

WITHOUT PREJUDICE

Delivered via Hand

July 21, 2017

The Corporation of the City of London
Business Manager's Office
300 Dufferin Street
London, ON
N6A 4L9

Attention: Catherine DeForest

Dear Ms. DeForest,

Re: 2190 Dundas Street East, London, ON.

I am the lawyer for George Nikopoulos and Paris Clubs Corporation, the holder of the Adult Live Entertainment license and Touche Spa Inc., the holder of a Body Rub Parlour license (hereinafter collectively referred to as the "License") at the above noted address. I am writing in furtherance to the Community and Protective Services Committee Meeting held on July 18, 2017.

My client has instructed me to prepare a vigorous challenge to any and all attempts made to prevent him from conducting his intended businesses at the above address. He has invested a significant amount of funds in renovations and other related expenses at this location. Mr. Nikopoulos has a record of operating his present business responsibly, without any by-law or criminal infractions. He is an exemplary member of the business community. Contrary to the sensationalized media reports, he holds over 700 bona fide signatures, with additional signatures amounting daily in relation to a petition requesting that the Adult Live Entertainment Establishment be permitted to continue operation at the location in question. The court of public opinion may not be as one-sided as it appears at first glance.

I am informed that over the past year or more that Mr. Nikopolous has had several meetings and communications with various officials including yourself, and that one of the items put forward was the possibility of moving the License to a different location. Of course, the location would have to be suitable and acceptable to my clients, and one which will need to have pre-authorized City Council approvals and not timelimited. Although my clients are fully confident that they will successfully challenge any attempts from the City to delete the License, my clients have instructed me to further explore an option with you, and perhaps find a solution acceptable to both parties.

The clock is running and my client is spending funds on an ongoing basis in order to meet the present deadline. For no other reason, I propose that we enter into immediate, good faith negotiations with a sense of urgency, and perhaps prevent costly and protracted litigation. If this is acceptable to you, please contact me at the number above to set a day and time to begin the

negotiation process. Due to the time sensitive nature of this situation, we ask that you respond no later than the end of business, Tuesday, July 25th.

My client has asked that I convey to you that it is not our intention to inflame the situation making comments in the media. My clients have not and will not make any public comment.

I look forward to hearing from you prior to the above noted time frame. If you have any questions, concerns or comments, or require clarification, please do not hesitate to contact me at your earliest convenience.

Yours truly,

A handwritten signature in black ink, appearing to read 'Christos Vitsentzatos', with a horizontal line extending to the right.

Christos Vitsentzatos, Esq.
CV/ml

cc: Paris Clubs Corporation
Touche Spa Inc.
George Nikopoulos