

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N

JULIUS DI FILIPPO and DAVID CARON

Plaintiffs

and

THE BANK OF NOVA SCOTIA, SCOTIA CAPITAL (USA) INC., BARCLAYS PLC, BARCLAYS BANK PLC, BARCLAYS CAPITAL CANADA INC., BARCLAYS CAPITAL INC., BARCLAYS CAPITAL PLC, DEUTSCHE BANK AG, DEUTSCHE BANK SECURITIES LIMITED, DEUTSCHE BANK SECURITIES, INC., HSBC BANK PLC., HSBC HOLDINGS PLC, HSBC BANK CANADA, HSBC SECURITIES (CANADA) INC., HSBC USA INC., HSBC SECURITIES (USA) INC., LONDON GOLD MARKET FIXING LTD., SOCIÉTÉ GÉNÉRALE, SOCIÉTÉ GÉNÉRALE (CANADA), SOCIÉTÉ GÉNÉRALE SA, SG AMERICAS SECURITIES, LLC, UBS AG, UBS BANK (CANADA) and UBS SECURITIES LLC

Defendants

Proceeding under the *Class Proceedings Act, 1992*

PLAN OF DISSEMINATION

1. The plaintiffs propose that the Notice of Certification and Settlement Approval Hearing be disseminated in accordance with the following Plan of Dissemination:
 - (a) The Notice of Certification and Settlement Approval Hearing will be sent by email or direct mail by Class Counsel to any person who has inquired about the Class Action or who has registered to receive updates on Class Counsels' respective websites. Where the person is located in Quebec or where the person has otherwise requested, the Notice of Certification will be sent in English and French;

- (b) The Notice of Certification and Settlement Approval Hearing will be posted by Class Counsel, in English and French on their respective websites;
- (c) The Notice of Certification and Settlement Approval Hearing 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;
 - (iii) Journal de Montreal;
 - (iv) Regina Leader Post;
 - (v) Calgary Herald;
 - (vi) Winnipeg Free Press;
 - (vii) Halifax Chronicle Herald;
 - (viii) StarPhoenix (Saskatoon);
 - (ix) Le Soleil (Quebec City); and
 - (x) National Post.

2. The costs of distributing the Notice of Certification and Settlement Approval Hearing shall be paid from the Settlement Amount.