

SCHEDULE "A"
NOTICE OF APPROVAL OF CLASS ACTION SETTLEMENT

Pre-1993 Memorial University Pensioners

The settlement of the class action brought by George Lee as Representative Plaintiff on behalf of the Pre-1993 Memorial University Pensioners against Memorial University of Newfoundland as Defendant has been approved by the Supreme Court of Newfoundland and Labrador.

By the terms of the approved settlement: the University will continue the post-retirement group insurance health coverage for the Class for life on a 70% (University) - 30% (Class) cost share basis; the University will continue the primary (other than Health) post-retirement group insurance coverage for the Class for life on the current 50% (University) - 50% (Class) cost share basis; the University will and pay a lump sum of \$500,000.00; the Class, as represented by the Plaintiff, George Lee, will release the University from the class action claim; and, the settlement is in full and final settlement of the class action claim against the University. Legal fees and litigation expenses will be deducted from the lump sum payment and the balance will be distributed *pro rata* among individual Class members who did not opt out of the class action in the form and method approved by the Court.

Class members will be required to complete and submit a Claim Form to Class Counsel at the address below in order to claim their share of the lump sum payment. A Claim Form and this Notice of Settlement will be mailed to Class members using their last mailing address known to the University, and post online on the Curtis Dawe website (www.curtisdawe.com). If an individual Class member fails to complete and submit a Claim Form to Class Counsel within 2 months of publication and mail out of this Notice of Settlement, then the individual Class member's share of the lump sum payment will be deemed to be unclaimed funds that will then be redistributed *pro rata* to the other Class members who did complete and submit a Claim Form.

For further information or inquiry about the approved settlement and how to claim your portion of the lump sum payment, Class members may contact Class Counsel using the following contact information:

Curtis, Dawe Lawyers
PO Box 337
11th Floor Fortis Building
139 Water Street
St. John's, NL A1C 5J9

Phone No. 709-722-5181

Fax No. 709-722-7541

www.curtisdawe.com

Attention:

Gregory M. Smith: Email (gsmith@curtisdawe.com)

Daniel M. Glover: Email (dglover@curtisdawe.com)

Daniel F. Furey: Email (dfurey@curtisdawe.com)