


This is Exhibit "A" mentioned and referred to in the Affidavit of Michael Wright, sworn before me at the City of Toronto, in the Province of Ontario, this 5th day of December, 2007.


A Commissioner, etc.

MICHAEL WRIGHT

Tel.: 416-964-5513

Email: mwright@cavalluzzo.com

Call to the Bar: 1991

Education: LLB 1989 Osgoode Hall Law School, JSD 1993 Stanford Law School



Michael is the firm's Managing Partner and also leads our Civil Litigation/Class Actions practice. He is well known for his work in bringing a number of innovative and class action proceedings on behalf of employees, retirees and pension plans. Michael has been recognized by his peers as one of the "Best Lawyers in Canada" in the area of labour and employment law.

Michael has a large practice which involves advising and representing executives and professionals in a range of industries on employment matters. He has acted for individuals in financial services, telecommunications, manufacturing and a variety of other sectors of the economy. His employment law practice focuses on providing advice and advocacy to employees concerning wrongful dismissal, competition issues and compensation matters. While he frequently appears on behalf of his clients in the Superior Court of Justice and the Court of Appeal, he brings a practical and solution focused approach to employment related disputes.

Michael also has extensive experience providing advice and advocacy to unions and professional organizations in a variety of sectors including industrial workers, professional engineers, symphony musicians, pilots and employees in technology fields. He has successfully negotiated dozens of collective agreements in the symphonic and television industries, including the Canadian Opera Company, National Ballet of Canada and Tafelmusik. He has acted both as counsel and as a nominee on arbitration boards in the final arbitration of numerous collective agreements in the power generation and university sectors.

As counsel, Michael has represented unions and professional organizations and their pension and benefit plans in the courts on pension matters, injunctions, judicial review applications and shareholder actions.

Michael obtained a doctorate from Stanford Law School where he focused on labour law issues arising from public sector privatization. He has published numerous articles on labour law and legal theory in journals. Michael has also taught advanced seminars in labour law at the University of Toronto and Osgoode Hall Law School, including the Masters Program in Labour Law offered by Osgoode Hall Law School. He is a frequent speaker on labour and employment law issues, and has recently presented at the Canadian Bar Association, the Law Society of Upper Canada's Special Lectures on Employment Law, the Centre for Labour Management Relations and the Lancaster House Annual Labour Arbitration Conference.

Michael is a member of the Canadian Association of Labour Lawyers and is a member of the Board of Directors of the Axis Investment Fund, a labour sponsored investment fund.

CAVALLUZZO HAYES SHILTON McINTYRE & CORNISH LLP

Barristers & Solicitors

474 Bathurst Street, Suite 300

Toronto, Ontario, M5T 2S6

Ph: (416) 964-1115 Fax: (416) 964-5895

Email: contactus@cavalluzzo.com

This is Exhibit "B" mentioned and referred to in the Affidavit of Michael Wright, sworn before me at the City of Toronto, in the Province of Ontario, this 5th day of December, 2007.

A handwritten signature in cursive script, appearing to read "Minnie Lee", written over a horizontal line.

A Commissioner, etc.

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DOC #:
DATE FILED: 9/25/07

SEP 10 2007

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re ROYAL GROUP TECHNOLOGIES
SECURITIES LITIGATION

Master File No. 06-Civ-0822 (RJD)

CLASS ACTION

**PRELIMINARY ORDER FOR NOTICE AND HEARING
IN CONNECTION WITH SETTLEMENT PROCEEDINGS**

WHEREAS, on March 30, 2007, the parties to the above-entitled action (the "U.S. Action") entered into a Stipulation and Agreement of Settlement as amended as of August 31, 2007 (the "Stipulation"), which is subject to review under Rule 23 of the Federal Rules of Civil Procedure and which, together with the exhibits thereto, sets forth the terms and conditions for the proposed settlement of the claims alleged in the Complaint on the merits and with prejudice; and the Court having read and considered the Stipulation and the accompanying documents; and the parties to the Stipulation having consented to the entry of this Order; and all capitalized terms used herein having the meanings defined in the Stipulation; and

WHEREAS, it is a condition to the effectiveness of the proposed Settlement that the Canadian putative class proceeding identified in the Stipulation (the "Canadian Class Action") be also settled and dismissed with prejudice and the Settlement be approved by the (Ontario) Superior Court of Justice before which the Canadian Class Action is pending.

NOW, THEREFORE, IT IS HEREBY ORDERED, this 25th day of September, 2007, that:

1. The Court does hereby preliminarily approve the Stipulation and the Settlement set forth therein as being fair, reasonable and adequate to U.S. Class Members, subject to further

consideration at the Settlement Hearing described in ¶ 5 below.

2. Pursuant to Rules 23(a) and (b)(3) of the Federal Rules of Civil Procedure, and for the purposes of the Settlement only, this U.S. Action is hereby certified as a class action on behalf of all United States citizens and entities that purchased or otherwise acquired the common stock of Royal Group on the New York Stock Exchange or Toronto Stock Exchange during the period between February 24, 2000 through October 18, 2004, inclusive (the "U.S. Class Period"), other than Excluded Persons (the "U.S. Class" or "U.S. Class Members"). Also excluded from the U.S. Class are any putative U.S. Class Members who exclude themselves by filing a timely and valid request for exclusion in accordance with the requirements set forth in the Notice.

3. The Court finds, for the purposes of the Settlement only, that the prerequisites for a class action under Rules 23(a) and (b)(3) of the Federal Rules of Civil Procedure have been satisfied in that: (a) the number of U.S. Class Members is so numerous that joinder of all members thereof is impracticable; (b) there are questions of law and fact common to the U.S. Class; (c) the claims of the named representatives are typical of the claims of the U.S. Class they seek to represent; (d) the U.S. Lead Plaintiffs will fairly and adequately represent the interests of the U.S. Class; (e) the questions of law and fact common to the members of the U.S. Class predominate over any questions affecting only individual members of the U.S. Class; and (f) a class action is superior to other available methods for the fair and efficient adjudication of the controversy.

4. Pursuant to Rule 23 of the Federal Rules of Civil Procedure, and for the purposes of the Settlement only, U.S. Lead Plaintiffs Philip B. Zipin, Marcia B. Snow, and Lewis R. Messenger are certified as Class Representatives.

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5. A hearing (the "Settlement Fairness Hearing") pursuant to Rule 23(e) of the Federal Rules of Civil Procedure is hereby scheduled to be held before the Court on

January 11, 200~~7~~⁸, at 2:00 p.m. for the following purposes:

- (a) to finally determine whether this U.S. Action satisfies the applicable prerequisites for class action treatment under Rules 23(a) and (b) of the Federal Rules of Civil Procedure;
- (b) to determine whether the proposed Settlement is fair, reasonable and adequate, and should be approved by the Court;
- (c) to determine whether the Judgment as provided under the Stipulation should be entered, dismissing the Complaint filed herein, on the merits and with prejudice, and to determine whether the release by the U.S. Class of the Settled Claims, as set forth in the Stipulation, should be provided to the Released Parties (as those terms are defined in the Stipulation);
- (d) to determine whether the proposed Plan of Allocation of the proceeds of the Settlement is fair and reasonable, and should be approved by the Court;
- (e) to consider U.S. Lead Plaintiffs' Counsel's application for an award of attorneys' fees and for reimbursement of expenses to U.S. Lead Plaintiffs' Counsel; and
- (f) to rule upon such other matters as the Court may deem appropriate.

6. The Court reserves the right to approve the Settlement with or without modification as may be agreed to by the Parties and with or without further notice of any kind. The Court further reserves the right to enter its Judgment approving the Stipulation and

dismissing the Complaint on the merits and with prejudice regardless of whether it has approved the Plan of Allocation or awarded attorneys' fees and expenses.

7. The Court approves the form, substance and requirements of the Notice of Pendency and Certification of Class Actions, Proposed Settlement and Settlement Approval/Fairness Hearing (the "Notice"), Proof of Claim form, and short-form notice (the "Summary Notice"), annexed hereto as Tabs 1, 2 and 3, respectively, and finds that the form, content, and mailing and distribution of the Notice and publishing of the Summary Notice substantially in the manner and form set forth in ¶¶ 8 and 11 of this Order meet the requirements of Rule 23 of the Federal Rules of Civil Procedure, Section 21D(a)(7) of the Securities Exchange Act of 1934, as amended, 15 U.S.C. § 78u-4(a)(7), included by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), Rule 23.1 of the Local Rules of the Southern and Eastern Districts of New York, and due process, and is the best notice practicable under the circumstances and shall constitute due and sufficient notice to all persons and entities entitled thereto.

