

**NOTICE OF PROPOSED CERTIFICATION AND SETTLEMENT  
OF RECALLED MAPLE LEAF FOODS PRODUCTS CLASS ACTIONS**

**TO:** *All persons who consumed or purchased certain food products manufactured, processed or packaged by Maple Leaf Foods Inc. and Maple Leaf Consumer Foods Inc. between January 1, 2008 and August 31, 2008, inclusive and their family members, excluding persons and corporations who purchased those food products for resale purposes (“Class Members”)*

**IF YOU CONSUMED OR PURCHASED MAPLE LEAF FOODS PRODUCTS THAT WERE RECALLED IN AUGUST 2008, YOU MAY BE BOUND BY THE SETTLEMENT AND MAY BE ELIGIBLE FOR COMPENSATION**

**PLEASE READ THIS NOTICE CAREFULLY. THESE CLASS ACTIONS AND THE PROPOSED SETTLEMENT MAY AFFECT YOUR RIGHTS EVEN IF YOU DO NOT ACT.**

**THIS NOTICE WAS AUTHORIZED BY COURTS IN SASKATCHEWAN, ONTARIO AND QUEBEC (THE “COURTS”). THIS IS NOT A SOLICITATION FROM A LAWYER OR A NOTICE OF A LAWSUIT AGAINST YOU.**

**YOU MAY BENEFIT FROM THE PROPOSED SETTLEMENT. IF YOU WISH TO RECEIVE BENEFITS UNDER THE PROPOSED SETTLEMENT, YOU MUST SUBMIT A CLAIM FORM.**

**SUMMARY OF PROPOSED SETTLEMENT**

- A proposed settlement (the “Settlement”) of class action lawsuits (the “Lawsuits”) regarding certain food products (the “Recalled Products”) produced by Maple Leaf Foods Inc. and/or Maple Leaf Consumer Foods Inc. (the “Defendants”) which were recalled from the Canadian market in August 2008 (the “Recall”) is pending before Canadian courts;
- The Lawsuits allege that the Defendants handled, distributed, supplied and manufactured food products that were contaminated with the bacteria *listeria monocytogenes*, and that, as a result of the contamination, persons who consumed the Recalled Products may have become sick and/or died;
- A list of all Recalled Products can be found on [www.mapleleafclaim.com](http://www.mapleleafclaim.com). You also may request copies of this list by calling or writing to the Claims Administrator. Contact information for the Claims Administrator is provided at the end of this document;
- The Defendants collectively have agreed to pay twenty-five million dollars (\$25,000,000.00 CDN) to settle the Lawsuits for the benefit of Class Members, including notice costs, administrative costs and class counsel fees and disbursements as more particularly described below, and have agreed to pay up to an additional two million dollars (\$2,000,000.00 CDN) if necessary;
- By agreeing to the Settlement, the Defendants make no admission of liability;
- You are a Class Member if you purchased and/or consumed the Recalled Products. You are also a Class Member if your family member(s) consumed the Recalled Products;
- The Courts still have to decide whether to approve the Settlement. Payments of claims will be made only if all of the Courts approve the Settlement, and after all appeals have been resolved.

QUESTIONS? VISIT [WWW.MAPLELEAFCLAIM.COM](http://WWW.MAPLELEAFCLAIM.COM) OR CALL TOLL-FREE 1-800-801-2521

SUMMARY OF CLASS MEMBERS' RIGHTS AND OPTIONS UNDER THE PROPOSED SETTLEMENT	
<b>SUPPORT THE SETTLEMENT (SUBMIT A CLAIM)</b>	<b>In order to be paid, Class Members <u>must submit their claims</u> by mail, fax or by email (pdf.) to the Claims Administrator by no later than 5:00 p.m. Eastern Standard Time on July 31, 2009.</b>
<b>DO NOTHING</b>	If you do nothing, and if the Settlement is approved, you will receive no payment unless you submit a claim and will not be allowed to bring or be part of any other lawsuit against the Defendants concerning the issues being settled.
<b>OBJECT TO THE SETTLEMENT</b>	Write to the Claims Administrator by no later than <b>March 2, 2009</b> about why you oppose the Settlement.
<b>GO TO A HEARING</b>	Write to the Claims Administrator by no later than <b>March 2, 2009</b> to ask to speak to the Courts about the Settlement.
<b>OPT-OUT (EXCLUDE YOURSELF)</b>	If the Lawsuits are certified and the Settlement is approved, you will have the opportunity to exclude yourself from the appropriate settlement class ("Opt-Out"). <u>If you Opt-Out, you will not receive any payment.</u> This is the only option that allows you to be part of any other lawsuit concerning the issues being settled now. If the Settlement is approved, a further notice will advise Class Members of the Opt-Out deadline, which is proposed to be 90 days from the publication of the notice of certification and settlement approval following the last settlement approval.

