

## NOTICE OF SETTLEMENT APPROVAL HEARING – SHORT FORM

### WAYLAND GROUP CORP., SCOTT LANGILLE, GERHARD MÜLLER, PAUL PATHAK, ERIC SILVER, MICHAEL STEIN, JOHN DOES 1-3, CANACCORD GENUITY CORP., AND RF SECURITIES CLEARING LP (FORMERLY KNOWN AS GMP SECURITIES L.P.) SECURITIES CLASS ACTIONS

Read this notice carefully as it may affect your rights

This Notice is directed to all persons and entities, other than Excluded Persons<sup>1</sup>, wherever they may reside or be domiciled, who purchased or otherwise acquired common shares, units and warrants of Wayland Group Corp. and Maricann Group Corp. on or after December 13, 2017 and held some or all of said securities as of the close of trading on August 2, 2019 (the “Class” or “Class Members”)

#### **PURPOSE OF THIS NOTICE**

Class actions brought on behalf of Class Members have been settled, pending approval by the Ontario Superior Court of Justice (the “Court”). This Notice provides Class Members will information about the Settlement Approval Hearing (as defined below) and how to opt-out of the Actions or object to the proposed settlement.

#### **THE ACTIONS**

This Notice provides Class Members with information about the proposed settlement of three shareholder class actions that were commenced in the Court: (i) *Marco Stajic, Mordecai Bobrowsky and Kyle Yamamura v. Wayland Group Corp. and Benjamin Ward*, Court File No. CV-21-00665194-00CP (the “Wayland Action”); (ii) *Marko Stajic v. Scott Langille, Gerhard Muller, Paul Pathak, Eric Silver, Michael Stein and John Does 1-3*, Court File No. CV-22-00687490-00CP (the “Stajic Action”); and (iii) *Michaël Bordeleau-Tassile v. Canaccord Genuity Corp., and GMP Securities L.P.*, Court File No. CV-23-00693650-00CP (the “Bordeleau-Tassile Action” and collectively with the Wayland Action and the Stajic Action, the “Actions”). Berger Montague (Canada) PC (“Class Counsel”) represents the proposed Class in all three Actions.

Copies of the Statements of Claims for each of the Actions, as well as other legal documents associated with the Actions, can be found at: <https://bergermontague.com/cases/wayland-group-corp/>.

#### **PROPOSED SETTLEMENT WITH SETTling DEFENDANTS**

The Plaintiffs in the Actions have entered into a proposed settlement with the Defendants in the Stajic Action, the Defendants in the Bordeleau-Tassile Action, and with the Defendant Wayland, through its Litigation Guardian, in the Wayland Action (together, the “Settling Defendants”). The proposed settlement does not include the defendant Benjamin Allan Ward (“Ward”).

The Settlement Agreement, if approved and its conditions fulfilled, provides that CAD \$8 million (the “Settlement Amount”) shall be paid by the Settling Defendants, or their insurers and reinsurers, into an interest bearing account for the benefit of the Class until such time that it is distributed in accordance with a Court-approved Plan of Allocation. The proposed settlement with the Settling Defendants is subject to court approval, as discussed below. The Settlement Agreement may be viewed at <https://bergermontague.com/cases/wayland-group-corp/>.

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<sup>1</sup> “Excluded Persons” means each Settling Defendant, their respective family members, and any businesses in which they have a financial interest, and any investor who falls within the certified Class definition but who validly opts-out of the Actions.

## **SETTLEMENT APPROVAL HEARING**

On March 9, 2026 beginning at 10:00am E.S.T., there will be a hearing (the “**Settlement Approval Hearing**”). The Settlement Approval Hearing will be held at the courthouse located at 130 Queen Street West, Toronto, Ontario, or virtually.

At the Settlement Approval Hearing, the Court will determine whether the Settlement Amount and the Plan of Allocation are fair, reasonable and in the best interests of the Class. At that hearing, Class Counsel will also seek court approval of its request for fees and expense reimbursement. As is customary in class actions, Class Counsel has prosecuted these Actions on a contingent fee basis.

## **OBJECTIONS AND OPT-OUTS**

At the Settlement Approval Hearing, the Court will consider any objections to the proposed Settlement and opt-outs from the Class by Class Members if the objections and/or opt-outs are submitted in writing, by prepaid mail or email to Berger Montague (Canada) PC, 330 Bay Street, Suite 505, Toronto, Ontario, M5H 2S8, Email: [info@bergermontague.ca](mailto:info@bergermontague.ca), Attention: Wayland Class Actions.

A written Objection can be submitted in English or French and must include the following information:

- a) the objector’s full name, current mailing address, telephone number and email address (as may be available);
- b) the number of shares purchased during, and held at the close of, the Class Period;
- c) a brief statement of the nature of and reasons for the objection; and
- d) whether the objector intends to appear at the hearing in person or by counsel, and, if by counsel, the name, address, telephone number and email address of counsel.

An Opt-Out can be submitted in English or French and must include the following information:

- a) the Class Member’s full name;
- b) current mailing address;
- c) telephone number; and,
- d) email address (as may be available).

If you opt-out of the Class, you will not be eligible to participate in the distribution of the Net Settlement Amount.

**OBJECTIONS MUST BE RECEIVED ON OR BEFORE February 23, 2026 AT 5:00PM E.S.T.**  
**OPT-OUTS MUST BE RECEIVED ON OR BEFORE March 2, 2026 AT 5:00PM E.S.T.**

Each Class Member who does not opt-out of the Actions will be bound by the terms of the Settlement Agreement and will not be allowed to pursue an independent action against the Settling Defendants. If you wish to pursue other claims against any of the Settling Defendants relating to the matters at issue in the Actions, you should immediately seek independent legal advice. If you do not exclude yourself from participating in the Actions, all of your claims relating to the subject matter of this litigation will be determined by the result obtained in the settlement.

## **QUESTIONS**

Questions for the Class Members’ lawyers may be directed to Class Counsel:

330 Bay Street, Suite 505

Toronto, ON M5H 2S8

Tel: 647.576.7840

Email: [info@bergermontague.ca](mailto:info@bergermontague.ca)

**INTERPRETATION**

If there is a conflict between the provisions of this Notice and the Settlement Agreement, the terms of the Settlement Agreement will prevail.

**This notice has been approved by the Court. Questions about matters in this notice should be directed to Berger Montague (Canada) PC and NOT directed to the Court.**