

FILE/DIRECTION/ORDER

BEFORE: Justice E.M. Morgan

Court File Nos. CV-21-00665194-00CP
CV-22-00687490-00CP
CV-23-00693650-00CP

MARKO STAJIC, MORDECAI BOBROWSKY, and KYLE YAMAMURA

Plaintiffs

– and –

WAYLAND GROUP CORP. and BENJAMIN ALLAN WARD

Defendants

* * *

MARKO STAJIC

Plaintiff

– and –

SCOTT LANGILLE, GERHARD MÜLLER, PAUL PATHAK, ERIC SILVER, MICHAEL
STEIN, and JOHN DOES 1-3

Defendants

* * *

MICHAËL BORDELEAU-TASSILE

Plaintiff

– and –

CANACCORD GENUITY CORP. and GMP SECURITIES L.P.

Defendants

COUNSEL/PARTIES:

Andrew Morganti, for the Plaintiffs (“Class Counsel”)

Cc:

Dana Peebles, for the Litigation Guardian to the Defendant, Wayland Group Corp.

Shawn Irving and Emilie Dillon, for the Defendants, Scott Langille, Gerhard Muller, Paul Pathak, Eric Silver, and Michael Stein

John Fabello and Colette Koopman, for the Defendants, Canaccord Genuity Corp., GMP Securities L.P. (now known as RF Securities Clearing LP)

(collectively the “Settling Defendants”)

SUPPLEMENTARY SETTLEMENT ENDORSEMENT

Class Counsel has written to counsel for the Settling Defendants and to the Court proposing the following amendments to the approved Plan of Allocation and Distribution Protocol (the “Plan”) that accompanies the approved settlement of these actions.

Counsel for the Settling Defendants have indicated in correspondence with the Court that they have no submissions to make in respect of the proposed amendments.

Class Counsel states that he and his colleagues have discovered a potential for confusion in paragraphs 3 and 4(iii) of the Plan. Specifically, he submits that paragraphs 3 and 4(iii) of the Plan should read harmoniously with paragraph 1(q) of the Plan and should include recovery caps depending upon when the Authorized Claimant sold or held the Qualified Securities.

The proposed amendments are as follows (revised language underlined):

Paragraph 3. The first stage of the Pro Rata Distribution for each Authorized Claimant will be calculated by the Administrator after the Claims Bar Deadline by multiplying each Authorized Claimant's Qualified Securities by the Damages Per Qualified Securities. The second stage will be to ascertain whether the Damages Per Qualified Securities exceeds the value assigned to buckets below and, if so, paragraph 4 shall apply.

Paragraph 4. Authorized Claimant’s Qualified Securities will be allocated into one (1) of three (3) buckets:

(i) Shares purchased between December 13, 2017 and April 23, 2019, and sold after April 23 but before May 6, 2019, the maximum recovery is \$0.17 per Share;

(ii) Shares purchased between December 13, 2017 and May 6, 2019, and held after May 6, 2019, the maximum recovery is \$0.74 per Share; and

(iii) Shares purchased on the U.S. markets between May 7 and August 2, 2019, and the Qualified Security is held past August 2, 2019, the maximum recovery is \$0.03 per Share.

An Authorized Claimant may have Qualified Securities in multiple buckets with corresponding different values. However, under no circumstances can the value of buckets (i) and (iii) recover a greater Pro Rata Distribution than bucket (ii).

For example, all Qualified Securities will receive a minimum of \$0.03 per Damage Per Qualified Security; all of the Qualified Securities purchased between December 13, 2017 and April 23, 2019, could receive up to \$0.17 per Damage Per Qualified Security; however, only Qualified Securities purchased between December 13, 2017 and May 6, 2019, and held after May 6, 2019, can recover greater than \$0.17 Damage Per Qualified Security and capped at \$0.74.

As Class Counsel explains it, the reason for the material difference in maximum recovery between (ii) and (iii) is that after May 6, 2019, Wayland's securities dropped to approximately \$0.24 per share on the U.S. over-the-counter markets. On August 2, 2019, after the release of the final Public Corrective Date, the price of Wayland's securities dropped to \$0.21. Since the difference comes to \$0.03 per share, it follows that Qualified Securities should be valued at \$0.03 per share.

Based on Class Counsel's explanation, paragraphs 3 and 4(iii) of the Plan are hereby amended as described above. The balance of the Plan remains unchanged.

This Supplementary Settlement Endorsement is to be posted on the website in respect of these actions and settlement administered by Class Counsel.

A handwritten signature in blue ink, appearing to read "Morgan J.", is centered on a light blue rectangular background.

DATE: April 28, 2026

Morgan J.