These rights and options – **and the deadlines to exercise them** – are explained in this Notice.

**WHAT THIS NOTICE CONTAINS**

	PAGE
<b>BASIC INFORMATION</b>	
1. Why Did I Get This Notice?	4
2. What Are The Lawsuits About?	4
3. Why Is This A Class Action?	4
4. How Do I Know If I Am Included In The Proposed Class Action?	4
5. How Do I Determine If The Food I Purchased or Consumed Was Recalled?	5
<b>THE SETTLEMENT BENEFITS – WHAT YOU MAY GET</b>	
6. What Does The Proposed Settlement Provide?	5
7. Are There Any Limits On The Amount I Can Recover?	7
8. What Happens If There Is Money Left Over In The Settlement Fund?	7
9. How Do I File A Claim and Will I Have to Pay Anything To Do So?	7
10. How Are Payments Determined?	8
<b>ARBITRATION AND APPEALS FROM THE CLAIMS ADMINISTRATOR’S ASSESSMENT</b>	
11. Can I Ask For Amounts Different Than Those Set Out In The Compensation Grid?	8
12. Can I Appeal the Claims Administrator’s Assessment?	8
<b>COMMENTING ON THE PROPOSED SETTLEMENT</b>	
13. Can I Comment On, Or Object To the Proposed Settlement?	8
14. Do I Have A Lawyer Representing My Interests In This Case?	9
15. How Will The Lawyers Be Paid?	9
16. Should I Get My Own Lawyer?	10
17. What If I Do Not Want To Be Part Of The Settlement?	10
18. Release Of Claims	10
<b>THE COURTS' APPROVAL HEARINGS</b>	
19. When And Where Will The Courts Decide On Whether To Grant Approval Of The Proposed Settlement?	10
20. Must I Attend The Approval Hearing(s)?	11
21. May I Speak At The Approval Hearing(s)?	11
22. What If The Settlement Is Not Approved?	11
<b>GETTING MORE INFORMATION</b>	
23. Where Do I Obtain More Information?	11

## **BASIC INFORMATION**

### **1. Why Did I Get This Notice?**

You received this Notice because you have identified yourself as a potential Class Member or because you requested a copy of the Notice either through a toll-free number or through the settlement website, or because you have otherwise been identified as a potential claimant against the Defendants.

### **2. What Are These Lawsuits About?**

The Lawsuits claim that the Defendants handled, distributed supplied, manufactured and/or sold the Recalled Products that may have contained the bacteria *listeria monocytogenes*. The Lawsuits also allege that consumers who ate the Recalled Products may have become ill and/or died. By agreeing to the Settlement, the Defendants make no admission as to the truth of these allegations and they deny any wrongdoing.

### **3. Why Is This A Class Action?**

In a class action, one or more people, called “Representative Plaintiffs”, sue on behalf of themselves and other people who have similar claims, known as “Class Members”. Before any decisions will bind Class Members, the courts must determine that the lawsuit should become a class action. This process is called “certification”. If certification occurs, then any decisions or settlement will bind all Class Members.

The parties to the Lawsuits have agreed to the Settlement, but the Settlement is not valid until each of the courts in Saskatchewan, Ontario and Quebec certify the three lead actions listed below (the “Lead Actions”) and approve the Settlement:

- *Bishay Estate et al. v. Maple Leaf Foods et al.*, Court File No. QB 1173 in the Court of Queen’s Bench of Saskatchewan (the “Saskatchewan Action”), for residents of Nova Scotia, Prince Edward Island, New Brunswick, Newfoundland and Labrador, Manitoba, Saskatchewan, Yukon, North West Territories, Nunavut, and residents outside of Canada;
- *Bilodeau et al. v. Maple Leaf Foods et al.*, Court File No. CV-08-361464CP in the Ontario Superior Court of Justice (the “Ontario Action”), for residents of Ontario, B.C. and Alberta; and
- *Melvin and Option Consommateurs et al. v. Maple Leaf Foods et al.*, Court File No. 500-06-445-086 in the Superior Court of Québec (the “Québec Action”), for residents of Québec.

