

IQT, LTD. MASS TERMINATION CLASS ACTION NOTICE OF CERTIFICATION AND OPT-OUT DEADLINE

This Notice may affect your rights. Please read carefully

TO CLASS MEMBERS WHO ARE:

persons who were employees of IQT, Ltd. whose employment in Oshawa, Ontario, was terminated on July 15, 2011, exclusive of its officers and directors.

CERTIFICATION

A class action was commenced in the Ontario Superior Court of Justice against IQT, Ltd., c.o.b. IQT Solutions, IQT Canada, Ltd., JDA Partners LLC, IQT, Inc., Alex Mortman, David Mortman, Bradley Richards, John Fellows and Renae Marshall.

The action against Bradley Richards was discontinued. The action has been stayed against IQT, Ltd. and Renae Marshall as they are now bankrupt. The action against all of the remaining defendants continues.

The class action seeks damages related to the mass termination of employment of employees of IQT, Ltd. The plaintiffs allege that the defendants are responsible to them and the Class Members for unpaid wages, termination pay and other damages.

On January 2, 2014, this action was certified as a class action. Certification allows for the determination by the common issues judge of a list of common issues but the Court has not yet decided whether any of the defendants are liable. The action will proceed to a common issues trial and then individual issues trials, as required. A trial date has not yet been set by the Court. The certification order and the reasons for certification are posted at www.charneylawyers.com/iqtsolutions.

DO NOTHING IF YOU WISH TO PARTICIPATE IN THE CLASS ACTION

Class Members are automatically included in the class action and need not do anything at this time if they wish to participate in the class action. Class Members who do not opt out of the class action will be bound by the judgment in this action whether favourable or not.

OPTING OUT

If you are part of the Class described above and wish to be excluded from this action and do not wish to be bound by any order made in the action, you must send a signed statement saying that you wish to be excluded. The statement must include your name, address, email address, and telephone number. The statement must be received by 5:00 p.m. eastern time on August 29, 2014, by prepaid mail, fax, courier or email to:

Charney Lawyers
151 Bloor St. West, Suite 890
Toronto, ON M5S 1P7
Attention: IQT Class Action
Fax: 416-964-7416
Email: classaction@charneylawyers.com

A person who decides to opt out of the class action will not be bound by any future order made in the class action, and will not be eligible for any compensation in the class action.

Do not opt out if you wish to participate in the class action.

If you do not opt out of the class action on or before 5:00 p.m. eastern time on August 29, 2014, you will be part of this class action and you will be bound by the terms of any order, judgment or settlement, whether favourable or not, and will not be entitled to prosecute an independent action.

No person may exercise an opt-out option for any person under a disability without permission of the Court after notice to the Public Guardian and Trustee.

CLASS COUNSEL FEES AND DISBURSEMENTS

The representative plaintiffs and Class Counsel signed a fee agreement which provides that Class Counsel will be paid out of any recovery a percentage of the recovery as fees, plus expenses, applicable taxes and a proportionate share of the interest accruing on the recovery, but only in

the event of success in the class action. The fees will be up to 33 $\frac{1}{3}$ % (including damages and interest, but excluding partial indemnity costs) of the recovery.

The fee agreement must be approved by the court. Class Members will not be required to pay Class Counsel unless the plaintiffs are successful in this action and then the fees will be deducted from their recovery.

INDIVIDUAL ISSUES

Individual issues may remain for determination after the common issues trial. If a Class Member wishes to retain a lawyer to assist with these individual issues, the Class Member may have to pay additional fees for this service.

PRESERVATION OF DOCUMENTS

Each Class Member who wishes to participate in this class action should take all reasonable steps to ensure all documents relating to his/her individual claim for damages are preserved. Any Class Member having questions

respecting which documents must be preserved should contact Class Counsel for assistance at the address listed below.

INFORMATION

This Notice was approved by the Ontario Superior Court of Justice. Inquiries should not be directed to the court. Additional information about the class action can be found at www.charneylawyers.com/iqtsolutions.

Any questions regarding this class action, the certification order or opting out should be directed to:

Ted Charney or Andrew Eckart
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Toronto ON M5S 1S4
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Fax: 416.964.7416
Email: tedc@charneylawyers.com or
andrew@charneylawyers.com