

NOTICE PLAN

All capitalized terms not otherwise defined have the meaning ascribed to them in the Settlement Agreement. The Hearing Notice and the Settlement Approval Notice (together the “Notices”) shall be disseminated as follows:

1. The Notices (long form) will be sent by email or direct mail by Class Counsel to any person who has requested it or who has inquired about the Proceedings or who has registered to receive updates through Class Counsel’s websites. Where the person is located in Quebec (or otherwise specifically requests), the Notices will be sent in English and French;
2. The Notices (long form) will be sent by email to each of the Provincial Health Insurers by Class Counsel;
3. The Notices (long form) will be posted by Class Counsel, in English and French, on their websites;
4. The Notices (long form) will be posted by the Claims Administrator, in English and French, on the designated website www.invokanacanadasettlement.com;
5. A national press release, in a form to be agreed upon by the Defendants, will be issued in English and French;
6. The Notices (short form, ¼ page) will be published once, in the weekend edition of the following newspapers:
 - a. The National Post (English);
 - b. Le Journal de Montreal (French);
 - c. Regina Leader Post (English);
 - d. Saskatoon Star Phoenix (English);
 - e. St. John’s Telegram (English);

- f. Telegraph Journal (English); and
 - g. Halifax Chronicle Herald (English);
7. Digital Banner Notices (digital display banner ads), in a form to be agreed upon by the Defendants, will be available for ten (10) business days on the following digital news outlets:
- a. The National Post and their other media properties of the Postmedia Network (in English); and
 - b. La Presse (in French).