

PARAMED CLASS ACTION: NOTICE OF SETTLEMENT APPROVAL HEARING

Please read this Notice carefully – your legal rights may be affected.

A proposed Settlement has been reached in a certified class action lawsuit against ParaMed Inc. (“ParaMed”): *Kellesis v ParaMed Inc.*, Ontario Superior Court of Justice Court File No. 1862/18. The lawsuit alleges that ParaMed failed to follow public health standards in the sterilization of medical instruments used at ParaMed’s wound-care clinics, exposing the Plaintiff and Class Members to the risk of contracting serious communicable diseases, including hepatitis B, hepatitis C, and HIV. ParaMed denies any liability whatsoever, and the Court did not decide who was right. The Parties have instead decided to settle the lawsuit.

Who are Settlement Class Members in the Proposed Settlement?

All persons who received wound care involving the use of medical instruments at ParaMed’s clinics located at 124 Barker Street, 1340 Huron Street, and 148 Fullarton Street, Suite 200 in London, Ontario between January 1, 2008 and July 27, 2018 and who were contacted by ParaMed and advised that they may have been exposed to infection and should be tested for hepatitis B, hepatitis C, and HIV, and who tested positive for hepatitis B, hepatitis C, or HIV, or where such person is deceased, the personal representative of the estate of the deceased person

What benefits are available to eligible Settlement Class Members under the Proposed Settlement?

ParaMed has agreed to provide a settlement fund of **\$195,000.00** to pay successful Settlement Class Member claims as well as certain fees and expenses, including Class Counsel Fees in an amount to be approved by the Court.

Depending on the infection(s) suffered, eligible Settlement Class Members may make one or more of three categories of Claims: a Hepatitis B Claim (\$15,000), a Hepatitis C Claim (\$10,000), or an HIV Claim (\$25,000). The quantum of the payments to Claimants with Approved Claims will be reduced *pro rata* if the Settlement Fund is insufficient to pay all of the Approved Claims. Contact McKenzie Lake Lawyers LLP (“Class Counsel”) for more information about eligibility and supporting evidence for making a Claim.

APPROVAL HEARING: The proposed Settlement must be approved by the Court before it becomes effective. The Court will decide whether or not to approve the Settlement on Friday, September 29, 2023 at 2:30 pm EST virtually over Zoom at the London Courthouse, 80 Dundas Street, London, ON N6A 6A3. Check Class Counsel’s website (below) regularly after that date to see if the Settlement has been approved. You can also register with Class Counsel to be notified by email if the Settlement is approved.

YOUR LEGAL RIGHTS AND OPTIONS:

- If the Court approves the Settlement, you can **participate** by submitting a Claim for compensation. If you wish to participate, you are not required to do anything until after the Settlement is approved.
- You can **object** to the proposed Settlement and attend the Approval Hearing to present that objection. If you wish to object, you must submit a signed and completed Objection Form to the Claims Administrator on or before **Tuesday, September 5, 2023.** A copy of the Objection Form can be obtained from Class Counsel’s website below or by reaching out to Class Counsel at the telephone number or email address below.

To obtain more information, visit Class Counsel online at <https://www.mckenzielake.com/paramed-class-action/>, email christina.noble@mckenzielake.com or call 1-844-672-5666.

This Notice was approved by order of the Ontario Superior Court of Justice. This is not a solicitation from a lawyer.