

OFFICIAL COURT NOTICE

If, prior to March 31st, 2017, you purchased a clothing item bearing a Moose Knuckles[®] trademark and stated to be “Made in Canada”, your rights could be affected by this notice

- A proposed settlement has been reached in a class action lawsuit against Moose International Inc. (“Moose Knuckles”) regarding the “Made in Canada” statement appearing on clothing products bearing the Moose Knuckles[®] trademark purchased anywhere in the world prior to March 31st, 2017.
- Pursuant to the settlement: (i) Moose Knuckles will donate, over a period of 2 years, a total of \$250,000.00 in retail value of fall/winter outerwear to charitable organisations identified in the proposed settlement agreement and will pay various costs; and (ii) there will be no payment or distribution of any kind to any class member.
- Your legal rights might be affected by the settlement. Read this notice carefully.

YOUR LEGAL RIGHTS PURSUANT TO THIS SETTLEMENT:	
OPT OUT	The only option if you don't want to forfeit any of your personal claims that may exist and which are allegedly covered by the class action.
OBJECT	Advise the court if you do not like the settlement.
GO TO A HEARING	Hear the court consider whether to approve the settlement.
DO NOTHING	Give up rights you may have against Moose Knuckles

- These rights and options – **and the deadlines to exercise them** – are explained in this notice.

The court in charge of this case must decide whether to approve the settlement.

WHAT THIS NOTICE CONTAINS

BASIC INFORMATION

Explains the class action and why there is a settlement.

CLASS MEMBERSHIP

Lets you understand whether you are in the class.

DONATIONS

Explains what the charitable donations by Moose Knuckles consist of.

OPTING OUT OF THE CLASS

Explains how and why you might wish to exclude yourself from the class.

THE LAWYERS

Tells about the lawyers representing the class and how they will be paid.

OBJECTING TO THE SETTLEMENT

Explains how to tell the court why you think the settlement should not be approved.

COURT APPROVAL

Describes how the court will decide whether to approve the settlement.

DOING NOTHING

Lets you know the effect of taking no action.

GETTING MORE INFORMATION

Tells you how and where to get more information.

BASIC INFORMATION

1. **Why was this notice issued?**

You have a right to know about a settlement that has been reached in a class action lawsuit brought by two (2) individuals (the “Applicants”) against Moose International Inc. (the “Defendant” or “Moose Knuckles”). The settlement may affect you. This notice explains the lawsuit, the terms of the Settlement, and your legal rights.

2. **What is this lawsuit about?**

The Plaintiffs allege that the “Made in Canada” statement by the Defendant with respect to certain clothing products bearing the Moose Knuckles® trademark purchased anywhere in the world prior to March 31, 2017, is incorrect.

The Defendant asserts that its “Made in Canada” claim is true and was made in conformity with all federal and provincial laws and regulations (Canada), and that it is not liable whatsoever to any class members.

3. **Why is this lawsuit a class action?**

In a class action, individuals called “class representatives” sue on behalf of all individuals, who have a similar problem, called a class (or class members).

A class action allows the court to resolve the issues for everyone affected, except for those who choose to exclude themselves from the class (opt out).

4. **Why is there a settlement?**

The court will not decide in favor of the Applicants or the Defendant. There will be no trial. Instead, both sides agreed to a settlement. The Applicants and their lawyers think the settlement is best for the whole class, so they are asking the court to approve it.

CLASS MEMBERSHIP

To see if this concerns you, you must first determine whether you are in the class or are a class member.

5. **How do I know if I am in the class or am a class member?**

You are a class member if you:

- (a) Purchased a clothing product bearing the Moose Knuckles® trademark; AND
- (b) A “Made in Canada” statement appears on the clothing item you bought; AND
- (c) The purchase occurred prior to March 31st, 2017.

6. Are there exceptions to class membership?

You are NOT a class member if:

- (a) The clothing product you purchased did not bear the Moose Knuckles® trademark; OR
- (b) A "Made in Canada" statement does not appear on the clothing item you bought; OR
- (c) You purchased the clothing item after March 31st, 2017.

7. I'm still not sure if I'm included.

If you are not sure whether you are included, the official "class definition" is at www.lpclex.com .

SETTLEMENT BENEFITS

8. What does the Settlement provide?

The Defendant will:

- (a) Donate, over a period of 2 years, a total of \$250,000.00 in retail value of fall/winter outerwear to charitable organisations identified in the proposed settlement agreement;
- (b) Pay the extrajudicial fees, and some legal disbursements to the Applicants' legal counsel;
- (c) Reimburse the Applicants for their time and personal disbursements incurred in the conduct of the class action.

According to the settlement, and subject to the amount being paid to the Applicants to reimburse them for their time and disbursements, the Defendant will not make a payment or a distribution of any kind to any class member.

A copy of the proposed settlement agreement (in full) is available at the www.lpclex.com. It explains in detail the terms of the settlement.

