

FULL AND FINAL RELEASE

IN CONSIDERATION of the University of Ottawa (the "University") and Dr. Amir Attaran (hereinafter "Dr. Attaran") agreeing to forgo their claims for costs and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged and will not be challenged, the Plaintiff, Dr Kulvinder Kaur Gill (the "Plaintiff" or the "Releasor"), as well as her respective representatives, insurers, successors, heirs, executors, administrators, estates, beneficiaries, assigns, employees, partners or agents, (hereinafter collectively referred to as the "Releasors") hereby release and forever discharge the University and Dr. Attaran, as well as their respective representatives, insurers, successors, heirs, executors, administrators, estates, beneficiaries, employees, agents, assigns officers and or directors (hereinafter collectively referred to as the "Releasees") from any and all actions, causes of action, claims, crossclaims, counterclaims, proceedings, duties, obligations, complaints, covenants, demands, damages, losses, including loss of reputation or other consequential losses, costs or injuries of any kind or nature whatsoever, which are, were, or could have been raised in the action commenced in the Superior Court of Ontario in Toronto under Court File No. CV-21-00658784-0000 (the "Action").

AND FOR THE SAID CONSIDERATION, it is agreed and understood that the Releasors or any one of them will not continue with or make any claim or take any proceedings in any Court, either in their own names or in the names of their agents or assigns or entities, which they or any one of them directly or indirectly control, against any one or more of the Releasees or against any person, corporation, partnership or other entity which or who might claim, in any manner or form, contribution or indemnity at common law or in equity, or under the provisions of any statute or regulation, including the *Negligence Act* and the amendments thereto and/or under any successor legislation thereto, and/or under the *Rules of Civil Procedure*, from any of the Releasees discharged by this Full and Final Release, in connection with the matters outlined herein.

IT IS AGREED AND UNDERSTOOD that if the Releasors or any one of them, directly or indirectly, should commence such an action, or take such proceedings, and the Releasees, or any one of them, are added to such proceeding in any manner whatsoever, whether justified in law or not, the Releasor or Releasors as the case may be commencing such an action or taking such

proceedings will immediately discontinue the actions, proceedings and/or claims, and the said Releasor(s) will be jointly and severally liable to the Releasees for the legal costs incurred in any such proceeding, on a substantial indemnity basis. This Full and Final Release shall operate conclusively as an estoppel in the event of any claim, action, complaint or proceeding which might be brought in the future by the Releasors or any one of them with respect to the matters covered by this Full and Final Release. This Full and Final Release may be pleaded in the event any such claim, action, complaint or proceeding is brought, as a complete defence and reply, and may be relied upon in any proceeding to dismiss the claim, action, complaint or proceeding on a summary basis and no objection will be raised by the Releasors or any one of them in any subsequent action that other parties in such action were not privy to formation of this Full and Final Release.

AND THE RELEASORS HEREBY CONFIRM that they have irrevocably authorized and instructed their lawyers to settle the claims on the terms outlined herein, and to execute a consent and any other documentation necessary to have the Court issue an Order dismissing the Action as outlined above as against The University and Dr. Attaran in its entirety.

AND FOR THE SAID CONSIDERATION, the Releasors hereby represent and warrant that they have not assigned to any person, firm or corporation any of the actions, causes of action, claims, counterclaims, debts, suits or demands of any nature or kind or of any other matter which they have released by this Full and Final Release, and that they have full authority and capacity to release their respective rights as against the Releasees, to the fullest extent allowed at law.

IT IS EXPRESSLY UNDERSTOOD AGREED AND ACKNOWLEDG that the Plaintiff has decided to abandon the Action entirely and that the consideration exchanged herein is not and shall never be characterized by her as an admission of liability on the part of the Releasees, or any one of them and the Releasors covenant and agree that no liability for the subject matter of this Release is admitted by any of the Releasees, and such liability is expressly denied by the Releasees.

THIS RELEASE may be executed in any number of counterparts with the same effect as if all parties had signed the same document. All counterparts shall be construed together and

shall constitute one and the same Release. A facsimile or email signature of any party to this Release shall constitute the valid and binding signature of such party with the same effect as if it were an original signature endorsed on this Release.

THE RELEASORS HEREBY WARRANT, ACKNOWLEDGE AND AGREE that the terms of this Release are fully understood by them and that the Release granted herein is given voluntarily after receiving independent legal advice, for the purpose of making full and final compromise, adjustment and settlement of all claims between the Releasees and the Releasers.

IN WITNESS THEREOF, Dr. Kulvinder Kaur Gill has hereunto set her hand this 26 day of

November, 2022.
~~September~~ ^{24th}

SIGNED, SEALED AND DELIVERED in
the presence of



WITNESS

NAME OF WITNESS: Jeff Saikaley

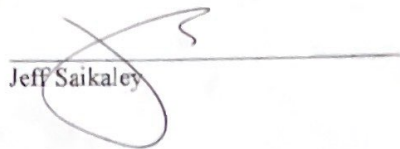


DR. KULVINDER KAUR GILL

LAWYER'S CERTIFICATE

I, **Jeff Saikaley**, authorized to practice law in the Province of Ontario, hereby represent and declare that I have fully explained the foregoing Release to my client, Dr. Kulvinder Kaur Gill, and that the signature which appears above are that of my client.

DATED at the City of Ottawa, this 26th day of ~~November~~^{September}, 2022²⁴.


Jeff Saikaley