

**TO MEMBERS OF THE CLASS ACTION CONCERNING
THE COPYRIGHTS OF THE GAZETTE'S FREELANCERS**

TAKE NOTICE THAT

**THE CLASS ACTION HAS BEEN SETTLED WITH THE DEFENDANT
HOLLINGER CANADIAN PUBLISHING HOLDINGS INC.
AND
THAT A MOTION WILL BE PRESENTED TO DISCONTINUE
THE CLASS ACTION AGAINST CEDROM-SNI**

The Group

1. The bringing of a class action has been authorized on the 31st day of March 2009 by judgment of the Honourable Mrs. Justice Eva Petras of the Superior Court of Quebec, for the benefit of the natural persons forming part of the group hereinafter described, namely:

« All persons residing in Quebec or having resided in Quebec or residing in Canada, who have been freelance writers or creators for the Southam Inc. daily newspaper The Gazette in Montreal, and whose articles or works have been reproduced without authorization or consent in the electronic database named INFOMART or in other electronic databases or in any form whatsoever and who have not obtained compensation for these illegal reproductions, as well as all assignees or transferees of copyright rights of these persons, or if these persons are deceased, their heirs or legal representatives. »

2. For the purposes of the class action, the status of representative has been ascribed to **THE ELECTRONIC-RIGHTS DEFENCE COMMITTEE** ("ERDC") and the status of designated member has been ascribed to **DAVID HOMEL**.

**SETTLEMENTS WITH THE DEFENDANT HOLLINGER CANADIAN PUBLISHING
HOLDINGS INC. ("HCPH")**

3. In November, 2011, a Settlement Agreement (the «Settlement») was entered into between ERDC and HCPH whereby the parties have agreed on a Settlement out of court without financial consideration, each party paying its own costs;

MOTION TO END THE CLASS ACTION AGAINST CEDROM-SNI

4. Considering the settlement of the Class Action against the majority of the defendants, ERDC will seek the authorization of the Court to discontinue the Class Action against the defendant CEDROM-SNI.
5. In the same proceedings, ERDC will ask the Court to declare that the prescription delay for Members of the Group to claim damages against CEDROM-SNI has been interrupted or at least suspended and that Members of the Group can present a claim on an individual basis at the Small Claim Court or at another tribunal for adjudication.

DATE OF PRESENTATION TO THE COURT

6. The Settlement and the Motion will be presented before the Honourable Justice Petras of the Superior Court of Quebec for approbation and adjudication on **Tuesday April 3rd, 2012 at 2h15 pm** in room **15.07** at the Court house located at 1, Notre-Dame East in Montreal.
7. Every member of the group is invited to make representations before the Court at this hearing.
8. If you have any question, you can contact the Attorneys for the Group of the Representative of the Group.

ATTORNEYS FOR THE GROUP

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REPRESENTATIVE OF THE GROUP

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THE PUBLICATION OF THIS NOTICE IS ORDERED BY THE COURT