

Court File No. CV-24-00000869-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

**GULED WARSAME and SHELLI SAREEN on their own behalf and on
behalf of all members of UNITE HERE Local 75**

Plaintiffs

and

**DAVID SANDERS, ASHLEY HAYES, RAFUNZEL KORNGUT AND ALLAN PACE
on his own behalf and on behalf of all members of THE TORONTO HOSPITALITY
EMPLOYEES UNION – CSN (THEU-CSN)**

Defendants

**AFFIDAVIT OF MEDHIN GEBRE
(SWORN MAY 28, 2024)**

I, Medhin Ghebre, of the City of Toronto, in the Province of Ontario, AFFRIM:

1. I work as a Housekeeper at the Chelsea Hotel in Toronto. In connection with my employment, I am a member of UNITE HERE Local 75. I am aware that the Toronto Hospitality Employees Union - CSN (“THEU CSN”) is attempting to recruit members of UNITE HERE Local 75. As such, I have knowledge of the matters contained in this Affidavit.
2. I have been a Housekeeper at the Chelsea Hotel in Toronto for approximately thirty-three (33) years. Throughout my employment at the Chelsea Hotel, I have been a member of UNITE HERE Local 75 and its predecessors.

3. Approximately three (3) months ago, an envelope was delivered to my home address in the mail. I live in an apartment. The envelope had my name and home address typed on it. The envelope also had the Toronto Hospitality Employees Union and CSN typed on it in logo.

4. The envelope I received contained promotional materials in it that encouraged me to join the THEU-CSN. These materials purported to compare the earnings of CSN members in Montreal to the earnings of UNITE HERE members in Toronto and indicated that I would be better represented by the THEU-CSN than I currently am by UNITE HERE Local 75.

5. I threw the envelope and promotional materials THEU-CSN sent me in the garbage because I did not wish to join the THEU-CSN.

6. Sometime around May 16, 2024, I received a text message on my personal cell phone from the THEU-CSN inviting me to click on a hyperlink. I did not click on the hyperlink, and I deleted the text message from my phone because I did not and do not wish to join the THEU-CSN. I also deleted the text message because I did not and do not want the THEU-CSN to contact me.

7. I am certain that I have never given anyone affiliated with the THEU-CSN or a union other than Local 75 my home address or phone number. While some of my colleagues know my cell phone number, I do not share and have never shared my specific apartment number with my colleagues. I am therefore confident that THEU-CSN did not obtain my contact information from one of my colleagues.

8. Several of my colleagues at the Chelsea Hotel have also told me that they also received promotional materials and text messages from the THEU-CSN. My colleagues' descriptions of the

promotional materials and text messages match the promotional materials and text messages I received and reviewed.

9. I affirm this affidavit *bona fide*.

SWORN remotely by Medhin Ghebre at the City of Toronto, in the Province of Ontario, before me at the City of Toronto in the Province of Ontario on May 28th, 2024, in accordance with O. Reg. 431/20. Administering Oath or Declaration Remotely.



DocuSigned by:
Lindsay Heidker
694EDD7284E647C

Commissioner for Taking Affidavits
LINDSAY HEIDKER

DocuSigned by:
M G
277E413C8D2B442

MEDHIN GEBRE

Lindsay Joan Heidker, a Commissioner, etc.,
Province of Ontario, for Cavalluzzo LLP,
Barristers and Solicitors.
Expires August 31, 2024.

GULED WARSAME and SHELLI SAREEN on their own behalf and on behalf of all members of UNITE HERE Local 75

-and- DAVID SANDERS, ASHLEY HAYES, RAFUNZEL A361 KORNGUT AND ALLAN PACE on his own behalf and on behalf of all members of THE TORONTO HOSPITALITY EMPLOYEES UNION – CSN (THEU-CSN)
Defendants

Plaintiffs

Court File No. CV-24-00000869-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

