

CANADA  
PROVINCE OF QUEBEC  
DISTRICT OF MONTREAL  
No.: 500-06-000859-179

**SUPERIOR COURT**  
(Class Action)

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**DENIS GAUTHIER**

Plaintiff

v.

**DAVID BAAZOV**

Defendants

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**AFFIDAVIT OF PAUL BATTAGLIA**  
(Sworn January 20, 2021)

I, **PAUL BATTAGLIA**, of the City of St. Catharines, in the Province of Ontario, **MAKE**

**OATH AND SAY:**

1. I am the President of Trilogy Class Action Services, located at 67 Queen Street, Second Floor, St. Catharines, Ontario, L2R 5G9 ("**Trilogy**");
2. I have personal knowledge of the facts attested to herein, except where stated to be on information and belief, and whereso stated, I have identified the source of my information, and, in each case, I believe the information to be true;
3. Pursuant to the Judgment of this Honourable Court dated November 4, 2020 (the "**Judgment**"), the Honourable Chantal Chatelain, J.S.C. approved the Notice Plan and Opt-Out administration procedure for opting out to the class action. The methods Trilogy employed are within the parameters outlined in the Judgment;

4. Trilogy published the bilingual notices (the “**Notices**”) in at least ¼ page size in the business/legal sections of the weekend editions of the National Post (English), La Presse digital (French) and two press releases in French and English on Saturday November 21, 2020;
5. Trilogy published the bilingual abbreviated notice content for ten (10) days on the National Post (English) and La Presse (French) websites with a link to the respective Baazov class action web page on Class Counsel’s website - <http://faguyco.com/portfolio/baazov-class-action/>;
6. Trilogy published the press release in both French and English advising of the authorization by the Superior Court of Québec a civil liability and securities class action against David Baazov and the procedure to opt-out of the class action by January 16, 2021;
7. Class Counsel made the Opt-Out Form available in PDF fillable format in French and English on each designated website page;
8. As of January 16, 2021, at 5:00 PM EST, no Class Member had submitted an Opt-Out Form to Trilogy;
9. I swear this affidavit to confirm compliance with the Judgment’s Notice Plan, paragraph 1;

**SWORN OR AFFIRMED** )  
before me at the City of St. )  
Catharines, )  
in the Province of Ontario, )  
this 20<sup>th</sup> day of January, 2021. )  
)  
)  
)

  
Paul Battaglia

  
A Commissioner for Taking Affidavits

**George Street Law**  
**Gary A. Hoftzyer**  
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**DENIS GAUTHIER**  
Plaintiff

and **DAVID BAAZOV**  
Defendants

Court File No.: 500-06-000859-179

*QUEBEC*  
SUPERIOR COURT OF JUSTICE  
PROCEEDINGS COMMENCED AT  
MONTREAL

**AFFIDAVIT OF PAUL BATTAGLIA**  
(Sworn January 20, 2021)

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