8. The Court approves the appointment of Crawford Class Action Services as the Claims Administrator. Within fourteen (14) calendar days of the latter of the date of this Order or the issuance of the Canadian Pre-Approval Order, the Claims Administrator shall cause the Notice and the Proof of Claim, substantially in the forms annexed hereto as Tabs 1 and 2, to be mailed, by first class mail, postage prepaid, to all U.S. Class Members who can be identified with reasonable effort. Royal Group shall cooperate in making Royal Group's transfer records and shareholder information available to the Claims Administrator no later than five (5) business days following entry of this Order for the purpose of identifying and giving notice to the U.S. Class. The Claims Administrator shall use reasonable efforts to give notice to nominee purchasers such as brokerage firms and other persons or entities who purchased Royal Group

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common stock during the Class Period as record owners but not as beneficial owners. Such nominee purchasers are directed, within seven (7) business days of their receipt of the Notice, to either forward copies of the Notice and Proof of Claim to their beneficial owners or to provide the Claims Administrator with lists of the names and addresses of the beneficial owners, and the Claims Administrator is ordered to send the Notice and Proof of Claim promptly to such identified beneficial owners. Nominee purchasers who elect to send the Notice and Proof of Claim to their beneficial owners shall send a statement to the Claims Administrator confirming that the mailing was made as directed. Additional copies of the Notice shall be made available to any record holder requesting such for the purpose of distribution to beneficial owners, and such record holders shall be reimbursed from the Gross Settlement Fund, upon receipt by the Claims Administrator of proper documentation, for the reasonable expense of sending the Notice and Proofs of Claim to beneficial owners. U.S. Lead Plaintiffs' Counsel shall, at least seven (7) calendar days prior to the Settlement Fairness Hearing, file with the Court proof of mailing of the Notice and Proof of Claim.

9. The Claims Administrator or the Escrow Agent or their agents are authorized and directed to prepare any tax returns required to be filed on behalf of or in respect of the Gross Settlement Fund and to cause any Taxes due and owing to be paid from the Gross Settlement Fund, and to otherwise perform all obligations with respect to Taxes and any reporting or filings in respect thereof as contemplated by the Stipulation, without further order of the Court.

10. U.S. Lead Plaintiffs' Counsel shall submit their papers in support of final approval of the Settlement and application for attorneys' fees and reimbursement of expenses by no later than seven (7) calendar days before the date fixed for the Settlement Fairness Hearing.

11. The Claims Administrator shall cause the Summary Notice to be published in

except that publication shall be made in the Wall Street Journal on a single occasion and not in Investor's Business Daily

accordance with the Plan of Notice annexed hereto as Tab 4, which publication shall begin within fourteen (14) calendar days of the mailing of the Notice and in accordance with the Notice Plan. U.S. Lead Plaintiffs' Counsel shall, at least seven (7) calendar days prior to the Settlement Fairness Hearing, file with the Court proof of the publication of the Publication Notice.

12. In order to be entitled to participate in the Net Settlement Fund, in the event the Settlement is effected in accordance with the terms and conditions set forth in the Stipulation, each U.S. Class Member shall take the following actions and be subject to the following conditions:

(a) A properly executed Proof of Claim (the "Proof of Claim"), substantially in the form annexed hereto as Tab 2, must be submitted to the Claims Administrator, at the Post Office Box indicated in the Notice, postmarked not later than one hundred and twenty (120) calendar days after the date fixed for the mailing of the Notice. Such deadline may be further extended by court order. Each Proof of Claim shall be deemed to have been submitted when postmarked (if properly addressed and mailed by first class mail, postage prepaid) provided that such Proof of Claim is actually received prior to completion of claims processing by the Claims Administrator. Any Proof of Claim submitted in any other manner shall be deemed to have been submitted when it was actually received at the address designated in the Notice.

(b) The Proof of Claim submitted by each U.S. Class Member must satisfy the following conditions: (i) it must be properly completed, signed and submitted in a timely manner in accordance with the provisions of the preceding subparagraph; (ii) it must be accompanied by adequate supporting documentation for the transactions reported therein, in the form of broker confirmation slips, broker account statements, an authorized statement from the broker containing the transactional information found in a broker confirmation slip, or such other

documentation as is deemed adequate by the Claims Administrator; (iii) if the person executing the Proof of Claim is acting in a representative capacity, a certification of his current authority to act on behalf of the U.S. Class Member must be included in the Proof of Claim; and (iv) the Proof of Claim must be complete and contain no material deletions or modifications of any of the printed matter contained therein and must be signed under penalty of perjury.

(c) As part of the Proof of Claim, each U.S. Class Member shall submit to the jurisdiction of this Court with respect to the claim submitted and shall (subject to effectuation of the Settlement) release all Settled Claims as provided in the Stipulation.

13. U.S. Class Members shall be bound by all determinations and judgments in the U.S. Action, whether favorable or unfavorable, unless such persons request exclusion from the U.S. Class in a timely and proper manner, as hereinafter provided. A U.S. Class Member wishing to make such request shall mail the request in written form by first class mail postmarked no later than sixty (60) calendar days after the date set for the mailing of the Notice to the address designated in the Notice. Such request for exclusion shall clearly indicate the name, address and telephone number of the person seeking exclusion, that the sender requests to be excluded from the U.S. Class, and must be signed by such person. Such persons requesting exclusion are also directed to state: the date(s), price(s) and number(s) of shares of all purchases and sales of Royal Group common stock during the Class Period. The request for exclusion shall not be effective unless it provides the required information and is made within the time stated above, or the exclusion is otherwise accepted by this Court. U.S. Class Members requesting exclusion from the U.S. Class shall not be entitled to receive any payment out of the Net Settlement Fund as described in the Stipulation and Notice.

14. All members of the U.S. Class shall be bound by all determinations and

judgments in the U.S. Action concerning the Settlement, including, but not limited to, the releases provided for therein, whether favorable or unfavorable to the U.S. Class.

15. Objections to the Settlement, the Plan of Allocation, or the application by U.S. Lead Plaintiffs' Counsel for an award of attorneys' fees and reimbursement of expenses and any supporting papers should be filed with the Court within sixty (60) calendar days after the date fixed for the mailing of the Notice, and delivered to U.S. Lead Plaintiffs' Counsel and Royal Group's Counsel at the addresses identified in the Notice. Attendance at the hearing is not necessary; however, persons wishing to be heard orally in opposition to the approval of the Settlement, the Plan of Allocation, and/or the request by U.S. Lead Plaintiffs' Counsel for attorneys' fees are required to indicate in their written objection their intention to appear at the hearing. U.S. Class Members do not need to appear at the hearing or take any other action to indicate their approval.

16. Any U.S. Class Member who does not object to the Settlement and/or the Plan of Allocation, and any U.S. Class Member who does not object to U.S. Lead Plaintiffs' Counsel's application for an award of attorneys' fees and reimbursement of litigation expenses in the manner prescribed in the Notice, shall be deemed to have waived such objection and shall forever be foreclosed from making any objection to the fairness, adequacy or reasonableness of the proposed Settlement, the Order and Final Judgment to be entered approving the Settlement, the Plan of Allocation or the application by U.S. Lead Plaintiffs' Counsel for an award of attorneys' fees and reimbursement of expenses.

17. Pending final determination of whether the Settlement should be approved, the U.S. Lead Plaintiffs, all U.S. Class Members, and each of them, and anyone who acts or purports to act on their behalf, shall not institute, commence or prosecute any action that asserts Settled

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Claims against any Released Party. The foregoing shall not be interpreted to apply to proceedings in respect of the seeking of approval of the Settlement in the (Ontario) Superior Court of Justice.

18. Any member of the U.S. Class may enter an appearance in the U.S. Action, at their own expense, individually or through counsel of their own choice. If they do not enter an appearance, they will be represented by U.S. Lead Plaintiffs' Counsel.

19. All proceedings in the U.S. Action are stayed until further order of this Court, except as may be necessary to implement the Settlement or comply with the terms of the Stipulation. Pending final determination of whether the Settlement should be approved, neither the U.S. Lead Plaintiffs nor any U.S. Class Member, either directly, representatively, or in any other capacity shall commence or prosecute against any of the Released Persons any action or proceeding in any court or tribunal asserting any of the Settled Claims.

20. The passage of title and ownership of the Settlement Fund to the Escrow Agent in accordance with the terms and obligations of the Stipulation is approved. No person who is not a U.S. Class Member or U.S. Lead Plaintiffs' Counsel shall have any right to any portion of, or in the distribution of, the Settlement Fund unless otherwise ordered by the Courts or otherwise provided in the Stipulation.

21. All funds held by the Escrow Agent shall remain subject to the jurisdiction of the Courts until such time as such funds shall be distributed pursuant to the Stipulation, the Plan of Allocation and/or further orders of the Courts.

