claimants' Compensation Plan.

Please provide written confirmation of compliance with the above requests via email to me and Ms. Boyle, copied below, no later than **March 25, 2025, at 2:00 pm EST**.

We trust you will govern yourself accordingly. Should you require any clarification, please do not hesitate to contact us.

Yours truly,

A handwritten signature in blue ink, appearing to be 'RFW', with a horizontal line extending to the right.

Raymond F. Wagner, K.C.

RFW/dm

raywagner@wagners.co

Enclosures

cc: Kate Boyle – kboyle@wagners.co
Paul Danziger – paul@dandell.com
Rod De Llano – rod@dandell.com

This is Exhibit "C" referred to in the
Affidavit of Dayna MacGillivray affirmed
before me on the 25th day of
March, 2025.



Signature

KATE BOYLE
A Barrister of the Supreme
Court of Nova Scotia

From: [Jonathan Kleiman](#)
To: [Dayna MacGillivray](#)
Cc: [paul@dandell.com](#); [rod@dandell.com](#); [Ray Wagner](#); [Kate Boyle](#)
Subject: Re: Urgent – Unauthorized Solicitation of Tobacco Claimants
Date: Monday, March 24, 2025 2:53:31 PM
Attachments: [instagramlogoicon_68x68_2ea14550-5416-4648-bf9a-80aaa6b91768.png](#)
[twitterlogoicon_68x68_070cefad-43d3-47f9-9899-13f2e594c285.png](#)
[facebooklogoicon_68x68_a897f42b-7226-4434-ad67-fadf7de91910.png](#)
[bestlawyersawardlogo_rescaled_e3a70271-1136-4523-b557-03ec29840e79.png](#)
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[youtubelogoicon_68x68_25312a24-c84c-491d-9f4a-d7c71f9cb4ca.png](#)
[wagners_logo@2x_8d5982a5-a3d8-4876-bcc4-f5ec30f42726.png](#)

Thanks. Taking it down now. Will confirm when done.

Jonathan Kleiman, BA, JD

1235 Bay St., Suite 700
Toronto, ON, M5R 3K4

O: 1-855-416-0416

F: 647-977-5770

M: 416-554-1639

E: Jonathan@JKleiman.com

W: www.JKleiman.com

I appreciate your reviews: <https://g.page/kleimanlaw/review?rc>

IMPORTANT NOTICE:

Funds transfer fraud is on the rise. Please note, we will never email you with a request to change or update any banking or transfer information. If you receive a request like that by email, please phone us immediately using a previously known number. In addition, if we receive any banking or transfer information from you, we will confirm this by independent means. If you have questions or concerns, please contact us at 416-554-1639.

This message and any attachment(s) are intended only for the use of the individual or entity to which they are addressed. They may contain information that is privileged, confidential and exempt from disclosure under applicable law. Distributing or copying this communication without permission of the intended recipient is strictly prohibited. If you have received this communication in error, please notify Jonathan Kleiman immediately by e-mail at Jonathan@JKleiman.com. Thank you.

From: [Jonathan Kleiman](#)
To: [Kate Boyle](#)
Cc: [Dayna MacGillivray](#); paul@dandell.com; rod@dandell.com; [Ray Wagner](#)
Subject: Re: Urgent – Unauthorized Solicitation of Tobacco Claimants
Date: Monday, March 24, 2025 3:16:56 PM
Attachments: [image005.png](#)
[image002.png](#)
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[facebooklogoicon_68x68_591050c4-2700-4fe6-8994-2a7ac071f77a.png](#)
[image001.png](#)
[image007.png](#)

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It has now been taken down.

Jonathan Kleiman, BA, JD

1235 Bay St., Suite 700
Toronto, ON, M5R 3K4

O: 1-855-416-0416
F: 647-977-5770
M: 416-554-1639
E: Jonathan@JKleiman.com
W: www.JKleiman.com

I appreciate your reviews: <https://g.page/kleimanlaw/review?rc>

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From: [Jonathan Kleiman](#)
To: [Kate Boyle](#)
Cc: [Dayna MacGillivray](#); paul@dandell.com; rod@dandell.com; [Ray Wagner](#)
Subject: Re: Urgent – Unauthorized Solicitation of Tobacco Claimants
Date: Monday, March 24, 2025 11:23:52 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[wagners_logo@2x_8d5982a5-a3d8-4876-bcc4-f5ec30f42726.png](#)
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[2023_toppersonalinjuryboutique_rescaled_1bdd0970-1920-475d-8790-a6f60c383de6.png](#)
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[facebooklogoicon_68x68_591050c4-2700-4fe6-8994-2a7ac071f77a.png](#)
[twitterlogoicon_68x68_9997861d-7790-472d-8042-6a1750c0b395.png](#)
[instagramlogoicon_68x68_89475fac-4e6f-4f8a-a7bf-6ad8e5a91b29.png](#)
[youtubebelogoicon_68x68_356e3937-1d6b-4292-979a-b5fdbb7a1b47.png](#)
[LeadsExport-March_24_2025_0442 - Tobacco.pdf](#)

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Please see attached for a list of all potential clients found through this campaign.

Of these, two signed retainers, and we have now sent non-retainer agreements to both.

I trust this satisfies your requests, but please let me know if anything else is required.

Thank you,

Jonathan Kleiman, BA, JD

1235 Bay St., Suite 700
Toronto, ON, M5R 3K4

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First Name	Last Name	Address 1	Zip	Mobile Phone	Email	Birthdate	Created Date
							3/22/25 0:51
							3/22/25 2:03
							3/22/25 2:56
							3/22/25 8:09
							3/22/25 15:26
							3/22/25 16:51
							3/22/25 16:54
							3/22/25 19:59
							3/22/25 20:09
							3/22/25 20:12
							3/22/25 22:05
							3/23/25 9:55
							3/23/25 10:08
							3/23/25 17:22
							3/23/25 18:39
							3/23/25 19:17
							3/23/25 20:02
							3/23/25 22:40
							3/24/25 0:46
							3/24/25 1:44
							3/24/25 1:49
							3/24/25 2:16
							3/24/25 9:13
							3/24/25 10:44
							3/24/25 12:01
							3/24/25 12:20
							3/24/25 12:31
							3/24/25 13:11

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c.C-36, AS AMENDED
AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF:

JTI-MACDONALD CORP.

IMPERIAL TOBACCO CANADA LIMITED AND IMPERIAL TOBACCO COMPANY LIMITED

ROTHMANS, BENSON & HEDGES INC.

Court File No. CV-19-615862-00CL

Court File No. CV-19-616077-00CL

Court File No. CV-19-616779-00CL

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)
Proceeding commenced at Toronto

SUPPLEMENTAL MOTION RECORD
PCC Representative Counsel's Motion for Injunctive Relief
(Returnable March 26, 2025)

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