

C A N A D A
PROVINCE OF QUEBEC

DISTRICT OF MONTREAL

NO.: 500-06-

SUPERIOR COURT
(Class Action)

CHARLES DAIGLE, domiciled and residing at 102 Cedarcrest, in the City of Dollard des Ormeaux, Province of Quebec, H9A 1G2

Petitioner

vs.

CLUB DE GOLF DE ROSEMÈRE, a legal person, duly constituted according to law, having an establishment at 282 Labelle Blvd., in the City of Rosemère, Province of Quebec, J7A 2H6

and

MARC BELLIVEAU, domiciled and residing at 204-260 place Harel, in the City of Sainte-Thérèse, Province of Quebec J7E 5W3

and

LOUIS BERGER, domiciled and residing at 3381 Cyprien Street, in the City of Laval, Province of Quebec H7P 4H6

and

JEAN COLLIN, domiciled and residing at 400-415 Saint-Antoine West, in the City of Montreal, Province of Quebec H2Z 2B9

and

GUY BÉRARD, domiciled and residing at 2488 des Bergeronnettes, in the City of Laval, Province of Quebec H7L 4X1

and

SERGE BOILEAU, domiciled and residing at 11211 Joseph-Casavant, in the City of Montreal, Province of Quebec H3M 2B8

and

LOUIS-PHILIPPE SÉGUIN, domiciled and residing at 251 de la Clairière, in the City of Rosemère, Province of Quebec J7A 4A5

and

JULES GAGNÉ, domiciled and residing at 269 de la Clairière, in the City of Rosemère, Province of Quebec J7A 4A5

and

DENIS TRÉPANIÉ, domiciled and residing at 4484 Gouin Blvd. West, in the City of Montreal, Province of Quebec H4J 1B7

and

ANDRÉ GOGUEN, domiciled and residing at 250 de la Clairière, in the City of Rosemère, Province of Quebec J7A 4G7

and

ANDRÉ MATHIEU, domiciled and residing at 174 place Ducharme, in the City of Rosemère, Province of Quebec J7A 1A1

and

MARCEL BERGERON, domiciled and residing at 412-64 Saint-Paul West, in the City of Montreal, Province of Quebec H2Y 4B8

and

SYLVIE SÉVIGNY, domiciled and residing at 11835 Marie-Anne-Lavallée, in the City of Montreal, Province of Quebec H3M 3E9

Respondents

and

CLUBLINK CORPORATION ULC, a legal person, duly constituted according to law, having an establishment at 888 3rd Street S.W. 4300 Bankers Hall West, in the City of Calgary, Province of Alberta, T2P 5C5

Impleaded Party

**APPLICATION FOR AUTHORIZATION TO INSTITUTE A CLASS ACTION
AND TO OBTAIN THE STATUS OF REPRESENTATIVE
(Articles 574 et seq. C.C.P.)**

TO ONE OF THE HONOURABLE JUDGES OF THE SUPERIOR COURT, SITTING IN AND FOR THE DISTRICT OF MONTREAL, PETITIONER RESPECTFULLY SUBMITS THE FOLLOWING:

1. **The Petitioner wishes to institute a class action on behalf of the class of persons hereinafter described, namely:**

“All natural or physical persons, estates, legal persons established for a private interest, partnerships and associations, or other groups not endowed with judicial personality in Canada or, in the alternative, Quebec, who hold one or more class “A” shares of Respondent Club de golf de Rosemère (the “**Club**”

(the “**Class**”);

2. **The Petitioner’s personal claim against the Respondents is based on the following facts:**

2A. The Parties

i) Petitioner

- 2.1. The Petitioner is a natural person, domiciled and residing in the Province of Quebec, District of Montreal;
- 2.2. At all relevant times, Petitioner has held and continues to hold two (2) class “A” shares of the Club, as appears from a copy of the share certificates dated February 5, 2018 communicated herewith, *en liasse*, as **Exhibit R-1**;

ii) The Club

- 2.3. The Club is a not-for-profit organization located in Rosemère (Laval), Quebec, the whole as appears from an excerpt from the *Registraire des entreprises* (CIDREQ) communicated herewith as **Exhibit R-2**;
- 2.4. The Club, in operation since 1922, is the subject of and is governed by a private bill which came into force in 1969 (the “**Private Bill**”), communicated herewith as **Exhibit R-3**;
- 2.5. As appears from an email dated March 28, 2018 from Marc Belliveau,

