

# NOTICE OF CERTIFICATION AND SETTLEMENT APPROVAL IN THE MATTER OF CARBONLESS PAPER CLASS ACTION LITIGATION

PLEASE READ THIS NOTICE CAREFULLY. IT MAY AFFECT YOUR LEGAL RIGHTS.

**TO: All persons who purchased Carbonless Paper Sheets Products in Ontario during the period of October 1, 1999 to September 30, 2000 and all persons who purchased Carbonless Paper Sheets Products in Quebec during the period of January 1, 2000 to December 31, 2000, except the Defendants, or directors, officers, employees, subsidiaries or affiliates of each Defendant, and the entities in which each Defendant or any of their subsidiaries or affiliates have a controlling interest.**

Carbonless Paper Sheets means carbonless paper sheets of all sizes and configurations in multi-ply or multiple format that, by virtue of chemical coatings on their front and back, are used to transfer images. Carbonless Paper Sheets Products means Carbonless Paper Sheets and any products that contain or include Carbonless Paper Sheets, including forms and receipts manufactured by commercial parties.

## I. THE PURPOSE OF THIS NOTICE

Class proceedings lawsuits have been initiated in Ontario and Quebec against Cascades Fine Papers Group Inc./ Cascades Groupe Papiers Fins Inc., Coast Paper Limited/ Papier Coast Limitée, Domtar Inc. and Unisource Canada, Inc. (collectively the "Defendants"), in which it is alleged that the Defendants agreed to unduly prevent or lessen competition in respect of the sale of Carbonless Paper Sheets in Ontario and Quebec (collectively the "Proceedings").

A single Settlement Agreement (the "Agreement") has been reached with the Defendants. This notice is to advise you of the Agreement and to inform you of your rights as a class member under the Agreement. You will be bound by the terms of the Agreement unless you exclude yourself by opting out of the Agreement. Opting out is explained below.

The action was certified and the Agreement approved by the Courts in Ontario and Quebec on July 2, 2008 and July 7, 2008 respectively.

Class Counsel legal fees and disbursements must be approved by the Courts. Class Counsel will collectively be requesting legal fees of up to 25% of the Settlement Funds, plus disbursements and applicable taxes, all to be paid out of the Settlement Funds.

## II. THE SETTLEMENT AGREEMENT

The Defendants have agreed, in exchange for a full release of claims against them relating to the Proceedings, to pay Cdn \$2,950,000.00. The Defendants do not admit any wrongdoing or liability on their part. The Agreement represents a compromise of disputed claims. The Proceedings were certified as a class proceeding on consent against the Defendants for the purpose of settlement only.

## III. COMPENSATION PLAN

Under the terms of the Distribution Protocol, the total settlement fund, \$2,950,000.00, plus interest and less deductions for class counsel fees and disbursements, notice and administration costs, will be allocated to the settlement class as follows:

1. 55% of the settlement fund will be used to compensate Settlement Class Members who purchased Carbonless Paper Sheets in Ontario from the Defendants between Oct. 1, 1999 and Sept. 30, 2000 or in Quebec from the Defendants between Jan. 1, 2000 and Dec. 31, 2000. Settlement Class Members may be entitled to up to \$0.15 per dollar spent on Carbonless Paper Sheets although this amount may be reduced depending on the number of eligible claims submitted.
2. 10% of the settlement fund will be used to compensate Settlement Class Members who purchased Carbonless Paper Sheets in Ontario from non-Defendants between Oct. 1, 1999 and Sept. 30, 2000 or in Quebec from non-Defendants between Jan. 1, 2000 and Dec. 31, 2000. Settlement Class Members may be entitled to up to \$0.03 per dollar spent on Carbonless Paper Sheets although this amount may be reduced depending on the number of eligible claims submitted.
3. 35% of the settlement fund will be paid to selected charitable organizations for the general benefit of

Settlement Class Members who are not otherwise eligible for direct compensation under the terms of the Distribution Protocol.

To be eligible for direct compensation, Settlement Class Members must submit a completed Claim Form together with the required supporting documentation, as outlined in the Claim Form. The Claim Form must be mailed by November 20, 2008 to:

CARBONLESS PAPER SHEETS LITIGATION CLAIMS ADMINISTRATOR  
c/o NPT Administration Inc.  
P.O. Box 3355  
London, ON N6A 4K3

## VI. OPTING OUT OF THE PROCEEDINGS

If you would like to exclude yourself from the Proceedings, you can opt out by submitting a written request to be excluded to the Claims Administrator. Your request should include the following information:

- (a) your full name, current address, and telephone number;
- (b) to the extent applicable, the previous name(s) under which you purchased Carbonless Paper Sheets from the Defendants;
- (c) the name(s) of each entity from whom you purchased Carbonless Paper Sheets; and
- (d) information in your possession concerning the purchase price paid by you for Carbonless Paper Sheets.

The request for exclusion must be mailed by October 21, 2008 to:

CARBONLESS PAPER SHEETS LITIGATION CLAIMS ADMINISTRATOR  
c/o NPT Administration Inc.  
P.O. Box 3355  
London, ON N6A 4K3  
Telephone: 1-866-432-5534  
Fax: (519) 432-6544

If a Class Member does not timely and properly opt out of the Agreement or does not timely and properly file a claim form with the Claims Administrator, he or she will be forever barred from receiving any benefits under the Agreement, and from instituting or continuing any action against the Defendants and/or Released Parties related to the price-fixing of Carbonless Paper Sheets.

## VII. FURTHER INFORMATION

Complete copies of the Settlement Agreement and the Distribution Protocol as well as instructions on how to obtain a Claim Form or Opt Out Form are available on Class Counsel's website at [www.classaction.ca](http://www.classaction.ca). To obtain a paper copy of the Claim Form necessary to file a claim for settlement benefits or an Opt Out Form necessary to opt out of the Agreement, please call the Claims Administrator at 1-866-432-5534.

The law firms of Siskinds LLP and Harrison Pensa LLP represents class members in Ontario as well as corporations of more than 50 employees in Quebec. Siskinds LLP can be reached toll free at 1-800-461-6166 ext. 2455 or by mail at 680 Waterloo Street, London, Ontario N6A 3V8 Attention: Charles Wright. Harrison Pensa LLP can be reached at 1-800-263-0489 ext. 775 or by mail at 450 Talbot Street, London, ON N6A 4K3 Attention: Jonathan Foreman.

The law firm of Siskinds Desmeules s.e.n.c.r.l. represents individuals and corporations of 50 or less employees who are class members in Quebec. Quebec Class Counsel can be reached at 418-694-2009 or by mail at Les promenades du Vieux-Quebec, 43 rue De Buade, bureau 320, Quebec City, QC G1R 4A2, Attention: Me Simon Hébert.

If there is a conflict between the provisions of this Notice and the Agreement and any of its appendices, the terms of the Agreement shall prevail.