

PROTECTIVE PRODUCTS OF AMERICA INC. SECURITIES CLASS ACTION

NOTICE OF CERTIFICATION AND AUTHORIZATION AND THE GRANTING OF LEAVE TO PROCEED WITH STATUTORY SECONDARY MARKET MISREPRESENTATION CLAIMS

Read this notice carefully as it may affect your legal rights

This notice is directed to all persons, wherever they may reside or be domiciled, who sold shares of Protective Products of America, Inc. ("PPA") during the period from and including October 8, 2009 to and including January 13, 2010 (the "Class Period") or who held shares of PPA at the end of the Class Period, other than certain excluded persons associated with the defendants described below (the "Class Members").

THE CERTIFICATION ORDERS

On April 24, 2013, the Ontario Superior Court of Justice certified the action *Michael Frank et al. v. R. Patrick Caldwell et al.*, Court File No. CV-10-415821-CP00 (the "Class Action") as a class proceeding and appointed Michael Frank, Sheldon Zamick, and Norman Spurgeon as representative plaintiffs.

The defendants in the Class action are R. Patrick Caldwell, Larry Moeller, Neil E. Schwartzman, Jason A. Williams, Brian L. Stafford, Henry H. Shelton, Frank E. Jaumot, Keith J. Engel, Richard P. Torykian, Sr., Charles E. Peters, Jr., and Deon Vaughan. (collectively, the "Defendants")

The Class Action has been certified on behalf of the following class: all persons, wherever they may reside or be domiciled, who sold shares of PPA or held shares of PPA at the end of the Class Period, except for PPA's past or present subsidiaries, affiliates, legal representatives, heirs, predecessors, successors and assigns, and all members of the Defendants' immediate families, and any entity in which any of the Defendants has or had a controlling interest

The certification order means that the Class Action may proceed to trial as a class action involving claims under securities legislation described below for damages for misrepresentations in PPA's disclosure documents and public oral statements and for its failure to make timely disclosure of a material change.

Certification is a preliminary procedural matter. The merits of the claims in the Class Action, or the allegations of fact on which the claims are based, have not been finally determined by the courts. The

Defendants deny that the claims in the actions have merit.

THE LEAVE ORDERS

On April 24, 2013, the Ontario Superior Court of Justice also granted leave to the plaintiffs in the Class Action to commence an action under the secondary market liability provisions of the Ontario *Securities Act* and the analogous provisions of the securities legislation of each other Canadian jurisdiction.

The only claims being pursued in the Class Action are claims under the secondary market liability provisions of the *Securities Act* of each Canadian province and territory. These claims may be subject to damages caps, which limit the amount of damages that can be recovered from the Defendants. Class counsel believes that the potential damages in this case exceed the damages caps. If you wish to pursue other claims against the Defendants relating to the matters at issue in the Class Action, you should immediately seek independent legal advice because these claims will be compromised if you do not opt out.

DO NOTHING IF YOU WANT TO PARTICIPATE IN THE CLASS ACTION

Class Members who want to participate in the Class Action are automatically included and need not do anything at this time.

YOU MUST OPT OUT IF YOU DO NOT WANT TO PARTICIPATE IN THE CLASS ACTION

Class Members who do not want to participate in the Class Action must opt out. **If you want to opt out of the Class Action, you must send a signed letter stating that you elect to opt out of the class in the Class Action and provide the additional information described below.**

In order for your opt out request to be valid, it must include all of the following information: (i) the date(s) on which you purchased and sold PPA shares; (ii) the number of shares purchased and sold; (iii) the price at which you purchased and sold PPA shares; and (iv) your

name, address, telephone number and signature. If you are submitting an opt out request on behalf of a corporation or other entity, you must state your position and provide your authority to bind the corporation or entity.

Your opt out request may be sent by fax or mail to:

NPT RicePoint Class Action Services
Re: PPA Securities Litigation
P.O. Box 3355
London, ON N6A 4K3 Canada
Fax: (519) 432-6544

In order for your opt out request to be valid, it must be postmarked or received no later than September 1, 2013 and it must contain all the requested information.

Each Class Member who does not opt out of the Class Action will be bound by the terms of any judgment or settlement, whether favourable or not, and will not be allowed to prosecute an independent action against any of the Defendants for any of the factual matters raised in the Class Action. If the Class Action is successful, you may be entitled to share in the amount of any award or settlement recovered. In order to determine if you are entitled to share in the award or settlement and the amount, if any, of your share, it may be necessary to conduct an individual determination. If there is an individual determination, there may be costs payable by you if it is determined that you are not entitled to share in the award or settlement. You will have the opportunity to decide if you wish to proceed with your individual determination before it begins.

No person may opt out a minor or a mentally incapable member of the class without permission of the courts after notice to The Children's Lawyer and/or the Public Guardian and Trustee, as appropriate.

A Class Member who opts out will not be entitled to participate in the Class Action and will not be entitled to share in the amount of any award, if the Class Action are successful, or in any settlement achieved, if any.

CLASS COUNSEL AND LEGAL FEES

The plaintiffs and the class in the Class Action are represented by Rochon Genova LLP.

Rochon Genova LLP is acting on a contingency basis, such that legal fees, disbursements and applicable taxes will be payable only in the event of success in the

Class Action. Rochon Genova LLP is also paying all disbursements incurred in the Class Action.

In the event of success in the Class Action, Rochon Genova LLP will make a motion to the courts to have their fees and disbursements approved.

As a Class Member, you will not be required to pay any costs in the event that the Class Action is unsuccessful.

ADDITIONAL INFORMATION

This notice was approved by the Ontario Superior Court of Justice. The court offices cannot answer any questions about the matters in this notice. The order of the Court and other information is available on class counsel's websites at www.rochongenova.com.

Questions relating to the Ontario Action should be directed by email or telephone to Ontario class counsel:

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The publication of this notice was authorized by the Ontario Superior Court of Justice