

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

TRUIST BANK, AS AGENT

Applicant

- and-

KEW MEDIA GROUP INC. and KEW MEDIA INTERNATIONAL (CANADA) INC.

Respondents

**APPLICATION UNDER SUBSECTION 243(1) OF THE *BANKRUPTCY AND
INSOLVENCY ACT*, R.S.C. 1985 C. B-3, AS AMENDED, AND SECTION 101 OF THE
COURTS OF JUSTICE ACT, R.S.O. 1990, C. C-43, AS AMENDED**

FACTUM

**(Extending Time for Service of the Statement of Claim and
Removing Thornton Grout Finnigan as Class Counsel)**

Kalloghlian Myers ^{LLP}
250 University Avenue, Suite 200
Toronto, ON M5H 3E5

Paul D. Guy (LSO# 49794K)
Serge Kalloghlian (LSO#: 55557F)
Garth Myers (LSO#: 62307G)
Tel: (647) 969-4472
Fax: (647) 243-6620
paul@kalloghlianmyers.com
serge@kalloghlianmyers.com
garth@kalloghlianmyers.com

FOREMAN & COMPANY
4 Covent Market Place
London, ON N6A 1E2

Jonathan J. Foreman (LSO #45087H)
Sarah A. Bowden (LSO #56835D)
Anne E. Legate-Wolfe (LSO #76832J)
Tel: (519) 914-1175
Fax: (226) 884-5340
jforeman@foremancompany.com
sbowden@foremancompany.com
alegatewolfe@foremancompany.com

Lawyers for the Plaintiffs

TO: THE SERVICE LIST

SERVICE LIST
(as at January 15, 2021)

TO: DENTONS CANADA LLP
77 King Street West, Suite 400
Toronto-Dominion Centre
Toronto, ON M5K 0A1

Kenneth Kraft
Tel: (416) 863-4374
Fax: (416) 863-4592
kenneth.kraft@dentons.com

Robert Kennedy
Tel: (416) 367-6756
robert.kennedy@dentons.com

Mark A. Freake
Tel: (416) 863-4456
mark.freake@dentons.com

Lawyers for the Applicant, Truist Bank, as Agent

AND TO: GOODMANS ^{LLP}
Bay Adelaide Centre -West Tower
333 Bay Adelaide Street, Suite 3400
Toronto, ON M5H 2S7

Robert Chadwick
Tel: (416) 597-4285
Fax: (416) 979-1234
rhadwick@goodmans.ca

Joseph Pasquariello
Tel: (416) 597-4216
jpasquariello@goodmans.ca

Andrew Harmes
aharmes@goodmans.ca

Bradley Wiffin
Tel: (416) 597-4208
bwiffin@goodmans.ca

Jason Wadden
Tel: (416) 597-5165

jwadden@goodmans.ca

Lawyers for the Respondents, Kew Media Group Inc. and Kew Media International (Canada) Inc.

AND TO: FTI CONSULTING CANADA INC.
TD Waterhouse Tower
79 Wellington Street West, Suite 2010
Toronto, ON M5K 1G8

Nigel Meakin
Tel: (416) 649-8065
Fax: (416) 649-8101
nigel.meakin@fticonsulting.com

Toni Vanderlaan
Tel: (416) 649-8075
toni.vanderlaan@fticonsulting.com

Jim Robinson
Jim.robinson@fticonsulting.com

Court appointed Receiver of Kew Media Group Inc. and Kew Media International (Canada) Inc.

AND TO: TORYS LLP
TD South Tower
79 Wellington Street West, 33rd Floor
Toronto, ON M5K 1N2

Tony DeMarinis
Tel: (416) 865-8162
Fax: (416) 865-7380
tdemarinis@torys.com

David Bish
Tel: (416) 865-7353
dbish@torys.com

Adam M. Slavens
Tel: (416) 865-7333
aslavens@torys.com

Lawyers for FTI Consulting Canada Inc. in its capacity as Court appointed Receiver of Kew Media Group Inc. and Kew Media International (Canada) Inc.

