

September 7, 2023

**Elizabeth Keenan**

ekeenan@mathewsdinsdale.com  
T 416.869.8549

**Toronto Office**

Wilson Laycraft Barristers & Solicitors  
Suite 650, 211 – 11<sup>th</sup> Avenue S.W.  
Calgary, Alberta T2R 0C6  
Attention: Robert J. Stack, Esq.  
**Via email [rstack@wilcraft.com](mailto:rstack@wilcraft.com)**

---

**Re: LEAN Systems LP Correspondence to nVent Electric plc Dated August 29, 2023**

---

Dear Mr. Stack:

Please be advised that we have been retained by nVent to represent its interest with respect to any and all claims by LEAN Systems Limited Partnership as they relate to Dr. David Southwell. Please direct all future communication, whether from counsel, client, or anyone affiliated with your client, to the undersigned. Further, please confirm whether or not you represent LEAN Systems GP Inc. and/or Mr. Bill Halina in his individual capacity, and/or to whom this communication should be directed on their behalf. For purposes of this letter, the three will be referred to as the “LEAN parties.”

The purpose of this correspondence is to formally make you aware of the blatant threats made by the LEAN parties in the attached, and more importantly to put you on express notice of nVent’s intention to hold them jointly and severally liable for any and all damages resulting from this veiled extortion attempt.

Should any of the LEAN parties follow through on this most recent threat of defaming my client, in an attempt to extort some sort of payment or otherwise, as contemplated in the attached letter, I have been authorized to file suit in the Alberta Court of King’s Bench in respect of all causes of action, in law and in equity, including, without limitation, for defamation, libel and/or intentional interference with economic relations. Again, without limiting the generality of the foregoing, as a publicly traded company, nVent (NYSE: NVT) will seek damages for any harm brought to its 165 million shareholders and its US\$9.5B market cap. Notwithstanding how conclusory, unsubstantiated and inaccurate the LEAN parties’ claims may be, should these false claims wind up in an analyst’s report that might move the stock price – even 0.5 cents – nVent’s claim will be in excess of US\$80 million. Dr. Padmanabhan will may similarly seek damages for any reputational harm to his illustrious 30 year career in technology and as a prolific inventor.

As previously communicated by nVent, it vehemently disagrees with your client's claims as set forth in your original correspondence of May 12, 2023. That notwithstanding, the proposed parties to such dispute can disagree on the merits of same and, if your client truly believes its position, is free to bring claims in a court of law. To that end, nVent has authorized me to accept service of process on your promised claim for breach of fiduciary duty and inducing breach of fiduciary duty.

In the interim, we strongly encourage you to counsel each of the LEAN parties on their potential individual exposure on account of their threatened actions before it is too late, as the financial impact of a judgment against the LEAN parties could be life altering.

If I don't hear confirmation from you that you represent Mr. Halina, in his personal capacity, and LEAN Systems GP Inc. by Monday, September 11, 2023, I will conclude they are unrepresented and will contact them directly to ensure that this notice has been properly received by each of them prior to the threatened defamatory statements' publication date of September 14.

Should you desire to discuss these claims or any others, or the potential resolution of the same, please feel to reach out to the undersigned at the number above.

Yours truly



M. Elizabeth Keenan

Enclosures

cc: J. Brad Whitus (via email)  
Brian Catalano (via email)