President and director of the Club (and one of the Individual Respondents herein), in March 2018, the Club accepted an \$18 million unconditional, irrevocable final offer to sell the Club to a third party (the “**Sale**”), the whole as appears more fully the email communicated herewith as **Exhibit R-4**;

iii) Individual Respondents

- 2.6. Individual Respondents named herein (the “**Individual Respondents**”) are, as per Exhibit R-2, directors of the Club;
- 2.7. The Individual Respondents or directors of the Club are also holders of class “B” shares of the Club, the whole as appears more fully from Sections 1.1.1 and 2.2 of the Club’s *Règlements des membres et autres participants*, communicated as **Exhibit R-5**, which establishes that only class “B” shareholders may be elected to the Club’s Board of Directors;

iv) Impleaded Party

- 2.8. Clublink Corporation ULC (“**Clublink**”) owns and operates Club de golf le Fontainebleau (“**Fontainebleau**”), the whole as appears more fully from an excerpt from the *Registraire des entreprises* (CIDREQ) communicated herewith as **Exhibit R-6**;
- 2.9. Clublink has recently accepted a letter of intention from the directors (Individual Respondents herein) of the Club to buy Fontainebleau (the “**Transaction**”), the whole as appears more fully from an email dated October 19, 2018 from Clublink’s Director and Chief Operating Officer, John Finlayson, to its members, (the “**Clublink Email**”), communicated herewith as **Exhibit R-7**;
- 2.10. As appears from the Clublink Email (Exhibit R-7), the Sale is referenced as a precursor to the Transaction;
- 2.11. The Clublink Email (Exhibit R-7) also confirms that the Transaction is set to close in mid-December 2018;

2B. Respondents’ Unlawful Conduct

i. Violation of the Private Bill

- 2.12. The Private Bill (Exhibit R-3) guarantees that any proceeds from the sale of the Club must be distributed evenly between the two groups of Club shareholders, the holders of the class “A” shares (such as those held by Petitioner) and the holders of the class “B” shares (such as those held by the Individual Respondents);

2.13. More particularly, paragraph 10(e) of the Private Bill, provides that:

10. The following provisions shall apply to the class "A" shares of the new authorized capital of the corporation:

(e) in the event of the dissolution of the corporation or of the sale of all or part of its immoveable property, any amount available for distribution to shareholders shall be distributed *pari passu* among the holders of class "A" and class "B" shares;

(emphasis added)

2.14. Notwithstanding the clear stipulations of the Private Bill, the Club and the Individual Respondents (its directors) have failed to distribute to the Petitioner and the Class their share of the Sale proceeds, the whole in violation of section 10(e) of the Private Bill;

2.15. Petitioner has spoken to other members of the Class who have also failed to receive any amount whatsoever further to the Sale;

2.16. Given the Club's commitment to proceed with the pending Transaction currently set to close in mid-December with Clublink for the purchase of Fontainebleau, it is clear that no Sale proceeds will be distributed to Petitioner and the Class;

ii. Violation of the *Civil Code of Quebec*

2.17. Respondents' actions are not only a violation of their obligations pursuant to the Private Bill, but of their general obligations to act prudently and diligently and in good faith, as per the applicable articles (including articles 6, 7, 1457) of the *Civil Code of Quebec* ("**CCQ**");

2.18. Respondents have a general obligation to act in good faith vis a vis the Petitioner and the members of the Class and not to cause them any damages as a result of their actions or conduct;

2.19. The significant damages caused to the Petitioner and the Class are the direct result of Respondents' failure to distribute to the Class members their share of the Sale proceeds in accordance with the terms of the the Private Bill;

2.20. Moreover, the Individual Respondents, as directors of the Club, have fiduciary duties to act reasonably, prudently and diligently, the whole as per the following articles of the CCQ:

321. A director is considered to be the mandatary of the legal person. He shall, in the performance of his duties, conform to the obligations imposed on him by law, the constituting act or the by-laws and he shall act within the limits of the powers conferred on him.

