

CANADA

PROVINCE OF QUEBEC
DISTRICT OF MONTREAL

NO: 500-06-001225-230

(Class Action)
SUPERIOR COURT

S.N.

Applicant

-vs.-

ROBERT GERALD MILLER
and
FUTURE ELECTRONICS INC.
and
SAM JOSEPH ABRAMS
and
RAYMOND POULET
and
HELMUT LIPPMANN

Defendants

-and-

ALONIM INVESTMENTS INC. care of
Defendant Robert G. Miller, Director, President,
and Secretary

ROBMILCO HOLDINGS LTD. care of
Defendant Robert G. Miller, Shareholder,
Director, President, and Secretary

**MULTIFORM PROPERTIES INC. (formerly
ROBERT GERALD MILLER HOLDINGS INC.)**
care of Defendant Robert G. Miller, shareholder

4306805 CANADA INC. care of Defendant
Robert G. Miller, shareholder, director,
President, and Secretary

11172247 CANADA INC. care of Rodney Miller,
Shareholder, director, President, and Secretary

RODNEY MILLER

Impleaded Parties



-and-

**L'OFFICIER DE LA PUBLICITÉ DES DROITS
DE LA CIRCONSCRIPTION FONCIÈRE DE
MONTRÉAL**

Mis en cause

**APPLICATION BY THE APPLICANT FOR A PROVISIONAL &
INTERLOCUTORY *MAREVA*-TYPE INJUNCTION ORDER AGAINST
DEFENDANTS ROBERT GERALD MILLER AND FUTURE ELECTRONICS INC.
(Arts. 49 & 510-511 C.C.P.)**

TO THE HONOURABLE MR. JUSTICE IMMER, J.S.C., CASE-MANAGEMENT JUDGE OF THE PRESENT CLASS ACTION, SITTING IN AND FOR THE DISTRICT OF MONTREAL, YOUR APPLICANT STATES AS FOLLOWS:

I. INTRODUCTION

1. On February 22, 2023, the Applicant filed a class action on behalf of the following group, of which she is a member, namely:
 - All persons who, while under the age of 18 years, performed sexual services in exchange for consideration¹ with and/or were victims of sexual exploitation by Robert G. Miller or any other group to be determined by the Court;
2. This case is a class action in damages where the alleged victims, who were minors at the time, are pursuing their alleged aggressor for sexual misconduct;
3. In this class action, the Applicant is claiming \$1 million in compensatory damages and \$1.5 million in punitive damages. The Applicant is also claiming a variable amount in compensatory damages for individual Class Members and \$1.5 million in punitive damages per alleged victim;
4. As more news stories are being published by the press, more alleged victims have been coming forward. At present, the Applicant anticipates that at least 50 alleged victims will join the class action. Given the number of Class Members and the anticipated amount in damages per alleged victim, the Applicant believes that CA\$200 million would be necessary to satisfy an eventual favourable judgment;

¹ Money or something else of value.



5. In addition, it should be noted that there are 3 individual actions that have been filed against Defendants Miller and Future Electronics based on the same or similar allegations:

File Name	File Number	Date of Filing	Amount Claimed	Exhibit
<i>A.B. c. Robert Gerald Miller et al.</i>	500-17-125100-233	May 10, 2023	\$8.25 million	MA-1
<i>A.B. c. Robert Gerald Miller et al.</i>	500-17-126739-237	Aug. 31, 2023	\$9.95 million	MA-2
<i>C.D. c. Robert Gerald Miller et al.</i>	500-17-127114-232	Oct. 3, 2023	\$11.4 million	MA-3

II. FACTUAL CRITERIA

A) POINT #1: Timing of the (Undisclosed) Sale Process

6. On February 2, 2023, Radio-Canada's investigative program *Enquête* aired a program called « *Le Système Miller – des jeunes filles, de l'argent, des hôtels* »² in which women were interviewed on camera and gave their stories about when Defendant Robert G. Miller (“Miller”) paid them, with money and gifts, to engage in sexual relations while they were under the age of 18 years old, between the years 1994 and 2006;³
7. The next day, on February 3, 2023, Defendant Miller denied these allegations, but nevertheless stepped down as President and CEO of Defendant Future Electronics Inc. (“Future Electronics”);⁴
8. On February 9, 2023, *Enquête* aired a follow-up program called « *Elles l'appelaient Bob...* », in which more women came forward to tell their stories;⁵
9. On February 22, 2023, the Applicant filed this class action on behalf of the alleged victims of sexual exploitation;
10. During this same time period, Defendant Miller, himself, made the decision to put his company, Defendant Future Electronics up for sale. This was reported by The Globe and Mail on September 14, 2023 in an article entitled “Montreal-based Future Electronics sold to Taiwanese company amid sex-related lawsuits against founder”,

² Para. 2 of the Re-Amended Application for Authorization (“AforA”) and Exhibit R-1A in support thereof; viewable at: <https://www.youtube.com/watch?v=PrKyr5u99MY>.

³ Class Counsel's own investigations and interviews with other alleged victims indicate that the time-period may have been even longer, being 1992-2012.

⁴ Para. 5 of the AforA and Exhibits R-4 and R-5.

⁵ Para. 7 of the AforA and Exhibit 7A; viewable at: https://www.youtube.com/watch?v=7VeQdgwX_Pc.



in which Jamie Singerman, Corporate Vice President – Worldwide of Future Electronics, was quoted:

« Future announced on Feb. 3 that Mr. Miller would step down as chief executive and chairman of the company in order to focus on “very serious health issues” and devote his attention to protecting his reputation. He “adamantly and vehemently denies” the allegations and says the claims arose as a result of a bitter divorce, the electronics distributor said in a statement at the time.

“The decision at that point was to separate Mr. Miller from the company,” Mr. Singerman said. This included the launch of a formal sale process. The founder made that call “in the best interest of the employees and the business model that’s been built over 55 years,” Mr. Singerman added. »

The whole as appears more fully from a copy of said newspaper article, produced herein as **Exhibit MA-4**;

11. This “formal sale process” was not disclosed to the federal regulator, Innovation, Science and Economic Development Canada (ISED)⁶, that must review and evaluate the sale of such a large Canadian-owned corporation to a foreign entity under section 14(1) of the *Investment Canada Act*, RSC 1985, c 28 (1st Supp). This was reported by *La Presse* on September 16, 2023 in an article entitled “*Nouvelle patate chaude pour Ottawa ?*”:

« À Ottawa, on s’est limité à rappeler qu’il y aura un examen en vertu de la Loi sur Investissement Canada (LIC), un mécanisme permettant aux autorités fédérales de bloquer une vente.

...

De son côté, le ministère de l’Économie, de l’Innovation et de l’Énergie a indiqué ne jamais avoir été contacté par Future Electronics.

...

La transaction peut être évaluée sous deux angles : l’« avantage net » ainsi que la « sécurité nationale ».

