SCHEDULE 'A"

NOTICE OF CERTIFICATION OF THE WESTERN REGIONAL INTEGRATED HEALTH AUTHORITY PRIVACY **BREACH CLASS ACTION**

To: Recipients of correspondence from the Western Regional Integrated Health Authority advising that their personal health information may have been improperly accessed by an employee.

Notice Of Certification:

Class Members be advised of a certification of a class action lawsuit regarding the Western Regional Integrated Health Authority Privacy Breach Class Action.

Who is Included?

All living persons who were sent letters from the Western Regional Integrated Health Authority advising them that their personal information had been inappropriately accessed by an employee.

What is the Nature of the Claim?

Compensation and/or damages for breach of privacy under the Privacy Act and the common law, breach of contract and negligence. judgment on the common issues for the Class will bind all Class Members who do not opt out.

What Option do Class Members have?

Class Members may opt out of the class action by sending written notice signed by the Class Member, to counsel for the Plaintiffs or to Western Health c/o Donna Hicks, Information and Quality, Western Health, P.O. Box 2005 Corner Brook, NL, A2H 6J7 on or before the deadline of [DD/MM/YY 90 days after publish].

Class Counsel Compensation:

The Representative Plaintiffs have entered into a Contingency Fee Agreement. Should any settlement or judgment be awarded in favour of the Class, the Plaintiffs' counsel will receive a percentage of the net award, subject to Court approval.

Where can Class Members get more information?

You may participate in the common issues trial by contacting Class Counsel.

For more information, or to access Opt-Out forms. https://buckinghamlaw.ca/ http://www.brotherslaw.ca/ or contact Class Counsel at the addresses below:

Bob Buckingham Bob Buckingham Law 81 Bond Street St. John' AICIT2

Office: 709-739-6688 Fax: 709-739-6686

Andrew May Brothers & Associates 89 West Valley Road Corner Brook, NL A2H 2X4 Office: 709-639-6400 Fax: 709-639-3410

Representatives of the Class

Barbara Hynes c/o Bob Buckingham **Bob Buckingham Law** 81 Bond Street St. John' A1C1T2

Valerie Dyke c/o Andrew May Brothers & Associates 89 West Valley Road Corner Brook, NL A2H 2X4

This summary notice has been approved by the Supreme Court of Newfoundland and Labrador. Do not contact the Court about this Certification.