

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

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF SECTION 101 OF THE *COURTS OF JUSTICE ACT*, R.S.O. 1990, c. C-43, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF VICTORIAN ORDER OF NURSES FOR CANADA, VICTORIAN ORDER OF NURSES FOR CANADA – EASTERN REGION AND VICTORIAN ORDER OF NURSES FOR CANADA – WESTERN REGION

Applicants

**AFFIDAVIT OF MARIE KELLY
(Sworn July 25, 2016)**

I, MARIE KELLY, of the City of Toronto, in the Province of Ontario, **MAKE OATH AND SAY:**

1. I am the Chief Executive Officer of the Ontario Nurses' Association ("ONA") and, as such, I have personal knowledge of the matters to which I depose, except as otherwise indicated. Where my statements rely upon information outside my direct personal knowledge, I have identified the source of that information and believe it to be true.

I. OVERVIEW

2. This affidavit is sworn in support of a motion by ONA in the *Companies' Creditors Arrangement Act* ("CCAA") proceedings involving the Victorian Order of Nurses for Canada ("VON Canada"), the Victorian Order of Nurses for Canada – Eastern Region ("VON East") and Victorian Order of Nurses for Canada – Western Region ("VON West", together with VON Canada and VON East, the "Applicants"), for an order

authorizing and directing VON Canada to take certain steps to restructure (the **"Transfer Restructuring"**) the pension plan which that organization administers (the **"VON Canada Pension Plan"**) for employees of the Applicants and employees of Victorian Order of Nurses for Canada – Ontario Branch (**"VON Ontario"**) and Victorian Order of Nurses for Canada Nova Scotia Branch (**"VON Nova Scotia"**), as is set out in greater detail below.

3. In connection with this matter, I have reviewed the affidavit of Jo-Anne Poirier sworn May 30, 2016 (the **"Poirier Affidavit"**) in support of a motion by the Applicants for an order authorizing an alternative form of pension plan restructuring (the **"Partial Wind-up Restructuring"**). For the reasons set out in this affidavit, it is ONA's position that the Transfer Restructuring is preferable to the Partial Wind-up Restructuring and that the Transfer Restructuring should be approved by this court.

II. ONA

4. ONA is a trade union and the certified bargaining agent for approximately 62,000 registered nurses working in the healthcare sector in the Province of Ontario.

5. ONA is the certified bargaining agent for and party to collective agreements with VON Ontario. ONA currently represents approximately 292 active employees of VON Ontario. ONA members are not employed by VON Canada or any of the other VON entities and ONA does not have any collective agreements with these other VON entities.

6. Based on information provided by VON Canada in its capacity as the administrator of the VON Canada Pension Plan, approximately 112 employees represented by ONA are active members of the VON Canada Pension Plan.

7. As set out in the Poirier Affidavit, I understand that the membership of the VON Canada Pension Plan as of June 1, 2015 is approximately 5,900 members including 2,945 active members.

8. Based on paragraph 29 of the Poirier Affidavit, the largest number of members are or were employed by VON Ontario and VON Nova Scotia (approximately 3,300 and 1,500 respectively).

9. I further understand that a significant number of different unions, including OPSEU and other labour organizations, are certified to bargain with VON Ontario. Similarly, other unions are certified to bargain with VON Nova Scotia. In addition, based on information provided by the Applicants, I understand that there are a significant number of non-unionized employees who are members of the VON Canada Pension Plan.

III. VON CANADA AND CCAA PROCEEDINGS

10. As set out in the Poirier Affidavit, VON Canada, VON East and VON West filed for protection under the *Companies' Creditors Arrangement Act* on November 25, 2015. I am advised by Frank Lamie of Gowling WLG (Canada) Inc., the solicitors for ONA in this matter ("Gowlings"), and believe that since the Applicants' initial filing, the stays and proceedings involving the Applicants have been extended to November 25, 2016.

11. As set out in the Poirier Affidavit, shortly after the commencement of the Applicants' CCAA Proceedings, VON East and VON West's operations were entirely shut down and all of their employees terminated as at the filing date.

