

NOTICE OF CERTIFICATION AND PROPOSED SETTLEMENT OF CANADIAN OXYCONTIN® AND OXYNEO® LITIGATION

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

NOTICE OF CERTIFICATION AND PROPOSED SETTLEMENT

A Canada-wide settlement has been reached in several proposed class actions relating to the prescription drugs OxyContin® and OxyNEO®. These lawsuits (the “Proceedings”) raised various allegations against the Defendants and sought damages on behalf of Canadians for harm and injuries which were allegedly related to the use of OxyContin® and OxyNEO®. The Defendants deny the allegations made in the lawsuits, make no admission as to the truth of these allegations and deny any wrongdoing.

This Notice advises you of the certification of the Proceedings as class actions, of the National Settlement Agreement (the “Settlement”) and of the hearings that will be held to decide whether the Settlement should be approved.

WHO IS INCLUDED?

If the Settlement is approved, it will apply to all persons in Canada, including their estates and provincial health insurers, who at any time between January 1, 1996 and February 28, 2017 inclusive, were prescribed in Canada and ingested OxyContin® tablets and/or OxyNEO® tablets, manufactured, marketed and/or sold or otherwise placed into the stream of commerce in Canada by one or more of the Defendants (the “Class” or “Class Members”), as well as all persons in Canada who by virtue of personal relationships to Class Members have statutory derivative claims for damages (the “Family Class” or “Family Class Members”).

Certification orders have been granted for the following regional classes:

Ontario Class: Class Members whose prescription occurred in Ontario and/or British Columbia;

Québec Class: Class Members whose prescription occurred in Québec;

Atlantic Canada Class: Class Members whose prescription occurred in Nova Scotia, Newfoundland and Labrador, New Brunswick and/or Prince Edward Island; and

Saskatchewan Class: Class Members whose prescription occurred in Saskatchewan, Alberta, Manitoba, the Yukon, the Northwest Territories and/or Nunavut.

You can review the certification Orders, as well as the Settlement and related documents at the settlement website: www.oxycontinclassactionsettlement.com or you can contact the Court-appointed Claims Administrator at the address listed later in this Notice.

WHAT IS THE PROPOSED SETTLEMENT?

The Settlement provides for the creation of a \$20 million (CDN) Settlement Payment which will be used to pay the claims of provincial health insurers, the costs of notice and administration, compensation for Approved Claimants, and Class Counsel Legal Fees. Payments to Approved Claimants will be made to Class Members who show that they suffered one or more of the injuries described in greater detail in the Compensation Protocol, which are all subject to various eligibility criteria and maximum payment values. Not all Class Members will be eligible for compensation.

The types of injuries that may qualify Class Members for compensation include fatal and non-fatal overdose, addiction and various life complications arising from dependency alleged to be associated with OxyContin® and/or OxyNEO® usage. Compensation will also be paid to eligible Family Class Members. For more information on the eligibility criteria, you can review the Compensation Protocol and the Claims Administration Protocol which are posted on the settlement website: www.oxycontinclassactionsettlement.com. Any undistributed balance of the Settlement Payment will be donated to an education fund related to opioid treatment and addiction, as approved by the supervising Courts on a future motion.

OPTING OUT

If you are a member of the Class or Family Class and do not wish to be bound by future orders made in the Proceedings, and/or by the Settlement, should it be approved, you must take active steps by “Opting Out”.

To Opt Out, you must fully complete and submit an Opt Out Form to the Claims Administrator by the Opt Out Deadline of **July 12, 2017**. Opt Out Forms are available at www.oxycontinclassactionsettlement.com or may be

requested by mail or telephone from the Claims Administrator. **If you Opt Out, you will NOT be able to make a claim for compensation under the Settlement.**

THE SETTLEMENT REQUIRES COURT APPROVAL

In order for the Settlement to become effective, it must be approved by the Courts. The Courts must be satisfied that the Settlement is fair, reasonable and in the best interest of the Classes. The dates for the Settlement Approval Hearings have been scheduled as follows:

Ontario Class: July 18, 2017 at 10:00 a.m. at the Ontario Superior Court of Justice, 361 University Avenue, Toronto, Ontario.

Québec Class: August 9, 2017 at 9:30 a.m. at the Superior Court of Québec, 300 Boulevard Jean Lesage, Québec, Québec.

Atlantic Canada Class: August 1, 2017 at 9:30 a.m. at The Law Courts Building, 1815 Upper Water Street, Halifax, Nova Scotia.

Saskatchewan Class: August 24, 2017 at 10:00 a.m. at the Court of Queen’s Bench, 2425 Victoria Avenue, Regina, Saskatchewan.

OBJECTING TO THE PROPOSED SETTLEMENT AND OPPORTUNITY TO APPEAR

If you wish to object to the Settlement, you must submit a written objection to the Claims Administrator by **no later than July 12, 2017** at the address listed in this Notice. The Claims Administrator will file copies of all objections with the appropriate Court. **Do NOT send an objection directly to the Courts.** You may also attend the Settlement Approval Hearing according to your geographic location and, if you submitted a written objection to the Claims Administrator, you may make oral submissions to the Court.

PARTICIPATING IN THE SETTLEMENT

If the Settlement is approved by the Courts, you will have a limited amount of time within which to submit a claim for compensation. You will be able to submit your claim online through a website portal. You will also have the option to submit a paper Claim Form. If the Settlement is approved, the paper Claim Form will be posted on the settlement website at www.oxycontinclassactionsettlement.com and will be available on request from the Claims Administrator.

WHO REPRESENTS ME?

Class Counsel in the Proceedings are:

Rochon Genova LLP	Siskinds LLP	Wagners	Merchant Law Group LLP
900-121 Richmond St.W. Toronto, ON M5H 2K1	680 Waterloo St. London, ON N6A 3V8	1869 Upper Water St. Halifax, NS B3J 1S9	100-2401 Saskatchewan Dr. Regina, SK S4P 4H8
Joel P. Rochon Tel: 416-363-1867	Michael G. Robb Tel: 877-672-2121	Raymond F. Wagner Tel: 902-425-7330	Tony Merchant Tel: 888-567-7777

LEGAL FEES

At or following the Settlement Approval Hearings, Class Counsel will request approval for payment of fees, disbursements and applicable taxes. Class Counsel have pursued this lawsuit on a contingency basis and will seek approval from the Courts for such payment in accordance with the terms of their retainer agreements.

FOR MORE INFORMATION:

If you have questions about the Settlement and/or would like to obtain more information and/or copies of the Settlement and related documents, please visit the settlement website at www.oxycontinclassactionsettlement.com or contact the Claims Administrator at:

RicePoint Administration Inc.
PO Box 4454, Toronto Station A,
25 The Esplanade
Toronto, ON M5W 4B1
Email: oxycontin@ricepoint.com
Toll Free: 1 (888) 663-7185

This Notice has been approved by the Ontario Superior Court of Justice, the Superior Court of Québec, the Supreme Court of Nova Scotia and the Court of Queen’s Bench for Saskatchewan.