

Court File No. 965/06

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

CANADIAN COMMERCIAL WORKERS INDUSTRY PENSION PLAN

Plaintiffs

- and -

ROYAL GROUP TECHNOLOGIES LTD., VIC DE ZEN,
DOUGLAS DUNSMUIR, GARY BROWN, RON GOEGAN, DOMINIC D'AMICO, GREGORY
SORBARA, RONALD SLAGHT and
RALPH BREHN

Defendants

Proceeding Under the *Class Proceedings Act*, 1992

Affidavit of Jason Goll

I, Jason Goll, of the Town of Elmira, in the Province of Ontario MAKE OATH AND SAY:

1. I am a project manager with Crawford Class Actions Services, the claims administrator appointed by this Court and the United States District Court for the Southern District of New York and as such, have knowledge of the following matters. Where my knowledge is based on information obtained from others, I have so indicated below, and I believe that information to be true.
2. On September 13, 2007, Michael Robb of Siskinds LLP provided us with lists of persons who purchased the shares of Royal Group Technologies Limited during the Class Period. Mr. Robb advised us that those lists had been provided by Royal Group's counsel, and that Royal Group's counsel had indicated that the provision of these lists satisfied the company's obligation to provide such information pursuant to the Stipulation.
3. On October 10th 2007, we posted the Notice of Pendency and Certification of Class Action, Proposed Settlement and Settlement Approval/Fairness Hearings, Summary Notice of Pendency and Certification of Class Action, Proposed Settlement and

Settlement Approval/Fairness Hearings, and the Proof of Claim and Release Form at www.rgtsettlement.ca.

4. On October 3, 2007 we mailed the Notice of Pendency and Certification of Class Action, Proposed Settlement and Settlement Approval/Fairness Hearings and the Proof of Claim and Release Form to the persons identified in the list provided to us by Mr. Robb identified as possible Class Members. The list contained 2,881 individual records, although upon reviewing the list, I recognize that there was some duplication.

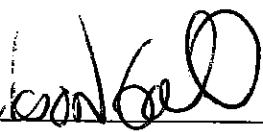
5. Some of the entries were for brokerage firms who requested additional copies of the notice for their clients. We have received the following requests for copies of the notice package to which we promptly responded:
 - (a) Bank of America requested 115 copies of the notice package;
 - (b) Goldman Sachs & Co. requested 301 copies of the notice package;
 - (c) CIBC requested 10,400 copies of the notice package;
 - (d) BMO Nesbitt Burns requested 15,000 copies of the notice package;
 - (e) Merrill Lynch requested 965 copies of the notice package; and
 - (f) Fidelity Investments provided the addresses for 150 clients, to whom we mailed the notice package;
 - (g) Charles Schwab and Company provided the addresses for 4,705 clients, to whom we mailed the notice package;
 - (h) Citibank provided the addresses for 3,873 clients, to whom we mailed the notice package;
 - (i) Citi Group Global provided the addresses for 75 clients, to whom we mailed the notice package;
 - (j) Morgan Stanley provided the addresses for 636 clients, to whom we mailed the notice package;
 - (k) UBS Financial Services Inc provided the mailing labels for 511 clients, to whom we mailed the notice package;
 - (l) Edward Jones provided the addresses for 130 clients, to whom we mailed the notice package;

- (m) McDonald Investments provided the addresses for 10 clients, to whom we mailed the notice package;
 - (n) AG Edwards provided the addresses for 450 clients, to whom we mailed the notice package;
 - (o) Schiffrin Barroway Topaz and Kessler LLP provided the addresses for 145 clients, to whom we mailed the notice package;
6. In total, therefore, we sent out 40,347 copies of the notice package. As of the date of this affidavit, 670 of those packages have been returned to us marked "undeliverable".
 7. As of the date of this affidavit, we have been contacted directly by approximately 155 phone calls with inquiries about the Notice or the Settlement generally. The theme of many phone calls has been to inquire "Why did I receive this claim form?"
 8. As of December 3, 2007, we have received 73 completed claim forms, 49 from Canadian residents and 24 from the U.S. Of the total claims forms received, 9 have been recommended for acceptance, 3 have been recommended for rejection, 29 have been marked deficient, and 32 remain pending.
 9. We have received no expressions of intention to opt-out of either of the actions.

SWORN OR AFFIRMED before)
 me at the City of Kitchener, in the)
 County of Waterloo this 4th day of)
 December, 2007.)



 A Commissioner, etc.)



 Jason Goll

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at London

Proceeding under the *Class Proceedings Act*, 1992

AFFIDAVIT

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