22. As provided in the Stipulation, U.S. Lead Plaintiffs' Counsel may pay the Claims Administrator the reasonable fees and costs associated with giving notice to the Class and the

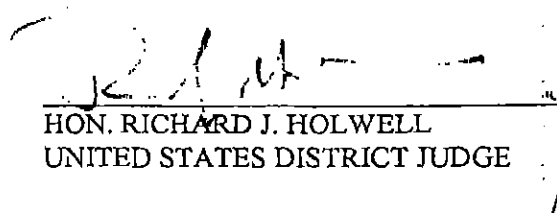
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review of claims and administration of the Settlement out of the Gross Settlement Fund without further order of the Court. In the event the Settlement is not approved by the Court, or otherwise fails to become effective, neither the U.S. Lead Plaintiffs nor U.S. Lead Plaintiffs' Counsel shall have any obligation to repay to Defendants the reasonable and actual costs of class notice and administration.

23. If (a) the Settlement is terminated by Royal Group pursuant to ¶ 40 of the Stipulation; or (b) any specified condition to the Settlement set forth in the Stipulation is not satisfied and U.S. Lead Plaintiffs' Counsel, Canadian Representative Plaintiffs' Counsel or Royal Group elect to terminate the Settlement as provided in ¶ 39 of the Stipulation, then, in any such event, the terms of ¶ 41 of the Stipulation including any amendment(s) thereof, shall apply, and this Order certifying the U.S. Class and the Class Representatives for purposes of the Settlement shall be null and void, of no further force or effect, and without prejudice to any party, and may not be introduced as evidence or referred to in any actions or proceedings by any person or entity, and each party shall be restored to his, her or its respective position as it existed immediately prior to the execution of the Stipulation.

24. The Court retains jurisdiction over the U.S. Action to consider all further matters arising out of or connected with the Settlement.

Dated: New York, New York
September 25, 2007



HON. RICHARD J. HOLWELL
UNITED STATES DISTRICT JUDGE

This is Exhibit "C" mentioned and referred to in the Affidavit of Michael Wright, sworn before me at the City of Toronto, in the Province of Ontario, this 5th day of December, 2007.

A handwritten signature in cursive script, appearing to read "N. L.", written over a horizontal line.

A Commissioner, etc.

☛ Tag for delivery



Case Name:

① Sorbara v. Canada

Between

Her Majesty the Queen in Right of Canada, Respondent,

and

Greg Sorbara, Applicant

[2006] O.J. No. 1973
Court File No. M043/06

**Ontario Superior Court of Justice
Toronto, Ontario
I.V.B. Nordheimer J.**

Heard: May 3-4, 2006.
Judgment: May 18, 2006.
(73 paras.)

Criminal law — Offences — Fraud — Application by Sorbara for an order in the nature of certiorari severing all references to him in four search warrants allowed — Insufficient evidence placed before the issuing judge upon which she could have concluded that there were reasonable and probable grounds to believe that the applicant had committed the offence of fraud — Application for a search warrant, at least as it related to the applicant, was premature — Criminal Code, s. 380.

Criminal law — Jurisdiction — Application by Sorbara for an order in the nature of certiorari severing all references to him in four search warrants allowed — No reason why name could not be severed from warrants, where court found insufficient evidence, and where allegations against the individuals were not so interconnected that they had to stand or fall together.

Criminal law — Powers of search and seizure — Search warrants — Reasonable grounds — When available — Application by Sorbara for an order in the nature of certiorari severing all references to him in four search warrants allowed — Insufficient evidence placed before the issuing judge upon which she could have concluded that there were reasonable and probable grounds to believe that the applicant had committed the offences of fraud or making a false prospectus or statement — Application for a search warrant, at least as it related to the applicant, was premature — Criminal Code, s. 380.

Application by Sorbara for an order in the nature of certiorari severing all references to him in

four search warrants. The applicant contended that the issuing judge ought not to have been satisfied that there were reasonable grounds to believe that the applicant had committed the offences alleged in the search warrants. The two offences upon which the search warrants were based as they related to the applicant were making a false prospectus or statement, and fraud over \$5,000. Other individuals were also being investigated. The search warrants arose out of an ongoing investigation being conducted by the RCMP into certain matters involving Royal Group Technologies. The applicant was a director of Royal Group from 1994 to 2003. He was also a member of its audit committee from 1995 to 2002. The allegations behind the offences related to the applicant involved a sale by a company, of which the applicant was a shareholder through a holding company, of two parcels of land to Royal Group.

HELD: Application allowed. As a preliminary issue, the court had jurisdiction to hear the application. If there were reasonable grounds to believe that some of the individuals had committed the offences but there were not such reasonable grounds regarding others, including the applicant, there was no reason why the latter group could not be severed from the former group, assuming that the allegations were not so interconnected that they had to stand or fall together. In this case, the allegations made against the applicant stood independently of the allegations involving the other individuals. There was insufficient evidence placed before the issuing judge upon which she could have concluded that there were reasonable and probable grounds to believe that the applicant had committed the offence of fraud. There was also a lack of sufficient evidence placed before the issuing judge upon which she could have concluded that there were reasonable and probable grounds to believe that the applicant had committed the offence of making a false statement. In sum, the application for a search warrant, at least as it related to the applicant, was very much premature. While the investigators had their suspicions, possibilities and submissions did not justify the issuance of a search warrant.

Statutes, Regulations and Rules Cited:

Canadian Charter of Rights and Freedoms, 1982, s. 24(1)

Criminal Code, s. 380, s. 400

Counsel:

G. Hainey, L. Mahoney and M. Reinhart, for the applicant

C. Bond and R. Goldstein, for the respondent

¶ 1 **I.V.B. NORDHEIMER J.:**— The applicant seeks an order in the nature of *certiorari* "severing and/or expunging" all references to him in four search warrants that were granted by Madam Justice Marshall of the Ontario Court of Justice on October 5, 2005. The applicant does not seek to quash the search warrants in their entirety nor to invalidate the search and seizures made pursuant to the search warrants.

¶ 2 By way of background, this application follows on earlier applications made by certain media organizations, together with some of the other individuals referred to in the search

warrants to, first, unseal a copy of the Information to Obtain Search Warrant upon which the search warrants were issued and, afterwards, to determine the correctness of the edits made to the copy of the Information that was revealed.

¶ 3 The central contention raised by the applicant is that the issuing judge ought not to have been satisfied that there were reasonable grounds to believe that the applicant had committed the criminal offences alleged in the search warrants. In that regard, there were two offences on which the search warrants were based as they relate to the applicant. One is the allegation that the applicant, along with four other named individuals as well as others unnamed:

"did unlawfully between the 1st day of January 1996 and September 30, 2002 at or near the Town of Woodbridge, and at or near the City of Toronto, in the Province of Ontario and elsewhere in Canada, did make, circulate or publish a prospectus, statement or account which they knew was false in a material particular, to wit: the material omission of related party transactions with intent to induce persons to become shareholders of Royal Group Technologies Limited, contrary to section 400(1) of the Criminal Code."

¶ 4 The other offence that relates to the applicant is the allegation that he, along with three other named individuals as well as others unnamed:

"did unlawfully between the 1st day of January 1996 and September 30, 2002 at or near the Town of Woodbridge, in the Province of Ontario and elsewhere in Canada, did by deceit, falsehood or other fraudulent means, defraud Royal Group Technologies Limited, its shareholders and/or creditors, of money or other valuable security of an amount greater than \$5000 in relation to related party transactions, contrary to section 380(1) of the Criminal Code."

¶ 5 These search warrants arose out of an ongoing investigation being conducted by the Integrated Market Enforcement Team of the Royal Canadian Mounted Police into certain matters involving Royal Group Technologies Limited. Throughout the investigation, the RCMP has been assisted by BDO Dunwoody, a forensic accounting firm. The RCMP's investigation commenced as a result of a referral from the Ontario Securities Commission. The OSC began investigating Royal Group after receiving anonymous packages of information that alleged that persons within Royal Group were involved in insider trading as well as the diversion of government grants to fund the construction of a casino and resort in St. Kitts, an island in the eastern Caribbean, that involved hundreds of millions of dollars. Various senior officers and directors of Royal Group were alleged to be involved in these activities. The applicant was not alleged to be one of those persons, however.

¶ 6 Royal Group is a Canadian company with its head office in Woodbridge, Ontario. It is listed on both the Toronto and New York Stock Exchanges. Royal Group has over one hundred subsidiary companies throughout the world. According to its annual report in 2001, Royal Group had sales of \$1.669 billion and net earnings of \$117 million. The applicant was a director of Royal Group from 1994 to 2003. He was also a member of its audit committee from 1995 to 2002.

¶ 7 The allegations behind the offences that relate to the applicant are much narrower than those involved in the broader investigation. They relate to two parcels of land referred to in the Information as Lots 4 and 5, Brewster Road in Brampton, Ontario. Both of those parcels of land were owned by Sam-Sor [See Note 1 below]. The applicant is a shareholder in Sam-Sor through a holding company. According to the applicant's public disclosure statement filed with the Ontario Legislature, as of September 1, 2002, his holding company held 19.35% of Sam-Sor. Sam-Sor sold both parcels to a subsidiary of Royal Group.

Note 1: Sam-Sor changed its name to NHD Developments Limited in 2003.

