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From: Teresa DiFalco cta-associates@cogeco.ca

Subject: Re: 14-855/AW
Date: April 4, 2016 at 2:18 PM
To: Sonja sonja@wynperlelaw.ca

Cc: Suzanne Young suzanne.young11@gmail.com

Sonja,

Yes, Suzanne was actively looking and did apply to several full time positions. We will itemize and provide these efforts to you.

Teresa

On 2016-04-04, at 1:27 PM, Sonja wrote:



Hi Teresa

Can you please seek to determine whether Suzanne has any evidence to show that she was actively looking for work prior the subject surgery?

Defence will require proof of efforts to seek full-time work pre-accident given that the loss of income claim will be based on full-time earning losses.

Yours truly,

Sonja A. Nuic, B.A., LL.B. Wynperle Law Personal Injury Lawyers 25 Main St. West, Suite 400 Hamilton, Ontario L8P 1H1 Tel: (905) 777-0300 Ext. 408

Fax: (905) 777-1050

Email: ______www.wynperlelaw.ca

From: Teresa DiFalco [mailto:cta-associates@cogeco.ca]

Sent: Thursday, March 10, 2016 9:20 AM

To: Allen Wynperle; Sonja Nuic Cc: Suzanne Young; Cari-Ann Young

Subject: 14-855/AW

Dear Allen and Sonja,

I wanted to provide you with a few updates:

Cari-Ann (Suzanne's daughter) has had a very difficult time getting her manager to provide the information that you had requested. She hopes to have this information for you by next week.

In addition, I am providing an update to your letters addressed to Suzanne, dated January 13, 2016. I will address both letters in this email so that you are both kept in the loop.

From: Teresa DiFalco cta-associates@cogeco.ca

Subject: RE: 14-855/AW Date: April 4, 2016 at 3:08 PM

To: Sonja Nuic sonja@wynperlelaw.ca

Cc: Suzanne Young suzanne.young11@gmail.com

Sonja, I wanted to share an example of Suzanne's skill/success prior to the accident. One example is, in 2011, while employed as a HR Specialist at Manpower, Suzanne received the "Q1 Reward and Recognition Winner", an award given to one employee across Canada that recognized excellence in customer service.

Teresa

Teresa DiFalco cta-associates@cogeco.ca

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From: Sonja sonja@wynperlelaw.ca

Subject: RE: 14-855/AW Date: April 4, 2016 at 3:48 PM

To: Teresa DiFalco cta-associates@cogeco.ca

Hi Teresa

As we have been unable to obtain the Manpower employment file despite repeated requests, if Susan has any of these award certificates, please provide same.

Yours truly,

Sonja A. Nuic, B.A., LL.B. Wynperle Law Personal Injury Lawyers 25 Main St. West, Suite 400 Hamilton, Ontario L8P 1H1 Tel: (905) 777-0300 Ext. 408

Fax: (905) 777-1050

Email: sonja@wynperlelaw.ca

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From: Teresa DiFalco [mailto:cta-associates@cogeco.ca]

Sent: Monday, April 04, 2016 3:09 PM

To: Sonja Nuic Cc: Suzanne Young Subject: RE: 14-855/AW

Sonja, I wanted to share an example of Suzanne's skill/success prior to the accident. One example is, in 2011, while employed as a HR Specialist at Manpower, Suzanne received the "Q1 Reward and Recognition Winner", an award given to one employee across Canada that recognized excellence in customer service. Dupliante

Teresa

Teresa DiFalco cta-associates@cogeco.ca

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