PROCEEDING COMMENCED AT
WATERLOO REGION

**AFFIDAVIT OF MEDHIN GHEBRE
(SWORN MAY 28, 2024)**

CAVALLUZZO LLP
474 Bathurst Street, Suite 300
Toronto ON M5T 2S6

Stephen J. Moreau, LSO# 48750Q

smoreau@cavalluzzo.com

Cole Eisen, LSO# 82209W

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Ryan White, LSO# 56979C

rdwhite@cavalluzzo.com

Tel: 416-964-1115

Lawyers for the Plaintiff

Court File No. CV-24-00000869-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

**GULED WARSAME and SHELLI SAREEN on their own behalf and on
behalf of all members of UNITE HERE Local 75**

Plaintiffs

and

**DAVID SANDERS, ASHLEY HAYES, RAFUNZEL KORNGUT AND ALLAN PACE
on his own behalf and on behalf of all members of THE TORONTO HOSPITALITY
EMPLOYEES UNION – CSN (THEU-CSN)**

Defendants

**AFFIDAVIT OF THOMAS WIMALENDRA
(SWORN MAY 27, 2024)**

I, Thomas Wimalendra, of the City of Toronto, in the Province of Ontario, MAKE OATH
AND SAY:

1. I work as a Houseperson at the King Edward Hotel in Toronto. In connection with my employment, I am a member of UNITE HERE Local 75. I am aware that the Toronto Hospitality Employees Union - CSN (“THEU CSN”) is attempting to recruit members of UNITE HERE Local 75. As such, have knowledge of the matters contained in this Affidavit.

2. I have been a Houseperson at the King Edward Hotel in Toronto for approximately thirty (30) years. Throughout my employment at the King Edward Hotel, I have been a member of UNITE HERE Local 75 and its predecessors.

3. Sometime in April, 2024, an envelope was delivered to my home address in the mail. The envelope had my name and home address typed on it along with my place of work, the King Edward Hotel. The envelope also had Toronto Hospitality Employees Union and CSN logo on it.

4. The envelope I received contained promotional materials inside it that encouraged me to join THEU-CSN and leave Local 75. I threw the envelope and promotional materials THEU-CSN sent me in the garbage because I did not wish to join the THEU-CSN.

5. I am certain that I have never given anyone affiliated with the THEU-CSN or a union other than Local 75 my home address. I do not share my personal address with my colleagues, and I am therefore confident that THEU-CSN did not obtain my contact information from one of my colleagues.

6. Several of my colleagues at the King Edward Hotel have told me that they also received promotional materials from THEU-CSN in the mail. My colleagues have described those materials to me and their description of the promotional materials match the content of the promotional materials I received and reviewed before placing them in the garbage.

7. I affirm this affidavit *bona fide*.

SWORN remotely by Thomas Wimalendra at the City of Toronto, in the Province of Ontario, before me at the City of Toronto in the Province of Ontario on May 27th, 2024, in accordance with O. Reg. 431/20. Administering Oath or Declaration Remotely.

DocuSigned by:
Lindsay Heidker
694FDD7284E647C

Commissioner for Taking Affidavits
LINDSAY HEIDKER

DocuSigned by:
Thomas
386685E14462421...

THOMAS WIMALENDRA

Lindsay Joan Heidker, a Commissioner, etc.,
Province of Ontario, for Cavalluzzo LLP,
Barristers and Solicitors.
Expires August 31, 2024.

360

GULED WARSAME and SHELLI SAREEN on their own behalf and on behalf of all members of UNITE HERE Local 75

-and- DAVID SANDERS, ASHLEY HAYES, RAFUNZEL A364 KORNGUT AND ALLAN PACE on his own behalf and on behalf of all members of THE TORONTO HOSPITALITY EMPLOYEES UNION – CSN (THEU-CSN)

Plaintiffs

Defendants

Court File No. CV-24-00000869-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

PROCEEDING COMMENCED AT
WATERLOO REGION

**AFFIDAVIT OF THOMAS WIMALENDRA
(SWORN MAY 27, 2024)**

CAVALLUZZO LLP
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Tel: 416-964-1115

Lawyers for the Plaintiff

A364

Court File No. CV-24-00000869-0000

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N:

**GULED WARSAME and SHELLI SAREEN on their own behalf and on
behalf of all members of UNITE HERE Local 75**

Plaintiffs

and

**DAVID SANDERS, ASHLEY HAYES, RAFUNZEL KORNGUT AND ALLAN PACE
on his own behalf and on behalf of all members of THE TORONTO HOSPITALITY
EMPLOYEES UNION – CSN (THEU-CSN)**

Defendants

**AFFIDAVIT OF ABDALLA IDRIS
(SWORN MAY 28, 2024)**

I, Abdalla Idris, of the City of Toronto, in the Province of Ontario, AFFIRM:

1. I work as a Union Organizer for UNITE HERE Local 75 (“Local 75”).
2. As a result of my involvement with Local 75, I speak, text, or otherwise communicate frequently with Local 75 members employed at the Sheraton Toronto Centre. As a result, I have knowledge of the matters deposed to here by me.
3. Over the past several weeks, I have spoken to Local 75 members who have told me that they have received communications at home and/or on their cell phone by text, or both, from what appears to be the “THEU – CSN”. These same members told me that these communications contain content designed to persuade the reader to join the THEU – CSN. These same members

have told me that they did not provide anyone apparently associated with the THEU – CSN with their home address or cell phone number.

4. I understand what I have set out above to be true and verily believe same to be true. I understand this to be true and verily believe same to be true in the case of the following individuals because it is those individuals who told me that this took place:

1. Yosief Oqbasellasi
2. Hussein Mohammed
3. Jason Singer
4. Lorena Castillo
5. Julita Joseph
6. Brenda Bascombe
7. Shu-Me Yu
8. Netsanet Tesfaye
9. Larisa Juaniza
10. Jalany Adam
11. Rosario Fuentes
12. Troy Richards

13. Natalia Dixon
14. Gerardo Tumampos
15. Victoria Saguid
16. Ester Ruiz
17. Vanessa Edwards
18. Mujibur Khan
19. Monica Scarlet
20. Dereb Zerihun
21. Fathi Kamil
22. Robin Clarke
23. Borche Kuzmanovski

5. Prior to my employment with Local 75, I was employed by the Chelsea Hotel in Toronto. Local 75 held bargaining rights at the Chelsea Hotel when I was employed there and continues to hold bargaining rights at the Chelsea Hotel today. I was a member of the Local 75 bargaining unit at the Chelsea Hotel until approximately 2019 when I became a full-time employee of Local 75. I have not been employed by the Chelsea Hotel since I became a full-time employee of Local 75.

6. Earlier this year, an envelope was delivered to my home address in the mail. The envelope had my name and home address typed on it. The envelope also had the Toronto Hospitality Employees Union and CSN typed on it in logo.

7. The envelope I received contained promotional materials in it that encouraged me to join the THEU-CSN. These materials match the materials that the individuals listed at paragraph 4 described to me. I threw the envelope and promotional materials THEU-CSN sent me in the garbage.

8. I am certain that I have never given anyone affiliated with THEU-CSN or a union other than Local 75 my home address or phone number. My home address and phone number are not publicly available. The home address THEU-CSN used to contact me was the same contact details the Chelsea Hotel and Local 75 would have had on file for me in 2017 and 2018. I can only conclude that THEU-CSN's contact information for me dates back to the period of time when I was still employed by the Chelsea Hotel.

9. I affirm this affidavit *bona fide*.

SWORN remotely by Abdalla Idris at the City of Toronto, in the Province of Ontario, before me at the City of Toronto in the Province of Ontario on May 28th, 2024, in accordance with O. Reg. 431/20. Administering Oath or Declaration Remotely.



DocuSigned by:
Lindsay Heidker
694EDD7284E647C

Commissioner for Taking Affidavits
LINDSAY HEIDKER

DocuSigned by:
Abdalla Idris
B978CD8193C545C...

ABDALLA IDRIS

Lindsay Joan Heidker, a Commissioner, etc.,
Province of Ontario, for Cavalluzzo LLP,
Barristers and Solicitors.
Expires August 31, 2024.