¶ 8 It should also be noted that, subsequent to these events, and at the time that the search warrants were obtained and executed, the applicant was Minister of Finance for the Province of Ontario and Chair of Management Board of Cabinet, positions from which he resigned almost immediately upon the search warrants being executed. The applicant's resignations resulted from the allegations of criminal wrongdoing against him that were contained in the search warrants and that were widely published by the media throughout Ontario.

¶ 9 The basic facts regarding the Brewster Road transactions are that on December 2, 1996, Sam-Sor sold Lot 5 to a subsidiary of Royal Group for \$2,230,000. On December 4, 2000, Royal Group sold Lot 5 to D'Angelo Brands Ltd. for \$3,150,000. On May 30, 1997, Sam-Sor sold Lot 4 to a subsidiary of Royal Group for \$320,000. On January 28, 2000, Royal Group sold Lot 4 to 1033803 Ontario Inc. for \$613,720.

¶ 10 The OSC advised Royal Group of its investigation. As a consequence of that advice, Royal Group's board of directors established a Special Committee to conduct its own investigation into the allegations. The Special Committee retained counsel to advise it and also retained Kroll Lindquist Avey, another firm of forensic accountants, to assist in the investigation. Subsequent to those steps, counsel to the Special Committee retained Integris Real Estate Counselors to review certain real estate transactions, including the Brewster Road parcels, and to provide a range of property values for the lands involved as at the time of the transactions.

¶ 11 The Special Committee has shared information arising from its investigation with the RCMP including a report by Kroll that, in turn, refers to the report provided by Integris. In relation to the Brewster Road parcels, the Information sets out findings from the Integris Report that the purchase price of \$2,230,000 paid by Royal Group's subsidiary to Sam-Sor for Lot 5 fell in the middle of the range of market values for that property at the time of the sale and that the purchase price of \$320,00 paid by Royal Group's subsidiary to Sam-Sor for Lot 4 fell in the upper end of the range of market values for that property at the time of the sale.

¶ 12 The Special Committee also shared with the RCMP the fact that Kroll had interviewed the applicant about the Brewster Road transactions. The applicant told Kroll that he may have been aware of the sale of Lot 5 through a casual conversation with Vic De Zen, the CEO of Royal Group but that he did not know the specifics of the transaction. The applicant recalled that, in this casual conversation, De Zen indicated that the applicant's brother was a tough negotiator.

The applicant had no specific recollection of the sale of Lot 4. The applicant also told Kroll that his brothers, Edward and Joseph, managed Sam-Sor and would have dealt with Royal Group regarding any business that Sam-Sor had with Royal Group. The applicant also advised Kroll that these transactions would not have been brought before the board of directors of Royal Group as they were below the board's threshold for review, that threshold being all transactions greater than \$60 million. The applicant further advised Kroll that Royal Group did not have any process in place for the board to review and approve of any related party transactions.

¶ 13 This latter point is of importance because it is a central contention of the investigation that the Brewster Road transactions were related party transactions. Indeed, this particular is set out in each of the offences alleged. It is further alleged that these transactions were not reported to, nor reviewed by, the audit committee of Royal Group or by its board of directors nor were they reported to, nor reviewed by, the auditors of Royal Group.

¶ 14 Finally, in terms of the Information, the affiant, Staff Sergeant Mel Young, makes two specific statements regarding his view that there are reasonable grounds to believe that the applicant was involved in the offences being investigated. Those two statements are as follows:

"I believe the details under the related heading in my ITO supports the s. 380 fraud allegation."

"Greg Sorbara failed to notify the external auditors, KPMG, about ownership in the company involved in the transaction and this failure also supports my reasonable grounds that he committed a criminal offence."

Scope of review

¶ 15 Before dealing with the issues raised, I should address one preliminary matter. The applicant filed an affidavit from Roderick McLeod on this application. In that affidavit, Mr. McLeod provides certain information and also expresses his views on whether the Information contains reasonable grounds respecting the offences relating to the applicant. In my view, the sufficiency of the foundation for the search warrants must be determined solely on the material that was before the issuing judge, that is, the Information. I have therefore ignored the contents of Mr. McLeod's affidavit in reaching my conclusions on this application.

¶ 16 Turning then to the issues raised by the application, the parties agree that the scope of judicial review on an application for certiorari in respect of a search warrant is set out in *Re Church of Scientology et al. and The Queen (No. 6)* (1987) 31 C.C.C. (3d) 449 (Ont. C.A.) where the court said, at p. 494:

"The appropriate test on a certiorari application for the judicial review of a search warrant is whether there was evidence upon which the justice of the peace could determine that a search warrant should be issued. It is not the task of the reviewing judge to weigh the evidence or to determine whether the justice should have been satisfied by the sworn information." [original emphasis]

¶ 17 Two issues are then raised by this application. One is whether there is any jurisdiction to

grant the relief sought by the applicant. If there is jurisdiction, then the second issue is whether there was evidence before the issuing judge upon which she could find that there were reasonable grounds to believe that the offences had been committed insofar as those offences relate to the applicant.

Jurisdiction

¶ 18 The respondent contends that the relief sought by the applicant, that is to remove any references to him in the search warrant, amounts to an attempt to amend the search warrant and that there is no jurisdiction in a reviewing court to do so – see *Re Dobney Holdings* (1985), 18 C.C.C. (3d) 238 (B.C.C.A.).

¶ 19 The applicant, however, asserts that, if it is shown that there was insufficient evidence upon which the issuing judge could have concluded that there were reasonable grounds to believe that he had committed the offences alleged, then the contrary conclusions in the search warrant were made without jurisdiction and are "bad". The applicant further contends that the bad portions of a search warrant may be severed and the search warrant quashed in that limited respect while allowing the search warrant to otherwise stand.

¶ 20 In support of his position, the applicant refers to *R. v. Johnson & Franklin Wholesale Distributors Ltd.* (1971), 3 C.C.C. (2d) 484 (B.C.C.A.). In that case, a search warrant gave authority to search a company's premises for obscene books being kept for distribution and company records, including invoices, that were being kept. The British Columbia Court of Appeal concluded that the search warrant was valid insofar as it referred to the obscene books but was invalid respecting the company records. Since there was no connection made in the search warrant between the company records and the obscene books, the British Columbia Court of Appeal held that the search warrant then left the records to be seized by the police wide-open and that was impermissible. Consequently, the British Columbia Court of Appeal determined that the search warrant was good in part and was bad in part. The British Columbia Court of Appeal went on to find, however, that it had the jurisdiction to sever the bad part of the search warrant from the good part. Mr. Justice Tysoe said, at p. 490:

"It appears to me that the doctrine of severability which was applied in *R. v. Green et al.*, and by Martin, J.A., in *R. v. Cox, supra*, [1929] 2 D.L.R. 785, to an order of Justices can properly be applied and should be applied to the search warrant issued by a Justice of the Peace in the present case. In my view the bad part of the warrant is clearly severable from the good. The two parts have no connection with one another."

¶ 21 This approach was subsequently adopted by the Ontario Court of Appeal in *Re Church of Scientology et al. and The Queen (No. 6)*, *supra*, where the court said, at p. 534:

"However, if the search warrant had specifically included the legal bureau documents, that part of it could be severed and quashed without invalidating the search warrant itself. In *Re Regina and Johnson & Franklin Wholesale Distributors Ltd.* (1971), 3 C.C.C. (2d) 484, 16 C.R.N.S. 107, [1971] 4 W.W.R.

This is Exhibit "D" mentioned and referred to in the Affidavit of Michael Wright, sworn-before me at the City of Toronto, in the Province of Ontario, this 5th day of December, 2007.

A handwritten signature in cursive script, appearing to read "Nirvan Ladd", written over a horizontal line.

A Commissioner, etc.

Royal Group's De Zen Invests In Caribbean Resort

By Ben Dummett
OF DOW JONES NEWSWIRES
637 words
5 December 2001
15:06
Dow Jones News Service
English
(Copyright (c) 2001, Dow Jones & Company, Inc.)

TORONTO -(Dow Jones)- **Royal Group Technologies Ltd. (RYG)** and at least one of the company's institutional shareholders have different views on a personal investment by Royal Group's chief executive in a new Caribbean **resort**.

Vic De Zen, Royal Group's chairman, president and chief executive, and a number of partners are investing in a 1,000-bed **resort** community on the island of St Kitts. The project, which is under construction, will consist of condominiums, a hotel, golf course and small casino. De Zen declined to identify his partners.

The **resort** is scheduled to open in the fall of 2002 and will be operated by Marriott International Inc. (MAR) on behalf of De Zen and his partners.

Royal Group, Brampton, Ont., isn't an investor in the project, though it is supplying building materials. "It's a showpiece," for the company's building materials, De Zen said. "A bunch of builders from Venezuela, Dominican Republic" and St. Kitts have visited the project, the executive said.

