**FORD FUEL CONSUMPTION CLASS ACTION**

**NOTICE OF CERTIFICATION**

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| **To all persons:** | Who purchased or leased a new 2013 or 2014 model year Ford vehicle in Canada (“**Class Members**”). |
| **Class Action Lawsuit** | In January 2016, a class proceeding was filed against Ford Motor Company, Ford Motor Company of Canada, Limited, and Yonge-Steeles Ford Lincoln Sales Limited (collectively “**Ford**”) alleging that Ford had made false, misleading, and deceptive representations to the public which understated the fuel consumption of new 2013 and 2014 model year Ford vehicles in contravention of both the *Competition Act,* R.S.C. 1985, c. C-34 and provincial consumer protection legislation. This class action seeks damages for individuals and/or corporations who purchased or leased a new 2013 or 2014 model year Ford vehicle in Canada. Robins Appleby LLP and McKenzie Lake Lawyers LLP are working cooperatively as Class Counsel. |
| **Certification** | On December 20, 2018, the action was certified by the Honourable Justice Morgan of the Ontario Superior Court of Justice on behalf of all individuals and/or corporations who purchased or leased a new 2013 or 2014 model year Ford vehicle in Canada.  The Court may determine a number of disputed issues common to the Class including:   * Whether Ford breached the *Competition Act*; * Whether Ford breached the provincial consumer protection legislation; and * Whether Class Members are entitled to damages and punitive damages under the *Competition Act* and/or the provincial consumer protection legislation.   **This notice does not mean that the Court has taken a position as to the likelihood of recovery on the part of any class member, or as to the merits of the claims or defences asserted by either side. The claims must be proven in Court. Ford denies these claims.** |
| **Participation in Class Action** | Class Members who want to participate in the class action are automatically included and need not do anything at this time. *The Class Proceedings Act* provides that no Class Member, other than the representative class member, will incur liability for legal costs if the action is dismissed. Each Class Member who does not opt out of the class action will be bound by the terms of any judgment or settlement and will not be allowed to pursue or continue an independent action with respect to these issues. If the class action is successful, Class Members may be entitled to share in the amount of any award or settlement recovered. |
| **Opting Out** | A Class Member who opts out will not be entitled to participate in the class action. If you wish to pursue or continue to pursue an individual action against Ford with respect to this issue, then you must opt out of the class action. If you would like to opt out of the class action, you must complete and return the opt-out form by **March 11, 2022**.  A copy of the opt-out form can be obtained at **www.robinsappleby.com** or **www.mckenzielake.com** or by contacting Class Counsel using the telephone number or e-mail addresses listed below.  No person may opt out a minor (person under 18 years of age) or a mentally incapable Class Member without permission of the Court after notice to The Children’s Lawyer and/or the Public Guardian and Trustee, as appropriate.  A Class Member who opts out will not be entitled to participate in the class action. His or her right to pursue a claim in a separate proceeding will not be affected. |

**Questions?**  The court offices will be unable to answer any questions about the matters in this Notice. If you have any questions regarding the certification order or about the class action in general, information is available on Class Counsel's websites: **www.robinsappleby.com OR www.mckenzielake.com** or by contacting Class Counsel directly, as follows:

**Robins Appleby LLP Toll Free Tel:** 1-877-221-9131

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**This Notice was approved by order of the Ontario Superior Court of Justice.**