Hearings will be held in each of the Court of Queen’s Bench of Saskatchewan, Ontario Superior Court of Justice and Quebec Superior Court to determine whether the Lawsuits should be certified, and the Settlement should be approved. See response to Question #19 below for the date of the approval hearings in each of the Lead Actions.

### **4. How Do I Know If I Am Included In The Proposed Class Actions?**

You are a Class Member if you purchased and/or consumed the Recalled Products. You are also a Class Member if a family member purchased or consumed the Recalled Products. Class Members who purchased but did not consume Recalled Products will not be eligible to receive compensation unless they are eligible for compensation as family members, but will be bound by the terms of the Settlement, including the release, covenant not to sue, and dismissal with prejudice described below in the response to Question #18. Persons and corporations who purchased Recalled Products for resale purposes are NOT Class Members and will not be bound by the Settlement.

You do not need to do anything to become a Class Member, **but you must complete the Claim Form in order to be eligible to receive any money from the Settlement**, if it is approved by the Courts.

**5. How Do I Determine If The Food I Purchased or Consumed Was Recalled?**

A list of the Recalled Products can be found at the settlement website, [www.mapleleafclaim.com](http://www.mapleleafclaim.com). You also may request a copy of the list by calling or writing to the Claims Administrator. Contact information for the Claims Administrator is provided at the end of this document in the response to Question #23 below.

**THE SETTLEMENT BENEFITS – WHAT YOU MAY GET**

**6. What Does The Proposed Settlement Provide?**

The Settlement provides for the creation of a \$25 million (CDN) settlement fund (Settlement Fund) from which eligible consumers and/or their family members may receive varying levels of compensation. Notice costs, administration costs, and class counsel fees and disbursements as more particularly described below will also be paid out of the Settlement Fund. The Defendants will also pay up to a further \$2 million (CDN) if the Settlement Fund is insufficient to fully compensate all eligible claims. The amount each claimant will receive depends upon the severity of their illness. For claimants who sustained physical symptoms consistent with Listeriosis, the compensation ranges from \$750 (for physical symptoms lasting between 24-48 hours) up to \$125,000 (for serious and long lasting physical injuries). The estates of Class Members who died as a result of symptoms consistent with Listeriosis will be paid \$120,000, plus additional substantial amounts to immediate family members. Symptoms consistent with Listeriosis include: vomiting, nausea, cramps, diarrhea, severe headache, constipation or persistent fever. The value of all claims may be subject to a *pro rata* reduction in the event that the total value of eligible claims, administrative and other court-approved expenses, the Opt-Out Reserve Fund and initial Class Counsel Fees exceeds \$27 million.

The specific amounts of compensation available to eligible claimants for pain and suffering, subject to any *pro rata* reduction, are set out in the Compensation Grid attached to this Notice as schedule “A” and are summarized in the chart below. Please note that claimants advancing claims under Level 4, 5, 6, 7, 8, 11 or 12 may request to have their claims assessed through Arbitration rather than under the Compensation Grid. The amount that the Arbitrator can award can be more or less than the amount set out in the Compensation Grid. With the exception of Level 1 claims, claimants may also claim for lost income and other expenses in addition to the amounts set out above. For some injury levels the above amounts are inclusive of claims for family members and for other injury levels additional compensation is available for certain family members. Please refer to the Compensation Grid at schedule “A” for a complete list of the benefits available to eligible claimants.

