

**CLASS ACTION REGARDING GATEWAY VILLAGE II LIMITED PARTNERSHIP, IRON-GATE ACQUISITIONS LIMITED PARTNERSHIP AND PARAMOUNT INVESTMENTS INC., AND OTHERS**

**NOTICE OF CERTIFICATION**

**What is the Class Action about?**

A lawsuit has been certified as a Class Action against Paramount Investments Inc., Gateway Village II Limited Partnership, Avenue Gateway II G.P. Corp., Iron-Gate Acquisitions Limited Partnership, Avenue Iron-Gate G.P. Corp., Adeeb Azizi, Samir Sawhney and Bryan Serbu. The lawsuit alleges that the Defendants orchestrated and instituted a Scheme to raise funds from investors in the Gateway Village II Limited Partnership and the Iron-Gate Acquisitions Limited Partnership, from investors to whom the Defendants were not permitted to solicit funds without issuing a prospectus.

The Representative Plaintiff is Patti Stobbe. In this lawsuit, the Representative Plaintiff is seeking damages on her own behalf and on behalf of everyone who invested in Gateway Village II Limited Partnership and Iron-Gate Acquisitions Limited Partnership, without receiving a prospectus, even though the Defendants were not permitted to solicit those investments.

**How do I know if I am a member of the Class?**

The Class has been defined by the Court as follows:

“All persons, individuals, entities or corporations who remitted Funds to the Defendants, or any of them, to purchase Units or interests in the Real Estate Limited Partnerships Gateway Village II Limited Partnership (“Gateway”) or Iron-Gate Acquisitions Limited Partnership (“Iron-Gate”), and who claim that no exemption applied or are uncertain whether an exemption applied under which the Defendants were permitted to sell those Units or interests to them without a prospectus pursuant to the provisions of *National Instrument 45-106*.”

The Defendants were not permitted to sell Units or interests in Gateway or Iron-Gate to Investors unless the Investors had very high net incomes, or very high net asset holdings, or unless they were close family members or close personal friends of a director, executive officer, founder or control person of Gateway or Iron-Gate, or an affiliate. If you are not sure whether or not you are a member of the Class, you should speak to Class Counsel, whose address is outlined below.

**What if I do not want to participate in this Class Action?**

Class Members who wish to participate in the Class Action do not need to do anything at this time. They are automatically included in the Class Action.

Any Class Member who wishes to opt out of the Class Action must do so by sending a written opt out form, signed by the Class Member, stating that he or she opts out of the Class Action.

The written opt out form can be obtained from Class Counsel, must be sent by pre-paid mail, courier or by e-mail to Class Counsel, and must be received by Class Counsel no later than June 9, 2017.

No Class Member will be permitted to opt out of the Class Action after May 26, 2017. If you opt out of the Class Action, you will take full responsibility for initiating your own lawsuit against the Defendants and for taking all legal steps necessary to protect your claim, if you wish to proceed with a claim.

### **What are the costs to me?**

Class Members will not be personally liable to pay any legal fees or disbursements to Class Counsel.

If the Class Action is successful in establishing that the Defendants are liable to pay money to the Class Members, the Court will then proceed to determine which Class Members may be entitled to that money, and how such amounts should be distributed to those Class Members.

If the Class Action is successful, legal costs will be deducted from the amounts recovered for the Class Members. All legal costs must be approved by the Court.

The Representative Plaintiff has retained Class Counsel to represent her and the Class in this lawsuit. Class Counsel will only be paid legal fees if the lawsuit is successful. If the lawsuit is successful, Class Counsel will request that legal fees be set by the Court.

### **How do I find out more about this Class Action?**

Questions about the matters in this Notice must not be directed to the Court. The Certification Order and other information with respect to the Class Action can be obtained at the following website: [www.jssbarristers.ca/pages/class-actions/class-actions.cfm](http://www.jssbarristers.ca/pages/class-actions/class-actions.cfm).

In addition, questions for Class Counsel should be directed by e-mail, fax or telephone to:

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