322. A director shall act with prudence and diligence.

- 2.21. Also, pursuant to Article 324 CCQ, "a director shall avoid placing himself in any situation where his personal interest would be in conflict with his obligations as a director";
- 2.22. As appears above, the Individual Respondents are directors and class "B" shareholders of the Club;
- 2.23. As appears from the Clublink Email (Exhibit R-7), the class "A" shareholders of the Club (the Class) have no golf privileges and will not, unlike the class "B" shareholders, be reaping the benefits of the Transaction. On the contrary, the Transaction is being carried out to the detriment of the Petitioner and the Class, without having advised or consulted same;
- 2.24. Given their interest in the Transaction as class "B" shareholders of the Club, the Individual Respondents have placed themselves in a conflict of interest thereby violating their obligations as directors of the Club;
- 2.25. As such, Respondents have breached the Private Bill and CCQ;
- 2.26. Moreover, Clublink is not entitled to proceed with the Transaction if in doing so it violates the rights of Petitioner and the Class in violation of Section 10(e) of the Private Bill (Exhibit R-3) and the CCQ;
- 2.27. Given the foregoing, Petitioner reserves his rights on his behalf and on behalf of the Class, to claim damages from Clublink and its directors in the event they proceed with the Transaction with the Club without first ensuring that the Class' rights are fully respected, the whole while these proceedings are pending and until a final judgment is rendered or satisfactory settlement, if any, is reached;

2C. The Respondents' Liability

- 2.28. Given the Sale and failure to remit their portion of the Sale proceeds to the Class, Respondents are liable towards the Class for all damages suffered;

- 2.29. More particularly, pursuant to the Private Bill and CCQ, the Club and the Individual Respondents, the latter as directors having a fiduciary duty, are responsible for all damages caused to the Class;

2D. The Remedies

- 2.30. The Petitioner is accordingly entitled to claim his share of the Sale proceeds distributed on a *pari passu* basis between the class "A" and class "B" shareholders of the Club, as per the Private Bill;
 - 2.31. There is a reference to "hundreds" of class "A" shareholders in the Clublink Email (Exhibit R-7) and, more specifically, 819 such (class "A") shareholders are referenced in both the Private Bill (Exhibit R-3) and on Petitioner's share certificates (Exhibit R-1);
 - 2.32. There is a reference to 89 remaining class "B" shareholders in the Clublink Email (Exhibit R-7);
 - 2.33. While the exact amount of the Sale proceeds available for distribution among shareholders, and the exact number of total Club "A" and "B" shareholders entitled to said Sale proceeds cannot be definitively quantified at this time (given that such information is in the hands of Respondents), the amount of damages to Petitioner and the other Class members is currently estimated at \$16 million;
3. **The personal claims of each of the members of the class against Respondents are based on the following facts:**
 - 3.1. All members of the Class are in the same situation as the Petitioner in that they are all class "A" shareholders of the Club owed sums in light of the Private Bill as a result of the Sale;
 - 3.2. Accordingly, Petitioner and each member of the Class are entitled to be reimbursed for his/her share of the Sale proceeds, thereby recovering from Respondents all proceeds from the Sale which have unlawfully been withheld from, and failed to be distributed to, the Class;
4. **The composition of the class makes it difficult or impracticable to apply the rules for mandates to take part in judicial proceedings on behalf of others or for consolidation of proceedings:**
 - 4.1. As appears above, to the best of Petitioner's knowledge, there are 819 class "A" shareholders of the Club (see Exhibits R-1 and R-3);
 - 4.2. Respondents are in possession of the data regarding those parties in Quebec and Canada who have class "A" shares since the Petitioner does

not have access to this data;

4.3. It would, accordingly, be impossible, and certainly difficult or impracticable, for the Petitioner to locate and contact all members of the Class to obtain a mandate to institute proceedings for their benefit or for there to be a consolidation of proceedings;

5. The identical, similar or related questions of law or of fact between each member of the class and the Respondent, which Petitioner wishes to have decided by this class action, are:

5.1. Are Respondents obliged to remit and distribute the Sale proceeds to class "A" shareholders (the Class) on a *pari passu* basis with class "B" shareholders of the Club?