LEVEL	DESCRIPTION	SETTLEMENT AMOUNT
<b>PHYSICAL HARM INCLUDING PSYCHOLOGICAL HARM, IF ANY</b>		
1	Class Members who consumed the Recalled Products and sustained physical symptoms consistent with Listeriosis lasting for <b>24 to less than 48 hours</b> subsequent to the ingestion of Recalled Products.	\$750
2	Class Members who consumed the Recalled Products and sustained physical symptoms consistent with Listeriosis lasting for <b>48 hours to less than 1 week</b> subsequent to the ingestion of Recalled Products.	\$3,000

3	Class Members who consumed the Recalled Products and sustained Physical symptoms consistent with Listeriosis lasting for <b>1 week to less than 2 weeks</b> subsequent to the ingestion of Recalled Products.	\$5,500 (plus \$750 per day of hospitalization)
4	Class Members who consumed the Recalled Products and sustained Physical symptoms consistent with Listeriosis lasting for <b>2 weeks to 1 month</b> subsequent to the ingestion of Recalled Products.	\$8,000 (plus \$750 per day of hospitalization)
5	Class Members who consumed the Recalled Products and sustained Physical symptoms consistent with Listeriosis accompanied by <b>secondary infection</b> including, but not limited to meningitis, pneumonia, septicaemia, etc., but <b>without ongoing and/or permanent physical symptoms</b> .	\$35,000 (plus \$750 per day of hospitalization)
6	Class Members who consumed the Recalled Products and sustained Physical symptoms consistent with Listeriosis with or without additional complications, <b>with ongoing and/or permanent physical symptoms</b> .	\$75,000 (plus \$750 per day of hospitalization)
7	Class Members who consumed the Recalled Products and suffered physical symptoms consistent with Listeriosis accompanied by <b>secondary complications</b> involving the central nervous system (including, but not limited to, meningoencephalitis or cerebritis, rhombencephalitis, brain abscess, septic shock) and/or focal infections (including, but not limited to ocuglandular syndrome, lymphadenitis, pneumonia, empyema, myocarditis, endocarditis, septic arthritis, osteomyelitis, prosthetic joint infections, arteritis, prosthetic graft infections, spinal and brain abscess and cholecystitis, acute hepatitis, and peritonitis among others) <b>resulting in serious and permanent impairment of physical and/or mental function</b> .	\$125,000 (plus \$750 per day of hospitalization)
8	Class Members who consumed the Recalled Products and sustained Physical symptoms consistent with Listeriosis resulting in <b>death</b> .	\$120,000
<b>PSYCHOLOGICAL HARM WITHOUT ACCOMPANYING BODILY INJURY</b>		
9	Class Members who consumed the Recalled Products and sustained psychological injuries or trauma for <b>up to 60 days</b> , with an onset after August 17, 2008, with no accompanying bodily injury.	\$2,000 per month to a total of \$4,000
10	Class Members who consumed the Recalled Products and sustained psychological injuries or trauma for <b>up to 60 days</b> , with an onset after August 17, 2008, with no accompanying bodily injury, if the class member falls <b>within a group that is particularly at risk</b> for contracting Listeriosis. Health Canada has identified at risk individuals as including pregnant women and their unborn/newborn children, the elderly (65 plus) and people with weakened immune systems.	\$3,000 per month to a total of \$6,000
11	Class Members who consumed the Recalled Products and sustained psychological injuries or trauma for <b>more than 60 days</b> , with an onset after August 17, 2008, with no accompanying bodily injury.	\$13,500

12	Class Members who consumed the Recalled Products and sustained psychological injuries or trauma for <b>more than 60 days</b> , with an onset after August 17, 2008, with no accompanying bodily injury, if the class member falls <b>within a group that is particularly at risk for contracting Listeriosis</b> . Health Canada has identified at risk individuals as including pregnant women and their unborn/newborn children, the elderly (65 plus) and people with weakened immune systems.	\$17,500
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**7. Are There Any Limits On The Amounts I Can Recover?**

A Claims Administrator independent of any party in this lawsuit will administer the Settlement. The Claims Administrator is a Class Actions services administration company appointed by the Courts to review and process claims. The Claims Administrator is Bruneau Group Inc. and may be contacted at the contact information set out in response to Question #23 below. The Claims Administrator will review all claims submitted and determine whether they are valid, reasonable and payable based on the terms of the Settlement and the eligibility criteria set out in the Compensation Grid. However, the value of all such claims may be subject to a *pro rata* reduction in the event that the total value of eligible claims, administrative and other court-approved expenses, the Opt-Out Reserve Fund and initial Class Counsel Fees exceeds \$27 million.