The whole as appears more fully from a copy of said newspaper article, produced herein as **Exhibit MA-5**;

12. On September 14, 2023, Defendant Future Electronics published a press release entitled “WT Microelectronics to Acquire Future Electronics for US\$3.8 Billion”, in which it states:

⁶ ISED is a department of the Government of Canada that is responsible for a number of the federal government's functions in regulating industry and commerce, promoting science and innovation, and supporting economic development.



« WT Microelectronics Co., Ltd. (TAIEX: 3036) (“WT Microelectronics”) today announced that it has entered into a definitive agreement to acquire 100% of the shares of Future Electronics Inc. (“Future Electronics”) for an enterprise value of US\$3.8 billion in an all-cash transaction.

...

The transaction has been unanimously approved by WT Microelectronics’ Board of Directors and Future Electronics’ Board of Directors, and is expected to close in the first half of 2024, subject to customary closing conditions including the receipt of required regulatory approvals.

...

Founded in 1993 and headquartered in Taiwan, WT Microelectronics is one of the leading and fastest growing semiconductor components distributors globally.

...

Founded in 1968, Future Electronics believes its 5,200 employees are its greatest asset, with 170 offices in 47 countries.

...

Media contact:

Jamie Singerman

Corporate Vice President – Worldwide

FUTURE ELECTRONICS

+1 514-694-7710 »

The whole as appears more fully from a copy of said press release, produced herein as **Exhibit MA-6**;

B) POINT #2: The Sale Price of \$3.8 Billion is in U.S. Dollars and Can be Deposited Anywhere in the World

13. As can be seen from the press release (Exhibit MA-6), while Defendant Future Electronics’ current head office is in Pointe-Claire, Quebec, they operate worldwide and have “170 offices in 47 countries”. As such, there is no reason to believe that the US\$3.8 billion will be deposited into a Canadian bank account;
14. To the contrary, as the sale is in U.S. dollars (as opposed to Canadian funds), it seems likely that this money will be deposited into a foreign bank account, under the control of Defendant Miller or in a manner that would make the source of ownership opaque and difficult if not deliberately impossible to ascertain or execute a judgment upon;
15. The Applicant does not have first-hand knowledge of where or to whom the sale proceeds will be paid;



C) POINT #3: Defendant Robert G. Miller's Whereabouts are Unknown

16. After the Applicant instituted the present class action, she attempted to serve Defendant Miller with a copy of the original Application for Authorization. This proved impossible, as Defendant Miller's whereabouts are unknown;
17. The first address that the bailiff attempted, without success, to serve Defendant Miller was at his presumed personal residence located at 78 Summit Crescent, in Westmount, Quebec, H3Y 1L7. The bailiff attempted service on Defendant Miller at this address 3 times on February 28, March 1, and March 2, 2023. Each time, a notice of a visit was left at the location in a sealed envelope. This is detailed in the bailiff's *Rapport de tentative*, which states:

« J'ai tenté de signifier et/ou exécuter l'acte de procédure suivant
APPLICATION TO AUTHORIZE THE BRINGING OF A CLASS ACTION & TO
APPOINT THE APPLICANT AS REPRESENTATIVE PLAINTIFF, SUMMONS
& ATTESTATION D'AUTHENTICITE à:

ROBERT GERALD MILLER
78 CRES SUMMIT, WESTMOUNT, QC, CANADA, H3Y 1L7

CE QUE JE N'AI PU FAIRE VU QUE PERSONNE N'ÉTAIT PRÉSENT AFIN
DE RECEVOIR LA SIGNIFICATION.

INCAPABLE DE SAVOIR SI LE DESTINATAIRE Y HABITE. L'ENTRÉE DE
GARAGE AINSI QUE LES ESCALIERS NE SONT PAS DENEIGES.

EN CONSÉQUENCE, J'EN FAIS LE PRÉSENT RAPPORT POUR SERVIR
ET VALOIR CE QUE DE DROIT.

...

De plus, j'ai laissé SOUS PLI CACHETÉ, UN AVIS DE VISITE prévu à l'art.
129 C.P.C.

AUTRES TENTATIVES:

28/02/2023 à 16:05 heures,
01/03/2023 à 7:55 heures »

The whole as appears more fully from a copy of said bailiff's *procès-verbal*, produced herein as **Exhibit MA-7**;

18. It did not appear that anyone was living at this address at that time, given that there did not appear to have been any snow removal on the premises. Therefore, Class Counsel provided the bailiff with several alternate potential addresses at which to attempt service on Defendant Miller, the whole as appears from correspondence between the bailiff and Class Counsel, produced herein *en liasse* as **Exhibit MA-8**;



19. The second and third addresses that the bailiff attempted, without success, to serve Defendant Miller was at the houses where many of the alleged illicit acts took place, namely, at 375 and 380 avenue Olivier, in Westmount, Quebec, H3Z 2C8. The bailiff attempted service on Defendant Miller at these addresses 3 times on March 6, 7, and 9, 2023. Each time, a notice of a visit was left in a sealed envelope. This is detailed in the bailiff's *Rapport de tentative*, which states:

« J'ai tenté de signifier et/ou exécuter l'acte de procédure suivant APPLICATION TO AUTHORIZE THE BRINGING OF A CLASS ACTION & TO APPOINT THE APPLICANT AS REPRESENTATIVE PLAINTIFF, SUMMONS & ATTESTATION D'AUTHENTICITE à:

ROBERT GERALD MILLER
375 AV OLIVIER, WESTMOUNT, QC, CANADA, H3Z 2C9

CE QUE JE N'AI PU FAIRE VU QUE PERSONNE N'ÉTAIT PRÉSENT AFIN DE RECEVOIR LA SIGNIFICATION.

EN CONSÉQUENCE, J'EN FAIS LE PRÉSENT RAPPORT POUR SERVIR ET VALOIR CE QUE DE DROIT.

AUCUN RETOUR D'APPEL SUITE AUX AVIS DE PASSAGE LAISSÉS DANS LA BOÎTE AUX LETTRES.

De plus, j'ai laissé SOUS PLI CACHETÉ, UN AVIS DE VISITE PRÉVU À L'ART. 129 C.P.C.

AUTRES TENTATIVES:

06/03/2023 à 15:05 heures, PRENEZ NOTE QU'UN HOMME ASIATIQUE EST ENTRÉ DANS LA MAISON ET N'A PAS RÉPONDU À LA PORTE.