OPTING OUT OF THE CLASS

If you don't want the claims you may have, and which are covered by the class action, extinguished by the effect of the release contained in the settlement, then you must take steps to exclude yourself. This is called "opting out".

It is important to know that opting out is not a guarantee you will get anything more. The settlement contains several declarations by the Defendant denying any liability whatsoever for the claims covered by the class action and that it has a valid defense against these claims that it intends to mount if the settlement is not approved, or if any class members opt out and decide to litigate personally.

9. **What happens if I opt out?**

If you opt out:

- (a) You will not be bound by anything decided by the class action;
- (b) You will keep any right you may have against the Defendant; and
- (c) You may not object to the settlement.

10. **What happens if I do NOT opt out?**

If you do NOT opt out:

- (a) You may object to the settlement;
- (b) You will be bound by all the court orders in the class action; and
- (c) You give up rights to sue the Defendant for the alleged claims covered by the class action.

If you do not opt out and if the settlement is approved, you will be releasing the Defendant for all the claims covered by the class action. You can visit www.lpclex.com if you have any questions about the legal terminology.

11. **How do I opt out of the Class?**

You must send a signed letter stating that you are class member and that you wish to opt out. You must mail your opt out request postmarked by **August 18th, 2017**, to:

Clerk of the Superior Court of Quebec
MONTRÉAL COURT HOUSE
1, Notre-Dame Street East
Suite 1.120
Montreal (Quebec) H2Y 185
Court docket: 500-06-000791-166

THE LAWYERS

12. **Do I have a lawyer in this case?**

Yes. L.P.C. Avocat Inc. represents the class members.

Their contact information is the following:

Mtre Joey Zukran
LPC AVOCAT INC.
5800, boul. Cavendish, Suite 411
Montreal (Quebec) H4W 2T5
Phone: 514 379-1572
Fax: 514 221-4441

QUESTIONS? VISIT WWW.LPCLEX.COM

Email: jzukran@lpclex.com

You will not be charged any money by these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

13. How will the lawyers be paid?

The Defendant has agreed to pay the lawyers of the class (i) a pre-determined amount representing the extrajudicial fees with respect of the conduct of the class action and all services rendered in this regard; and (ii) the cost of the court stamp(s) and bailiffs' service with respect to the class action proceedings, up to a pre-determined amount.

The Defendant will not pay any other fees or disbursements.

OBJECTING TO THE SETTLEMENT

You can tell the court that you don't agree with the settlement or to any part of it.

14. How do I tell the court if I disagree with the Settlement?

If you have an objection, you can write to the court by **September 5th, 2017**, at:

Clerk of the Superior Court of Quebec
MONTRÉAL COURT HOUSE
1, Notre-Dame Street East
Suite 1.120
Montreal (Quebec) H2Y 1R5
Court docket: 500-06--000791-166

A copy of the objection must also be sent to:

Mtre. Joey Zukran
LPC AVOCAT INC.
5800, boul. Cavendish
Suite 411
Montreal (Quebec) H4W 2T5
Phone: 514 379-1572
Fax: 514 221-4441
Email: jzukran@lpclex.com

Be sure to explain why you disagree with the settlement. Include your name, address, telephone number, and signature.

If you send an objection in writing, you are not obligated to visit the court. However, you may also be able to object by speaking at a court hearing. See "Court Approval" below.

15. Do I need a lawyer to object?

No. You can object without paying a lawyer. If you want to be represented by your own lawyer, you may hire one at your own expense.

QUESTIONS? VISIT WWW.LPCLEX.COM

COURT APPROVAL

The court will hold a hearing to consider whether to approve the settlement.

16. When and where will the court consider approving the settlement?

The court will hold a hearing to consider whether the settlement is acceptable. The hearing will be held at 09h00 a.m. on **September 5th, 2017** in courtroom 2.08 at 10 Notre-Dame Street East, Montréal, Québec, Canada. If there are objections, the court will consider them.

17. Do I have to come to the hearing?

No. The class lawyers will answer any questions the judge may have. But, you are welcome to come at your own expense. The hearing may be moved to a different date without additional notice, so it is a good idea to visit www.lpclex.com before you attend.

18. May I speak at a hearing?

You are welcome to attend the hearing and ask the court for permission to speak regarding the settlement. You may pay a lawyer to attend and speak for you, but it is not required.

19. How long will it take the court to make a decision regarding the settlement?

The court may decide to approve the settlement at the hearing, or it could take longer. If the court approves the settlement, it must allow time for any appeals. After that, the settlement becomes "final".

GETTING MORE INFORMATION

20. How do I get more information?

You can get a copy of the settlement agreement at www.lpclex.com . You may also email questions to the class counsel by writing to:

Mtre Joey Zukran
LPC AVOCAT INC.
5800, boul. Cavendish, Suite 411
Montreal (Quebec) H4W 2T5
Phone: 514 379-1572
Fax: 514 221-4441
Email: jzukran@lpclex.com

The official court reference for this lawsuit is:

No. 500-06-000791-166, Superior Court, District of Montréal, Province of Quebec