

SCHEDULE “E”: NOTICE PLAN

1. Capitalized terms used in this Notice Plan have the meanings ascribed to them in the Settlement Agreement.
2. The short-form and long-form Notice of Certification and Settlement Approval Hearing, the Notice of Settlement Approval, the Opt-Out Form, and the Claim Form will be made available in both English-language and French-language versions. Where these documents are to be posted on a website or published through digital media, both the English-language and French-language versions will be posted or published. The French-language versions will also be forwarded to any Settlement Class Member who requests them.

Notice of Certification and Settlement Approval Hearing

3. The Notice of Certification and Settlement Approval Hearing shall first be published by April 4, 2024, and shall thereafter be distributed as follows:
 - (a) the Claims Administrator and Class Counsel shall post the short-form and long-form Notice of Certification and Settlement Approval Hearing, the Opt-Out Form, and the Settlement Agreement on their websites;
 - (b) the Claims Administrator shall send the short-form Notice of Certification and Settlement Approval Hearing by email directly to all Settlement Class Members who have an email address listed on the Settlement Class List provided to the Claims Administrator by the Defendant;
 - (c) the Claims Administrator shall send the short-form Notice of Certification and Settlement Approval Hearing by regular mail directly to all Settlement Class Members who have a mailing address, but not an email address, listed on the Settlement Class List provided by the Defendant;
 - (d) the Claims Administrator shall publish the short-form Notice of Certification and Settlement Approval Hearing through the Google Display Network and on Facebook, blogTO, and MobileSyrup for a period of 60 days, optimizing the publications to increase the number of views;
 - (e) Class Counsel shall maintain a support line to provide assistance to Settlement Class Members or other Persons who make inquiries on their own behalf or on behalf of Settlement Class Members;
 - (f) Class Counsel shall send the short-form Notice of Certification and Settlement Approval Hearing by email directly to Settlement Class Members who have provided their email address to Class Counsel;
 - (g) the Claims Administrator and Class Counsel shall forward copies of short-form and long-form Notice of Certification and Settlement Approval Hearing, the Opt-Out Form, and the Settlement Agreement to any Settlement Class Member who requests them; and

- (h) Class Counsel will forward the short-form and long-form Notice of Certification and Settlement Approval Hearing to The Canadian Bar Association Class Action Database with a request that they be posted online.

Notice of Settlement Approval

- 4. The Notice of Settlement Approval shall first be published within forty-five (45) days of the Settlement Approval Order, and shall thereafter be disseminated as follows:
 - (a) the Claims Administrator and Class Counsel shall post the Notice of Settlement Approval, Settlement Approval Order, and the Claim Form on their websites;
 - (b) the Claims Administrator shall send the Notice of Settlement Approval and the Claim Form by email directly to all Settlement Class Members who have an email address listed on the Settlement Class List provided by the Defendant;
 - (c) Settlement Class Members may register their email address on the Claims Administrator's website, and the Claims Administrator will send the Notice of Settlement Approval and the Claim Form by email directly to the email addresses provided;
 - (d) the Claims Administrator shall publish the Notice of Settlement Approval through the Google Display Network and on Facebook, blogTO, and MobileSyrup for a period of 60 days, optimizing the publications to increase the number of views;
 - (e) Class Counsel shall send the Notice of Settlement Approval and the Claim Form by email directly to Settlement Class Members who have provided their email address to Class Counsel;
 - (f) the Claims Administrator and Class Counsel shall forward copies of the Notice of Settlement Approval and the Claim Form to any Settlement Class Member who requests them; and
 - (g) Class Counsel will forward the Notice of Settlement Approval to The Canadian Bar Association Class Action Database with a request that it be posted online.