12. As set out in my affidavit above and described in more detail in the Poirier Affidavit, neither VON Ontario or VON Nova Scotia are applicants or subject to any formal insolvency proceedings.

13. While I do not have full details of the manner in which the VON entities carry on their activities, I am aware that VON Ontario is the party that contracts with the Ministry of Health and Long-Term Care (Ontario) and other organizations for the provision of the nursing services that make up the core of the business in which ONA members are working. VON Canada is not the contracting party for this business.

14. As described in the Poirier Affidavit, the VON entities are not-profit corporations incorporated under various corporate statutes. In particular, based on searches conducted by Gowlings with respect to VON Canada, VON Ontario and VON Nova Scotia, I understand that VON Ontario is incorporated under the *Corporations Act* (Ontario), that VON Nova Scotia is incorporated under Nova Scotia legislation and that VON Canada is incorporated under federal not-for-profit corporations legislation. I have attached hereto as Exhibits "A" and "B" copies of summary corporate searches for VON Canada and VON Ontario, respectively, with file currency of July 12, 2016.

15. With respect to the organization and governance of VON Canada, VON Ontario and VON Nova Scotia, counsel to the Applicants has advised that the current members of VON Ontario (the not-for-profit equivalent of shareholders based on my understanding) are VON Canada and each of the current members of VON Canada's board of directors. As well, based on my review of the corporate searches for VON Canada and VON Ontario, eight of the ten directors of VON Canada also serve as directors of VON Ontario.

16. With respect to the current status of the Applicants' restructuring, I am advised by Gowlings and verily believe that no formal plan or proposal concerning a compromise or arrangement with the Applicants' creditors has yet been put forward.

IV. VON CANADA PENSION PLAN

17. The VON Canada Pension Plan and its provisions are summarised in the Poirier Affidavit. In essence, it is a defined benefit pension plan formerly made available to employees of all five of the VON entities.

18. Following the cessation of operations of VON East and VON West and the termination of their employees, contributions in respect of these members of the VON Canada Pension Plan have apparently ceased. The Poirier Affidavit states that approximately 94 employees of VON East and VON West were affected by the

cessation of their operations and that an additional 35 employees of VON Canada have been terminated due to a downsizing.

19. As set out in the Poirier Affidavit, the most recent valuations of the pension plan reflect that it is in a wind-up deficit position. Estimates as of January 1, 2016 are said to reveal a wind-up deficiency of approximately \$20 million or 6% of the total assets of the VON Canada Pension Plan.

V. PENSION PLAN RESTRUCTURING

20. As a result of the cessation of operations of VON East and VON West and the termination of their employees, the Applicants have proposed a restructuring of the VON Canada Pension Plan.

21. As described in the Poirier Affidavit, the pension plan restructuring proposed by VON Canada would:

- (a) divide members of the VON Canada Pension Plan into different categories depending upon their specific situations, effectively into three groups – members who are or were employed by VON Canada, VON Ontario and VON Nova Scotia ("**Continuing Members**"), members employed by VON Canada but terminated by VON Canada ("**VON Canada Terminated Members**") and members who were terminated by VON East and VON West ("**VON East and VON West Terminated Members**");
- (b) split the pension plan assets between the assets relating to the VON East and VON West Terminated Members and the assets relating to the balance of the plan membership;
- (c) determine aggregate wind-up liabilities for the VON East and VON West Terminated Members;

- (d) provide that the VON Canada Pension Plan would be partially wound-up in respect of the VON East and VON West Terminating Members and that the benefits of VON East and Von West Terminating Members would be reduced to reflect the wind-up funding deficiency existing in the VON Canada Pension Plan; and,
- (e) provide for the required regulatory applications and implementing steps.

22. The Partial Wind-up Restructuring proposed by VON Canada has the benefit of segregating the funding deficiencies of the VON Canada Pension Plan relating to members and former members whose organisations can no longer sustain pension funding, while permitting the balance of the VON Canada Pension Plan to continue without immediate adverse effect on other participating members.