07/03/2023 à 7:30 heures »

The whole as appears more fully from a copy of said bailiff's *procès-verbaux*, produced herein *en liasse* as **Exhibit MA-9**;

20. On May 8, 2023, the bailiff attempted, also without success, to serve Defendant Miller at Defendant Future Electronics' head office in Pointe-Claire, Quebec. No alternate address was given by legal counsel for Defendant Future Electronics. As the *Rapport de tentative* states:

« J'ai tenté de signifier et/ou exécuter l'acte de procédure suivant APPLICATION TO AUTHORIZE THE BRINGING OF A CLASS ACTION & TO APPOINT THE APPLICANT AS REPRESENTATIVE PLAINTIFF, SUMMONS & ATTESTATION D'AUTHENTICITE à:

ROBERT GERALD MILLER
237 BOUL HYMUS, POINTE-CLAIRE, QC, CANADA, H9R 5C7



CE QUE JE N'AI PU FAIRE VU QUE: M. MILLER N'EST PLUS ADMINISTRATEUR SELON GEORGE MAUGHAN, (514-501-4066, CONVERSATION TÉLÉPHONIQUE) AVOCAT POUR L'ENTREPRISE FUTURE ELECTRONICS. IL,NE PEUT DONC PAS RECEVOIR LA PROCÉDURE POUR LUI. »

The whole as appears more fully from a copy of said bailiff's *procès-verbal*, produced herein as **Exhibit MA-10**;

21. The Applicant was never able to uncover where to serve Defendant Miller, but Class Counsel wrote an email to Defendant Miller's lawyer on March 16, 2023 and forcefully persuaded him to accept service on behalf of his client (under threat of filing a motion), the whole as appears more fully from a copy of said correspondence, produced herein as **Exhibit MA-11**;
22. A source has told Class Counsel that Defendant Miller currently lives in a condominium located in The Excelsior, a luxury high-rise featuring 28 units, located at 400 South Ocean Blvd., in Boca Raton, Florida, 33432, USA. This information has not been independently verified;
23. The same source has stated that Defendant Miller has another residence in the Bahamas. This information has also not been independently verified;

D) POINT #4: Defendant Miller's Name Does Not Appear on Title of His Real Estate Holdings or Corporations

24. Prior to the institution of the present class action, the Applicant (through her attorneys) researched the properties and corporations that they were aware of or become aware of through their research. As far as the Applicant is aware, Defendant Miller's only important asset owned, directly or indirectly, by him in his personal name or through a holding company, is Defendant Future Electronics;
25. It would appear that, other than this one major asset (Defendant Future Electronics worth US\$3.8 billion), Defendant Miller has arranged his affairs to effectively be a "ghost". As Madame 13 wrote in her Affidavit dated April 25, 2023, in the context of the Applicant's Application for the issuance of a Safeguard Measure:

« 11. Il m'a dit que tout l'argent était immobilisé dans la compagnie de M. Miller, Future Electronics.⁷ Il m'a aussi dit que puisqu'ils ne connaissaient pas encore le nombre de femmes qui allaient réclamer de l'argent, ils ne pouvaient pas m'en donner plus, ni me le donner en un seul montant. »

⁷ It is clear from the context that "Il" refers to Me Karim Renno, attorney representing Defendant Miller;



The whole as appears more fully from a copy of said Affidavit, produced herein as **Exhibit MA-12**;

26. Defendant Future Electronics is owned by Alonim Investments Inc., which is in turn owned by Robmilco Holdings Ltd., which is in turn is 100% owned by Defendant Robert G. Miller.⁸

Future Electronics Inc. → Alonim Investments Inc. → Robmilco Holdings Ltd. → Robert G. Miller

27. The headquarters of Defendant Future Electronics is located at 237 boulevard Hymus, in Pointe-Claire, Quebec, H9R 5C7. The building located there is owned by Robert Gerald Miller Holdings Inc. (which is now Multiform Properties Inc.), which is 100% owned by Defendant Miller, the whole as appears more fully from a copy an extract from the Registre des entreprises, produced herein as **Exhibit MA-13**. A copy of the *Index des immeubles* from the *Registre foncier du Québec* for 237 boulevard Hymus and the *Rôle d'évaluation foncière* of the city of Montreal are produced herein as **Exhibit MA-14** and **Exhibit MA-15**; the current city evaluation of the property is \$30,450,000;
28. However, after this class action was instituted on February 22, 2023 and after Defendant Miller decided to put his prize jewel Defendant Future Electronics up for sale, which was around that same time period (i.e. after he stepped down on February 3, 2023, see para. 10 above) – Defendant Miller attempted to look more “above board” with regard his assets and corporate structures – evidently, in an attempt to not look like he is trying to make himself judgment-proof. This strategy is very transparent, as will be shown below;

78 Summit Crescent, Westmount, Quebec, H3Y 1B5 – A Fictitious Sale to a Company with Fictitious Ownership and Ending with a Fraudulent Conveyance

29. As can be seen from Exhibit R-9 of the AforA, Defendant Miller’s home address is listed as 78 Summit Crescent, in Westmount, Quebec. And yet, he is not the listed owner of his own personal residence that he bought from Charles R. Bronfman on March 16, 1984;
30. On July 16, 2021, by Deed of Donation, Defendant Miller gave 78 Summit Crescent to the numbered company 11172247 Canada Inc. for \$0, while the value of the property was estimated at over \$7 million, the whole as appears more fully from a copy of said deed, produced herein as **Exhibit MA-16**;
31. As of February 21, 2023 (the day before the present class action was filed), 11172247 Canada Inc. listed its sole shareholder, director, and officer as Me Jules Charette, a senior partner, specializing in charities, tax law, and trusts and estates, at Norton Rose Fulbright Canada S.E.N.C.R.L., s.r.l., the whole as appears more fully from a

⁸ Para. 10 of the AforA and Exhibit R-9.



copy of an extract from the *Registre des entreprises*, produced herein as **Exhibit MA-17**. However, it is quite evident that Me Charette was also not the beneficial owner of 11172247 Canada Inc., but was acting directly or indirectly on behalf of and for the financial benefit of his client, Defendant Miller;

32. When contacted by *La Presse* regarding this transaction, Me Jules Charette declined to comment, the whole as appears more fully from a copy of the *La Presse* article entitled “*Allégations de prostitution juvénile – Nouvelle direction, même propriétaire chez Future Electronics*” dated February 8, 2023, produced herein as **Exhibit MA-18**;
33. After the class action was instituted and after Defendant Future Electronics was put up for sale (both occurring in February 2023), on March 30, 2023, 11172247 Canada Inc. filed a modification at the *Registre des entreprises* removing Me Jules Charette of Norton Rose as sole shareholder, director, and officer and replacing these 3 roles with Defendant Miller, the whole as appears more fully from a copy of the *Déclaration de mise à jour annuelle pour une personne moral*, produced herein as **Exhibit MA-19**.
34. On April 19, 2023, 11172247 Canada Inc. filed a correction at the *Registre des entreprises* and replaced Defendant Miller as the sole shareholder, director, and officer with his son, Rodney Miller, the whole as appears more fully from a copy of the *Déclaration de mise à jour de correction* and from a copy of an extract from the *Registraire des Entreprises*, produced herein *en liasse* as **Exhibit MA-20**;
35. On August 31, 2023, 11172247 Canada Inc. transferred the property to Rodney Miller (Defendant Miller’s son), the whole as appears from a copy of the *Acte de Cession Sous Seing Privé*, produced herein as **Exhibit MA-21**. Of interest in this transfer deed (Exhibit MA-21) is the admission that 11172247 Canada Inc. was, in reality, owned and controlled by Defendant Miller (and not by one of his attorneys), as it states:

« CONSIDÉRATION

La présente cession est faite pour le prix d’UN DOLLAR (1.00\$) et bonnes et valables considérations, payées par le Cessionnaire, dont quittance totale et finale.

