



Hicks Morley Hamilton Stewart Storie LLP  
77 King St. W., 39th Floor, Box 371, TD Centre  
Toronto, ON M5K 1K8  
Tel: 416.362.1011 Fax: 416.362.9680

**ALLISON E. MACISAAC**  
allison-macisaac@hicksmorley.com  
Direct: 416.864.7326  
Cell: 416.904.4113

Toronto  
Waterloo  
London  
Kingston  
Ottawa

File No. 13179-1  
July 13, 2021

**VIA EMAIL**

**WITH PREJUDICE**

Laurie Kent & Mike Biliski  
Koskie Minsky  
20 Queen Street West  
Suite 900  
Toronto, ON M5H 3R3

Dear Ms. Kent and Mr. Biliski:

**Re: U.A., Local 787 and RT HVAC Holdings Inc. and AtlasCare**

I am counsel to RT HVAC Holdings Inc. ("Right Time").

As you may know, non-employee representatives from the United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry of the United States and Canada, Local 787 (the "Union") have been trespassing on Right Time property without permission. Specifically, these representatives were seen on private property attempting to engage with employees during work hours at the following two locations earlier this morning:

1. **Mersey Heating and Air Conditioning-** 1960 Ellesmere Road, Unit 6, Scarborough, Ontario M1P 3C2
2. **Comfort Masters** - 501 Ritson Road South, Unit 1, Oshawa, Ontario L1H 5K3

As you are no doubt aware, these sites are private property and access is restricted to employees. Union organizers are not allowed on site and therefore, have engaged in trespassing.

Further, section 76 of the *Labour Relations Act* has a clear provision designed to protect all people and parties from threats of intimidation, reprisal and coercion. Everyone has the right to be free from discrimination, intimidation or coercion related to their decision and has the right to attend work uninterrupted. The Union's conduct constitutes an unfair labour practice.

The Union is thereby put on notice that it is in violation of the law, including section 76 of the *Labour Relations Act* and is directed to cease this behaviour immediately. Right Time reserves its right to file any complaint it deems appropriate to address such unlawful behaviour.

Yours very truly,



Allison MacIsaac

AEM/lt

c: client