23. The Partial Wind-up Restructuring will, however, involve necessary transaction costs in connection with the wind-up reports and other regulatory steps that are required. More importantly, depending upon the outcome of the VON Canada restructuring and CCAA proceedings, the Partial Wind-up Restructuring, if approved, would leave residual uncertainty.

24. Since VON Canada is the administrator of the VON Canada Pension Plan, if its CCAA proceedings do not result in a successful plan of compromise and arrangement sanctioned by the Court, there is a risk that VON Canada will be replaced as administrator of the VON Canada Pension Plan and that the entire VON Canada Pension Plan will be wound-up.

25. In contrast to the Partial Wind-up Restructuring, ONA proposes a pension plan restructuring that does not require a partial wind-up of the VON Canada Pension Plan. The pension plan restructuring proposed by ONA would still involve a split of the pension plan assets attributable to the VON East and VON West Terminating Members and those attributable to remaining pension plan members, but would proceed by way of an application under section 81 of the *Pension Benefits Act* (Ontario), or analogous

provisions in other provinces to the extent applicable, for a transfer of assets from the VON Canada Pension Plan to a new pension plan to be established, with VON Ontario as administrator (the "New VON Pension Plan"). Subject to the views of other members and to the outcomes for VON Canada in its CCAA proceedings, the New VON Pension Plan would provide benefit continuity and continuing benefit accruals on substantially the same terms as the existing plan, for employees and former employees of VON Ontario, VON Nova Scotia and VON Canada.

26. The benefits and entitlements of those former employees of VON East and VON West who are members in the VON Canada Pension Plan would be dealt with following the transfer of assets and liabilities to the New VON Pension Plan, probably by a full wind-up of the VON Canada Pension Plan.

VI. POSITION OF OTHER PARTIES

27. In response to the Partial Wind-up Restructuring proposed by VON Canada, I am advised by Gowlings that the Superintendent of Financial Services for Ontario has filed a factum requesting that this proposal be rejected, except for a single member of the VON Canada Pension Plan formerly employed in Saskatchewan.

28. In addition to the objection of the Superintendent of Financial Services for Ontario, I am advised by Gowlings that the United Nurses of Alberta have filed a responding motion record on behalf of certain VON West terminated employees, asserting the position that the partial wind-up of the VON West portion of the VON Canada Pension Plan is inconsistent with Alberta legislation.

29. As of the date of this Affidavit, I am uncertain of the position that may be taken by other pension plan members employed by VON Ontario, VON Nova Scotia and VON Canada with regard to the Transfer Restructuring proposed by ONA for the VON Canada Pension Plan. I am similarly unsure of the position that the Superintendent of Financial Services for Ontario and other regulators may take.

VII. CONCLUSION

30. I believe that the Transfer Restructuring proposed by ONA is superior to the Partial Wind-up Restructuring, insofar as the Transfer Restructuring:

- (1) increases the likelihood that the pension entitlements of employees of VON Ontario and VON Nova Scotia will continue uninterrupted and without further adverse effects occasioned by the insolvency of VON Canada;
- (2) provides an efficient means for protecting the members working for VON Ontario, VON Nova Scotia and potentially VON Canada from bearing the costs connected with any partial wind-up of the portions of the VON Canada Pension Plan relating to the VON West and VON East Terminated Members; and
- (3) does not suffer from the objections raised by the Superintendent of Financial Services for Ontario and the United Nurses of Alberta concerning the lack of legislative authority for partial wind-ups that result in benefit reductions for affected member.

31. I make this Affidavit in support of ONA's motion for an order approving the Transfer Restructuring and for no other improper purpose.

SWORN before me at the City of Toronto,
in the Province of Ontario, on July 25,
2016.



Commissioner for Taking Oaths
Sumran Prihar

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)



MARIE KELLY

TAB A

THIS IS EXHIBIT "A"
REFERRED TO IN THE AFFIDAVIT
OF MARIE KELLY
SWORN JULY 25, 2016



A Commissioner for Taking Affidavits

Simran Prihar



Government
of Canada

Gouvernement
du Canada

Federal Corporation Information

Federal Corporation Information - 063160-4

Glossary of Terms used on this page (<http://www.ic.gc.ca/eic/site/cd-dgc.nsf/eng/cs04128.html>)

⚠ Caution

This information is available to the public in accordance with legislation (see Public disclosure of corporate information (<https://www.ic.gc.ca/eic/site/cd-dgc.nsf/eng/cs06724.html>)).