Les Parties déclarent en sus que la présente cession est faite en exécution d’une entente de prête-nom exécutée entre elles sous seing privé à Montréal, province de Québec, le seize juillet deux mille vingt-et-un (16-07-2021),⁹ et pour laquelle elles se donnent quittance totale et finale.

...

⁹ This is the exact same date that 11172247 Canada Inc. was donated the property from Defendant Miller, making this donation a ruse.



6. Le Cessionnaire bénéficie d'une EXEMPTION du paiement du droit de mutation, le tout en vertu de l'article 19 alinéa 1 paragraphe b) de la loi, car l'acte est relatif à un transfert par un cédant qui est une personne morale à un cessionnaire qui est une personne physique quand, tout au long de la période de 24 mois qui précède immédiatement le transfert, le cessionnaire est propriétaire d'actions du capital-actions du cédant qui lui confèrent au moins 90% des droits de vote pouvant être exercés en toute circonstance à l'assemblée annuelle des actionnaires du cédant, le tout tel qu'en fait foi l'immatriculation du Cédant au Registre des entreprises relatée ci-haut. »

78 Summit Crescent → Robert G. Miller → 11172247 Canada Inc. → Me Jules Charette → Robert G. Miller → Rodney Miller

36. A copy of the *Index des immeubles* from the *Registre foncier du Québec* for 78 Summit Crescent and the *Rôle d'évaluation foncière* of the city of Montreal are produced herein as **Exhibit MA-22** and **Exhibit MA-23**; the current city evaluation of the property is \$9,511,100;

375 Olivier Avenue, Westmount, Quebec, H3Z 2C8 – A Fictitious Sale to a Company with Fictitious Ownership

37. On May 4, 2004, Defendant Helmut Lippmann (Executive Vice President at Future Electronics) entered into a Deed of Sale, in his personal capacity, to purchase the property located at 375 Olivier Avenue, in Westmount, Quebec, H3Z 2C8.¹⁰ On October 31, 2005, Defendant Lippmann sold the property to 4306805 Canada Inc.;¹¹
38. At the time of the purchase, 4306805 Canada Inc. was represented by Me Samuel Minzberg, who was listed as the company's "Sole Director, Officer and Shareholder" (Exhibit R-13). Me Minzberg is a senior attorney at the law firm Davies Ward Phillips & Vineberg S.E.N.C.R.L., s.r.l. and it is quite evident that he is not the beneficial owner of 4306805 Canada Inc., but was acting directly or indirectly and for the financial benefit of his client, Defendant Miller;¹²
39. As of February 21, 2023 (the day before the present class action was filed), 4306805 Canada Inc. listed its sole shareholder, director, and officer as Me Jules Charette, an attorney at Norton Rose Fulbright Canada S.E.N.C.R.L. and it is quite evident that he is also not the beneficial owner of 4306805 Canada Inc., but is acting directly or indirectly and for the financial benefit of his client, Defendant Miller;¹³
40. After the class action was instituted and after Defendant Future Electronics was put up for sale (both occurring in February 2023), on March 30, 2023, a *Déclaration de mise à jour annuelle 2022* was filed with the *Registraire des entreprises* and now, the

¹⁰ Para. 19 of the AforA and Exhibit R-12.

¹¹ Para. 20 of the AforA and Exhibit R-13.

¹² Para. 21 of the AforA.

¹³ Para. 22 of the AforA and Exhibit R-14.



sole director, officer and shareholder of 4306805 Canada Inc. is listed as Defendant Miller;¹⁴

41. On August 31, 2023, 4306805 Canada Inc. transferred the property to Defendant Miller, the whole as appears from a copy of the *Acte de Cession Sous Seing Privé*, produced herein as **Exhibit MA-24**. Of interest in this transfer deed (Exhibit MA-24) is the admission that 4306805 Canada Inc. was, in reality, owned and controlled by Defendant Miller (and not one of his attorneys), as it states:

« CONSIDÉRATION

La présente cession est faite pour le prix d'UN DOLLAR (1.00\$) et bonnes et valables considérations, payées par le Cessionnaire, dont quittance totale et finale.

Les Parties déclarent en sus que la présente cession est faite en exécution d'une entente de prête-nom exécutée entre elles sous seing privé à Montréal, province de Québec, le trente-et-un octobre deux mille cinq (31-10-2005)¹⁵, et pour laquelle elles se donnent quittance totale et finale.

...

6. Le Cessionnaire bénéficie d'une EXEMPTION du paiement du droit de mutation, le tout en vertu de l'article 19 alinéa 1 paragraphe b) de la loi, car l'acte est relatif à un transfert par un cédant qui est une personne morale à un cessionnaire qui est une personne physique quand, tout au long de la période de 24 mois qui précède immédiatement le transfert, le cessionnaire est propriétaire d'actions du capital-actions du cédant qui lui confèrent au moins 90% des droits de vote pouvant être exercés en toute circonstance à l'assemblée annuelle des actionnaires du cédant, le tout tel qu'en fait foi l'immatriculation du Cédant au Registre des entreprises relatée ci-haut. »

375 Olivier Avenue → Helmut Lippmann → 4306805 Canada Inc. → Me Samuel Minzberg → Me Jules Charette → Robert G. Miller

42. A copy of the *Index des immeubles* from the *Registre foncier du Québec* for 375 Olivier Avenue and the *Rôle d'évaluation foncière* of the city of Montreal are produced herein as **Exhibit MA-25** and **Exhibit MA-26**; the current city evaluation of the property is \$2,175,300;

¹⁴ Para. 22 of the AforA and Exhibit R-14A.

¹⁵ This is the exact same date that 4306805 Canada Inc. purchased the property from Helmut Lippmann, making this sale a ruse.



