

Schedule "B"

Gottfriedson et al. v. His Majesty the King in Right of Canada

(Court File No. T-1542-12)

Plan of Dissemination – Notice of Settlement Approval

The notice of settlement approval (“**Notice**”) will be sent directly to all Band Class Members. Class Counsel will take further steps to confirm that Class Members have received the Notice.

A comprehensive list of Band Class Members is attached as Schedule “A” to the Order of Justice McDonald dated September 6, 2022, as amended January 23, 2023. Because this is an opt-in class action, all 325 Class Members are known to Class Counsel. Further, Class Counsel have had direct contact with each Class Member, including in February 2022, as part of the re-opened opt-in process, and again in January 2023, in order to provide notice of the proposed settlement and settlement approval hearing.

Class Counsel have maintained a comprehensive spreadsheet of contact information for each Class Member, including email addresses, mailing addresses, fax numbers (where available) and phone numbers.

DIRECT CONTACT

The Court-approved Notice will be sent directly to the administrative and/or political office of each Class Member by email, mail and, where available, fax by March 10, 2023. The Notice requests that Class Members confirm receipt of the Notice with Class Counsel to ensure that Notice is effective.

Class Counsel will contact the administrative and/or political office of each Class Member that does not confirm receipt of the Notice, directly by phone, to ensure that all Class Members have, in fact, received the Notice.

WEBSITE

The information in the Notice will be posted at www.bandrepairs.ca by March 3, 2023.

LANGUAGES

The Notice will be sent to the Class Members in English and French. Key information from the Notices will also be made available in six of the most commonly used Indigenous languages – James Bay / Eastern Cree, Plains Cree, Ojibwe, Dene, Inuktitut, and Mi’kmaq – as soon as practicable on www.bandrepairs.ca.

CLASS COUNSEL CONTACT

Class Counsel have established a dedicated toll-free number and email address in order to receive inquiries from Class Members and from the general public. Class Counsel will use the toll-free number and email address to communicate the information contained in the Notice.