Corporation Number

063160-4

Business Number (BN)

129482493RC0001

Corporate Name

VICTORIAN ORDER OF NURSES FOR CANADA

LES INFIRMIÈRES DE L'ORDRE DE VICTORIA DU CANADA

Status

Active

Governing Legislation

Canada Not-for-profit Corporations Act - 2014-07-08

Registered Office Address

2315 ST. LAURENT BOULEVARD, SUITE 100

OTTAWA ON K1G 4J8

Canada

Note

Active NFP Act corporations are required to update this information ([bs/chngRgstrdcdrsWz.html?corporationId=631604](http://bs.chngRgstrdcdrsWz.html?corporationId=631604)). Changes are only legally effective when filed with Corporations Canada. A corporation key (<http://www.ic.gc.ca/eic/site/cd-dgc.nsf/eng/cs04178.html>) is required. If you are not authorized to update this information, you can either contact the corporation or contact Corporations Canada (http://www.ic.gc.ca/eic/site/icgc.nsf/eng/h_07026.html#from=Corporations&pageid=E770-Hcs00000). We will inform the corporation of its reporting obligations (<http://www.ic.gc.ca/eic/site/cd-dgc.nsf/eng/cs04956.html>).

Directors

Minimum

3

Maximum

20

GARY URSELL 71 HUDSON DRIVE TORONTO ON M4T 2K2 Canada	NEIL STUART 8 GRANDVIEW AVENUE TORONTO ON M4K 1J2 Canada	KAREN URSEL 114-55 LUTZ STREET MONCTON NB E1C 4B7 Canada
DAVID MACIVER 56 DALEY DRIVE HALIFAX NS B1R 2J4 Canada	John Peddle 10 Spratt Place St. John's NL A1E 4M2 Canada	Malcolm M. Mercer 324 Durie Street Toronto ON M6S 3G3 Canada
Pete Larocque 1122 Falaise Road Nepean ON K2E 6R3 Canada	AMY LEE 42 GRETNA GREEN LONDON ON N6G 1X1 Canada	JIM MERKLEY 102 KELLY'S VIEW DRIVE BOULARDERIE EAST NS B1X 1Z3 Canada
LYNN POWER 42 SAUVE STREET ST. JOHN'S NL A1N 4K6 Canada		

Note

Active NFP Act corporations are required to update director information (bs/chngDrctrs.html?corporationId=631604) (names, addresses, etc.) within 15

days of any change. A corporation key (<http://www.ic.gc.ca/eic/site/cd-dgc.nsf/eng/cs04178.html>) is required. If you are not authorized to update this information, you can either contact the corporation or contact Corporations Canada (http://www.ic.gc.ca/eic/site/icgc.nsf/eng/h_07026.html#from=Corporations&pageid=E770-Hcs00000). We will inform the corporation of its reporting obligations (<http://www.ic.gc.ca/eic/site/cd-dgc.nsf/eng/cs04956.html>).

Annual Filings

Anniversary Date (MM-DD)

07-08

Date of Last Annual Meeting

Not Available

Annual Filing Period (MM-DD)

07-08 to 09-06

Type of Corporation

Soliciting

Status of Annual Filings

2016 - Due to be filed

2015 - Filed

Corporate History

**Corporate
Name History**

1897-12-28 to 2014-07-08	VICTORIAN ORDER OF NURSES FOR CANADA -	1897-12-28 to 2014-07- 08	LES INFIRMIERES DE L'ORDRE DE VICTORIA DU CANADA
2014-07-08 to Present	VICTORIAN ORDER OF NURSES FOR CANADA	2014-07-08 to Present	LES INFIRMIÈRES DE L'ORDRE DE VICTORIA DU CANADA

