

Condensed Notice of Hearing

NOTICE OF HEARING FOR PARTIAL CERTIFICATION AND SETTLEMENT APPROVAL

Fortress Syndicated Mortgages Class Actions in respect of:
Collier Centre, Barrie
Harmony Simcoe/The Kemp, Barrie
Orchard, Calgary
Sutton/The Link, Burlington
Ten88 Progress, Toronto

You are receiving this notice because you invested in a syndicated mortgage loan in respect of one or more of the following developments:

- the **Collier Centre Project First Syndicated Mortgage only**, (i.e. investments prior to January 30, 2015) located at 90 Collier Street and 55 Mulcaster Street, Barrie, Ontario, in respect of the charge registered as Instrument SC1005953;
- the **Harmony Simcoe/The Kemp Project**, located at 51, 53, 55 and 75 Bradford Street, Barrie, Ontario, in respect of the charge registered as Instrument SC983678.
- the **Sutton/The Link Project**, located at 5210, 5218, 5226, 5236 Dundas Street and 2500 Burloak Drive in Burlington, Ontario in respect of the charges registered as Instruments HR1062915, HR1163232, or HR1174204;
- the **Orchard Project** located at 602, 606, 610, 620, 624, 626 and 628 12th Avenue S.E., in Calgary, Alberta in respect of the charge registered as Registration Number 141 112 373; or
- the **Progress/Ten88 Project**, located at 1088 Progress Avenue, Toronto, Ontario in respect of the charge registered as Instrument AT3101004.

A Partial Settlement in the total amount of **\$1,648,725** has been reached with the Defendants, Derek Sorrenti, Grant Morgan, and Sorrenti Law Professional Corporation (together, the “Sorrenti Defendants”) in these class actions. The settlement fund is being paid by the Sorrenti Defendants’ insurer, and is all of their remaining available insurance.

You can review the Settlement Agreement at <https://www.sotosclassactions.com/current-cases/> under the Fortress Class Actions Documents tab.

Before the settlement is final, it must be approved by the Ontario Superior Court of Justice. The court hearing to decide if these actions should be certified as class actions against the Sorrenti Defendants, and to decide if the Partial Settlement is fair, reasonable

and in the best interest of the Classes, and therefore should be approved is scheduled for **June 2, 2025**, and will be heard by videoconference.

Class Counsel will also be seeking approval of their legal fees equal to 25% of the settlement fund, plus disbursements and HST.

Questions about this Notice, the Class Actions or the Partial Settlement should be directed to:

MSTW Professional Corporation Barrister and Solicitor 36 Toronto Street, Suite 1120 Toronto, ON M5C 2C5 mwine@mstwlaw.com Tel: 416-477-5524 Fax: 416-477-1657	SOTOS LLP 55 University Ave, Suite 600 Toronto, ON M5J 2H7 namaya@sotos.ca Tel: 1-888-684-5545 (toll-free)
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The Ontario Superior Court of Justice has authorized distribution of this Notice, however, questions about this Notice should NOT be directed to the Court.