

SCHEDULE “E”

Notice Distribution Plan **Notice of Settlement Approval**

1. As soon as practicable following the approval of the Settlement and Settlement Notice, and the signed Order appointing the Claims and Notice Administrator (“the Administrator”), Settlement Class Counsel will provide the Administrator with the Class Member List.
2. As soon as practicable, upon receiving the Class Member List, the Administrator will make any updates necessary to the Class Member contact information (addresses and email addresses), based on the previous notice distribution.
3. Once the Class Member List is updated, the Administration will:
 - a) Send a paper mail Notice (short form), in English only, to the last-known address of all persons on the Class Member Notice List;
 - b) Email the Notice to all persons on the Class Member Notice List;
4. The Claims Administrator and Settlement Class Counsel will provide a paper version of the Claim Form to any Class Member who requests one, and will post the electronic version of the Claim Form on their webpages dedicated to this Action.
5. Settlement Class Counsel will issue a national press release in English and French advising of the proposed settlement, briefly outlining the key features of the settlement, including the deadline to file a claim, and will include a link to the Settlement Notice on Class Counsel’s web page dedicated to this proceeding.
6. Settlement Class Counsel will also provide a link to the Notice on the private social media group sites relating to this matter that are administered by the Representative Plaintiffs, along with a brief update advising of key terms of the settlement, and explaining the procedure for making a claim, including how to contact the Claims Administrator and the claims deadline.
7. Settlement Class Counsel will post the Settlement Notice on their social media channels and include a link to their webpage containing the Settlement Notices and Claim Form.
8. The Representative Plaintiffs may post a link to the short-form and long-form Settlement Notices on Settlement Class Counsel’s webpage on their personal social media accounts.