Certificates and Filings

Certificate of Continuance

2014-07-08

Previous jurisdiction: Canada Corporations Act - Part II
(CCA-II)

[Start New Search](#)

[Return to Search Results \(fdrlCrpSrch.html?\)](#)

[V_SEARCH.command=refine&V_TOKEN=1468340609565&crpNm=Victorian Order of
Nurses for Canada&crpNmbr=&bsNmbr=\)](#)

Date Modified:

2016-06-29

TAB B

THIS IS EXHIBIT "B"
REFERRED TO IN THE AFFIDAVIT
OF MARIE KELLY
SWORN JULY 25, 2016



A Commissioner for Taking Affidavits
Simran Pihor

Request ID: 019162212
Transaction ID: 61642833
Category ID: UN/E

Province of Ontario
Ministry of Government Services

Date Report Produced: 2016/07/12
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CORPORATION PROFILE REPORT

Ontario Corp Number	Corporation Name	Incorporation Date
1464944	VICTORIAN ORDER OF NURSES FOR CANADA - ONTARIO BRANCH	2001/04/17
		Jurisdiction
		ONTARIO
Corporation Type	Corporation Status	Former Jurisdiction
ONTARIO CORP NON-SHARE	ACTIVE	NOT APPLICABLE
Head Office Address		Date Amalgamated
ESTHER SHAINBLUM 2315 ST. LAURENT BLVD.		NOT APPLICABLE
		Amalgamation Ind.
		NOT APPLICABLE
Suite # 100 OTTAWA ONTARIO CANADA K1G 4J8		New Amal. Number
		NOT APPLICABLE
		Notice Date
		NOT APPLICABLE
		Letter Date
		NOT APPLICABLE
Mailing Address		Revival Date
JO ANN POIRIER (FINANCE) 2315 ST. LAURENT BLVD.		NOT APPLICABLE
		Continuation Date
		NOT APPLICABLE
Suite # 100 OTTAWA ONTARIO CANADA K1G 4J8		Transferred Out Date
		NOT APPLICABLE
		Cancel/Inactive Date
		NOT APPLICABLE
		EP Licence Eff.Date
		NOT APPLICABLE
		EP Licence Term.Date
		NOT APPLICABLE
		Date Commenced in Ontario
		NOT APPLICABLE
		Date Ceased in Ontario
		NOT APPLICABLE
Activity Classification		
NOT AVAILABLE		

Request ID: 019162212
Transaction ID: 61642833
Category ID: UN/E

Province of Ontario
Ministry of Government Services

Date Report Produced: 2016/07/12
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CORPORATION PROFILE REPORT

Ontario Corp Number

1464944

Corporation Name

VICTORIAN ORDER OF NURSES FOR
CANADA - ONTARIO BRANCH

Corporate Name History

VICTORIAN ORDER OF NURSES FOR
CANADA - ONTARIO BRANCH

Effective Date

2001/04/17

Current Business Name(s) Exist:

NO

Expired Business Name(s) Exist:

NO

Administrator: Name (Individual / Corporation)

MADELEINE
BRILLANT

Address

401 RUE DE SAINTE-MAXIME

GATINEAU
QUEBEC
CANADA J8T 8M9

Date Began

2012/06/22

First Director

NOT APPLICABLE

Designation

DIRECTOR

Officer Type

Resident Canadian

Y

Request ID: 019162212
Transaction ID: 61642833
Category ID: UN/E

Province of Ontario
Ministry of Government Services

Date Report Produced: 2016/07/12
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CORPORATION PROFILE REPORT

Ontario Corp Number

1464944

Corporation Name

VICTORIAN ORDER OF NURSES FOR
CANADA - ONTARIO BRANCH

Administrator:
Name (Individual / Corporation)

MADELEINE
BRILLIANT

Address

401 RUE DE SAINTE MXIME

GATINEAU
QUEBEC
CANADA J8T 8M9

Date Began

2012/06/22

First Director

NOT APPLICABLE

Designation

DIRECTOR

Officer Type

Resident Canadian

Administrator:
Name (Individual / Corporation)