However, Jean Michaud, a portfolio manager at Tal Global Asset Management, said he wasn't aware of the **resort** project and worried that the investment could be a distraction for De Zen. He suggests that De Zen's investment in the project could be "a red flag.... You (have) to check with the company to be convinced" it isn't a distraction, the manager said.

For the quarter ended Sept. 30, Tal funds held a total of almost 5.9 million Royal Group shares, or nearly 8% of Royal Group's almost 75 million outstanding shares.

De Zen's Brother Building Resort Project

De Zen said the **resort** is being built by his brother and the brother's two sons, who are in the construction business. De Zen stressed he has no involvement in the project's construction and is focused on Royal Group's operations.

"You come every Saturday, I'm here (at Royal Group's headquarters in Brampton). I'm here every night" until 7 p.m., the executive said.

De Zen owns almost 16 million Royal Group shares, indicating it wouldn't be in his interest to let the St. Kitts project distract him from his duties at Royal Group.

As a supplier to the project, Royal Group has provided various building materials, including the company's Royal Building System, a patented wall system.

St. Kitts' hot climate and the Caribbean's exposure to hurricanes and other severe types of storms means the **resort** project "will be a showcase for the Royal Building System," said Mark Badger, Royal Group's spokesman.

The Royal Building System consists of rigid extruded polymer components that serve as the finished formwork for a variety of concrete walls for bearing, non-bearing, retaining, and foundation walls.

The technology has proven to reduce maintenance and air-conditioning costs and to be hurricane-resistant, Badger said.

Michaud said he typically doesn't like executives of companies he invests in to be involved in significant outside investments because "it can divert the concentration of the people, that's the first reaction." He said, "You can bet I will talk to them about" the project.

The manager said "he would have to be convinced" that the project is a showcase for Royal Group's building materials.

Royal Group expects to have generated a total of C\$60 million to C\$80 million in revenue from sales of building supplies to the resort's developers over the three-year construction period. For Royal Group's latest fiscal year ended Sept. 30, the company had sales of almost C\$1.67 billion.

Company Web Site: <http://www.royalgrouptech.com.proxy1.lib.uwo.ca:2048> [<http://www.royalgrouptec>

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-Ben Dummett, Dow Jones Newswires; 416-306-2024;

ben.dummett@dowjones.com

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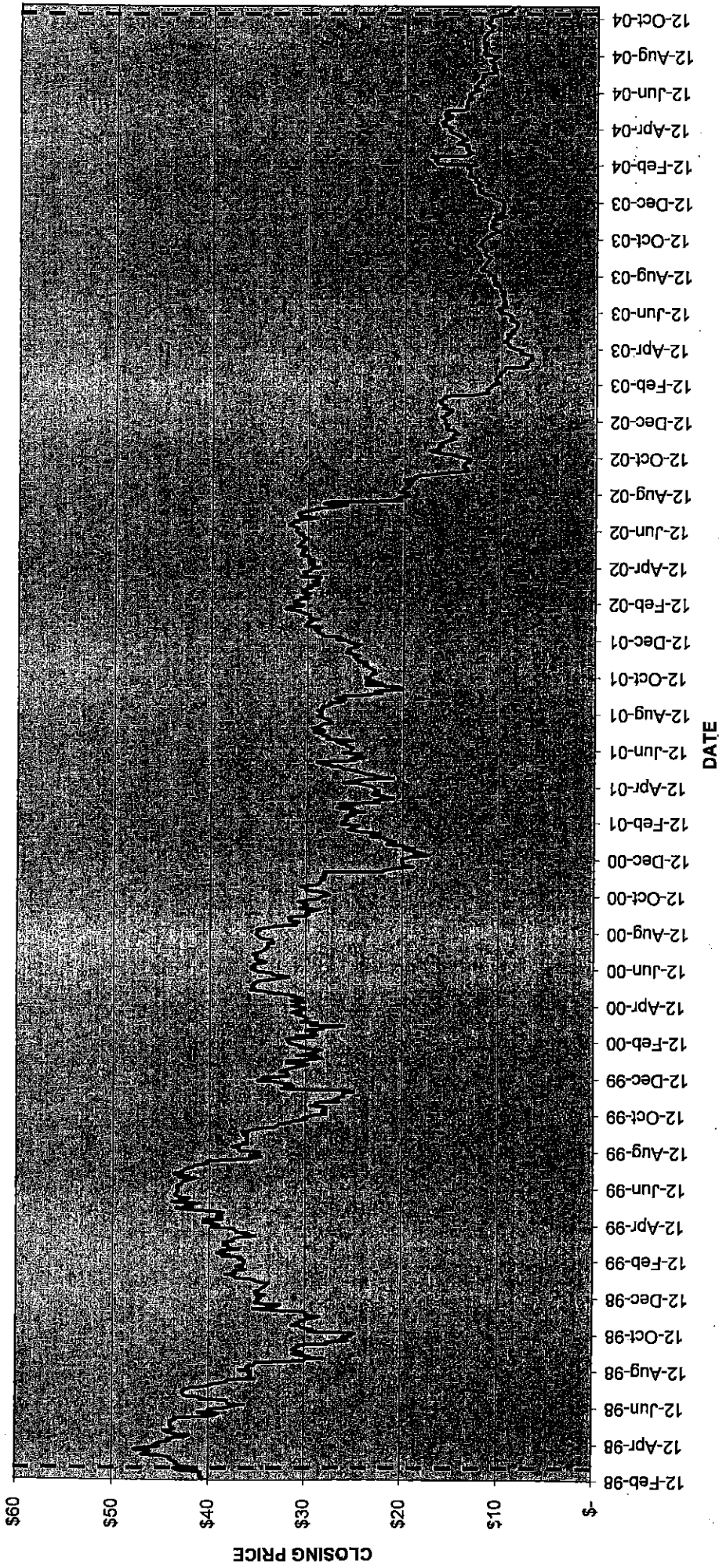
This is Exhibit "E" mentioned and referred to in the Affidavit of Michael Wright, sworn before me at the City of Toronto, in the Province of Ontario, this 5th day of December, 2007.

A handwritten signature in cursive script, appearing to read "M. L.", written over a horizontal line.

A Commissioner, etc.

Royal Group Technologies - Close Data from Feb 12/98 to Nov 1/04

Dotted line represents the beginning and end of the class period.



This is Exhibit "F" mentioned
and referred to in the
Affidavit of Michael Wright,
sworn before me at the City
of Toronto, in the Province of
Ontario, this 5th day of
December, 2007.

A handwritten signature in cursive script, appearing to read "Nina L.", is written over a horizontal line.

A Commissioner, etc.

Press Release

**For Immediate Release,
January 24, 2003**

Royal Group Revises Earnings Guidance for First Quarter

Royal Group Technologies Limited (RYG: TSX, NYSE) announced today that fully diluted earnings per share for the first quarter of fiscal 2003 are anticipated to be in the range of \$0.16 to \$0.19. Royal had previously expected first quarter earnings per share to be in the range of \$0.24 to \$0.27. Royal will formally release its first quarter financial results on February 12th.

Royal Group's President, Douglas Dunsmuir, stated that, "repositioning of the U.S. window coverings operations has not yet produced the financial results we are expecting". He also noted that, "while Royal Group achieved overall sales of approximately \$420 million in the first quarter, an unfavorable product mix also contributed to the earnings shortfall". Royal Group had previously guided that sales for the first quarter would be in the range of \$395 to \$420 million.

Royal Group Technologies Limited is a manufacturer of innovative, polymer-based home improvement, consumer and construction products. The company has extensive vertical integration, with operations dedicated to provision of materials, machinery, tooling, real estate and transportation services to its plants producing finished products. Royal's manufacturing facilities are primarily located throughout North America, with international operations in South America, Europe and Asia.

For further information contact:

Ron Goegan, Chief Financial Officer

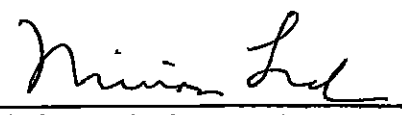
OR

Mark Badger, Vice President, Corporate Communications

Phone: (905) 264 0701 Fax: (905) 264 0702

The information in this document contains certain forward-looking statements with respect to Royal Group Technologies Limited, its subsidiaries and affiliates. These statements are often, but not always made through the use of words or phrases such as "expects", "should continue", "believes", "anticipates", "estimated" and "intends" or similar formulations. By their nature, these forward-looking statements involve known and unknown risks, uncertainties and other factors affecting Royal specifically or its industry generally that could cause actual performance and financial results to differ materially from those contemplated by the forward-looking statements. These risks and uncertainties include fluctuations in the level of renovation, remodeling and construction activity, changes in product costs and pricing, an inability to achieve or delays in achieving savings related to the cost reductions, or revenues related to sales price increases, consolidation and restructuring programs, changes in product mix, the growth rate of the markets into which Royal's products are sold, market acceptance and demand for Royal's products, changes in availability or prices for raw materials, pricing pressures resulting from competition, difficulty in developing and introducing new products, failure to penetrate new markets effectively (particularly markets in developing countries), the effect on foreign operations of currency fluctuations, tariffs, nationalization, exchange controls, limitations on foreign investment in local business and other political, economic and regulatory risks, difficulty in preserving proprietary technology, changes in environmental regulations, currency risk exposure and other risks described from time to time in publicly filed disclosure documents and securities commission reports of Royal Group Technologies Limited and its subsidiaries and affiliates. In view of these uncertainties we caution readers not to place undue reliance on these forward-looking statements. Statements made in this document are made as of January 24, 2003 and Royal disclaims any intention or obligation to update or revise any statements made herein, whether as a result of new information, future events or otherwise.