**8. What Happens If There Is Money Left Over In The Settlement Fund?**

Any money remaining in the Settlement Fund after payment of all amounts for eligible claims, administration and other court-approved expenses, the Opt-Out Reserve Fund and initial Class Counsel Fees, will be called the “Residue”. If there is a Residue, Class Members with claims at Physical Harm Levels 7 & 8 will be paid a further benefit equal to up to 15% of their Compensation Grid award (or the award made following Arbitration if applicable) (“Enhanced Payments”), subject to a *pro rata* reduction, if the total is more than the Residue. If money remains in the Residue after all Enhanced Payments have been made in full, Class Counsel may apply for further fees. If money remains in the Residue thereafter, it will be distributed to various charitable Canadian organizations.

**9. How Do I File A Claim, And Will I Have To Pay Anything To Do So?**

Enclosed with this Notice is a Claim Form.

**IF THE SETTLEMENT IS APPROVED AND IF YOU DO NOT SUBMIT YOUR SIGNED CLAIM FORM BY THE CLAIMS DEADLINE, YOU WILL BE DEEMED TO HAVE WAIVED YOUR RIGHT TO RECEIVE ANY PAYMENT FROM THE SETTLEMENT.**

You are encouraged to submit claims as soon as possible; however, claims will only be processed and paid, if eligible, following approval of the settlement by the Courts. As part of your claim, you must provide all documentation required by the Claim Form. Please note that claimants’ health card number and information related to claimants’ medical treatment may be disclosed to the appropriate provincial health insurer for the purpose of calculating the provincial health insurer’s subrogated claim. All information provided will otherwise be treated as confidential. While it does not cost anything to submit a claim, you may have to incur costs in obtaining, copying and submitting the documents to support your claim, such as medical records and information attesting to purchase and/or consumption of the Recalled Products. You will not be reimbursed for these costs as part of the Settlement.

**The Claim Form must be signed.** Please note that your signature on the Claim Form indicates that you declare, under penalty of perjury, that the information you are submitting is true and accurate. The signature also authorizes the Administrator to contact you for more information.

**IN ORDER TO BE ELIGIBLE TO RECEIVE COMPENSATION, YOU MUST COMPLETE, SIGN, AND SUBMIT THE CLAIM FORM, ALONG WITH THE REQUIRED ACCOMPANYING DOCUMENTATION, TO THE CLAIMS ADMINISTRATOR BY MAIL, FAX OR EMAIL (PDF. FORMAT) ON OR BEFORE 5:00 P.M. EASTERN STANDARD TIME ON JULY 31, 2009 at:**

Bruneau Group Inc.  
P.O. Box 20187 - 390 Rideau Street  
Ottawa ON K1N 9P4  
Attention: Maple Leaf Foods Class Actions Settlement  
Tel.: 1-800-801-2521  
Fax: 613-562-0321  
Email: info@mapleleafclaim.com

#### **10. How Are Payments Determined?**

The Claims Administrator appointed by the Courts will determine whether a claim is valid and payable in accordance with the terms of the Settlement and the eligibility criteria set out in the Compensation Grid based on the Claim Form (including information provided with the Claim Form). The Claims Administrator is an independent party, not affiliated with either the Plaintiffs or the Defendants or their counsel.

### **ARBITRATION AND APPEALS FROM THE CLAIMS ADMINISTRATOR'S ASSESSMENT**

#### **11. Can I Ask For Amounts Different Than Those Set Out In The Compensation Grid?**

Claimants advancing claims under Level 4, 5, 6, 7, 8, 11 or 12 may request in the Claim Form that their claim be assessed through Arbitration rather than under the Compensation Grid. The amount that the Arbitrator can award can be more or less than the amount set out in the Compensation Grid. Claimants who request to have their claims assessed through Arbitration will be provided notice of the Arbitration process directly by the Claims Administrator. The Arbitration process is described in the Claims Administration and Arbitration Protocol which you can obtain by contacting the Claims Administrator or accessing [www.mapleleafclaim.com](http://www.mapleleafclaim.com). Although the Arbitrator's fees and costs will be paid from the Settlement Fund, Claimants are responsible for their own representation and costs (i.e.: lawyer fees, transportation, expert, etc.).

