

SCHEDULE "A"

NOTICE OF PROPOSED SETTLEMENT OF A CLASS ACTION RELATED TO THE PRESCRIPTION MEDICINE PREPULSID®

PLEASE READ CAREFULLY. IGNORING THIS NOTICE WILL AFFECT YOUR LEGAL RIGHTS.

NOTICE OF PROPOSED SETTLEMENT

This Notice advises you of a proposed settlement of the following lawsuits regarding the prescription medication Prepulsid®: *Boulangier v. Johnson & Johnson Corporation* Court File No. 00-CV-197409CP (the "Ontario Action") and *Gardner v. Johnson & Johnson Corporation* N°: 500-06-000137-014 (the "Quebec Action")

For more complete information, you can read the Motion for Settlement Approval and the Settlement Agreement at www.PrepuisidSettlement.com, www.services.justice.gouv.qc.ca, or www.cba.org/recourscollectifs, or you can call the Administrator at 1-866-348-0333.

WHO IS INCLUDED?

The parties will seek the approval of the Ontario and Quebec Courts for a proposed Settlement. In the Ontario Action, the proposed Settlement will apply to:

All persons in Canada (including their estates), excluding residents of Quebec, who ingested the prescription medicine Prepulsid® (the "Class") and to spouses, children, grandchildren, parents, grandparents, brothers and sisters of the Class who, by reason of their relationship with members of the Class are entitled to assert a claim (the "Family Class").

In the Quebec Action, the proposed Settlement will apply to:

All persons, including minor persons, who reside or have resided in Quebec (other than members of the Class as defined in the Ontario action), and who ingested the drug CISAPRIDE, marketed under the name PREPULSID (the "Quebec Class"), as well as their spouses, children, grandchildren, parents, grandparents, brothers and sisters and heirs and assigns (the "Quebec Family Class").

WHAT ARE THE LAWSUITS ABOUT?

The lawsuits raised allegations of negligence and breach of warranty and sought damages on behalf of Canadians for certain types of cardiovascular injuries which were allegedly suffered by Class members because of their use of the prescription medicine Prepulsid®. The defendants deny the allegations made in these lawsuits, make no admission as to the truth of these allegations and they deny any wrongdoing.

WHAT IS THE PROPOSED SETTLEMENT?

The proposed Settlement provides for the creation of an \$8.75 million (CDN) Settlement Fund from which eligible claimants may receive compensation. Eligibility for compensation will require proof of ingestion of Prepulsid®, and proof that Prepulsid® caused or was a substantial or materially contributing factor in causing certain types of cardiovascular injury such as death, cardiac arrest or primary tachycardic ventricular arrhythmia (limited to primary sustained ventricular tachycardia, ventricular fibrillation or Torsades de Pointes). Not all class members will be eligible for compensation. Eligibility for compensation will be determined on an individual basis by a Medical Panel of impartial physicians upon an analysis of individual Class Members' medical records. The amount of compensation depends upon the severity of injury suffered, as well as damages for loss of income and certain expenses. Notice and administration costs (estimated to be approximately \$750,000), as well as lawyers' fees and expenses (as discussed later in this Notice) will be paid out of the Settlement Fund, and any undistributed balance remaining in the Settlement Fund shall be returned to the defendants. All aspects of this proposed Settlement are subject to the approval of the Ontario and Quebec Courts, and, in the Quebec Action, authorization from the Court for the lawsuit to proceed as a class action is required.

THE ADMINISTRATOR

The Administrator is a Class Actions services administration company which will review and process claims. The proposed Administrator is **Crawford Class Action Services** and contact information is included at the end of this Notice.

THE PROPOSED SETTLEMENT REQUIRES COURT APPROVAL

In order for the Settlement to become effective, it must be approved by the Courts in Ontario and Quebec. Each of the Courts must be satisfied that the

Settlement is fair, reasonable and in the best interests of Class members. The dates for the Settlement Approval Hearing in Ontario and the consent Authorization and Settlement Approval Hearing in Quebec have been scheduled with the respective courts as follows:

In the Ontario Action on **October 19, 2009 at 10:00 a.m.** at the Ontario Superior Court of Justice, 393 University Avenue, Toronto, Ontario.

In the Quebec Action on **October 20, 2009 at 9:30 a.m. in room 2.13** at the Superior Court of Quebec, 1 Notre-Dame East, Montreal, Quebec.

OBJECTING TO THE SETTLEMENT – If you wish to object to this proposed Settlement, you may submit a written objection to the Administrator at the following address: Suite 3-505, 133 Weber Street North, Waterloo, ON N2J 3G9. Further information is also available on the Administrator's website at www.PrepuisidSettlement.com. All written objections must be received **no later than October 12, 2009**. The Administrator will file copies of all objections with the Courts.

OPPORTUNITY TO APPEAR – You may also attend the hearings on the dates noted above, and present arguments as regards the proposed Settlement and distribution of any balance remaining.

SUBMITTING CLAIMS – If the proposed Settlement is approved by the Ontario and Quebec Courts, a further Notice will be published that will provide detailed information about submitting a claim, including the deadlines for doing so. A downloadable version of the Claim Form is currently available online at the Administrator's website.

WHO REPRESENTS ME?

The following law firms represent the plaintiffs in the Ontario Action:

ROCHON GENOVA LLP

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The following law firms represent the plaintiffs in the Quebec Action:

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LEGAL FEES

At or following the Settlement Approval Hearings, Plaintiffs' counsel will request approval for payment of their fees and disbursements and applicable taxes. Plaintiffs' counsel for the Ontario national class have pursued this lawsuit for the past nine years, through a multitude of motions and appeals including contested certification. Plaintiffs' counsel for the Ontario national class will seek initial approval from the courts for fees of \$3 million plus disbursements and applicable taxes and, if money remains in the Settlement Fund following the end of the administration of the Settlement, a further

application for fees may be made. Plaintiffs' counsel in Quebec will seek initial approval from the Courts for fees of \$300,000 plus disbursements and applicable taxes and, if money remains in the Settlement Fund immediately following the end of the administration of the Settlement, a further application for fees may be made by Quebec Counsel.

WHERE CAN I OBTAIN MORE INFORMATION?

For more information, you can contact the Administrator at:
1-866-348-0333. Please do not contact the Courts.