

Schedule "A"

NOTICE OF CERTIFICATION OF CLASS PROCEEDING AGAINST FORD CANADA MOTOR COMPANY OF CANADA, LIMITED ("FORD CANADA") RE: OAKVILLE ASSEMBLY COMPLEX THIRD WORK SHIFT

Read this notice carefully as it may affect your legal rights.

PURPOSE OF THIS NOTICE

This notice is to all individuals (or the estates of any deceased individuals) who were offered employment by Ford Canada as general assemblers in connection with Ford Canada's plan to introduce a third shift at the Oakville Assembly Complex, training for which was to commence July 28, 2008, except for those individuals (or estates of any deceased individuals) who, at the time the offers were made, were bargaining unit employees on lay-off from Ford Canada's operations in Windsor, Ontario with recall rights (the "Class Members").

In 2008, Brenda Austin, Matthew Beltrano and Gabriel Levesque commenced a proposed class proceeding against Ford Canada in the Ontario Superior Court of Justice, given Court File No. 4767/08. The plaintiffs allege that Ford Canada offered employment to Class Members and then withdrew those offers, wrongfully terminating their employment, committing anticipatory breach of employment contracts and/or repudiating the employment contracts.

On January 21, 2010, Mr. Justice Sproat of the Ontario Superior Court of Justice certified this action as a class proceeding pursuant to a consent arrangement reached between the parties. This does not mean that the Court has made a decision as to the likelihood of recovery by the representative plaintiffs, other Class Members, or as to the merits of the claims or defences asserted by either side.

This notice is being published to provide notice to Class Members whose rights might be affected by the lawsuit.

COMMON ISSUES

The class proceeding will determine the following common issues:

- a) did Ford Canada anticipatorily breach contracts of employment with Class Members by failing to provide them with employment?
- b) alternatively, did Ford Canada breach employment contracts with Class Members?
- c) alternatively, did Ford Canada repudiate contracts of employment with Class Members?
- d) alternatively, did Ford Canada wrongfully dismiss Class Members?
- e) if there were employment contracts between Ford Canada and Class Members, were those contracts frustrated?
- f) were the offers of employment made by Ford Canada to Class Members subject to conditions, including the requirement that they become members of Local 707 of the CAW and subject to the provisions of the applicable collective agreement between Ford Canada and the CAW?
- g) if the answer to (e) or (f) is yes, what effect, if any, does this have on any determination of Ford Canada's liability to Class Members and/or any calculation of damages?
- h) was Ford Canada negligent in its conduct in withdrawing offers of employment made to Class Members?
- i) could Class Members be entitled to damages from Ford Canada?
- j) if the answer to (i) is yes, what types of damages, if any, could Class Members be entitled to?
- k) does the conduct of Ford Canada justify an award of punitive damages in the circumstances?
- l) if the answer to (k) is yes, what is the amount of punitive damages to be awarded?

PARTICIPATION AND EXCLUSION FROM THE CLASS

If you wish to remain a Class Member you do not have to do anything at this time. If you wish to obtain more information about your rights as a Class Member, you may contact any of the class counsel listed at the end of this notice. If you wish to opt-out of the class, you must follow the procedure set out in this notice.

If you wish to exclude yourself from the class proceeding ("opt-out") you must deliver a written notice (the "Opt-Out Form") to the opt-out administrator at the contact information set-out below. You can request a copy of the Opt-Out Form from the opt-out administrator or from class counsel. The Opt-Out Form must be received by the opt-out administrator on or before April 21, 2010.

Any Class Member who does not deliver an Opt-Out Form to the opt-out administrator on or before April 21, 2010 will be bound by the result in the class proceeding, whether favourable or not. You must deliver an Opt-Out Form if you wish to proceed with individual legal action.

Opt-out administrator contact information:

- (a) by mail to: Nicholas Mastroluisi, C.A.,
Pettinelli, Mastroluisi LLP
6th Floor, 1 James Street South
Hamilton, ON L8P 4R5
- (b) by fax to: 905-522-6574
- (c) by e-mail to: nickm@petmas.ca

FINANCIAL CONSEQUENCES

The class proceeding will deal with the common issues as set out in this notice. No Class Member will be liable for costs with respect to the determination of the common issues. However, once the Court has determined the common issues, it might be necessary for individual Class Members to participate in individual proceedings to determine issues which are not common to the Class in order to establish their claims. If this is necessary, each Class Member may have to bear the costs of such individual proceedings and, if unsuccessful, could be liable to pay a portion of Ford Canada's costs incurred with respect to such individual proceedings. Class Members may be entitled to receive financial compensation from Ford Canada if the class proceeding is successful, but this has not yet been determined.

The representative plaintiffs have entered into agreements with class counsel whereby fees related to the trial of the common issues will be payable only in the event of success in the class proceeding. Any fees charged by class counsel must be approved by the Court. The class counsel acting in this case are as follows:

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| CHRISTOPHER SWEENEY (LSUC #53864F) Barrister and Solicitor 2061 Gerrard St. East Toronto, Ontario M4E 2B4 c.sweeney@rogers.com Tel: 416-834-2251 Fax: 647-477-6891 | SHINEHOFT LAW 15 Bold Street Hamilton, Ontario L8P 1T3 JACK SHINEHOFT jshinehoft@shinehoftlaw.ca JEFFREY S. SHINEHOFT Jeffrey@shinehoftlaw.ca Tel: 905-529-3476 Fax: 905-529-3663 | BALL & ALEXANDER Barristers and Solicitors 82 Scollard Street Toronto, Ontario M5C 2W7 KEN ALEXANDER kenalexander@82scollard.com Tel: 416-921-7997 Fax: 416-921-3662 | SCARFONE HAWKINS LLP Barristers & Solicitors One James Street South 14 th Floor P.O. Box 926, Depot 1 Hamilton, Ontario L8N 3P9 DAVID THOMPSON bdespres@shlaw.ca Tel: 905-523-1374 ext. 278 Fax: 905-523-5878 |
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ADDITIONAL INFORMATION

Questions for class counsel should be directed by telephone or in writing to:

CHRISTOPHER SWEENEY (LSUC #53864F)
Barrister and Solicitor
2061 Gerrard St. East
Toronto, Ontario
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c.sweeney@rogers.com
Tel: 416-834-2251
Fax: 647-477-6891

Additional information regarding the action can be found at www.classactionlaw.ca; www.shinehoftlaw.ca and www.oakvilleclass.ca.

This notice has been approved by the Superior Court of Justice.
Questions about this notice should NOT be directed to the court.