ED
COLQUHOUN

Address

1 DURLEY STREET

AMHERST
NOVA SCOTIA
CANADA B4H 2B2

Date Began

2013/10/06

First Director

NOT APPLICABLE

Designation

DIRECTOR

Officer Type

Resident Canadian

Request ID: 019162212
Transaction ID: 61642833
Category ID: UN/E

Province of Ontario
Ministry of Government Services

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CORPORATION PROFILE REPORT

Ontario Corp Number

1464944

Corporation Name

VICTORIAN ORDER OF NURSES FOR
CANADA - ONTARIO BRANCH

Administrator: Name (Individual / Corporation)

ROBERT

FRASER

Address

560 GLADSTONE AVENUE

TORONTO
ONTARIO
CANADA M6H 3J2

Date Began

2011/09/18

First Director

NOT APPLICABLE

Designation

DIRECTOR

Officer Type

Resident Canadian

Administrator: Name (Individual / Corporation)

PETE

LAROCQUE

Address

1122 FALAISE ROAD

NEPEAN
ONTARIO
CANADA K2E 6R3

Date Began

2014/10/19

First Director

NOT APPLICABLE

Designation

DIRECTOR

Officer Type

Resident Canadian

Y

Request ID: 019162212
Transaction ID: 61642833
Category ID: UN/E

Province of Ontario
Ministry of Government Services

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CORPORATION PROFILE REPORT

Ontario Corp Number

1464944

Corporation Name

VICTORIAN ORDER OF NURSES FOR
CANADA - ONTARIO BRANCH

Administrator:
Name (Individual / Corporation)

PETER
LAROCQUE

Address

1122 FALAISE ROAD

NEPEAN
ONTARIO
CANADA K2E 6R3

Date Began

2014/10/19

First Director

NOT APPLICABLE

Designation

DIRECTOR

Officer Type

Resident Canadian

Administrator:
Name (Individual / Corporation)

DAVID
MACIVER

Address

66 DALEY DRIVE

HALIFAX
NOVA SCOTIA
CANADA B1R 2J4

Date Began

2011/09/18

First Director

NOT APPLICABLE

Designation

DIRECTOR

Officer Type

Resident Canadian

Request ID: 019162212
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Category ID: UNE

Province of Ontario
Ministry of Government Services

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CORPORATION PROFILE REPORT

Ontario Corp Number

1464944

Corporation Name

VICTORIAN ORDER OF NURSES FOR
CANADA - ONTARIO BRANCH

**Administrator:
Name (Individual / Corporation)**

MALCOLM
M.
MERCER

Address

324 DURIE STREET

TORONTO
ONTARIO
CANADA M6S 3G3

Date Began

2014/10/19

First Director

NOT APPLICABLE

Designation

DIRECTOR

Officer Type

Resident Canadian

Y

**Administrator:
Name (Individual / Corporation)**

MALCOLM
MERCER

Address

324 DURIE STREET

TORONTO
ONTARIO
CANADA M6S 3G3

Date Began

2014/10/19

First Director

NOT APPLICABLE

Designation

DIRECTOR

Officer Type

Resident Canadian

Request ID: 019162212
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Category ID: UNE

Province of Ontario
Ministry of Government Services

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CORPORATION PROFILE REPORT

Ontario Corp Number

1464944

Corporation Name

VICTORIAN ORDER OF NURSES FOR
CANADA - ONTARIO BRANCH

**Administrator:
Name (Individual / Corporation)**

BARBARA
MIAZGA

Address

2327 FRENCH HILL ROAD A

CUMBERLAND
ONTARIO
CANADA K4C 1H6

Date Began

2015/01/30

First Director

NOT APPLICABLE

Designation

DIRECTOR

Officer Type

Resident Canadian

**Administrator:
Name (Individual / Corporation)**

BARBARA
MIAZGA

Address

2327 FRENCH HILL ROAD

CUMBERLAND
ONTARIO
CANADA K4C 1H6

Date Began

2015/01/31

First Director

NOT APPLICABLE

Designation

DIRECTOR

Officer Type

Resident Canadian

Y

Request ID: 019162212
Transaction ID: 61642833
Category ID: UN/E

Province of Ontario
Ministry of Government Services

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CORPORATION PROFILE REPORT

Ontario Corp Number

1464944

Corporation Name

VICTORIAN ORDER OF NURSES FOR
CANADA - ONTARIO BRANCH

Administrator: Name (Individual / Corporation)