380 Olivier Avenue, Westmount, Quebec, H3Z 2C8 – A Fictitious Sale to a Company with Fictitious Ownership

43. On April 7, 2011, Pierre Guilbault (Executive Vice President at Future Electronics), on behalf of Robert Gerald Miller Holdings Inc., entered into a Deed of Sale, in his capacity as Vice-President, Chief Financial Officer and Treasurer of Future Electronics, to purchase the property located at 380 Olivier Street, in Westmount, Quebec, H3Z 2C9;¹⁶
44. On July 16, 2021, Multiform Properties Inc. (formerly Robert Gerald Miller Holdings Inc.) sold the property to 4306805 Canada Inc. (that same elusive company referred to above with regard to 375 Olivier Avenue, where the owner was either Me Minzberg from Davies or Me Charette from Norton Rose), the whole as appears more fully from a copy of said Deed of Sale, produced herein as **Exhibit MA-27**;
45. After the class action was instituted and after Defendant Future Electronics was put up for sale (both occurring in February 2023), on August 31, 2023, 4306805 Canada Inc. transferred the property to Defendant Miller, the whole as appears from a copy of the *Acte de Cession Sous Seing Privé*, produced herein as **Exhibit MA-28**. Of interest in this transfer deed (Exhibit MA-28) is the admission that 4306805 Canada Inc. was, in reality, owned and controlled by Defendant Miller (and not one of his attorneys), as it states:

« CONSIDÉRATION

La présente cession est faite pour le prix d'UN DOLLAR (1.00\$) et bonnes et valables considérations, payées par le Cessionnaire, dont quittance totale et finale.

Les Parties déclarent en sus que la présente cession est faite en exécution d'une entente de prête-nom exécutée entre elles sous seing privé à Montréal, province de Québec, le seize juillet deux mille vingt-et-un (16-07-2021)¹⁷, et pour laquelle elles se donnent quittance totale et finale.

...

6. Le Cessionnaire bénéficie d'une EXEMPTION du paiement du droit de mutation, le tout en vertu de l'article 19 alinéa 1 paragraphe b) de la loi, car l'acte est relatif à un transfert par un cédant qui est une personne morale à un cessionnaire qui est une personne physique quand, tout au long de la période de 24 mois qui précède immédiatement le transfert, le cessionnaire est propriétaire d'actions du capital-actions du cédant qui lui confèrent au moins 90% des droits de vote pouvant être exercés en toute circonstance à l'assemblée annuelle des actionnaires du cédant, le tout tel qu'en fait foi l'immatriculation du Cédant au Registre des entreprises relatée ci-haut. »

¹⁶ Para. 24.1 of the AforA and Exhibit R-46.

¹⁷ This is the exact same date that 4306805 Canada Inc. purchased the property from Multiform Properties Inc. (formerly Robert Gerald Miller Holdings Inc.), making this sale a ruse.



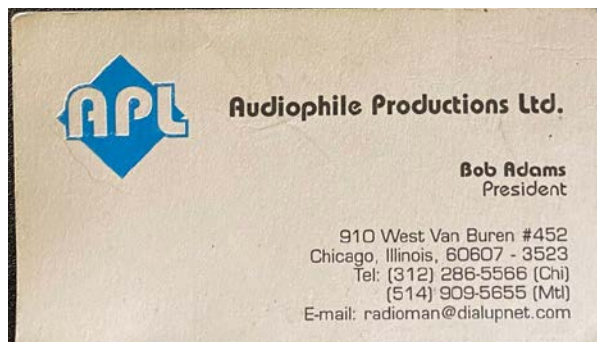
380 Olivier Avenue → Robert Gerald Miller Holdings Inc. (which then becomes Multiform Properties Inc.) → 4306805 Canada Inc. → Me Jules Charette (or perhaps Me Samuel Minzberg) → Robert G. Miller

46. A copy of the *Index des immeubles* from the *Registre foncier du Québec* for 380 Olivier Avenue and the *Rôle d'évaluation foncière* of the city of Montreal are produced herein as **Exhibit MA-29** and **Exhibit MA-30**; the current city evaluation of the property is \$ 2,362,900;

E) POINT #5: Defendant Miller is Being Accused Herein of Alleged Criminal and Fraudulent Conduct

47. In accordance with the allegations as stated in the Re-Amended Application for Authorization as well as the Affidavits, sworn under oath, of 35 Class Members in support thereof,¹⁸ Defendant Miller's conduct would constitute a crime under Sections 153 and 286.1 of the *Criminal Code*, RSC 1985, c C-46;

48. It is also alleged that in furtherance of Defendant Miller's scheme, he fraudulently told his alleged sexual exploitation victims that his name was "Bob Adams" and that he lived in the United States – neither of which are true – and he even produced a fake business card with the name "Bob Adams" on it living in Chicago, Illinois;¹⁹



49. This business card was sent to Class Counsel by a woman who was an alleged sexual assault victim of Defendant Miller in the summer of 1996, but who is not a Class Member (and therefore did not sign any affidavit) because she was over 18 years old at the time of the incident. However, the Applicant has seen the business card and remembers being given the exact same business card in the year 1996; she

¹⁸ *Inter alia*, para 7.2 of the AforA and Exhibits R-17 to R-44 (Madames 1-31) and Exhibits R-51 to R-57 (Madames 32-38). It should be noted that an additional 5 alleged victims have contacted Class Counsel and their affidavits are currently being drawn up. Assuming all Class Members execute their affidavits, this will bring the total number of alleged victims' sworn statements up to 40 persons.

¹⁹ Para. 7.2 of the AforA and Exhibit R-45.



also recognizes the phone number on the business card (514-909-5655) that she used to call in order to contact Defendant Miller;

F) POINT #6: Taiwan's is Not an Independent State and its Future is Uncertain due to the Geopolitical Climate

50. Taiwan, which is the domicile of WT Microelectronics, is not recognized by the international community as an independent state under the *Montevideo Convention on the Rights and Duties of States*,²⁰ primarily due to China's claim of sovereignty over the territory, to which has been recognized by most nation-states in the world;
51. There have been threats of invasion, including, most recently, China having sent warships into the seas around Taiwan, among other hostile manoeuvres, suggesting an imminent military conflict, as appears more fully from the BBC article entitled "China and Taiwan: A really simple guide" dated April 6, 2023 and from a copy of the NBC News Associated Press article entitled "China's foreign minister steps up threats against Taiwan" dated April 21, 2023, produced herein *en liasse* as **Exhibit MA-31**;

G) POINT #7: Taiwan in Not a Signatory to the Hague Convention

52. Because Taiwan is not recognized as an independent country, it is not (and cannot be) a signatory to the *Convention of 15 November 1965 on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters* (Hague Service Convention), as appears more fully from a list of state members, produced herein as **Exhibit MA-32**;
53. This lack of international coordination would have a serious impact on Class Members' ability to enforce a potential favourable judgment in the class action on WT Electronics' assets;

III. LEGAL CRITERIA

H) POINT #8: Strong Appearance of Right

54. It is quite rare to find a civil action with so many affidavits filed in the Court record prior to trial²¹ (whereas in the present case, we have 35-40 alleged victims' sworn statements). These Class Members have written out a summary of their testimony under oath;
55. Upon reading these affidavits, the evidence is outright overwhelming that Defendant Miller paid (in both money and gifts) underage adolescent girls to engage in sexual relations and that his employees at Defendant Future Electronics aided and abetted him through a well-planned network;

²⁰Signed at Montevideo, 26 Decembre 1933; Entered into Force, 26 December 1934.

