

SCHEDULE C

NOTICE PLAN

A. NOTICE OF HEARING FOR SETTLEMENT APPROVAL (“NOTICE OF HEARING”)

- (1) For the purposes of this Notice Plan, the definitions found in the Settlement Agreement apply.
- (2) Reference is made in this Notice Plan to the *Notice of Hearing for Settlement Approval* in English and in French (the “**Notice of Hearing**”, **Schedule B** to the Settlement Agreement), and the Notice of Court Order.

Notice of Hearing

- (3) The Notice of Hearing shall be disseminated as follows:
 - (a) The Defendant will provide the Claims Administrator with a list of Class Members email addresses that they have on file, as per the Distribution Protocol.
 - (b) The Claims Administrator will send the Notice of Hearing (**Schedule B**) to Class Members by email, using the email addresses for Class Members provided by the Defendant. No further attempts to deliver the notice will be made if the email is undeliverable or bounces back.
- (4) Once the settlement is made public by the filing of materials before the Court in connection therewith, Class Counsel will, at their expense, post the Notice of Hearing (**Schedule B**), the Settlement Agreement with its schedules and any relevant

proceedings and judgments on their firm's webpage dedicated to the present Class Action and on the Quebec Class Action Registry.

(5) Class Counsel will also have the option, at their expense, to send the Notice of Hearing (**Schedule B**) by email solely to those individuals who have previously contacted Class Counsel in this file.

(6) The Claims Administrator shall cause a Settlement Website to be created in both English and French, as detailed in the Distribution Protocol, at URLs to be approved by the Defendant. The Settlement Website will provide addresses to contact the Claims Administrator by email and mail.

Notice Of Court Order

(7) The Notice of Court Order shall be disseminated as follows:

(a) The Claims Administrator will send the Notice of Court Order to the Class by email, using the email addresses provided by the Defendant. No further attempts to deliver the notice will be made if the email is undeliverable or bounces back.

(b) The Claims Administrator will post the Notice of Court Order on the Settlement Website.

(8) Within 10 days of the Second Order, Class Counsel will also, at their expense, post the Notice of Court Order on their firm's webpage dedicated to this Class Action.

(9) Class Counsel will also have the option, at their expense, to send the Notice of Court Order by email to individuals having previously contacted Class Counsel in this file.