

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

BETWEEN:

**BARBARA KRANJCEC, on her own behalf and on behalf of  
all retired former employees of the Ontario Government  
receiving coverage under the Supplementary Health and  
Hospital Insurance, Dental and Life Insurance Plan as of  
June 1, 2002**

Plaintiffs

- and -

**HER MAJESTY THE QUEEN IN RIGHT OF ONTARIO**

Defendant

**AFFIDAVIT OF MARIO ALLOI**

I, **Mario Alloi**, of the City of Sault Ste. Marie, in the Province of Ontario,  
MAKE OATH AND SAY:


1. I am the Chair of the Executive of the Retired Members' Division of the Ontario Public Service Employees' Union ("OPSEU") and as such have knowledge of the matters to which I hereinafter depose.
2. I retired from the Ontario government in 1980. I started working for the government in May, 1946 as an employee of the Ministry of Natural Resources. My last position prior to retirement was in purchasing. I was located in Sault Ste Marie.

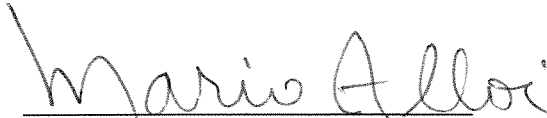
3. The OPSEU Retired Members' Division represents retired former OPSEU members. We are divided into seven (7) Regions in the province, with each Region having its own Chairperson. In addition to being the Chair of the Executive, I am also the Chair of Region 6, which covers the area from North Bay to White River. The Executive is comprised of the Chairs of each Region.
4. Many of our members are members of the class in the within action. I, myself, am a class member.
5. The Executive has been aware of the within class action more or less since its inception. On April 20, 2006, we met with class counsel, Michael Wright and Shaun O'Brien, to discuss the class's settlement agreement with the government. At the time of the meeting, class counsel had attended two pre-trial/mediation sessions with government representatives, at the end of which the parties reached a settlement.
6. At our meeting with class counsel on April 20, 2006, counsel explained to us the details of the settlement. We had the opportunity to ask questions and to discuss the settlement at some length.
7. The members of the Executive were generally impressed with and supportive of the settlement. However, we also wanted to receive input from our members. In the weeks following our meeting with class counsel, each Region Chair held a meeting with his or her members to discuss various issues, including the settlement.
8. We met with a total of approximately 250 members in the various Regions during the course of these meetings. The response from members to the settlement has generally been very positive. Voting to accept the settlement was carried. Some members feel they lost more than they will recoup but they accepted that it was necessary to average the settlement payment over the class. Some were

concerned about future contracts as the Order in Council ties us to future negotiations which are not concluded by us.

9. I have now reviewed the final settlement agreement entered into by the parties, which is attached hereto as Exhibit "A". In view of the response from members at the meetings we held, I can say on behalf of our members that we support this settlement.

10. I make this affidavit in support of a motion to have this settlement approved, and for no other or improper purpose.

SWORN BEFORE ME at the City of )  
London in the Province of )  
Ontario, this 14<sup>th</sup> day of June, 2006 )  
)  
 )  
A Commissioner, etc. )

  
MARIO ALLOI