AND TO: MILLER THOMSON ^{LLP}
Scotia Plaza
40 King Street West, Suite 5800
Toronto, ON M5H 3S1

Jeffrey C. Carhart
Tel: (416) 595-8615
Fax: (416) 595-8695
jcarhart@millerthomson.com

Jonathan Dyck
Tel: (416) 595-7944
jdycck@millerthomson.com

Lawyers for Bank of Montreal, in its capacity as lender to certain production subsidiaries of Kew Media Group Inc.

AND TO: BLAKE, CASSELS & GRAYDON ^{LLP}
199 Bay Street, Suite 4000
Commerce Court West
Toronto, ON M5L 1A9

Chris Burr
Tel: (416) 863-3261
Fax: (416) 863-2653
chris.burr@blakes.com

Lawyers for Argonon Ltd.

AND TO: MCMILLAN ^{LLP}
Brookfield Place, Suite 4400
181 Bay Street
Toronto, ON M5J 2T3

Tushara Weerasooriya
Tel: (416) 865-7890
tushara.weerasooriya@mcmillan.ca

Stephen Brown-Okruhlik
Tel: (416) 865-7043
stephen.brown-okruhlik@mcmillan.ca

Lawyers for Paul Heaney and Dina Subhani

AND TO: LENCZNER SLAGHT
130 Adelaide Street West, Suite 2600
Toronto, ON M5H 3P5

Sarah Bittman
Tel: (416) 865-9673
sbittman@litigate.com

Peter Osborne
Tel: (416) 865-3094
posborne@litigate.com

Lawyers for Shaftesbury Films Inc.

AND TO: LOOPSTRA NIXON
135 Queens Plate Drive, Suite 600
Etobicoke, ON M9W 6V7

Graham Phoenix
Tel: (416) 784-4776
Fax: (416) 746-8319
gphoenix@loonix.com

Lawyers for Beyond Entertainment Limited

AND TO: PAUL HEANEY
paul.heaney@tcbmediarights.com

EMAIL LIST

kenneth.kraft@dentons.com; robert.kennedy@dentons.com; mark.freake@dentons.com;
rchadwick@goodmans.ca; jpasquariello@goodmans.ca; aharmes@goodmans.ca;
bwiffen@goodmans.ca; jwadden@goodmans.ca; nigel.meakin@fticonsulting.com;
tonivanderlaan@fticonsulting.com; jim.robinson@fticonsulting.com; tdemarinis@torys.com;
dbish@torys.com; aslavens@torys.com; jcarhart@millერთhompson.com;
jdyck@millერთhompson.com; chrisburr@blakes.com; tushara.weerasooriya@mcmillan.ca;
Stephen.brown-okruhlik@mcmillan.ca; paul.heaney@tcbmediarights.com;
gphoenix@loonix.com; sbittman@litigate.com; posborne@litigate.com;
paul@kalloghlianmyers.com; serge@kalloghlianmyers.com; garth@kalloghlianmyers.com;
jforeman@foremancompany.com; sbowden@foremancompany.com;
alegatewolfe@foremancompany.com;

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PART I - OVERVIEW

1. Pursuant to a July 14, 2020 Order of this Court (the “**Lift Stay Order**”), the plaintiffs Alex Kan and Stuart Rath (“**Plaintiffs**”) were granted leave to issue and serve their Statement of Claim in a putative securities class proceeding issued against Kew Media Group Inc. (“**Kew Media**”) and certain of its former officers and directors (the “**Action**”). Pursuant to the Lift Stay Order, the Action was commenced by way of a Statement of Claim issued on July 20, 2020.
2. To date, service upon the seven individual defendants has been completed. The Plaintiffs have attempted to serve the Statement of Claim on Kew Media both through a process server who physically attended at the former premises of the company and through the Receiver. When the process server attended at Kew Media’s former premises, he was advised by the current tenant that Kew Media had gone bankrupt and no longer resides at the Office. To date, the Receiver has declined to accept service of the Statement of Claim on behalf of Kew Media.
3. In light of the Receiver’s position, it is anticipated that a motion to validate service or alternatively, a motion for substituted service may be necessary in order to effect service against Kew Media. It is currently anticipated that that motion will be heard with the next lift stay motion.
4. To prevent the potential for any prejudice to the Plaintiffs and members of the putative class in the Action, the Plaintiffs bring the within motion to request that the deadline for effecting service be extended for a further 120 days to July 13, 2021.
5. There is no prejudice or unfairness to any parties in the Action that will result from the extension of the time for service of the Statement of Claim.
6. The plaintiffs also seek an Order revoking the appointment of Thornton Grout Finnigan ^{LLP} (“**TGF**”) as Class Counsel pursuant to paragraph 10 of the Lift Stay Order. As of January 1, 2021,

Paul Guy, the partner at TGF with carriage of the file, withdrew from TGF's partnership and joined Kalloghlian Myers ^{LLP}, co-counsel in the class proceedings against Kew Media and others.