This is Exhibit "G" mentioned and referred to in the Affidavit of Michael Wright, sworn before me at the City of Toronto, in the Province of Ontario, this 5th day of December, 2007.



A Commissioner, etc.

ROYAL GROUP TECHNOLOGIES LIMITED

FEBRUARY 25, 2004

TORONTO, ONTARIO -- Royal Group Technologies Limited ("Royal Group" or the "Company") (RYG: TSX, NYSE) announced today that the Enforcement Branch of the Ontario Securities Commission ("OSC") informed the Company yesterday afternoon after the close of the markets that, based on the OSC's investigation relating to the Company, including information recently obtained by the OSC, public disclosure should be made of the existence of the investigation. The Company understands that the investigation principally concerns transactions between the Company and a St. Kitts resort development which was a purchaser of the Company's products and services. The St. Kitts resort, which is controlled by Mr. Vic De Zen, the controlling shareholder of the Company, purchased goods and services from the Company over the past five years which the Company advises have a value of approximately \$32 million. The OSC also informed the Company this morning that the RCMP, along with the Canada Customs Revenue Agency, is conducting its own investigation.

In late December 2003, the Company was advised that the OSC was conducting the investigation and the Company has been cooperating with the OSC and providing information to the OSC regarding the Company's relationship with the St. Kitts resort and past financial transactions between them. The Company established a Special Committee of the Board of Directors in late December 2003 to deal with those matters, consisting solely of independent directors who have retained independent legal counsel and forensic accountants. The Company will continue to cooperate fully with the OSC.

Royal Group Technologies Limited is a manufacturer of innovative, polymer-based building products, serving the home improvement, consumer and construction sectors of the market. The Company has extensive vertical integration, with operations dedicated to provision of materials, machinery, tooling, real estate and distribution services to its plants producing finished products. Royal Group's manufacturing facilities are primarily located throughout North America, with international operations in South America, Europe and Asia. Additional investment information is available on Royal Group's web site at www.royalgrouptech.com under the "Investor Relations" section.

The information in this document contains certain forward-looking statements with respect to Royal Group, its subsidiaries and affiliates. These statements are often, but not always made through the use of words or phrases such as "expect", "should continue", "continue", "believe", "anticipate", "estimate", "contemplate", "target", "plan", "budget", "may", "will", "schedule" and "intend" or similar formulations. By their nature, these forward-looking statements are necessarily based upon a number of estimates and assumptions that, while considered reasonable by management, are inherently subject to significant, known and unknown, business, economic, competitive and other risks, uncertainties and other factors affecting Royal Group specifically or its industry generally that could cause actual performance, achievements and financial results to

differ materially from those contemplated by the forward-looking statements. These risks and uncertainties include fluctuations in the level of renovation, remodeling and construction activity; changes in product costs and pricing; an inability to achieve or delays in achieving savings related to the cost reductions or revenues related to sales price increases; the sufficiency of our restructuring activities, including the potential for higher actual costs to be incurred in connection with restructuring activities compared to the estimated costs of such actions; the ability to recruit and retain qualified employees; the level of outstanding debt and our current debt ratings; the ability to meet the financial covenants in our credit facilities; changes in product mix; the growth rate of the markets into which Royal Group's products are sold; market acceptance and demand for Royal Group's products; changes in availability or prices for raw materials; pricing pressures resulting from competition; difficulty in developing and introducing new products; failure to penetrate new markets effectively; the effect on foreign operations of currency fluctuations, tariffs, nationalization, exchange controls, limitations on foreign investment in local business and other political, economic and regulatory risks; difficulty in preserving proprietary technology; adverse resolution of litigation and administrative and intellectual property disputes; changes in environmental regulations; currency risk exposure and other risks described from time to time in publicly filed disclosure documents and securities commission reports of Royal Group and its subsidiaries and affiliates. In view of these uncertainties we caution readers not to place undue reliance on these forward-looking statements. Statements made in this document are made as of February 25, 2004 and Royal Group disclaims any intention or obligation to update or revise any statements made herein, whether as a result of new information, future events or otherwise.

-30-

FOR FURTHER INFORMATION PLEASE CONTACT:

Royal Group Technologies Limited
Scott D. Bates
General Counsel and Corporate Secretary
or
Mark Badger
Vice-President, Marketing and Corporate Communications
(905) 264-0701
(905) 264-0702 (FAX)

This is Exhibit "H" mentioned and referred to in the Affidavit of Michael Wright, sworn before me at the City of Toronto, in the Province of Ontario, this 5th day of December, 2007.

A handwritten signature in cursive script, appearing to read "M. L.", written over a horizontal line.

A Commissioner, etc.

Press Release For Immediate Release

ROYAL GROUP TECHNOLOGIES LIMITED

October 15, 2004

TORONTO, ONTARIO -- Royal Group Technologies Limited ("Royal Group" or the "Company") (RYG: TSX, NYSE) announced today that Staff of the Ontario Securities Commission (the "Commission") provided the Company with a copy of a Production Order (the "Order") on October 12, 2004 that was issued on October 5, 2004 by a Justice in Ontario addressed to the Vice President and Chief Security Officer of Scotiabank. The Company's shares were halted from trading by Market Regulation Services Inc. in the afternoon of October 13, 2004 pending the issue of this press release.

The Order, which relates to the time period between January 1, 1996 to July 30, 2004, requires that certain documents be provided by Scotiabank to the RCMP in relation to four companies, Royal Building Systems, a subsidiary of the Company, Royal St. Kitts Beach Resort Limited (the "Resort") and two of the Resort's affiliates. The Resort is majority-owned by Vic De Zen, the controlling shareholder and non-executive Chairman of Royal Group. Douglas Dunsmuir, the Chief Executive Officer of the Company, has a 5% interest in the Resort.

The Resort purchased products and services from the Company during the aforementioned period for an approximate value of \$32 million.

The documents requested under the Order relate to these four companies and include banking documents, documents relating to research and development grants and related tax credits and the Kroll Report referred to below. In support of the document request, the Order lists five allegations of actions contrary to the *Criminal Code* and specifically names Vic De Zen, Douglas Dunsmuir and Gary Brown, a former officer of the Company. These allegations include an intent to defraud the shareholders and creditors of the Company and to deceive the shareholders and others by circulating or publishing a prospectus or statement or account which they knew was false. These are allegations only. The Company has not been provided with any particulars of these allegations.

The Company requested that the Justice who issued the Order, seal it. The Company was concerned that it would not be able to issue a public statement in a full and complete fashion, as there was no clarity in the Order in terms of the specific allegations, events and transactions being investigated without disclosure of all of the information in the supporting affidavit. Public disclosure was made concerning the existence of the Order and as a result, the request was withdrawn today by the Company. The Order is supported by an affidavit sworn by the RCMP. The affidavit was and remains sealed. The Company and its independent directors are seeking counsel's advice as to methods to access the information underlying the allegations to consider whether they can take further action and in order for the Company and its independent directors to provide full public disclosure.

The Company understands that the RCMP has confirmed that search warrants have been issued in connection with their investigation. The Company has not received a copy of any such search warrants. No search warrants or production orders have been served on the Company.

The Company established a Special Committee comprised of independent members of the Board of Directors in late December 2003 to conduct an independent investigation related to the OSC and RCMP investigations into transactions involving the Company and the Resort. The Company has never been provided by the OSC or the RCMP with any particulars of allegations relating to these investigations. The Special Committee retained Kroll Linquist Avey ("Kroll") to assist in the independent investigation. Kroll concluded in its Report, which was issued in April 2004, that there was no evidence of conduct or actions calculated to improperly shift costs to the Company from the Resort. Kroll had reviewed its work plan with the Ontario Securities Commission prior to commencing its work to ensure that the scope of the work would be appropriate to address the concerns raised by the Commission. A summary of the Kroll Report is contained in the Company's press release dated April 29, 2004. Following the Kroll Report, and based on all of the available information at that time, the Special Committee recommended that no further investigative action be taken at that time.

The Company has always and continues to cooperate fully with the RCMP, including its recent gathering of voluminous materials arising from communications with the RCMP and in anticipation of their review. Based on all of the information available to the Company, including discussions with the RCMP, Royal Group continues to understand, as previously announced, that it is not the target of the RCMP's investigation.

