

## MOVING PARTY'S NOTICE

Pursuant to an Order (the “**Initial Order**”) of Justice Penny of the Ontario Superior Court of Justice (Commercial List) (the “**Court**”) dated August 7, 2014 (the “**Appointment Date**”), Collins Barrow Toronto Limited (“**Collins Barrow**”) was appointed as monitor (the “**Monitor**”) to monitor the business and financial affairs of Martin Ross Group Inc. (“**MRG**”) pursuant to the *Companies’ Creditors Arrangement Act* (the “**CCA**”).

Pursuant to an order of the Court dated October 8, 2014 (the “**Representative Counsel Order**”), Dewart Gleason LLP (“**Dewart Gleason**”) was appointed as representative counsel (“**Representative Counsel**”) of all Eligible Employees (as set out in Schedule “A” to the Representative Counsel Order) in all matters relating to the Mandate (as defined in the Representative Counsel Order).

The reasonable fees of and disbursements incurred by the Representative Counsel with respect to the Mandate shall be paid by 2436768 Ontario Inc. (“**243 Ontario**”) on a periodic basis. Accordingly, **you are not required to contribute to the costs of the Representative Counsel.**

**If you do not wish to be bound by this Order**, you must notify 243 Ontario and Dewart Gleason in writing, by mail, e-mail or delivery on or before **October 14, 2014**. Your notice that you do not wish to be bound by the Representative Counsel Order must be in the form of a fully completed and enclosed “Opt-Out Letter” attached as Schedule “B” to the Representative Counsel Order and also available on the Monitor’s website at:

<http://www.collinsbarrow.com/en/toronto-ontario/martin-ross-group>

Additional information concerning the MRG CCA proceeding, including previous Orders granted in the proceeding, can be also found on the Monitor’s website at the same link. Eligible Employees may contact Dewart Gleason in confidence directly at:

**DEWART GLEASON LLP**  
Barristers & Solicitors  
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**Attention: Sean Dewart**

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