7. Given Mr. Guy's departure, TGF is no longer involved in the litigation and has consented to its removal as counsel. The other firms representing the Plaintiffs in the Class Counsel group remain unchanged.

PART II - THE FACTS

A. The Receivership Proceedings

8. On February 28, 2020, an Order was granted appointing FTI Consulting Canada Inc. as Receiver of all of the assets, undertakings and properties of Kew Media and certain related entities (the "**Receivership Order**").

Reference: Affidavit of Sarah Bowden, sworn January 15th, 2021 at para 2.

B. The Proposed Class Proceeding

9. The Plaintiffs retained TGF, Kalloghlian Myers ^{LLP} and Foreman & Company Professional Corporation (collectively, "**Class Counsel**") to commence a class proceeding against Kew Media in relation to damages they and other security holders suffered arising from alleged misrepresentations in Kew Media's public disclosure.

Reference: Affidavit of Sarah Bowden, sworn January 15th, 2021 at para 3.

10. On July 14, 2020, the Plaintiffs sought and obtained the Lift Stay Order from this Court in order to permit the issuance and service of the Action. The Lift Stay Order also expressly permitted motions to be brought if necessary in respect of service of the Statement of Claim.

Reference: Affidavit of Sarah Bowden, sworn January 15th, 2021 at para 4.

11. The Action was commenced by way of a Statement of Claim issued on July 20, 2020 as against Kew Media and seven of the company's former officers and directors.

Reference: Affidavit of Sarah Bowden, sworn January 15th, 2021 at para 5.

12. Pursuant to the Receivership Order, the Receiver is authorized and empowered to defend all proceedings now pending or hereafter instituted with respect to the company, its property and/or the Receiver and to settle or compromise any such proceedings.

Reference: Affidavit of Sarah Bowden, sworn January 15th, 2021 at para 7.

C. Service of the Statement of Claim

13. On February 28, 2020, all directors of Kew Media resigned from their role with the corporation, nine employees of Kew Media were terminated by the Receiver, and the Receiver secured possession and control over Kew Media's physical office space.

Reference: Affidavit of Sarah Bowden, sworn January 15th, 2021 at paras 8, 10.

14. Between February 28, 2020 and August 25, 2020, all remaining employees of Kew Media resigned or had their employment terminated by the Receiver.

Reference: Affidavit of Sarah Bowden, sworn January 15th, 2021 at paras 10, 11.

15. In April and June, 2020, the Receiver terminated the leases of Kew Media's physical office space.

Reference: Affidavit of Sarah Bowden, sworn January 15th, 2021 at para 12.

16. On December 30, 2020 and January 4, 2021, a process server retained by the Plaintiffs attended the former premises of Kew Media. The process server was unsuccessful on both attempts as Kew Media no longer maintains an office space.

Reference: Affidavit of Sarah Bowden, sworn January 15th, 2021 at para 13.

17. A copy of the Statement of Claim was served on the Receiver in conjunction with the motion to obtain the Lift Stay Order. Thereafter, a copy of the issued Statement of Claim was provided to the Receiver.

Reference: Affidavit of Sarah Bowden, sworn January 15th, 2021 at para 14.

18. On December 21, 2020, the Plaintiffs requested confirmation from the Receiver that it had accepted service of the issued Statement of Claim on behalf of Kew Media. The Receiver acknowledged receipt of the Statement of Claim, but declined to accept service on behalf of Kew Media.

Reference: Affidavit of Sarah Bowden, sworn January 15th, 2021 at paras 15, 16.