JOHN

PEDDLE

Address

10 SPRATT PLACE

ST. JOHN'S
NEWFOUNDLAND AND LABRADOR
CANADA A1E 4M2

Date Began

2014/10/19

First Director

NOT APPLICABLE

Designation

DIRECTOR

Officer Type

Resident Canadian

Administrator: Name (Individual / Corporation)

JO-ANNE

POIRIER

Address

2315 ST. LAURENT BLVD.

Suite # 100
OTTAWA
ONTARIO
CANADA K1G 4J8

Date Began

2014/01/02

First Director

NOT APPLICABLE

Designation

OFFICER

Officer Type

CHIEF EXECUTIVE OFFICER

Resident Canadian

Request ID: 019162212
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Province of Ontario
Ministry of Government Services

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CORPORATION PROFILE REPORT

Ontario Corp Number

1464944

Corporation Name

VICTORIAN ORDER OF NURSES FOR
CANADA - ONTARIO BRANCH

Administrator: Name (Individual / Corporation)

JO-ANNE
POIRIER

Address

2315 ST. LAURENT BLVD.
Suite # 100
OTTAWA
ONTARIO
CANADA K1G 4J8

Date Began

2014/10/19

First Director

NOT APPLICABLE

Designation

OFFICER

Officer Type

SECRETARY

Resident Canadian

Administrator: Name (Individual / Corporation)

LYNN
POWER

Address

42 SAUVE STREET
ST JOHN'S
NEWFOUNDLAND AND LABRADOR
CANADA A1N 4K6

Date Began

2009/09/25

First Director

NOT APPLICABLE

Designation

OFFICER

Officer Type

CHAIR

Resident Canadian

Request ID: 019162212
Transaction ID: 61642833
Category ID: UN/E

Province of Ontario
Ministry of Government Services

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CORPORATION PROFILE REPORT

Ontario Corp Number

1464944

Corporation Name

VICTORIAN ORDER OF NURSES FOR
CANADA - ONTARIO BRANCH

Administrator: Name (Individual / Corporation)

LYNN
POWER

Address

42 SAUVE STREET

MOUNT PEARL
NEWFOUNDLAND AND LABRADOR
CANADA A1N 4K6

Date Began

2009/11/27

First Director

NOT APPLICABLE

Designation

DIRECTOR

Officer Type

Resident Canadian

Administrator: Name (Individual / Corporation)

MARCY
SAXE BRAITHWAITE

Address

15 VIEWMOUNT CRESCENT

BRAMPTON
ONTARIO
CANADA L6Z 4P4

Date Began

2013/10/06

First Director

NOT APPLICABLE

Designation

DIRECTOR

Officer Type

Resident Canadian

Request ID: 019162212
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Province of Ontario
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CORPORATION PROFILE REPORT