5.2. In failing to distribute to the Class their share of the Sale proceeds, have Respondents breached their obligations pursuant to the Private Bill and the CCQ?

5.3. What is the amount of the Sale proceeds available for distribution to the Club's class "A" and class "B" shareholders?

5.4. What is the amount of the Sale proceeds due and owing to the Class?

5.5. Are Respondents and the Impleaded Party entitled to proceed with the Transaction notwithstanding the rights of the Class?

6. The questions of law or of fact which are particular to each of the members of the class is:

6.1. The only individual or particular question for the members of the Class is determining the specific amount to be paid to each member of the Class depending on the number of class "A" shares held by each of them;

7. It is expedient that the institution of a class action for the benefit of the members of the class be authorized for the following reasons:

7.1. A class action is the best procedural vehicle available to members of the Class in order to protect and enforce their rights herein;

7.2. A class action is the best, and likely the only, means for the hundreds of Class members to seek justice from Respondents, arising from their violation of the Private Bill and/or CCQ;

- 7.3. The question of whether the parties violated the Private Bill and/or CCQ is identical for each and every member of the Class, the questions of law and of fact are identical for each member of the Class, and the legal issues accordingly ought to be determined by a single Judge within a single judicial proceeding in order to avoid a multitude of proceedings and the risk of contradictory judgments;
8. **The nature of the recourse which the Petitioner wishes to exercise on behalf of the members of the class is:**

8.1. An Action to recover amounts collected by Respondents from the Sale and which have unlawfully been withheld from and failed to be distributed to the Class, the whole in violation of the Private Bill and/or CCQ and to condemn Respondents to pay said amounts;

8.2. Petitioner, on his own behalf and on behalf of the Class, reserves all rights to claim damages from Clublink and its directors personally, should they decide, notwithstanding having been advised of the Class' rights as set out herein, to proceed with the Transaction without first ensuring that the Class' rights are fully respected;

9. **The conclusions sought by the Petitioner against the Respondents are as follows:**

GRANT the class action against the Respondents;

CONDEMN the Respondents to pay to the Petitioner, for the benefit of the Class, the total amount of Sale proceeds owed to the class "A" shareholders, further to the Sale, on a *pari passu* with the class "B" shareholders of the Club, the whole with interest and the additional indemnity provided by law, said amount currently estimated to be \$16 million, *sauf à parfaire*;

ORDER collective recovery of the total amount of the claims herein and liquidation of such claims in accordance with articles 595 to 598 CCQ;

CONDEMN the Respondents to any further relief as may be sought by Petitioner and as may be deemed just and proper by this Court;

RESERVE Petitioner's rights to institute the necessary proceedings and/or claim damages from Clublink and its directors personally, should they proceed with the Transaction notwithstanding the institution of these proceedings without first ensuring that the Class' rights are fully respected;

THE WHOLE with legal costs, including the costs of all exhibits, reports, expertise and publication of notices.

10. **Petitioner is in a position to represent the members of the class adequately for the following reasons:**
 - 10.1. Petitioner is an individual, domiciled and residing in the Province of Quebec;
 - 10.2. Petitioner is a member of the Class in that he is a holder of two (2) class "A" shares of the Club;
 - 10.3. Petitioner has learned that the Respondents have failed to distribute any portion of the Sale proceeds to other class "A" shareholders of the Club;
 - 10.4. Petitioner, with the undersigned attorneys, is prepared to devote the time to communicate with numerous members of the Class, in order to inform them of the present class action (the "Action") and to inform them of their rights;
 - 10.5. Petitioner is not in a conflict with any member of the Class;
 - 10.6. Petitioner has the resources to advance the present class action in the best interests of the members of the Class;
 - 10.7. Petitioner is in good faith and is interested in protecting and advancing the rights of consumers and other members of the Class;
 - 10.8. Petitioner is well-informed of and understands the facts giving rise to the present Action and the nature of the present Action;
 - 10.9. Petitioner is determined to devote the time necessary to act as the representative of the Class in this Action;
 - 10.10. Petitioner has retained competent counsel with experience in class actions, and has met with class counsel for purposes of the present Action;
 - 10.11. Petitioner has fully cooperated with the undersigned attorneys, including answering diligently and intelligently their questions, and there is every reason to believe that he will continue to do so;
 - 10.12. Petitioner will fairly and adequately represent and protect the rights of the members of the Class and will take measures with the undersigned attorneys to keep the members of the Class informed of the present Action.