²¹ Para 7.2 of the AforA and Exhibits R-17 to R-44 (Madames 1-31) and Exhibits R-51 to R-57 (Madames 32-38).



56. With respect, this is a case about quantifying damages and legal determinations (i.e. such as the application of art. 1463 C.C.Q.²²) – it should not be a case about hide-and-seek with the Defendants' assets, such that a successful judgment, which is only a question of time and following proper procedure, would be for naught as damages cannot be collected;

I) POINT #9: Serious Harm to Applicant and the Class

57. The harm that the Applicant and Class Members would suffer is both serious and irreparable as well as self-evident (i.e. not collecting). If a successful judgment is obtained against Defendants Miller and/or Future Electronics (which is almost guaranteed), execution may well be rendered impossible without the present *Mareva*-Type order contemplated herein;

58. Should Defendant Future Electronics be sold to WT Microelectronics unencumbered, a company based in Taiwan, the Applicant foresees major obstacles in satisfying a monetary judgment due to the jurisdictional difficulties involved in both serving and enforcing a Quebec decision in Taiwan (Republic of China). This issue is further exacerbated by the fact that Taiwan is not recognized by the international community as an independent state that is capable of entering into legal relations, including being a signatory to any bilateral treaties or conventions. Should this sale go through as is, there would be no meaningful mechanism available to the Applicant or to Class Members to be able to execute a judgment against the assets of WT Microelectronics. In addition, and even if the Applicant and Class Members believe they can overcome the above-mentioned hurdles, Taiwan has an "execution fee" of 0.8% of the claim (**Exhibit MA-33**). In the present case, this would mean that the Applicant and Class Members would have to lay out up to CA\$1.6 million of an up-front cost, in the hopes of collecting on their judgment in a foreign territory, that is not recognized by the international community – this is prohibitive, as nobody would be prepared to take on the risk of losing CA\$1.6 million;

59. In addition, as the present *Mareva*-Type motion has indicated, it may also prove impossible to locate the funds and execute solely against Defendant Miller, regardless of the proportion of the US\$3.8 billion that he gains from the sale, due to certain corporate or structural arrangements already in place or that he can put into place to obviate personal legal title of his assets and made himself judgment-proof, which in accordance with his past behaviour and *modus operandi*, he is exceptionally likely to further do;

²² Para. 12 of the AforA.



J) **POINT #10: Balance of Convenience**

60. If security is set at CA\$200 million to satisfy a potential successful judgment in the present class action, this would amount to only 4% of the announced sale price of \$US3.8 billion (CA\$5.2 billion);²³
61. The above calculation is based on the whole CA\$200 million being frozen and set aside in a Canadian bank account. However, it is well-known in business that financial institutions offer the service of granting a non-revocable letter of credit to its customers to guarantee payment to creditors;
62. While the exact cost of such a facility will vary, for an average borrower, the annual fee will be between 0.75%–1.5% of the total value of the letter of credit issued (**Exhibit MA-34 en liasse**). However, given Defendant Miller’s net worth, his cost could be much lower, or even waived by his bank. In the highest possible scenario, the costs would be anywhere between CA\$1.5–\$3 million per year;
63. A 5-year non-redeemable GIC (Guaranteed Investment Certificate) at the Royal Bank of Canada currently pays 5% per year (**Exhibit MA-35**).²⁴ If the CA\$5.2 billion was invested in a GIC, it would pay CA\$255 million per year. Overall, this means that an irrevocable letter of credit would amount to only 1.8% of the interest generated annually by the GIC, an almost negligible sum in the circumstances;

K) **POINT #11: Urgency**

64. As stated in Defendant Future Electronics’ press release (Exhibit MA-6) it appears that: (i) “the transaction has been unanimously approved by WT Microelectronics’ Board of Directors and Future Electronics’ Board of Directors”, (ii) that “a definitive agreement to acquire 100% of the shares of Future Electronics Inc. for an enterprise value of US\$3.8 billion in an all-cash transaction” has been executed, and (iii) that it “is expected to close in the first half of 2024”;
65. In other words, the deal can close at any time in the immediate future and Defendant Miller will be receiving US\$3.8 billion in “all-cash”;
66. Provisional execution should be ordered as an appeal will “cause serious irreparable prejudice” if Defendants Miller and Future Electronics complete the sale before the present judgment becomes final.

²³ As of the last business day, October 20, 2023, the Bank of Canada exchange rate from USD to CAD was 1.3695 = CA\$5.2041 billion; viewable at <https://www.bankofcanada.ca/rates/exchange/currency-converter>.

²⁴ The current advertised GIC rates are: (i) 3% for a 1-year cashable term; (ii) 5.35% for a 1-year non-redeemable term; (iii) 5.30% 5.35% for a 2-year non-redeemable term; and (iv) 5% for a 5-year non-redeemable term; viewable at: <https://www.rbcroyalbank.com/investments/gic-rates.html>. Presumably, for an important client that will invest significant sums, these percentages will be even higher, and so these rates are a floor for the present situation.



IV. CONCLUSIONS

FOR THESE REASONS, MAY IT PLEASE THIS HONOURBLE COURT TO:

- a) **GRANT** the present Application;
- b) **DISPENSE** the Applicant from providing security in connection with the foregoing injunction;
- c) **DISPENSE** the Applicant from any need to serve Alonim Investments Inc., Robmilco Holdings Ltd., Multiform Properties Inc. (formerly Robert Gerald Miller Holdings Inc.), 4306805 Canada Inc., 11172247 Canada Inc., and Rodney Miller with the present Application;
- d) **ORDER** provisional execution of this Judgment notwithstanding any appeal;
- e) **ORDER** that this Judgment will cease to have effect if Defendant Robert G. Miller and Defendant Future Electronics jointly and solidarily (*in solidum*) provide security by paying the sum of \$200 million into Court, to be held by the Court and disbursed in accordance with a final judgment rendered on the merits of the present legal proceeding;
- f) **ALLOW** Defendant Robert G. Miller, Defendant Future Electronics Inc. and the Impleaded Parties to apply to the present Court for a Motion regarding the funds necessary for future support and expenses, which the Applicant will have the right to contest;

Defendant Robert G. Miller and the Impleaded Parties

- g) **ISSUE** a Mareva-type order to remain in full force and effect until an interlocutory order is granted and then until final judgment is rendered on the merits of the present legal proceeding as follows:
 - 1. **ORDER** that Defendant Robert G. Miller and Alonim Investments Inc., Robmilco Holdings Ltd., Multiform Properties Inc., Robert Gerald Miller Holdings Inc., 4306805 Canada Inc., 11172247 Canada Inc. (the “Impleaded Parties”), and their servants, employees, agents, assigns, officers, directors and anyone else acting on their behalf or in conjunction with any of them, and any and all persons with notice of this injunction, are restrained from directly or indirectly, by any means whatsoever:
 - (a) selling, removing, disposing, dissipating, alienating, transferring, ceding, assigning, donating, bestowing, encumbering, mortgaging, pledging, or similarly dealing with any and all of Defendant Robert G. Miller and the Impleaded Parties’ assets, wherever situated worldwide, among others in Canada, the United States of America or elsewhere;



