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SISKINDS | THE
LAW
FIRM

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FILE NO. 852623/MAP/ak

By Fax: 416-599-1926 and Email: ctimmings@RNAO.ca

October 11, 2016

URGENT

Ms. Carol Timmings
President
Registered Nurses' Association of Ontario
158 Pearl St.
Toronto, ON M5H-1L3

Dear Ms. Timmings:

**Re: London Health Sciences Centre v Registered Nurses' Association of Ontario
and Doris Grinspun**

As you are likely aware, we represent the London Health Sciences Centre with respect to recent defamatory statements made against it by representatives of the Registered Nurses' Association of Ontario.

It has come to our attention that the Middlesex-Elgin Chapter of the RNAO is hosting a public forum event in London, Ontario, on October 14, 2016, concerning the "Mind the Safety Gap" Report. We further understand that you will be the keynote speaker at this event.

In that regard, we write to advise you that, while we encourage all honest and fair debate on the issues, defamatory and untrue statements made of and concerning our client, the LHSC, will not be tolerated and will be met with swift action.

The LHSC intends to hold both the RNAO and yourself personally responsible for the conduct of this meeting and we therefore trust that you will proceed respectfully on October 14, using an impartial and balanced approach. We further trust that this is reasonable and sufficient notice to you of same.

In the event our client becomes aware of any further disparaging and/or derogatory remarks which are publicly made of and concerning it, or any of its employees, this letter will be brought to the attention of the Trial Judge as evidence of the RNAO's malice and ill will toward the LHSC, obviating any defence of qualified privilege you may wish to invoke.

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We expect it will not come to that.

Yours truly,

Siskinds LLP

Per:

Michael A. Polvere

MAP/ak