### **Avandia Class Action Hearing Notice Plan**

Capitalized terms used in this Notice Plan have the meanings assigned in the Settlement Agreement.

The Hearing Notice shall be distributed no later than November 15, 2018, except that Print News Notice will be implemented on November 17, 2018. For purposes of the Settlement Agreement, the Hearing Notice Date shall be November 15, 2018.

The Hearing Notice shall be distributed in the following manner:

#### **Direct Notice**

1. Class Counsel will send the Notice (full form) directly to all Class Members known to Class Counsel and Related Counsel. Where the person is located in Quebec (or otherwise specifically requests), the Notice will be sent in English and French.

2. The Notice (full form), and/or the Opt Out Form will be provided by Class Counsel to any person who requests it.

3. Class Counsel will post the Notice (full form), in English and French, on their websites;

4. The Notice (full form) will be posted on the *Registre des actions collectives du Québec*.

#### Print News Notice

5. The Notice (full form) will be printed in no less than a one-eighth page advertisement in the print edition of the Globe and Mail (national edition) on November 17, 2018.

6. The Notice (full form) will be printed in no less than a one-eighth page advertisement in the print edition of the Chronicle Herald on November 17, 2018.

# **Digital News Notice**

7. A digital notice campaign will be established by RicePoint Administration Inc. using banner advertisements (abridged form) directing potential Class Members to the Settlement

Website where they will be able to obtain more information about the Settlement Agreement. The banner adverstisements will be displayed on the following online news sources, in English and French as proportionate to the population:

- (a) theglobeandmail.com
- (b) nationalpost.com
- (c) calgaryherald.com
- (d) vancouversun.com
- (e) thestarphoenix.com
- (f) winnipegfreepress.com
- (g) thechronicleherald.ca
- (h) thetelegram.com
- (i) theguardian.pe.ca
- (j) telegraphjournal.com
- (k) journaldemontreal.com
- (l) journaldequebec.com

# Settlement Website

8. The Notice (full form) will be posted in English and French on the website created by RicePoint Administration Inc. for the purpose of this Settlement Agreement (the "Settlement Website"). The Notice will direct potential Class Members to the Settlement Website where they will be able to obtain more information about the Settlement Agreement, review the Settlement Agreement and related documents, download the Opt Out Form and claim forms and communicate with RicePoint Administration Inc.

9. The motion records in support of the motions to approve the Settlement Agreement and Class Counsel Legal Fees will be made available on the Settlement Website no later than December 15, 2018.

Press Release

10. A national press release will be issued in English and French through Canada Newswire.

11. Class Counsel may apply to the Court on notice to the Defendants for approval to make any further distribution of Notice to Class Members as may be deemed necessary to facilitate their interests in the settlement.

### Provincial and Territorial Health Insurers

12. Class Counsel will provide the designated representatives of the Provincial and Territorial Health Insurers with the motion records (electronically, where possible) in support of the motions to approve the Settlement Agreement and Class Counsel Legal Fees no later than December 15, 2018 and will obtain acknowledgement of receipt.