

ONTARIO
SUPERIOR COURT OF JUSTICE

BETWEEN:

**IRVING PAPER LIMITED and IRVING PULP & PAPER,
LIMITED**

Plaintiffs

and

FMC CORPORATION and FMC of CANADA, LTD.

Defendants

Proceeding under the *Class Proceedings Act, 1992*

PLAN OF DISSEMINATION

1. The plaintiffs propose that the Notices of Settlement Approval Hearing be disseminated in accordance with the following Plan of Dissemination:
 - (a) The Short-form Notice of Settlement Approval Hearing will be sent by email, direct mail, or fax by Class Counsel or under Class Counsel's supervision to:
 - (i) any person who has inquired about the Class Action;
 - (ii) any person who has registered to receive updates on Class Counsels' respective websites;
 - (iii) any person who has previously been recognized and approved by the Claims Administrator in the first distribution of settlement proceeds; and
 - (iv) any person who is identifiable, from the documents produced by the FMC defendants, of having purchased hydrogen peroxide from the FMC defendants during the class period.

Where the person is located in Quebec or where the person has otherwise requested, the Notice of Settlement Approval Hearing will be sent in English and French;

(b) The Distribution Protocol, Short-form and Long-form Notice of Settlement Approval Hearing will be posted by Class Counsel, in English and French on the following websites:

- (i) www.classaction.ca;
- (ii) www.cfmlawyers.ca;
- (iii) www.strosbergco.com; and
- (iv) www.hydrogenperoxideclassaction.ca;

(c) An advertisement will be published once in the following newspapers, in either English or French, as is appropriate for each newspaper, subject to each having reasonable publication deadlines and costs:

- (i) The Globe and Mail, national edition;
- (ii) The Vancouver Sun; and
- (iii) Le Journal de Montreal;

(d) The Short-form and Long-form Notice of Settlement Approval Hearing will be sent to the following industry associations, in English and/or French, as is appropriate for each association, requesting voluntary distribution to their membership:

- (i) Forest Products Association of Canada;
- (ii) The Mining Association of Canada;
- (iii) Ontario Mining Association;
- (iv) Canadian Aquaculture Industry Alliance;
- (v) Luggage, Leathergoods, Handbags & Accessories Association of Canada; and

(vi) Pulp and Paper Products Council;

2. The costs of distributing the Notices of Settlement Approval Hearing shall be paid from the Settlement Amount.