19. As a result of the COVID-19 pandemic, the time for taking any step in a proceeding was suspended retroactive to March 16, 2020 by Ontario Regulation 73/20 made under the *Emergency Management and Civil Protection Act*, R.S.O. 1990, c. E.9 (the “**Regulation**”). The Regulation was repealed on September 14, 2020 and the timeline for taking a step in the proceedings resumed on September 14, 2020. As a result, the deadline for service of the Statement of Claim is March 14, 2021.

Reference: Affidavit of Sarah Bowden, sworn January 15th, 2021 at paras 17, 18.

20. Class Counsel has taken all reasonable steps to date to swiftly effect service on Kew Media by regular and alternative channels. In light of the Receiver’s position, it is anticipated that a motion to validate service or alternatively, a motion for substituted service may be necessary in order to effect service against Kew Media. It is currently anticipated that this motion will be heard with the next lift stay motion.

Reference: Affidavit of Sarah Bowden, sworn January 15th, 2021 at para 19.

21. To prevent the potential for any prejudice to the Plaintiffs and members of the putative Class in the Action, the Plaintiffs have requested that the deadline for effecting service be extended for a further 120 days to July 13, 2021.

Reference: Affidavit of Sarah Bowden, sworn January 15th, 2021 at para 20.

22. Extending the time for service will advance the just resolution of allegations in the Statement of Claim and will not result in any prejudice to any defendant as all other parties to the Action have been served with the Statement of Claim.

Reference: Affidavit of Sarah Bowden, sworn January 15th, 2021 at para 21.

D. Class Counsel

23. At paragraph 10 of the Lift Stay Order, Justice Koehnen ordered that Thornton Grout Finnigan ^{LLP}, Kalloghlian Myers ^{LLP} and Foreman & Company be appointed as Class Counsel to prosecute the Action. Paul Guy was the partner at TGF with carriage of the file. As of January 1, 2021, Paul Guy withdrew from the partnership of TGF and joined Kalloghlian Myers ^{LLP}.

Reference: Affidavit of Sarah Bowden, sworn January 15th, 2021 at para 22.

24. Given Mr. Guy's departure, TGF is no longer involved in the litigation of the Action and has consented to its removal as counsel. Individual counsel to the Plaintiffs in the Class Counsel group remains unchanged.

Reference: Affidavit of Sarah Bowden, sworn January 15th, 2021 at para 23.

PART III - ISSUES AND THE LAW

A. Extension of the Time for Service of the Statement of Claim

25. As a result of the COVID-19 pandemic, the time for taking any step in a proceeding was temporarily suspended retroactive to March 16, 2020 by Ontario Regulation 73/20 (the "**Regulation**").

Reference: Affidavit of Sarah Bowden, sworn January 15th, 2021 at para 17.
O.Reg. 73/20: *Limitation Periods*, s. 2.

26. Any period of time within which a step must be taken in a proceeding that is temporarily suspended under the Regulation “resumes running on the date on which the temporary suspension ends and the temporary suspension period shall not be counted.”

Reference: O.Reg. 73/20: *Limitation Periods*, s. 6.

27. The Action was commenced during the suspension period under the Regulation.

Reference: Affidavit of Sarah Bowden, sworn January 15th, 2021 at para 18.

28. The Regulation was repealed effective September 14, 2020, at which time the time for taking a step in the Action began running.

Reference: Affidavit of Sarah Bowden, sworn January 15th, 2021 at para 17.
O.Reg. 457/20: *Revoking O.Reg. 73/20 (Limitation Periods)*, s. 1.

29. Where an action is commenced by a statement of claim, the statement of claim shall be served within six months after it is issued.

Reference: *Rules of Civil Procedure*, R.R.O. 1990, Reg. 194, r. 14.08(1).

30. The court may, on motion, order an extension or abridgement of any time prescribed by the Rules on such terms as are just.

Reference: *Rules of Civil Procedure*, R.R.O. 1990, Reg. 194, r. 3.02(1) and (2).

31. The court should not fix in advance rules or guidelines when an extension should be refused. Each case should be decided on its facts, focusing on whether the defence is prejudiced by the delay.

Reference: *Chiarelli et al. v. Wiens*, [2000] O.J. No. 296, at para 17 - Book of Authorities at **Tab 1**.

