BUSINESS INTERRUPTION INSURANCE CLASS ACTION

NOTICE OF CERTIFICATION AND SETTLEMENT APPROVAL HEARING

PLEASE READ THIS NOTICE CAREFULLY AS IT MAY AFFECT YOUR RIGHTS

Proposed settlements have been reached with Wynward Insurance Group ("**Wynward**") and Northbridge General Insurance Corporation and Federated Insurance Company of Canada ("**Northbridge/Federated**") in a class action against various insurance companies (the "**Action**"). Wynward, and Northbridge/Federated deny any liability whatsoever, and the Court did not decide who was right. The parties have instead decided to settle the lawsuit.

- The Wynward Settlement provides for a Settlement Amount of $500,000.
- The Northbridge/Federated Settlement provides for a Settlement Amount of $200,000.

Capitalized terms used in this Notice are defined in the settlement agreements, which can be found at: https://kmlaw.ca/cases/business-interruption-insurance-class-action/.

WHAT IS THIS ACTION ABOUT?

The Plaintiffs in this lawsuit allege that the Defendants, including Wynward and Northbridge/Federated, breached their insurance policy contracts with insured individuals or businesses, and other duties, by denying claims for insurance coverage for alleged business interruptions losses relating to the Covid-19 pandemic, and they claim damages for these alleged breaches.

The Defendants deny the allegations and assert that they properly assessed and only denied claims in accordance with the terms of the applicable insurance policies. In 2023, a trial took place in connection with some of the coverage provisions in the Defendants' insurance policies. The court found that the Defendants did not owe coverage under those policy provisions. The lawsuit continues against the Defendants with respect to other policy provisions.

SETTLEMENT APPROVAL HEARING

The Honourable Justice Black of the Ontario Superior Court of Justice will hold a public hearing on January 25, 2027 at 330 University Avenue, Toronto, Ontario, M5G 1R7 to determine whether to approve the Settlements and legal fees requested by Class Counsel of $231,000 plus HST, representing 33% of the Settlement Amounts plus HST.

If the Settlements are approved, the Settlement Amounts, less costs of this lawsuit and a small honorarium to several plaintiffs (if approved) will be held in Class Counsel's trust account for the benefit of the Class. The Settlement Amounts shall be paid out in accordance with a further order of the Court.

YOUR RIGHTS MAY BE AFFECTED

If the Court approves the proposed settlements, they will be binding upon all Wynward and Northbridge/Federated Class Members.

Wynward Class Members are all natural and legal persons in Canada, except for those in the province of Quebec, that contracted with Wynward for business interruption policies and whose policy was in force for some or all of the period from March 1, 2020 through August 31, 2021.

Northbridge/Federated Class Members are all natural and legal persons in Canada, except for those in Quebec, that:

(a) contracted with Northbridge and/or Federated for business interruption policies;

(b) on or before August 31, 2021, made a claim under their business interruption policy for losses due to: (i) the actual or suspected infection of staff, agents, customers or other persons with the SARS CoV-2 virus or its variants at the insured premises or within such proximity as may be specified in the insured's business interruption policy; (ii) the actual or suspected presence of the SARS CoV-2 virus or its variants on the insured premises; or (iii) the order of a civil authority regarding the SARS CoV-2 virus or its variants; and

(c) were denied insurance coverage for those losses by Northbridge and/or Federated.

Your options depend on whether you are a Wynward or Northbridge/Federated Class Member:

Options for Wynward Class Members	**Options for Northbridge/Federated Class Members**
1. Do nothing: you may be eligible for a share of the settlement proceeds if you made a claim for coverage to Wynward between March 1, 2020 and August 31, 2021. 2. Opt out of the Class Action and settlement: you will not receive any share of the settlement proceeds but you keep any rights to sue Wynward on your own about the same legal claims in this lawsuit. Opt-out instructions are provided in the long form notice which you can obtain by contacting class counsel. If you do not want to participate in the settlement and receive your share of the settlement, you must opt out by January 15, 2027; or 3. Object to the settlement and ask the Court not to approve it. If the Court does not approve the settlement, there will be no settlement proceeds at this time. The deadline for objecting is January 15, 2027 You can access the objection form by contacting class counsel.	1. Do nothing: you may be eligible for a share of the settlement proceeds if you made a claim for coverage to Northbridge/Federated between March 1, 2020 and August 31, 2021. 2. Object to the settlement and ask the Court not to approve it. If the Court does not approve the settlement, there will be no settlement proceeds at this time. The deadline for objecting is January 15, 2027. You can access the objection form by contacting class counsel.

FOR MORE INFORMATION

You can obtain independent legal advice at your own expense. If you would like more information or if you have a question, please contact class counsel at:

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1-866-777-6335

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https://kmlaw.ca/cases/business-interruption-insurance-class-action/

This notice is only a summary. More details can be found on the website of Class Counsel, hyperlinked above.

QUESTIONS? CALL 1-866-777-6335 or VISIT WWW.KMLAW.CA/CASES/BUSINESS-INTERRUPTION-INSURANCE-CLASS-ACTION/