365

GULED WARSAME and SHELLI SAREEN on their own behalf and on behalf of all members of UNITE HERE Local 75

-and- DAVID SANDERS, ASHLEY HAYES, RAFUNZEL A369 KORNGUT AND ALLAN PACE on his own behalf and on behalf of all members of THE TORONTO HOSPITALITY EMPLOYEES UNION – CSN (THEU-CSN)

Plaintiffs

Defendants

Court File No. CV-24-00000869-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE
PROCEEDING COMMENCED AT
WATERLOO REGION**

**AFFIDAVIT OF ABDALLA IDRIS
(SWORN MAY 28, 2024)**

CAVALLUZZO LLP
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Cole Eisen, LSO# 82209W
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Tel: 416-964-1115

Lawyers for the Plaintiffs

A369

Court File No. CV-24-00000869-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

**GULED WARSAME and SHELLI SAREEN on their own behalf and on
behalf of all members of UNITE HERE Local 75**

Plaintiffs

and

**DAVID SANDERS, ASHLEY HAYES, RAFUNZEL KORNGUT AND ALLAN PACE
on his own behalf and on behalf of all members of THE TORONTO HOSPITALITY
EMPLOYEES UNION – CSN (THEU-CSN)**

Defendants

**AFFIDAVIT OF MAHEN KRISHNAMOORTHY
(SWORN MAY 28, 2024)**

I, Mahen Krishnamoorwthy, of the City of Toronto, in the Province of Ontario, AFFIRM:

1. I work as a Union Organizer for UNITE HERE Local 75 (“Local 75”).
2. As a result of my involvement with Local 75, I speak, text, or otherwise communicate frequently with Local 75 members employed at the Chelsea Hotel. As a result, I have knowledge of the matters deposed to here by me.
3. Over the past several weeks, I have spoken to Local 75 members who have told me that they have received communications at home and/or on their cell phone by text, or both, from what appears to be the “THEU – CSN”. These same members told me that these communications contain content designed to persuade the reader to join the THEU – CSN. These same members

have told me that they did not provide anyone apparently associated with the THEU – CSN with their home address or cell phone number.

4. I understand what I have set out above to be true and verily believe same to be true. I understand this to be true and verily believe same to be true in the case of the following individuals because it is those individuals who told me that this took place:

- 1) Medhin Ghebre
- 2) Erlinda Fawila
- 3) Carmen Wynter
- 4) Demetria Segundo
- 5) Melody Arcangel
- 6) Amelia Directo
- 7) Holden Brown
- 8) Cynthia McMillan
- 9) Syed Hossein
- 10) Abdalla Idris
- 11) Yu Shao
- 12) Syed Hossein
- 13) Aria Woldgerald
- 14) Julison Kurusumuthu
- 15) Ali Alasow
- 16) Errol Simpson
- 17) Tom Veragodos
- 18) Melita Terrado
- 19) Kumar Kathirgamanathan

- 20) Marie Communication
- 21) Carol Hendrick
- 22) Lauro Quinoes
- 23) Rogen Duro
- 24) Ariel Sangalang
- 25) Kathleen Burgess
- 26) Eugenia Trian
- 27) Amy Huang
- 28) Peter Ruin
- 29) Nena Duldulao
- 30) Kumar Landry
- 31) Ernesto Valencia
- 32) Rica Lira
- 33) Eden Barud
- 34) Su Yan
- 35) Conchita Calakal
- 36) Monica Agarpao
- 37) Micheal Williams
- 38) Jessica David
- 39) Su Yan
- 40) Raisa Sagun
- 41) Andy Lu
- 42) Yu Hua
- 43) Rover Salar
- 44) Anthony Gomes

- 45) George De Costa
- 46) K. C. Leung
- 47) Nelson Hailar
- 48) Wai Chun
- 49) Jaime Barcelo
- 50) Estella Reyes
- 51) Arlene Moore
- 52) Maribel Jamorol
- 53) Ferdinand De Lafente
- 54) Dulce Matias
- 55) Emma Sumantra

5. I affirm this affidavit *bona fide*.

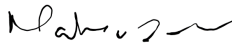
SWORN remotely by Mahen
 Krishnamoorthy at the City of Toronto, in the
 Province of Ontario, before me at the City of
 Toronto in the Province of Ontario on May 28th, 2024, in accordance with O. Reg. 431/20.
 Administering Oath or Declaration Remotely.



