

LAUGHTON & COMPANY

BARRISTERS & SOLICITORS

BRUCE LAUGHTON

LEAH TERAI

Suite 1090 - 1090 West Georgia Street, Vancouver, B.C. V6E 3V7 TEL: (604) 683-6665 FAX: (604) 683-6622

June 11, 2004

FAX: (604) 669-4737
Shortt Moore & Arsenault
#1300 - 1140 West Pender Street
Vancouver, B.C. V6E 4G1

Attention: Theo Arsenault

Re: O.P.E.I.U. v. O.P.E.I.U. Local 15 and others – BCSC No. S042975

We are writing to express our concern with the fact that your client the OPEIU through its International President Mr. Goodwin has been communicating directly with our client OPEIU Local 378 regarding matters that are the subject of the above noted action.

In particular, Mr. Goodwin wrote to Local 378 on June 9, 2004 demanding copies of documents and further posing a series of questions which would clearly qualify as "interrogatories" under the Supreme Court Rules. A copy of that letter is attached.

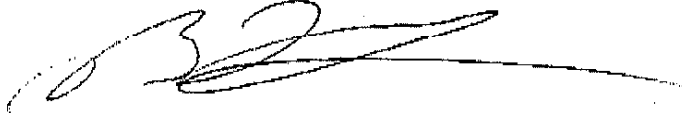
We are not prepared to allow your client to conduct a form of back door discovery outside the confines of those rules. We therefore insist that your client cease such communications and conduct all dealings regarding this action through us.

Would you please advise us what your position is regarding this matter.

We also note that we sent you a form of Order on Monday, June 7, 2004 relating to Mr. Justice Pitfield's decision. Would you please advise us whether you have approved this Order and sent it on to Mr. Edgar.

Yours truly,

LAUGHTON & COMPANY

A handwritten signature in black ink, appearing to read 'B. Laughton', with a long horizontal flourish extending to the right.

BRUCE LAUGHTON
File: /cs

Copy to Jerri New, OPEIU Local 378
Rick Edgar