32. Extending the time for service a further 120 days to July 13, 2021 will advance the just resolution of allegations in the Statement of Claim and will not result in any prejudice to any defendant as all other parties to the Action have been served with the Statement of Claim.
33. The extension of the deadline for service will allow the Plaintiffs and Receiver time to confer to determine a path forward in the Action and the within Receivership proceedings, including the potential for bringing a motion to validate service or substituted service.
34. Extending the time for service will further prevent the potential for any prejudice to the Plaintiffs and members of the putative Class in the Action if the aforementioned motion(s) cannot be brought prior to the initial expiry of the time for service of the Statement of Claim on March 14, 2021.

B. Class Counsel

35. At paragraph 10 of the Lift Stay Order, Justice Koehnen ordered that TGF, Kalloghlian Myers ^{LLP} and Foreman & Company be appointed as Class Counsel to prosecute the Action. Paul Guy was the partner at TGF with carriage of the file.

Reference: Affidavit of Sarah Bowden, sworn January 15th, 2021 at para 16.

36. Given Mr. Guy's withdrawal from the TGF partnership as of January 1, 2021, TGF is no longer involved in the litigation and has consented to its removal as counsel of record.

Reference: Affidavit of Sarah Bowden, sworn January 15th, 2021 at paras 22, 23.

37. As Mr. Guy has joined Kalloghlian Myers, who was also appointed as Class Counsel the individual counsel to the Plaintiffs in the Class Counsel group remains unchanged.

Reference: Affidavit of Sarah Bowden, sworn January 15th, 2021 at paras 22, 23.

PART IV - ORDER REQUESTED

38. The Plaintiffs request an order:
- (a) extending the time for service of the Statement of Claim on Kew Media; and,
 - (b) revoking the appointment of TGF as Class Counsel pursuant to paragraph 10 of the Lift Stay Order.

ALL OF WHICH IS RESPECTFULLY SUBMITTED



**Jonathan J. Foreman / Sarah A.
Bowden / Paul D. Guy / Garth Myers /
Serge Kalloghlian**

Lawyers for the Plaintiffs

SCHEDULE “A” - LIST OF AUTHORITIES

1. *Chiarelli et al. v. Wiens*, [2000] O.J. No. 296.

SCHEDULE "B" - RELEVANT STATUTES

Rules of Civil Procedure, R.R.O. 1990, Reg. 194.

EXTENSION OR ABRIDGMENT

General Powers of Court

3.02 (1) Subject to subrule (3), the court may by order extend or abridge any time prescribed by these rules or an order, on such terms as are just. R.R.O. 1990, Reg. 194, r. 3.02 (1).

(2) A motion for an order extending time may be made before or after the expiration of the time prescribed. R.R.O. 1990, Reg. 194, r. 3.02 (2).

TIME FOR SERVICE IN ACTIONS

14.08 (1) Where an action is commenced by a statement of claim, the statement of claim shall be served within six months after it is issued. R.R.O. 1990, Reg. 194, r. 14.08 (1).

(2) Where an action is commenced by a notice of action, the notice of action and the statement of claim shall be served together within six months after the notice of action is issued. R.R.O. 1990, Reg. 194, r. 14.08 (2).

(3) REVOKED: O. Reg. 170/14, s. 2.

(4) REVOKED: R.R.O. 1990, Reg. 194, r. 14.08 (5).

(5) SPENT: O. Reg. 198/05, s. 1. (as amended by O. Reg. 438/08, s. 11 (2)).

Notice of Change of Lawyer

15.03 (1) A party who has a lawyer of record may change the lawyer of record by serving on the lawyer and every other party and filing, with proof of service, a notice of change of lawyer (Form 15A) giving the name, address and telephone number of the new lawyer. O. Reg. 575/07, s. 12.

***Reopening Ontario (A Flexible Response to COVID-19) Act, 2020, O.Reg. 73/20
Formerly Under Emergency Management And Civil Protection Act***

Period of time, steps in a proceeding

2. Any provision of any statute, regulation, rule, by-law or order of the Government of Ontario establishing any period of time within which any step must be taken in any proceeding in Ontario, including any intended proceeding, shall, subject to the discretion of the court, tribunal or other decision-maker responsible for the proceeding, be suspended, and the suspension shall be retroactive to Monday, March 16, 2020. O. Reg. 73/20, s. 2; O. Reg. 258/20, s. 2.