- (b) instructing, requesting, counselling, demanding, or encouraging any other person to do so; and
 - (c) facilitating, assisting in, aiding, abetting, or participating in any acts the effect of which is to do so;
2. **ORDER** that paragraph 1 above applies to all of Defendant Robert G. Miller's and the Impleaded Parties' assets, whether held directly or indirectly through the intermediary of other persons, whether they be physical, moral or legal persons, whether or not they are in their own name and whether they are solely or jointly owned. For the purpose of this Judgment, Defendant Robert G. Miller and the Impleaded Parties' assets include any asset which they have the power, directly or indirectly, to dispose of or deal with as if it were their own. Defendant Robert G. Miller and the Impleaded Parties are to be regarded as having such power if a third party holds or controls the assets in accordance with their direct or indirect instructions;
 3. Without restricting the generality of the preceding paragraphs 1 and 2 above, Defendant Robert G. Miller and the Impleaded Parties' assets specifically include the interests and/or rights in the following immoveable properties situated at:
 - 78 Summit Crescent, in Westmount, Quebec, H3Y 1L7;
 - 375 Olivier Avenue, in Westmount, Quebec, H3Z 2C8;
 - 380 Olivier Street, in Westmount, Quebec, H3Z 2C9;
 - 237 boulevard Hymus, in Pointe-Claire, Quebec, H9R 5C7;
 4. Without restricting the generality of the preceding paragraphs 1, 2 and 3 above, Defendant Robert G. Miller and the Impleaded Parties' assets specifically include the interests and/or rights in any and all funds, securities, investments, proceeds, interest payments, dividends or all other assets held by any bank or financial institution in an account registered in the name of any of Defendant Robert G. Miller and the Impleaded Parties;
- h) **ORDER** that Defendant Robert G. Miller and the Impleaded Parties, prepare and provide to the Applicant within 10 days of this Judgment, sworn statements describing the nature, value, and location of all of Defendant Robert G. Miller and the Impleaded Parties' assets worldwide, whether in their own names or not and whether solely or jointly owned, including a list of all financial institution names, addresses, account names, and account numbers where any monies are held, as well as, to provide a copy of all monthly or periodic statements since January 1, 2023 to present, for any accounts held by Defendant Robert G. Miller and the Impleaded Parties personally or jointly in any bank or financial institution



- i) **ORDER** that Defendant Robert G. Miller submit to an examination under oath within 30 days of the delivery by Defendant Robert G. Miller and the Impleaded Parties of the aforementioned sworn statements;
- j) **ORDER** Defendant Robert G. Miller and the Impleaded Parties to fully collaborate with the Applicant by answering all questions in relation to the locations where assets are held as well as in collaborating in helping the Applicant obtain documents and information not in the possession of Defendant Robert G. Miller and the Impleaded Parties, but rather in the possession of third parties;
- k) **DECLARE INOPPOSABLE** as to the Applicant the following juridical act:
- Acte de Cession Sous Seing Privé dated August 9, 2023 and published on August 31, 2023 on the Cadastre du Québec, Registration Division of Montreal under the Inscription Number 28 246 903;
- l) **ALLOW** the Applicant to register the present Judgment in the *Registre foncier du Québec* on following immovables properties described as:
- Le lot numéro UN MILLION CINQ CENT QUATRE-VINGT-TROIS MILLE TREIZE (1 583 013) du cadastre du Québec, circonscription foncière de Montréal. Avec bâtisse dessus érigée portant le numéro civique 78 croissant Summit, à Westmount, province de Quebec, H3Y 1L7;
 - Le lot numéro UN MILLION CINQ CENT QUATRE-VINGT-QUATRE MILLE CINQ CENT DOUZE (1 584 512) du cadastre du Québec, circonscription foncière de Montréal. Avec bâtisse dessus érigée portant le numéro civique 375 avenue Olivier, à Westmount, province de Québec, H3Z 2C9;
 - Le lot numéro UN MILLION CINQ CENT QUATRE-VINGT-QUATRE MILLE DEUX CENT SOIXANTE-TREIZE (1 584 273) du cadastre du Québec, circonscription foncière de Montréal. Avec bâtisse dessus érigée portant le numéro civique 380 avenue Olivier, à Westmount, province de Quebec, H3Z 2C9;
 - Le lot numéro DEUX MILLIONS CINQ CENT VINGT HUIT MILLE TROIS CENT SOIXANTE-HUIT (2 528 368) du cadastre du Québec, circonscription foncière de Montréal. Avec bâtisse dessus érigée portant le numéro civique 237 boulevard Hymus, à Pointe-Claire, province de Quebec, H9R 5C7;

AND ORDER that the *Officier de la publicité des droits de la circonscription foncière de Montréal* accept such registrations;

Defendant Future Electronics Inc.

- m) **ISSUE** a Mareva-type order to remain in full force and effect until an interlocutory order is granted and then until final judgment is rendered on the merits of the present legal proceeding as follows:



1. **ORDER** that Defendant Future Electronics Inc., and its servants, employees, agents, assigns, officers, directors and anyone else acting on its behalf or in conjunction with any of them, and any and all persons with notice of this injunction, are restrained from directly or indirectly, by any means whatsoever:
 - (a) selling, removing, disposing, dissipating, alienating, transferring, ceding, assigning, donating, bestowing, encumbering, mortgaging, pledging, or similarly dealing with any and all of Defendant Future Electronics Inc., wherever situated worldwide, among others in Canada, the United States of America or elsewhere;
 - (b) instructing, requesting, counselling, demanding, or encouraging any other person to do so; and
 - (c) facilitating, assisting in, aiding, abetting, or participating in any acts the effect of which is to do so;
 2. **ORDER** that paragraph 1 above applies to Defendant Future Electronics Inc.'s assets, whether held directly or indirectly through the intermediary of other persons, whether they be physical, moral or legal persons, whether or not they are in their own name and whether they are solely or jointly owned. For the purpose of this Judgment, Defendant Future Electronics Inc.'s assets include any asset which it has the power, directly or indirectly, to dispose of or deal with as if it were its own. Defendant Future Electronics Inc. is to be regarded as having such power if a third party holds or controls the assets in accordance with its direct or indirect instructions;
 3. Without restricting the generality of the preceding paragraphs 1 and 2 above, Defendant Future Electronics Inc.'s assets specifically include the interests and/or rights in any and all funds, securities, investments, proceeds, interest payments, dividends or all other assets held by any bank or financial institution in an account registered in the name of Defendant Future Electronics Inc.;
- n) **ORDER** that Defendant Future Electronics Inc. prepare and provide to the Applicant within 10 days of this Judgment, a sworn statement describing the nature, value, and location of all of Defendant Future Electronics Inc.'s assets worldwide, whether in its own name or not and whether solely or jointly owned, including a list of all financial institution names, addresses, account names, and account numbers where any monies are held, as well as, to provide a copy of all monthly or periodic statements since January 1, 2023 to present, for any accounts held by Defendant Future Electronics Inc. personally or jointly in any bank or financial institution

