

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

RONALD J. VALLIERE and SHAUNTELLE PAUL

Plaintiffs

- and -

**CONCORDIA INTERNATIONAL CORP., MARK THOMPSON
and ADRIAN DE SALDANHA**

Defendants

Proceeding under the *Class Proceedings Act, 1992*

PLAN OF NOTICE

1. The First Notice shall be disseminated as follows:
 - (a) Class Counsel shall publish the First Notice in English in at least ¼ page size in the business/legal section of The National Post and the Gazette;
 - (b) Class Counsel shall publish the First Notice in French online in La Presse;
 - (c) Class Counsel shall disseminate a press release advising of the settlement and the procedure to object to the settlement;
 - (d) Class Counsel shall post the First Notice in English and French on the website at www.strosbergco.com/concordia and www.faguyco.com/concordia; and
 - (e) Concordia shall post the First Notice in English and French in the investor relations section of www.concordia.com.
2. The Second Notice shall be disseminated as follows:
 - (a) Class Counsel shall publish the Second Notice in English in at least ¼ page size in the business/legal section of The National Post and the Gazette;
 - (b) Class Counsel shall publish the Second Notice in French online in La Presse;

- (c) Class Counsel shall disseminate a press release advising of the certification, settlement approval, how to file a claim form and how to opt-out of the action;
- (d) Class Counsel shall post the Second Notice in English and French on the website at www.strosbergco.com/concordia and www.faguyco.com/concordia; and
- (e) Concordia shall post the Second Notice in English and French in the investor relations section of www.concordia.com.