Based on the information now available to the independent directors of the Board, particularly the extensive investigation conducted by Kroll, and in the absence of any new or contrary evidence or information, the independent directors of the Board continue to fully support Mr. Dunsmuir's efforts to improve the Company's performance and enhance shareholder value.

As stated in the Company's press release dated April 29, 2004, the Commission had advised the Company that the RCMP's investigation may produce results which are material to the Company, most specifically in relation to its past financial disclosure and certain trading. Accordingly, the Commission retains an investigative interest in the matter.

Royal Group Technologies Limited is a manufacturer of innovative, polymer-based building products, serving the home improvement, consumer and construction sectors of the market. The Company has extensive vertical integration, with operations dedicated to provision of materials, machinery, tooling, real estate and distribution services to its plants producing finished products. Royal Group's manufacturing facilities are primarily located throughout North America, with international operations in South America, Europe and Asia. Additional investment information is available on Royal Group's web site at www.royalgroupotech.com under the "Investor Relations" section.

The information in this document contains certain forward-looking statements with respect to Royal Group, its subsidiaries and affiliates. These statements are often, but not always made through the use of words or phrases such as "expect", "should continue", "continue", "believe", "anticipate", "estimate", "contemplate", "target", "plan", "budget", "may", "will", "schedule" and "intend" or similar formulations. By their nature, these forward-looking statements are necessarily based upon a number of estimates and assumptions that, while considered reasonable

by management, are inherently subject to significant, known and unknown, business, economic, competitive and other risks, uncertainties and other factors affecting Royal Group specifically or its industry generally that could cause actual performance, achievements and financial results to differ materially from those contemplated by the forward-looking statements. These risks and uncertainties include fluctuations in the level of renovation, remodeling and construction activity; changes in product costs and pricing; an inability to achieve or delays in achieving savings related to the cost reductions or increases in revenues related to sales price increases; the sufficiency of our restructuring activities, including the potential for higher actual costs to be incurred in connection with restructuring activities compared to the estimated costs of such actions; the ability to recruit and retain qualified employees; the level of outstanding debt and our current debt ratings; the ability to meet the financial covenants in our credit facilities; changes in product mix; the growth rate of the markets into which Royal Group's products are sold; market acceptance and demand for Royal Group's products; changes in availability or prices for raw materials; pricing pressures resulting from competition; difficulty in developing and introducing new products; failure to penetrate new markets effectively; the effect on foreign operations of currency fluctuations, tariffs, nationalization, exchange controls, limitations on foreign investment in local business and other political, economic and regulatory risks; difficulty in preserving proprietary technology; adverse resolution of any litigation, investigations or administrative or intellectual property disputes; changes in securities or environmental laws, rules and regulations; currency risk exposure and other risks described from time to time in publicly filed disclosure documents and securities commission reports of Royal Group and its subsidiaries and affiliates. In view of these uncertainties we caution readers not to place undue reliance on these forward-looking statements. Statements made in this document are made as of October 15, 2004 and Royal Group disclaims any intention or obligation to update or revise any statements made herein, whether as a result of new information, future events or otherwise.

-30-

FOR FURTHER INFORMATION PLEASE CONTACT:

Media Contact

Royal Group Technologies Limited
Scott D. Bates
General Counsel and Corporate Secretary

or

Investor Contact

Mark Badger
Vice-President, Marketing and Corporate Communications
(905) 264-0701
(905) 264-0702 (FAX)

This is Exhibit "I" mentioned and referred to in the Affidavit of Michael Wright, sworn before me at the City of Toronto, in the Province of Ontario, this 3rd day of December, 2007.

A handwritten signature in cursive script, appearing to read "Nina L.", written over a horizontal line.

A Commissioner, etc.

Press Release For Immediate Release

ROYAL GROUP TECHNOLOGIES LIMITED

October 18, 2004

TORONTO, ONTARIO -- Royal Group Technologies Limited ("Royal Group" or the "Company") (RYG.SV: TSX, NYSE) announced today that it has received a letter from the RCMP advising that Royal Group is a target of the RCMP's investigation. Prior to receiving the letter from the RCMP, Royal Group understood, based on all of the information available to the Company, including discussions with the RCMP, that the Company was not a target of its investigation. Except as disclosed in the Production Order referred to below as detailed in the Company's press release on October 15, 2004, the Company has no information as to the reasons for the RCMP's change in position.

On Friday, October 15, 2004, the Company announced that Staff of the Ontario Securities Commission provided the Company with a copy of a Production Order on October 12, 2004 that was issued on October 5, 2004 by a Justice in Ontario addressed to the Vice President and Chief Security Officer of Scotiabank. The Company's shares were halted from trading by Market Regulation Services Inc. in the afternoon of October 13, 2004 pending the issue of a press release. The shares resumed trading on Monday October 18, 2004. Reference is made to the Company's press release of October 15, 2004 for further particulars with respect to the Production Order.

Royal Group Technologies Limited is a manufacturer of innovative, polymer-based building products, serving the home improvement, consumer and construction sectors of the market. The Company has extensive vertical integration, with operations dedicated to provision of materials, machinery, tooling, real estate and distribution services to its plants producing finished products. Royal Group's manufacturing facilities are primarily located throughout North America, with international operations in South America, Europe and Asia. Additional investment information is available on Royal Group's web site at www.royalgrouptech.com under the "Investor Relations" section.

The information in this document contains certain forward-looking statements with respect to Royal Group, its subsidiaries and affiliates. These statements are often, but not always made through the use of words or phrases such as "expect", "should continue", "continue", "believe", "anticipate", "estimate", "contemplate", "target", "plan", "budget", "may", "will", "schedule" and "intend" or similar formulations. By their nature, these forward-looking statements are necessarily based upon a number of estimates and assumptions that, while considered reasonable by management, are inherently subject to significant, known and unknown, business, economic, competitive and other risks, uncertainties and other factors affecting Royal Group specifically or its industry generally that could cause actual performance, achievements and financial results to differ materially from those contemplated by the forward-looking statements. These risks and uncertainties include fluctuations in the level of renovation, remodelling and construction activity; changes in product costs and pricing; an inability to achieve or delays in achieving savings related to the cost reductions or increases in revenues related to sales price increases; the

sufficiency of our restructuring activities, including the potential for higher actual costs to be incurred in connection with restructuring activities compared to the estimated costs of such actions; the ability to recruit and retain qualified employees; the level of outstanding debt and our current debt ratings; the ability to meet the financial covenants in our credit facilities; changes in product mix; the growth rate of the markets into which Royal Group's products are sold; market acceptance and demand for Royal Group's products; changes in availability or prices for raw materials; pricing pressures resulting from competition; difficulty in developing and introducing new products; failure to penetrate new markets effectively; the effect on foreign operations of currency fluctuations, tariffs, nationalization, exchange controls, limitations on foreign investment in local business and other political, economic and regulatory risks; difficulty in preserving proprietary technology; adverse resolution of any litigation, investigations or administrative or intellectual property disputes; changes in securities or environmental laws, rules and regulations; currency risk exposure and other risks described from time to time in publicly filed disclosure documents and securities commission reports of Royal Group and its subsidiaries and affiliates. In view of these uncertainties we caution readers not to place undue reliance on these forward-looking statements. Statements made in this document are made as of October 18, 2004 and Royal Group disclaims any intention or obligation to update or revise any statements made herein, whether as a result of new information, future events or otherwise.

-30-

FOR FURTHER INFORMATION PLEASE CONTACT:

Media Contact

Royal Group Technologies Limited
Scott D. Bates
General Counsel and Corporate Secretary

or

Investor Contact

Mark Badger
Vice-President, Marketing and Corporate Communications
(905) 264-0701
(905) 264-0702 (FAX)

This is Exhibit "J" mentioned
and referred to in the
Affidavit of Michael Wright,
sworn before me at the City
of Toronto, in the Province of
Ontario, this 5th day of
December, 2007.


A Commissioner, etc.

Attention Business Editors:

Royal Group Technologies Appoints James Sardo as Interim President and CEO, and Robert Lamoureux as Interim CFO

- Appointments follow terminations of company's President and CEO, and CFO
- Vic De Zen removed as Chairman
- Terminations resulted from documents, newly found by forensic accountants retained by Special Committee, concerning the executives' roles in a related-party land transaction in 1998

TORONTO, Nov. 29 /CNW/ - Royal Group Technologies Limited (Royal Group or the company) (RYG.SV-TSX, RYG-NYSE) today announced that the Special Committee of independent directors, acting on the authority previously provided by the Board of Directors, has terminated for cause Douglas Dunsmuir, the company's President and Chief Executive Officer, and Ron Goegan, its Senior Vice-President and Chief Financial Officer.

The Special Committee also dismissed Vic De Zen as Chairman of the Board. The Special Committee determined that Mr. De Zen, who resigned on December 18, 2003 as the company's co-Chief Executive Officer, Mr. Dunsmuir, and Mr. Goegan are not entitled to receive termination severance. The Special Committee has requested that all three resign as directors of the company.