- o) ORDER** that a representative of Defendant Future Electronics Inc. submit to an examination under oath within 30 days of the delivery by Defendant Future Electronics Inc. of the aforementioned sworn statement;
- p) ORDER** Defendant Future Electronics Inc. to fully collaborate with the Applicant by answering all questions in relation to the locations where assets are held as well as in collaborating in helping the Applicant obtain documents and information not in the possession of Defendant Future Electronics Inc., but rather in the possession of third parties;

Montreal, October 23, 2023



CONSUMER LAW GROUP INC.
Per: Me Jeff Orenstein
Attorneys for the Applicant

SOLEMN DECLARATION

I, S.N., electing domicile at my lawyers' office located at 1030 rue Berri, Suite 102, Montreal, Quebec, H2L 4C3, solemnly affirm that:


1. I reside in the province of Quebec;
2. I swear this Solemn Declaration in support of my Application for a Provisional & Interlocutory *Mareva*-type Injunction Order Against Defendants Robert Gerald Miller and Future Electronics Inc. (the "Application") and for no other or improper purpose;
3. Each and every paragraph, allegation, fact, and exhibit as found in the attached Application are integrated hereto as if recited at full length herein and are true and accurate to the best of my knowledge;
4. I am the Applicant in the present matter and, as such, I have personal knowledge of the matters herein deposed. Where I made statements in the attached Application that are not within my personal knowledge, I have indicated the source of that information and I verily believe such information to be true;
5. No portion of this Solemn Declaration is meant to waive, nor should it be construed as a waiver of, solicitor-client litigation or any other privilege;
6. The attached Application and this Solemn Declaration are made in good faith.

AND I HAVE SIGNED BY TECHNOLOGICAL MEANS

[SN]

S.N.

Solemnly affirmed before me at Montreal by technological means
this 23rd day of October, 2023



Commissioner of Oaths for
the Province of Quebec



NOTICE OF PRESENTATION

TO:

<p>Attorneys for Defendant ROBERT GERALD MILLER</p> <p>RENNO VATHILAKIS INC. Me Karim Renno krenno@renvath.com Me Ava Liaghati aliaghati@renvath.com</p> <p>145 rue St-Pierre, Suite 201 Montreal, Quebec, H2Y 2L6 Tel: (514) 937-1221 Fax: (514) 221-4714</p>	<p>Attorneys for Defendant FUTURE ELECTRONICS INC.</p> <p>ROBINSON SHEPPARD SHAPIRO LLP Me Jean-Pierre Sheppard jpsheppard@rsslex.com Me Xavier Morand Bock xmbock@rsslex.com</p> <p>800 rue du Square-Victoria, Bureau 4600 Montreal, Quebec, H4Z 1H6 Tel: (514) 393-4013 Fax: (514) 878-1865</p>
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<p>Attorneys for Defendant HELMUT LIPPMANN</p> <p>SPIEGEL SOHMER INC. Me Neil G. Oberman noberman@spiegelsohmer.com Me Marie-Christine Sicard mcsicard@spiegelsohmer.com Me Carolyn Booth cbooth@spiegelsohmer.com</p> <p>1255, rue Peel, bureau 1000 Montréal, Québec, H3B 2T9 Tel: (514) 878-2100 Fax: (514) 875-8237</p>	



TAKE NOTICE that the present APPLICATION BY THE APPLICANT FOR A PROVISIONAL & INTERLOCUTORY *MAREVA*-TYPE INJUNCTION ORDER AGAINST DEFENDANTS ROBERT GERALD MILLER AND FUTURE ELECTRONICS INC. (Arts. 49 & 510-511 C.C.P.) will be presentable for adjudication before the Honourable Mr. Justice Christian Immer of the Superior Court, at the Palais de Justice in Montreal, located at 1 Notre Dame East (Montreal, Quebec), **on November 2, 2023 at 9:00 A.M. in a room to be determined**, or as soon as the Court decides.

Montreal, October 23, 2023



CONSUMER LAW GROUP INC.
Per: Me Jeff Orenstein
Attorneys for the Applicant

CONSUMER LAW GROUP INC.

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Cc: "agross@clg.org"
Subject: Notification by Email – S.N. vs. Robert Gerald Miller et al., S.C.M. 500-06-001225-230
Date: October 23, 2023 9:53:00 AM
Attachments: [image001.png](#)
[Motion for Mareva Order.pdf](#)

CANADA PROVINCE OF QUEBEC DISTRICT OF MONTREAL NO: 500-06-001225-230	(Class Action) SUPERIOR COURT <hr/> S.N. <i>Applicant</i> -vs.- ROBERT GERALD MILLER <i>et al.</i> <i>Defendants</i>
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NOTIFICATION BY EMAIL – TRANSMISSION SLIP
 (Articles 110 & 134 C.C.P.)

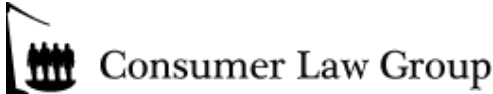
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DATE:	October 23, 2023
DOCUMENTS:	APPLICATION BY THE APPLICANT FOR A PROVISIONAL & INTERLOCUTORY MAREVA-TYPE INJUNCTION ORDER AGAINST DEFENDANTS ROBERT GERALD MILLER AND FUTURE ELECTRONICS INC.

	(Arts. 49 & 510-511 C.C.P.)
NUMBER OF ATTACHED DOCUMENTS:	1 PDF
SENDER:	Me Jeff Orenstein CONSUMER LAW GROUP INC. 1030 rue Berri, Suite 102 Montréal, Québec, H2L 4C3 Tel: (514) 266-7863, Ext. 2 Fax: (514) 868-9690 Email: jorenstein@clg.org Attorneys for the Applicant

If you have not received all of these documents or if you have trouble with receipt thereof, please call (514) 266-7863, Ext. 2

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N°: 500-06-001225-230

(Class Action)
SUPERIOR COURT
DISTRICT OF MONTREAL

S.N.

Applicant

-vs.-

ROBERT GERALD MILLER
and
FUTURE ELECTRONICS INC.
Defendants

**APPLICATION BY THE APPLICANT FOR A
PROVISIONAL & INTERLOCUTORY MAREVA-TYPE
INJUNCTION ORDER AGAINST DEFENDANTS
ROBERT GERALD MILLER AND
FUTURE ELECTRONICS INC.
(Arts. 49 & 510-511 C.C.P.)**

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