11. **Petitioner suggests that the class action be brought before the Superior Court for the district of Montreal for the following reasons:**

11.1. Petitioner is domiciled in the District of Montreal;

11.2. To the best of Petitioner's knowledge, a significant number of members of the Class are domiciled in the City of Montreal, Quebec's most populous city;

11.3. Certain Respondents are domiciled in the District of Montreal;

11.4. Petitioner's undersigned attorneys practice in the District of Montreal;

12. The present Application is well-founded in fact and in law;

WHEREFORE THE PETITIONER PRAYS THAT BY JUDGMENT TO BE RENDERED HEREIN, MAY IT PLEASE THIS HONOURABLE COURT TO:

GRANT the present Application;

AUTHORIZE the institution of the class action;

GRANT the status of representative to Petitioner for the purpose of instituting the said Class action for the benefit of the following group of persons, namely:

"All natural or physical persons, estates, legal persons established for a private interest, partnerships and associations, or other groups not endowed with judicial personality in Canada or, in the alternative, Quebec who, hold one or more class "A" shares of Respondent Club de golf de Rosemère (the "**Club**")

(the "**Class**");

IDENTIFY the principal questions of law and of fact to be dealt with collectively as follows:

- a) Are Respondents obliged to remit and distribute the Sale proceeds to class "A" shareholders (the Class) on a *pari passu* basis with class "B" shareholders of the Club?
- b) In failing to distribute to the Class their share of the Sale proceeds, have Respondents breached their obligations pursuant to the Private Bill and the CCQ?
- c) What is the amount of the Sale proceeds available for distribution to the Club's class "A" and class "B" shareholders?

- d) What is the amount of the Sale proceeds due and owing to the Class?
- e) Are Respondents and the Impleaded Party entitled to proceed with the Transaction notwithstanding the rights of the Class?

IDENTIFY the conclusions sought by the class action to be instituted as being the following:

GRANT the Class Action against the Respondents;

CONDEMN the Respondents to pay to the Petitioner, for the benefit of the Class, all amounts owing to the Class, the whole with interest and the additional indemnity provided by law;

ORDER collective recovery of the total amount of the claims herein and liquidation of such claims in accordance with articles 595 to 598 CCQ;

CONDEMN the Respondents to any further relief as may be just and proper;

THE WHOLE with legal costs, including the costs of all exhibits, reports, expertise and publication of notices.

DECLARE that any member of the Class who has not requested his/her exclusion from the Class be bound by any judgment to be rendered on the Class action, in accordance with law;

FIX the delay for exclusion from the Class at sixty (60) days from the date of notice to the members, and at the expiry of such delay, the members of the Class who have not requested exclusion be bound by any such judgment;

ORDER the publication of a notice to the members of the Class drafted according to the terms of form VI of the Rules of Practice of the Superior Court of Quebec and to be published:

1. In the following newspapers: La Presse, Le Journal de Montréal, The Gazette, Le Devoir, Le Soleil, The Globe and Mail, and National Post;
2. On the internet site of the Respondent, Club de golf de Rosemère - <http://www.golfrosemere.ca> and the website of the attorneys for Petitioner with a hypertext entitled "Avis aux membres d'une action collective, Notice to all Class Action Members" prominently displayed on Respondent's website and to be maintained thereon until the Court orders publication of another notice to members by final judgment in this instance or otherwise;

REFER the record to the Chief Justice so that he may fix the district in which the Class action is to be brought and the Judge before whom it will be heard;

ORDER the Clerk of this Court, in the event that the Class action is to be brought in another district, upon receiving the decision of the Chief Justice, to transmit the present record to the Clerk of the district so designated;

THE WHOLE with legal costs, including the costs of all publications of notices.