DocuSigned by:
Lindsay Heidker

Commissioner for Taking Affidavits
LINDSAY HEIDKER

Lindsay Joan Heidker, a Commissioner, etc.,
 Province of Ontario, for Cavalluzzo LLP,
 Barristers and Solicitors.
 Expires August 31, 2024.

DocuSigned by:

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MAHEN KRISHNAMOORTHY

370

GULED WARSAME and SHELLI SAREEN on their own behalf and on behalf of all members of UNITE HERE Local 75

-and- DAVID SANDERS, ASHLEY HAYES, RAFUNZEL A374 KORNGUT AND ALLAN PACE on his own behalf and on behalf of all members of THE TORONTO HOSPITALITY EMPLOYEES UNION – CSN (THEU-CSN)

Plaintiffs

Defendants

Court File No. CV-24-00000869-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE
PROCEEDING COMMENCED AT
WATERLOO REGION**

**AFFIDAVIT OF MAHEN KRISHNAMOORTHY
(SWORN MAY 28, 2024)**

CAVALLUZZO LLP
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Tel: 416-964-1115

Lawyers for the Plaintiffs

A374

Court File No. CV-24-00000869-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

**GULED WARSAME and SHELLI SAREEN on their own behalf and on
behalf of all members of UNITE HERE Local 75**

Plaintiffs

and

**DAVID SANDERS, ASHLEY HAYES, RAFUNZEL KORNGUT AND ALLAN PACE
on his own behalf and on behalf of all members of THE TORONTO HOSPITALITY
EMPLOYEES UNION – CSN (THEU-CSN)**

Defendants

**AFFIDAVIT OF MELAKU SEYOUM
(SWORN MAY 28, 2024)**

I, Melaku Seyoum, of the City of Toronto, in the Province of Ontario, AFFIRM:

1. I work as a Union Organizer for UNITE HERE Local 75 (“Local 75”).
2. As a result of my involvement with Local 75, I speak, text, or otherwise communicate frequently with Local 75 members employed at the King Edward Hotel. As a result, I have knowledge of the matters deposed to here by me.
3. Over the past several weeks, I have spoken to Local 75 members who have told me that they have received communications at home and/or on their cell phone by text from what appears to be the “THEU – CSN”. These same members told me that these communications contain content designed to persuade the reader to join the THEU – CSN. These same members have told

me that they did not provide anyone apparently associated with the THEU – CSN with their home address or cell phone number.

4. I understand what I have set out above to be true and verily believe same to be true. I understand this to be true and verily believe same to be true in the case of the following individuals because it is those individuals who told me that this took place:

- 1) Thomas Wimalendra
- 2) Ronilo Reyes
- 3) Yiota Tassiopoulos
- 4) Dana Yang
- 5) Hyacinth Bailey Bryan
- 6) Margret Manswell
- 7) Ronaldo Ranara
- 8) Mehari Abraha
- 9) Anna Kostalida
- 10) Michael Richards
- 11) Frank Escobal
- 12) Hanane Karim
- 13) Samson Taddese
- 14) Dey Bishwarup
- 15) Kalaimohan Singaravadiv
- 16) Habtu Woldgabriel
- 17) Kevin Anselmus
- 18) Roy Daye
- 19) Edmon Rimondo
- 20) Thana Iyathura
- 21) Luca Maglietta
- 22) Artura Mena
- 23) Min Iszam

- 24) Siva Ravi
- 25) Stella Cop
- 26) Jorge Da Silva
- 27) Nazrul Islam
- 28) Cheslav Vodov
- 29) Sisay Gebretasdik

5. I affirm this affidavit *bona fide*.

SWORN remotely by Melaku Seyoum, at the City of Toronto, in the Province of Ontario, before me at the City of Toronto in the Province of Ontario on May 28th, 2024, in accordance with O. Reg. 431/20. Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits
COLE EISEN, LSO# 82209W



MELAKU SEYOUM

Lindsay Joan Heidker, a Commissioner, etc.,
 Province of Ontario, for Cavalluzzo LLP,
 Barristers and Solicitors.
 Expires August 31, 2024.