End of temporary suspension

6. For greater certainty, any limitation period or period of time within which a step must be taken in a proceeding that is temporarily suspended under this Regulation resumes running on the date on which the temporary suspension ends and the temporary suspension period shall not be counted. O. Reg. 378/20, s. 5.

***Reopening Ontario (A Flexible Response To Covid-19) Act, 2020, O.Reg. 457/20
Revoking O. Reg. 73/20 (LIMITATION PERIODS)***

Revocation

1. Ontario Regulation 73/20 is revoked.

Commencement

2. This Regulation comes into force on the later of September 14, 2020 and the day it is filed.

<p>TRUIST BANK, AS AGENT -and- KEW MEDIA GROUP INC. and KEW MEDIA INTERNATIONAL (CANADA) INC.</p> <p style="text-align: right;">Applicant Respondents</p>	<p style="text-align: right;">Court File No: CV-20-00637081-00CL</p>		
	<p style="text-align: center;">ONTARIO SUPERIOR COURT OF JUSTICE (COMMERCIAL LIST) Proceeding Commenced at TORONTO</p> <p style="text-align: center;">FACTUM (Extending Time for Service of the Statement of Claim and Removing Thornton Grout Finnigan as Class Counsel)</p> <table border="0" style="width: 100%;"> <tr> <td style="vertical-align: top; width: 50%;"> <p>KALLOGHLIAN MYERS ^{LLP} 250 University Avenue, Suite 200 Toronto, ON M5H 3E5</p> <p>Paul D. Guy (LSO# 49794K) Serge Kalloghlian (LSO#: 55557F) Garth Myers (LSO#: 62307G) Tel: (647) 969-4472 Fax: (647) 243-6620 paul@kalloghlianmyers.com serge@kalloghlianmyers.com garth@kalloghlianmyers.com</p> <p>Lawyers for the Plaintiffs</p> </td> <td style="vertical-align: top; width: 50%;"> <p>FOREMAN & COMPANY 4 Covent Market Place London, ON N6A 1E2</p> <p>Jonathan J. Foreman (LSO #45087H) Sarah A. Bowden (LSO #56835D) Anne E. Legate-Wolfe (LSO #76832J) Tel: (519) 914-1175 Fax: (226) 884-5340 jforeman@foremancompany.com sbowden@foremancompany.com alegatewolfe@foremancompany.com</p> </td> </tr> </table>	<p>KALLOGHLIAN MYERS ^{LLP} 250 University Avenue, Suite 200 Toronto, ON M5H 3E5</p> <p>Paul D. Guy (LSO# 49794K) Serge Kalloghlian (LSO#: 55557F) Garth Myers (LSO#: 62307G) Tel: (647) 969-4472 Fax: (647) 243-6620 paul@kalloghlianmyers.com serge@kalloghlianmyers.com garth@kalloghlianmyers.com</p> <p>Lawyers for the Plaintiffs</p>	<p>FOREMAN & COMPANY 4 Covent Market Place London, ON N6A 1E2</p> <p>Jonathan J. Foreman (LSO #45087H) Sarah A. Bowden (LSO #56835D) Anne E. Legate-Wolfe (LSO #76832J) Tel: (519) 914-1175 Fax: (226) 884-5340 jforeman@foremancompany.com sbowden@foremancompany.com alegatewolfe@foremancompany.com</p>
<p>KALLOGHLIAN MYERS ^{LLP} 250 University Avenue, Suite 200 Toronto, ON M5H 3E5</p> <p>Paul D. Guy (LSO# 49794K) Serge Kalloghlian (LSO#: 55557F) Garth Myers (LSO#: 62307G) Tel: (647) 969-4472 Fax: (647) 243-6620 paul@kalloghlianmyers.com serge@kalloghlianmyers.com garth@kalloghlianmyers.com</p> <p>Lawyers for the Plaintiffs</p>	<p>FOREMAN & COMPANY 4 Covent Market Place London, ON N6A 1E2</p> <p>Jonathan J. Foreman (LSO #45087H) Sarah A. Bowden (LSO #56835D) Anne E. Legate-Wolfe (LSO #76832J) Tel: (519) 914-1175 Fax: (226) 884-5340 jforeman@foremancompany.com sbowden@foremancompany.com alegatewolfe@foremancompany.com</p>		