

MEMORANDUM OF SETTLEMENT

BETWEEN:

RETAIL WHOLESALE CANADA/CAW DIVISION  
A DIVISION OF THE NATIONAL AUTOMOBILE, AEROSPACE,  
TRANSPORTATION AND GENERAL WORKERS OF CANADA  
ON ITS OWN BEHALF AND OF ITS LOCAL UNIONS

(Collectively referred to as  
"RW/CAW Division")

-and-

UNITED FOOD & COMMERCIAL WORKERS  
INTERNATIONAL UNION, LOCAL 175

(UFCW Local 175)

-and-

UNITED FOOD AND COMMERCIAL WORKERS  
INTERNATIONAL UNION, LOCAL 1000A

(UFCW, Local 1000A)


MEMORANDUM OF SETTLEMENT

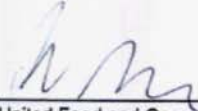
**WHEREAS** a number of disputes have arisen between the trade unions referred to above, concerning the right to represent employees at specific locations;


**WHEREAS** the parties are interested in reaching a full and final settlement including a resolution of proceedings before the Ontario Labour Relations Board and arbitrators appointed under the collective agreements as follows:

1. The parties collectively undertake and agree to respect the bargaining rights of the other trade union parties whether acquired by certification or by voluntary recognition.

2. Should any potential dispute arise in the future concerning the bargaining rights of any of the parties, a meeting shall be held between the affected parties for the purpose of resolving the dispute. Each party shall produce all documentation in support of its claim to bargaining rights.
3. RW/CAW Division hereby withdraws its Application under s.69 of the *Labour Relations Act* in respect of Sean's No Frills (Board File No. 0906-98-R).
4. RW/CAW Division hereby withdraws its grievance dated February 24, 1998 in respect of Campbellford No Frills.
5. RW/CAW Division and UFCW Local 175 hereby agree to withdraw any and all complaints or applications before the Ontario Labour Relations Board in respect of the Maxi store located in Waterdown, Ontario, (Board File Nos. 0320-98-R, 2325-98-U, 2035-98-R).
6. UFCW Local 175 agrees to withdraw its application before the Ontario Labour Relations Board pursuant to s.1(4) (Board File No. 0754-99-R).
7. This memorandum of settlement is binding upon any successor trade unions to the parties hereto.

  
Retail Wholesale Canada/CAW Division  
a Division of the National Automobile,  
Aerospace, Transportation and General  
Workers of Canada (on its own behalf  
and on behalf of its Local Unions)

  
United Food and Commercial Workers  
International Union, Local 175

  
United Food and Commercial Workers  
International Union, Local 1000A

DATED at ETOBICOKE FEBRUARY 22 / 2000  
December 22 / 1999.