GULED WARSAME and SHELLI SAREEN on their own behalf and on behalf of all members of UNITE HERE Local 75

-and-

DAVID SANDERS, ASHLEY HAYES, RAFUNZEL KORNGUT AND ALLAN PACE on his own behalf and on behalf of all members of THE TORONTO HOSPITALITY EMPLOYEES UNION – CSN (THEU-CSN) **A378**

Plaintiffs

Defendants

Court File No. CV-24-00000869-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

PROCEEDING COMMENCED AT
WATERLOO REGION

**AFFIDAVIT OF MELAKU SEYOUM
(SWORN MAY 28, 2024)**

CAVALLUZZO LLP
474 Bathurst Street, Suite 300
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Stephen J. Moreau, LSO# 48750Q
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Cole Eisen, LSO# 82209W
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Ryan White, LSO# 56979C
rdwhite@cavalluzzo.com

Tel: 416-964-1115

Lawyers for the Plaintiffs

Court File No. CV-24-00000869-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

**GULED WARSAME and SHELLI SAREEN on their own behalf and on
behalf of all members of UNITE HERE Local 75**

Plaintiffs

and

**DAVID SANDERS, ASHLEY HAYES, RAFUNZEL KORNGUT AND ALLAN PACE
on his own behalf and on behalf of all members of THE TORONTO HOSPITALITY
EMPLOYEES UNION – CSN (THEU-CSN)**

Defendants

**AFFIDAVIT OF MONICA MCKENZIE
(SWORN MAY 28, 2024)**

I, Monica McKenzie, of the City of Toronto, in the Province of Ontario, AFFIRM:

1. I have worked as a Union Organizer for UNITE HERE Local 75 (“Local 75”).
2. As a result of my involvement with Local 75, I speak, text, or otherwise communicate frequently with Local 75 members employed at the Hilton Airport Hotel. As a result, I have knowledge of the matters deposed to here by me.
3. Over the past several weeks, I have spoken to Local 75 members who have told me that they have received communications at home and/or their cell phone by text, or both, from what appears to be the “THEU – CSN”. These same members told me that these communications contain content designed to persuade the reader to join the THEU – CSN. These same members

have told me that they did not provide anyone apparently associated with the THEU – CSN with their home address or cell phone number.


4. I understand what I have set out above to be true and verily believe same to be true. I understand this to be true and verily believe same to be true in the case of the following persons because each of them told me that this took place:

- (a) Flora Carolina Velasquez
- (b) Amitesh Singh
- (c) Alicia DeAvila
- (d) Mary(Christine)Smalling
- (e) Esrut Tofik

5. I affirm this affidavit *bona fide*.

SWORN remotely by Monica McKenzie, at the City of Toronto, in the Province of Ontario, before me at the City of Toronto in the Province of Ontario on May 28th, 2024, in accordance with O. Reg. 431/20.
Administering Oath or Declaration Remotely.



DocuSigned by:

694EDD7284E647C...

Commissioner for Taking Affidavits
LINDSAY HEIDKER

DocuSigned by:

F53B0A33072C4B1...

MONICA MCKENZIE

Lindsay Joan Heidker, a Commissioner, etc.,
 Province of Ontario, for Cavalluzzo LLP,
 Barristers and Solicitors.
 Expires August 31, 2024.