MONTREAL, November 15, 2018



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SUMMONS
(articles 145 and following C.C.P.)

Take notice that the Petitioner has filed this *Application for Authorization to Institute a Class Action and Obtain the Status of Representative* in the office of the **Superior Court** in the judicial district of **Montreal**.

You must answer the application in writing, personally or through a lawyer, at the **Courthouse of Montreal** situated at **1 Notre-Dame Street East, Montreal, Quebec, H2Y 1B6** within 15 days of service of the application or, if you have no domicile, residence or establishment in Quebec, within 30 days. The answer must be notified to the plaintiff's lawyer or, if the plaintiff is not represented, to the plaintiff.

If you fail to answer within the time limit of 15 or 30 days, as applicable, a default judgment may be rendered against you without further notice and you may, according to the circumstances, be required to pay the legal costs.

In your answer, you must state your intention to:

- Negotiate a settlement;
- Propose mediation to resolve the dispute;
- Defend the application and, in the cases required by the Code, cooperate with the Petitioner in preparing the case protocol that is to govern the conduct of the proceeding. The protocol must be filed with the court office in the district specified above within 45 days after service of the summons or, in family matters or if you have no domicile, residence or establishment in Quebec, within 3 months after service;
- Propose a settlement conference

The answer to the summons must include your contact information and, if you are represented by a lawyer, the lawyer's name and contact information.

You may ask the court to refer the *Application for Authorization to Institute a Class Action and Obtain the Status of Representative* to the district of your domicile or residence, or of your elected domicile or the district designated by an agreement with the plaintiff.

If the application pertains to an employment contract, consumer contract or insurance contract, or to the exercise of a hypothecary right on an immovable serving as your main residence, and if you are the employee, consumer, insured person, beneficiary of

the insurance contract or hypothecary debtor, you may ask for a referral to the district of your domicile or residence or the district where the immovable is situated or the loss occurred. The request must be filed with the special clerk of the district of territorial jurisdiction after it has been notified to the other parties and to the office of the court already seized of the originating application.

If you qualify to act as a plaintiff under the rules governing the recovery of small claims, you may also contact the clerk of the court to request that the application be processed according to those rules. If you make this request, the plaintiff's legal costs will not exceed those prescribed for the recovery of small claims.

Within 20 days after the case protocol mentioned above is filed, the court may call you to a case management conference to ensure the orderly progress of the proceeding. Failing this, the protocol is presumed to be accepted.

In support of the *Application for Authorization to Institute a Class Action and Obtain the Status of Representative*, the Petitioner intends to use the following exhibits:

- Exhibit R-1:** Two (2) class "A" shares of the Club de golf de Rosemère;
- Exhibit R-2:** Excerpt from the *Registraire des entreprises* (CIDREQ) regarding Club de golf de Rosemère;
- Exhibit R-3:** Private Bill of Club de golf de Rosemère;
- Exhibit R-4:** Email dated March 28, 2018 from Marc Belliveau, Club de golf de Rosemère;
- Exhibit R-5:** Club de golf de Rosemère's *Règlements des membres et autres participants*;
- Exhibit R-6:** Excerpt from the *Registraire des entreprises* (CIDREQ) regarding Clublink Corporation ULC;
- Exhibit R-7:** Email dated October 19, 2018 from John Finlayson to Clublink Corporation ULC's members.

These exhibits are hereby attached.

If the application is an application in the course of a proceeding or an application under Book III, V, excepting an application in family matters mentioned in article 409, or VI of the Code, the establishment of a case protocol is not required; however, the application must be accompanied by a notice stating the date and time it is to be presented.

MONTREAL, November 15, 2018

Kugler Kandestin LLP

KUGLER KANDESTIN LLP

Attorneys for Petitioner

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N°.: 500-06-

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DISTRICT OF MONTREAL

CHARLES DAIGLE;

Petitioner

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CLUB DE GOLF DE ROSEMÈRE ET AL.;

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INSTITUTE A CLASS ACTION AND TO OBTAIN
THE STATUS OF REPRESENTATIVE, SUMMONS
AND EXHIBITS R-1 TO R-7
(Articles 574 et seq. C.C.P.)**

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