#### **12. Can I Appeal The Claims Administrator's Assessment?**

Claimants who disagree with the Claims Administrator's assessment of their claim will be entitled to appeal the Claims Administrator's decision to an Arbitrator appointed by the Courts. The process for such appeals is described in the Claims Administration and Arbitration Protocol which you can obtain by contacting the Claims Administrator or accessing [www.mapleleafclaim.com](http://www.mapleleafclaim.com).

### **COMMENTING ON THE PROPOSED SETTLEMENT**

#### **13. Can I Comment On, Or Object To, The Proposed Settlement?**

If you have comments about, or object to, any aspect of the proposed settlement, you may express your views to the Courts in writing. The written response should include your name, address, telephone number, a statement that you are a member of the Class, as well as a brief explanation of your comment or reason for objection. All comments and objections should be submitted to the Claims Administrator on or before **March 2, 2009** at the following address:

Bruneau Group Inc.  
P.O. Box 20187 - 390 Rideau Street  
Ottawa ON K1N 9P4  
Attention: Objections to the Maple Leaf Foods Class Actions Settlement  
Fax: 613-562-0321  
Email: info@mapleleafclaim.com

The Claims Administrator will file copies of all timely comments and objections with the Courts in advance of the approval hearings.

#### 14. Do I Have A Lawyer Representing My Interests In This Case?

Yes. The following law firms, referred to as “Class Counsel” will answer your questions regarding the Settlement:

- For residents of Nova Scotia, Prince Edward Island, New Brunswick, Newfoundland and Labrador, Manitoba, Saskatchewan, Yukon, North West Territories, Nunavut, and residents outside of Canada: Merchant Law Group LLP (306) 359-7777.
- For residents of Ontario, B.C., and Alberta: Branch McMaster, (604) 654-2999, Docken and Company (403) 269-3612, Falconer Charney (416) (416) 964-3408, Hotz Lawyers (416) 590-7823, Merchant Law Group LLP (647) 215-7776, Rochon Genova LLP (416) 363-1867, Stevensons LLP (416) 599-7900, Sutts, Strosberg LLP (519) 561-6294.
- For residents of Québec: Merchant Law Group LLP (514) 842-7776, Sylvestre Fafard Painchaud (514) 937-2881.

You will not be charged personally for these lawyers, but they will ask the Courts to award them a fee that will be paid out of the Settlement Fund as set out below. Class Members who consider it desirable or necessary to seek the advice or representation of their own lawyers may do so at their own expense.

#### 15. How Will The Lawyers Be Paid?

Since the lawsuits began, the nine law firms making up Class Counsel listed in the response to Question #14 above have devoted substantial resources and expenditures in addressing the issues raised by the Recall on behalf of Class Members on a contingency fee basis, and these law firms have received no compensation to date for their services or reimbursement of their expenses. At or following the approval hearings, Class Counsel will collectively request that the Courts approve payment of legal fees and expenses to the nine law firms out of the Settlement Fund as follows:

- a) \$3 million plus disbursements and applicable taxes will be requested to be paid upon court approval;
- b) Following the administration of the Settlement, Class Counsel may apply for additional fees if there are funds remaining in the Settlement Fund after all eligible claims have been paid in full.

Further, the Merchant Law Group will request at the Saskatchewan approval hearing that the Merchant Law Group’s portion of \$1.65 million plus applicable taxes be paid into trust to be held until all eligible claims have been paid in full, at which time such funds will be released to the Merchant Law Group.

Class Counsel’s request for legal fees and the basis for the request will be set out in Class Counsel’s motion materials which will be available for review at [www.mapleleafclaim.com](http://www.mapleleafclaim.com) prior to the approval hearings.

The Courts will assess the reasonableness of Class Counsel's fee request at the approval hearings and any subsequent hearings that may be requested to approve fees.

#### **16. Should I Get My Own Lawyer?**

See response to Question #14 above.

#### **17. What If I Do Not Want To Be Part Of The Settlement?**

If the Lead Actions are certified and the Settlement is approved by the Courts, Class Members will be bound by all of the applicable Court's orders, the release and other provisions of the Settlement, unless you choose to exclude yourself from the Settlement ("Opting Out"). If you choose to Opt Out of the Settlement, you will not be entitled to receive any payment from the Settlement. The process and deadline for Opting Out will be set out in a further notice that will be issued only if the Lead Actions are certified and the Settlement is approved by the Courts. The Opt Out deadline is proposed to be 90 days from the publication of the notice of certification and settlement approval following the last settlement approval.