377

GULED WARSAME and SHELLI SAREEN on their own behalf and on behalf of all members of UNITE HERE Local 75

-and- DAVID SANDERS, ASHLEY HAYES, RAFUNZEL A381 KORNGUT AND ALLAN PACE on his own behalf and on behalf of all members of THE TORONTO HOSPITALITY EMPLOYEES UNION – CSN (THEU-CSN)

Plaintiffs

Defendants

Court File No. CV-24-00000869-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

PROCEEDING COMMENCED AT
WATERLOO REGION

**AFFIDAVIT OF MONICA MCKENZIE
(SWORN MAY 28, 2024)**

CAVALLUZZO LLP
474 Bathurst Street, Suite 300
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Cole Eisen, LSO# 82209W
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Ryan White, LSO# 56979C
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Tel: 416-964-1115

Lawyers for the Plaintiffs

A381

Court File No. CV-24-00000869-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

**GULED WARSAME and SHELLI SAREEN on their own behalf and on
behalf of all members of UNITE HERE Local 75**

Plaintiffs

and

**DAVID SANDERS, ASHLEY HAYES, RAFUNZEL KORNGUT AND ALLAN PACE
on his own behalf and on behalf of all members of THE TORONTO HOSPITALITY
EMPLOYEES UNION – CSN (THEU-CSN)**

Defendants

**AFFIDAVIT OF KAREN DUBLIN
(SWORN MAY 28, 2024)**

I, Karen Dublin, of the City of Toronto, in the Province of Ontario, AFFIRM:

1. I work as a Union Organizer for UNITE HERE Local 75 (“Local 75”) at four hotels set out below.
2. As a result of my involvement with Local 75, I speak, text, or otherwise communicate frequently with Local 75 members employed at the Hotels I service, which are the DoubleTree Downtown, the Novotel Downtown, the Marriott City Centre, and One King West in Toronto. As a result, I have knowledge of the matters deposed to here by me.
3. Over the past several weeks, I have spoken to Local 75 members who have told me that they have received communications at home and/or on their cell phone by text, or both, from what appears to be the “THEU – CSN”. These same members told me that these communications

contain content designed to persuade the reader to join the THEU – CSN. These same members have told me that they did not provide anyone apparently associated with the THEU – CSN with their home address or cell phone number”.

4. I understand what I have set out above to be true and verily believe same to be true. I understand this to be true and verily believe same to be true in the case of the following individuals because it is those individuals who told me that this took place:

At One King West

- 1) Jocelyn Cuasay
- 2) Tanbir Kohinoor
- 3) Anwarul Bhuiyan
- 4) Catherine Fernandez
- 5) Justina Soriano
- 6) Eusebia Alonzo

At the Marriott City Centre

- 7) Kerryann Palmer
- 8) Carol Arellano
- 9) Luz Flores
- 10) Passang Dolma
- 11) Filicea Trentadue

At the Novotel

- 12) Margaret Lewis
- 13) Sherif Serag
- 14) Anna Rodondo
- 15) Ma Edin Savundaranayagam
- 16) Mohamed Ibrahim

At the Double Tree Downtown

17) Diego Restrepo

5. I affirm this affidavit *bona fide*.

SWORN remotely by Karen Dublin at the City of Toronto, in the Province of Ontario, before me at the City of Toronto in the Province of Ontario on May 28, 2024, in accordance with O. Reg. 431/20. Administering Oath or Declaration Remotely.



DocuSigned by:
Lindsay Heidker
604EDD7284E647C...

Commissioner for Taking Affidavits
LINDSAY HEIDKER

DocuSigned by:
K Dublin
B4A39D3FC2EF488...

KAREN DUBLIN

Lindsay Joan Heidker, a Commissioner, etc.,
Province of Ontario, for Cavalluzzo LLP,
Barristers and Solicitors.
Expires August 31, 2024.

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GULED WARSAME and SHELLI SAREEN on their own behalf and on behalf of all members of UNITE HERE Local 75

-and- DAVID SANDERS, ASHLEY HAYES, RAFUNZEL A385 KORNGUT AND ALLAN PACE on his own behalf and on behalf of all members of THE TORONTO HOSPITALITY EMPLOYEES UNION – CSN (THEU-CSN)

Plaintiffs

Defendants

Court File No. CV-24-00000869-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE
PROCEEDING COMMENCED AT
WATERLOO REGION**

**AFFIDAVIT OF KAREN DUBLIN
(SWORN MAY 28, 2024)**

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