

**NOTICE OF HEARING FOR CERTIFICATION AND
SETTLEMENT APPROVAL**

Redublo et al. v. 8262900 CANADA INC. o/a CAREPARTNERS

(cyber-security breach class action)

You are receiving this notice because you were:

- a patient or former patient of CarePartners between January 1, 2010 and June 11, 2018, or
- a non-unionized employee or contractor of CarePartners during the same time.

A proposed class action was commenced by Arthur Redublo and Donna Moher for damages arising from a cyber-security breach of CarePartners' computer systems, which was discovered on or about June 18, 2018. Because you were a patient, non-unionized employee or contractor of CarePartners between January 1, 2010 and June 11, 2018, you may have been affected by the cyber-breach, and you are a potential class member.

You are not being sued. You do not have to pay any legal fees out of your own pocket.

This notice is to tell you that **a settlement of the proposed class action has been reached**. By entering into this settlement, CarePartners has not admitted liability - the settlement is a negotiated compromise of the parties' positions.

You can review the Settlement Agreement at: www.carepartnersclassaction.ca or <https://www.hshlawyers.com/expertise/mass-tort-class-action-litigation/carepartners-class-action-lawsuit/> .

Under the terms of the Settlement, CarePartners will pay a settlement fund totaling up to \$3,440,000.00, which includes all damages to be paid to the Class, legal fees and settlement administration expenses, interest and taxes. In exchange, CarePartners will receive a full and final release from the Class for the claims made against it relating to the cyber-breach.

Before the Settlement is final, the action must be certified as a class proceeding, and the Settlement has to be approved by the Ontario Superior Court of Justice. The court hearing to decide if this action should be allowed to proceed as class action, and to decide if the Settlement is fair, reasonable and in the best interests of the Class, and if it should therefore be approved, **is scheduled for February 9, 2022 at 10:00 am for one half day, and will be heard by videoconference, which can be accessed at the following link:** <https://ca01web.zoom.us/j/61647172548?pwd=aWMYm1ZE0EcwUDBlQ0Y1RWxOdHZpUT09> .

Individuals who wish to attend the hearing, should plan to log in 30 – 45 minutes before the start time for the hearing to allow time to be admitted before the hearing begins.

At the same time as the hearing for certification and approval of the Settlement Agreement, the Plaintiffs’ lawyers will ask the Court to approve their legal fees and expenses to be paid from the Settlement Fund. The legal fees requested will be 20% of the Settlement Fund, plus taxes and disbursements, consistent with the contingency fee retainer agreement signed by the Plaintiffs.

Your legal rights will be impacted if the Settlement is approved. You have the right to either attend the hearing or to make written submissions to the Court about the Settlement Agreement, including if you wish to object to the terms of the settlement, or about the legal fees to be paid to the Plaintiffs’ Lawyers.

More details about the Settlement, how it will affect you, and how to make submissions to the Court are available on the websites referenced above, or you may contact the Plaintiffs’ Lawyers at the addresses referenced below to get more information.

Questions about this Notice, the Class Action, or the Settlement can be made to:

Waddell Phillips Professional Corporation Barristers 36 Toronto Street, Suite 1120 Toronto, ON M5C 2C5 reception@wadellphillips.ca Tel: 1-888-684-5545 (toll-free)	or:	HOWIE, SACKS & HENRY LLP 20 Queen Street West, Suite 3500 Toronto, ON M5H 3R3 Paul Miller PMiller@hshlawyers.com Tel: 416.361.5990	or:
SCHNEIDER LAW FIRM 1120 Finch Avenue West, Suite 700 Toronto, ON M3J 3H7 Cary Schneider CSchneider@schneiderlawfirm.ca Tel: 416.849.6633			

The Ontario Superior Court of Justice has authorized distribution of this Notice; however, questions about this Notice should NOT be directed to the Court.