Ontario Corp Number

1464944

Corporation Name

VICTORIAN ORDER OF NURSES FOR
CANADA - ONTARIO BRANCH

**Administrator:
Name (Individual / Corporation)**

MARCY

SAXE-BRATHWAITE

Address

4 KING STREET WEST

Suite # 400
TORONTO
ONTARIO
CANADA M5H 1B6

Date Began

2013/10/06

First Director

NOT APPLICABLE

Designation

DIRECTOR

Officer Type

Resident Canadian

Y

**Administrator:
Name (Individual / Corporation)**

NEIL

STUART

Address

8 GRANDVIEW AVENUE

TORONTO
ONTARIO
CANADA M4K 1J2

Date Began

2009/09/25

First Director

NOT APPLICABLE

Designation

DIRECTOR

Officer Type

Resident Canadian

Y

Request ID: 019162212
Transaction ID: 61642833
Category ID: UN/E

Province of Ontario
Ministry of Government Services

Date Report Produced: 2016/07/12
Time Report Produced: 12:22:25
Page: 12

CORPORATION PROFILE REPORT

Ontario Corp Number

1464944

Corporation Name

VICTORIAN ORDER OF NURSES FOR
CANADA - ONTARIO BRANCH

**Administrator:
Name (Individual / Corporation)**

NEIL
STUART

Address

8 GRANDVIEW AVENUE

TORONTO
ONTARIO
CANADA M4K 1J2

Date Began

2009/09/25

First Director

NOT APPLICABLE

Designation

OFFICER

Officer Type

CHAIR

Resident Canadian

**Administrator:
Name (Individual / Corporation)**

NEIL
STUART

Address

8 GRANDVIEW AVENUE

TORONTO
ONTARIO
CANADA M4K 1J2

Date Began

2014/10/19

First Director

NOT APPLICABLE

Designation

OFFICER

Officer Type

PRESIDENT

Resident Canadian

Y

Request ID: 019162212
Transaction ID: 61642833
Category ID: UN/E

Province of Ontario
Ministry of Government Services

Date Report Produced: 2016/07/12
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Page: 13

CORPORATION PROFILE REPORT

Ontario Corp Number

1464944

Corporation Name

VICTORIAN ORDER OF NURSES FOR
CANADA - ONTARIO BRANCH

Administrator: Name (Individual / Corporation)

KAREN
URSEL

Address

55 LUTZ STREET
Suite # 114
MONCTON
NEW BRUNSWICK
CANADA E1C 4B7

Date Began

2013/10/06

First Director

NOT APPLICABLE

Designation

DIRECTOR

Officer Type

Resident Canadian

Administrator: Name (Individual / Corporation)

GARY
URSELL

Address

71 HUDSON DRIVE
TORONTO
ONTARIO
CANADA M4T 2K2

Date Began

2012/06/22

First Director

NOT APPLICABLE

Designation

DIRECTOR

Officer Type

Resident Canadian

Request ID: 019162212
Transaction ID: 61642833
Category ID: UN/E

Province of Ontario
Ministry of Government Services

Date Report Produced: 2016/07/12
Time Report Produced: 12:22:25
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CORPORATION PROFILE REPORT

Ontario Corp Number

Corporation Name

1464944

VICTORIAN ORDER OF NURSES FOR
CANADA - ONTARIO BRANCH

Last Document Recorded

Act/Code Description

Form

Date

CIA ANNUAL RETURN 2015

1C

2015/11/29

THIS REPORT SETS OUT THE MOST RECENT INFORMATION FILED BY THE CORPORATION ON OR AFTER JUNE 27, 1992, AND RECORDED IN THE ONTARIO BUSINESS INFORMATION SYSTEM AS AT THE DATE AND TIME OF PRINTING. ALL PERSONS WHO ARE RECORDED AS CURRENT DIRECTORS OR OFFICERS ARE INCLUDED IN THE LIST OF ADMINISTRATORS.

ADDITIONAL HISTORICAL INFORMATION MAY EXIST ON MICROFICHE.

The issuance of this report in electronic form is authorized by the Ministry of Government Services.

IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF SECTION 101 OF THE COURTS OF JUSTICE ACT, R.S.O. 1990, c. C-43, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF VICTORIAN ORDER OF NURSES FOR CANADA, VICTORIAN ORDER OF NURSES FOR CANADA – EASTERN REGION AND VICTORIAN ORDER OF NURSES FOR CANADA – WESTERN REGION

Applicants

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

(PROCEEDING COMMENCED AT TORONTO)**

**AFFIDAVIT OF MARIE KELLY
(Sworn July 25, 2016)**

GOWLING WLG (CANADA) LLP
Barristers & Solicitors
1 First Canadian Place,
100 King Street West, Suite 1600
Toronto ON M5X 1G5

Clifton P. Prophet (#34845K)
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Lawyers for the Ontario Nurses' Association