#### **18. Release Of Claims**

If the Lead Actions are certified and the Settlement is approved by the Courts and you do not Opt Out, whether or not you submit a Claim Form, and whether or not your claim is approved for payment, you will be deemed to have completely and unconditionally released, forever discharged, and acquitted the Defendants, and their respective parents, affiliates, associates, and subsidiaries together with their past and present and future officers, directors and employees, shareholders, representatives, partners, attorneys, insurers, reinsurers, subrogees and assigns (the "Releasees") from any and all of the settled claims. If you do not Opt Out, you will be forever barred and enjoined from commencing, instituting or prosecuting any action, litigation, investigation or other proceeding in any court of law or equity, arbitration, tribunal, proceeding, governmental forum, administrative forum or any other forum, directly, representatively or derivatively, asserting against the Releasees any claims that relate to or constitute any claims or actions covered by the Settlement. If you are a Class Member and do not want to be prevented from bringing, continuing, or being a part of such a lawsuit, you must Opt Out.

### **THE COURTS' APPROVAL HEARINGS**

#### **19. When And Where Will The Courts Decide On Whether To Grant Approval Of The Proposed Settlement?**

All aspects of this Settlement are subject to court approval. In order for the Settlement to become effective, it must be approved by the courts in Ontario, Québec, and Saskatchewan each of which must be satisfied that the settlement is fair, reasonable, and in the best interests of Class Members. Dates for the settlement approval hearings have been scheduled with the respective courts as follows:

- In the Saskatchewan Action on Tuesday, March 10, 2009, at 9:00 a.m. at the Court of Queen's Bench of Saskatchewan, 2425 Victoria Avenue, Regina, Saskatchewan.
- In the Ontario Action on Thursday, March 5, 2009, at 10:00 a.m. at the Ontario Superior Court of Justice, 361 University Avenue, Toronto, Ontario.
- In the Québec Action on Wednesday, March 20, 2009, at 9:00 a.m. at the Superior Court of Québec, 1 Notre-Dame East, Montréal, Québec.

Please note that the approval hearings may be postponed to a different date without direct additional notice. Updated information will be posted on the settlement website, [www.mapleleafclaim.com](http://www.mapleleafclaim.com).

#### 20. Must I Attend The Approval Hearing(s)?

Attendance at the approval hearing(s) is not required, even if you properly mailed a written comment or objection. If you or your personal lawyer wishes to attend one of the approval hearings, you are welcome to do so at your expense. However, it is not necessary that either of you attend. As long as your comment or objection was received by the Claims Administrator prior to the objection deadline, the Courts will consider it.

#### 21. May I Speak At the Approval Hearing?

If you want to speak at one of the approval hearings, or have your own lawyer speak at the approval hearing, you should provide notice in writing to the Claims Administrator of an intention to appear at the approval hearing on or before **March 2, 2009** (“Notice of Appearance”). If you intend to have a lawyer speak at the approval hearing the Notice of Appearance should indicate the name, address, telephone number, fax number and email address of your lawyer.

#### 22. What If The Settlement Is Not Approved?

The Settlement will only become effective if it is approved by all Courts. While you may submit a claim before final approval, no claims will be paid until and unless all Courts approve the Settlement. If the Settlement is not approved, the Lead Actions will not be certified at the approval hearings although the plaintiffs and Class Counsel will be at liberty to apply subsequently for certification of the actions and to continue the lawsuits as if the Settlement had never existed.

### GETTING MORE INFORMATION

#### 23. Where Do I Obtain More Information?

If you have any questions about the lawsuit or this Notice, you may:

- Visit the settlement website at [www.mapleleafclaim.com](http://www.mapleleafclaim.com)
- Call the Claims Administrator toll free at 1-800-801-2521
- Email the Claims Administrator at [info@mapleleafclaim.com](mailto:info@mapleleafclaim.com)
- Write to the Claims Administrator at:

Bruneau Group Inc.  
P.O. Box 20187 - 390 Rideau Street  
Ottawa ON K1N 9P4  
Attention: Maple Leaf Foods Class Actions Settlement