

**NOTICE OF CERTIFICATION OF THE DEER LAKE CLASS ACTION
DEWEY V. CORNER BROOK PULP & PAPER LTD AND THE TOWN OF DEER LAKE**

WHAT IS THE CLASS ACTION ABOUT?

Class Members are advised of certification of a class action regarding flooding and water seepage issues in defined areas of the Town of Deer Lake caused by the Water Control System, which includes Grand Lake Reservoir and a series of dams, dykes and the Humber Canal. The claim is brought against Corner Brook Pulp and Paper Limited and The Town of Deer Lake.

The class action seeks compensation for damage to, and substantial interference with the enjoyment of, the properties in the Town of Deer Lake located within the Class Boundary. The damage is alleged to have been caused by the Water Control System, and the Defendants' actions or omissions. The claim alleges nuisance and negligence.

WHO IS INCLUDED?

All persons (other than the Defendants and their parent companies, affiliates or subsidiaries) who were either Owner or Non-Owner Class Members on May 22, 2015, defined as:

- a) Owner Class Members: all persons who own or owned real property on that date within the Class Boundary depicted in Schedule "A" to the Order certifying this action as a class proceeding;
- b) Non-Owner Class Members: all persons who reside or have resided in, but did not own, real property on that date within the Class Boundary depicted in Schedule "A" to the Order certifying this action as a class proceeding.

REPRESENTATIVE PLAINTIFF:

Richard Dewey (c/o Wagners).

CLASS COUNSEL COMPENSATION:

The Representative Plaintiff has entered into a Contingency Fee Agreement with Wagners. Wagners will apply to the Court at the conclusion of the case to have its legal fees approved. Wagners will pay for all case expenses incurred in advancing the case and if the case is successful, Wagners will apply to the court to be reimbursed for these case expenses. If the case is not successfully settled or tried, Wagners will not be paid or be reimbursed for any expenses.

WILL IT COST ME TO PARTICIPATE?

You do not have to pay anything out of pocket to participate in the class action, and you will not be liable for any legal costs of the Defendants should the trial be unsuccessful. Class Members are encouraged to contact Wagners for further explanation of costs.

WHAT OPTIONS DO CLASS MEMBERS HAVE?

If you are a Class Member and, as of April 11, 2025, resided in Newfoundland and Labrador, you do not need to do anything at this point to benefit from any ruling on the common issues. A judgment on the common issues, favourable or not, will bind all resident Class Members who do not opt-out.

If the common issues are resolved in favour of the Class, Class Members will need to advance an individual claim, and any remaining individual issues will need to be addressed in a manner to be determined by the Court.

If you are a **resident of Newfoundland and Labrador** and **wish to be excluded from** the Class you must **opt-out** of the class action by sending an **Opt-Out Form** to Wagners on or before August 16, 2025. By opting out you will exclude yourself from the benefit of any settlement or trial.

If you are a Class Member and as of April 11, 2025 **reside outside of Newfoundland and Labrador**, and **wish to participate in** the class action, you must **opt in** to the class action by delivering a completed **Opt-In Form** to Wagners on or before August 16, 2025.

To access an Opt-Out or Opt-In Form, or to obtain further information, visit <http://www.wagners.co> or contact Wagners at:

WAGNERS

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