

**IN THE MATTER OF
USI TECH LIMITED, ELEANOR PARKER AND CASEY COMBDEN**

File No. 2018-8

**MOTION OF
GOWLING WLG (CANADA) LLP**

(For Removal as Counsel of Record,
under Rule 21(2) of the OSC *Rules of Procedure and Forms*)

A. ORDER SOUGHT

The Moving Party, Gowling WLG (Canada) LLP, requests with notice, that the Ontario Securities Commission make the following order:

1. An Order removing Gowling WLG (Canada) LLP as counsel of record for the Respondents, USI Tech Limited, Eleanor Parker and Casey Combden.

B. GROUNDS

The grounds for the motion are:

1. The Respondent, USI Tech Limited, has terminated its retainer with Gowling WLG (Canada) LLP;
2. The Respondent, Casey Combden, consents to the removal of Gowling WLG (Canada) LLP as his counsel;
3. The Respondent, Eleanor Parker, has been notified that Gowling WLG (Canada) LLP is moving to remove itself as counsel;
4. Rules 21(2) and 28 of the Ontario Securities Commission *Rules of Procedure*; and

5. Such further and other grounds as counsel may advise.

C. EVIDENCE

The Moving Party intends to rely on the following evidence for the motion:

1. The affidavit of Alex Zavaglia, Partner at Gowling WLG (Canada) LLP, and the exhibits attached thereto.

DATED this 15th day of August, 2018.

GOWLING (WLG) CANADA LLP

100 King Street West
Suite 1600
Toronto, Ontario M5X 1G5

Usman M. Sheikh

Tel: (416) 862-3627
Fax: (416) 862-7661
usman.sheikh@gowlingwlg.com

Counsel to USI Tech Limited, Eleanor Parker and
Casey Combden

TO: ONTARIO SECURITIES COMMISSION

20 Queen Street West, 22nd Floor
Toronto, ON M5H 3S8

Alexandra Matushenko
Litigation Counsel

AND TO: USI TECH LIMITED

PO Box 65736
Dubai, UAE

PO Box 122036, Dubai UAE
Fairmont Hotel, Skeikh Zayed Rd
Dubai, UAE

Email: info@usitech-int.com
info@usitechltd.com
service@gerabia.com

AND TO: ELEANOR PARKER
3 Stonegate Walk
Chatham, Ontario
N7M 0A3
eleanorparker98@gmail.com

AND TO: CASEY COMBDEN
968 Elgin Street
Newmarket, Ontario
L3& 3C1
casey@caseyjamescombden.com