Robert Lamoureux, who joined Royal Group's Board in November 2003 as an independent director and who has been serving as the Board's lead director, will continue in that capacity. The Board expects to appoint a new Chairman at a future date and is undertaking a search for individuals who will further strengthen its Board as independent directors.

The Board appointed V. James Sardo, an independent director who joined the Board in November 2003, to serve as the company's interim President and Chief Executive Officer and Mr. Lamoureux as interim Chief Financial Officer. Both men have been, and will continue to serve, on the Special Committee. The Board will be considering both internal and external candidates to fill the CEO and CFO positions for the longer-term.

On November 8, 2004, the Special Committee retained Kroll Lindquist Avey (Kroll) to carryout forensic accounting work beyond the scope of the investigation that it completed earlier this year. The earlier work by Kroll, completed at the end of April 2004, concerned transactions between Royal Group and the Royal St. Kitts beach resort development, majority-owned by Mr. De Zen.

In the early stages of its additional forensic work under the new mandate, Kroll identified and brought to the attention of the Special Committee information regarding a related-party land transaction completed in 1998, involving Mr. De Zen, Mr. Dunsmuir, and others, and which Mr. Goegan facilitated. The transaction concerned the purchase in Woodbridge, Ontario of approximately 185 acres of land by a numbered company, owned by Mr. De Zen and certain associates, including Mr. Dunsmuir, for \$20.5 million. Immediately after the closing of that purchase the property was sold to Royal Group for approximately \$27 million. The fact that the land purchase was a related-party transaction was not brought to the attention of the Board of Directors in 1998. The Board also was not informed about the profit that the related party would make on the purchase. The purchase was not authorized by the Board.

"At the very least, in the unanimous opinion of the Special Committee," Mr. Sardo said, "the roles played by Mr. Dunsmuir, Mr. Goegan, and Mr. De Zen in these matters showed a breach of their responsibilities to the company causing us to terminate their positions.

"It should be noted," Mr. Sardo continued, "that the related-party land purchase transaction took place more than six years ago and it does not appear to have had a material effect on the company's financial performance in 1998. It has no impact on Royal Group's current financial strength."

The Special Committee also terminated for cause and without severance two other non-executive employees of the company, engaged in its tool and die manufacturing operations, Fortunato Bordin and Domenic D'Amico, as the result of their participation in the related-party land purchase transaction as investors in the numbered company.

Jim Sardo, Royal Group's interim President and CEO, brings to his new role extensive senior management experience in publicly owned companies in Canada and internationally. Mr. Sardo, who was appointed to Royal Group's Board in November 2003, has served as President and/or CEO of six companies in diverse sectors, including building products, consumer products, automotive parts, printing, and retail.

Mr. Sardo's previous senior corporate positions have included: President of the Canadian Operations of Moore Corporation Ltd., Toronto; President and CEO, Amre Inc. (was one of the largest home improvement window and siding companies in the U.S.), Dallas, Texas; President and CEO of SMK Speedy International Inc., Toronto; Chairman, President, and CEO, Firestone Canada Inc., Hamilton, Ontario; President of Bridgestone/Firestone's Firestone Industrial Products Company, Indianapolis, Indiana; and President and CEO of SNE Enterprises, Inc., Wausau, Wisconsin (one of the largest window manufacturers in the United States). He also currently serves as a director or trustee of five publicly owned companies and income funds, and is a former Director and Vice-Chairman of the National Wood, Window & Door Association in the U.S. He is also a member of the Institute of Corporate Directors.

Robert Lamoureux, a Chartered Account, joined Royal's board in November 2003. He currently serves as lead director and chair of the audit committee. Mr. Lamoureux retired from PricewaterhouseCoopers in 2003, after nearly 35 years of service. During his career, he was an audit partner for a number of years and during his last three years he was National Leader of PwC's Corporate Governance practice. Mr. Lamoureux also serves on the board of one other Canadian public company. Mr. Lamoureux is a director of the Institute of Corporate Directors and Chair of its Ontario Chapter.

"The changes that we made are necessary and significant," Mr. Sardo continued, "and we believe that the quality of the more than 9,000 people throughout the Royal Group who have helped to make this company one of Canada's leading domestic and international manufacturing success stories, the excellence of our products and manufacturing technologies, and the strong relationships that we have forged with suppliers and customers over the years, will enable the company to continue to prosper. We are taking immediate steps that we believe will result in further improvements to Royal Group's operating efficiencies and financial performance, while ensuring that we meet the needs of our customers, suppliers, and employees."

As previously announced, the Special Committee's mandate includes all matters relating to the investigations and inquiries by the securities regulatory authorities and the RCMP and any similar or related investigations and inquiries that may be commenced by these or other authorities.

"The forensic work of Kroll is continuing, under the mandate provided to it when the Special Committee retained it earlier this month. As previously stated, we are committed to cooperating fully with the RCMP and the securities commissions and therefore intend to provide to them any significant findings resulting from Kroll's work," Mr. Sardo said.

Kroll's forensic work, according to its mandate from the Special Committee, includes investigations of:

- related-party transactions from January 1, 1996 to the present inclusive of all real estate dealings entered into by Royal Group with related parties;
- any areas that the Special Committee and/or Kroll are able to determine are of concern to the RCMP and/or the Ontario Securities Commission (OSC);
- any further areas regarding the St. Kitts project about which the RCMP and/or OSC have questions or require further information; and
- any other area deemed appropriate by the Special Committee.'

Royal Group will be holding a conference call today at 11:00 a.m. The call will be simultaneously webcast in its entirety through the Investor Relations section of the company's web site - www.royalgrouptech.com. A replay of the call will be available on Royal Group's web site or by phone by dialing 416-640-1917 (replay access code 21103136 followed by the number sign). The telephone replay will be available approximately two hours after completion of the conference call through December 6, 2004. An archive of the call will be maintained on the web site for three months.

Royal Group Technologies Limited is a manufacturer of innovative, polymer-based building products, serving the home improvement, consumer and construction sectors of the market. The Company has extensive vertical integration, with operations dedicated to provision of materials, machinery, tooling, real estate, and distribution services to its plants producing finished products. Royal Group's manufacturing facilities are primarily located throughout North America, with international operations in South America, Europe, and Asia. Additional investment information is available on Royal Group's web site at www.royalgrouptech.com under the "Investor Relations" section.

The information in this document contains certain forward-looking statements with respect to Royal Group Technologies Limited, its subsidiaries and affiliates. These statements are often, but not always made through the use of words or phrases such as "expect", "should continue", "continue", "believe", "anticipate", "estimate", "contemplate", "target", "plan", "budget", "may", "will", "schedule" and "intend" or similar formulations. By their nature, these forward-looking statements are necessarily based upon a number of estimates and assumptions that, while considered reasonable by management, are inherently subject to significant, known and unknown, business, economic, competitive and other risks, uncertainties and other factors affecting Royal specifically or its industry generally that could cause actual performance, achievements and financial results to differ materially from those contemplated by the forward-looking statements. These risks and uncertainties include the outcome of the ongoing internal review and investigations by the Special Committee of the Board of Directors; fluctuations in the level of renovation, remodeling and construction activity; changes in product costs and pricing; an inability to achieve or delays in achieving savings related to the cost reductions or increases in revenues related to sales price increases; the sufficiency of our restructuring activities, including the potential for higher actual costs to be incurred in connection with restructuring activities compared to the estimated costs of such actions; the ability to recruit and retain qualified employees; the level of outstanding debt and our current debt ratings; the ability to meet the financial covenants in our credit facilities; the ability to successfully replace our syndicated credit facility; changes in product mix; the growth rate of the markets into which Royal's products are sold; market acceptance and demand for Royal's products; changes in availability or prices for raw materials; pricing pressures resulting from competition; difficulty in developing and introducing new products; failure to penetrate new markets effectively; the effect on foreign operations of currency fluctuations, tariffs, nationalization, exchange controls, limitations on foreign investment in local business and other political, economic and regulatory risks; difficulty in preserving proprietary technology; adverse resolution of any litigation, investigations, administrative and regulatory matters, intellectual property disputes, or similar matters; changes in securities or environmental laws, rules and regulations; currency risk exposure and other risks described from time to time in publicly filed disclosure documents and securities commission reports of Royal Group Technologies Limited and its subsidiaries and affiliates. In view of these uncertainties we caution readers not to place undue reliance on these forward-looking statements. Statements

made in this document are made as of November 29, 2004 and Royal disclaims any intention or obligation to update or revise any statements made herein, whether as a result of new information, future events or otherwise.

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/For further information: James Sardo, Chairman of the Special Committee of Independent Directors, Royal Group Technologies Limited, (905) 264-0701; Richard W. Wertheim, Wertheim + Company Inc., (416) 594-1600, (416) 518-8479 (cell)/

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