

# NOTICE OF THE CERTIFICATION AND SETTLEMENT OF THE CONCORDIA SECURITIES CLASS ACTIONS

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

This notice is directed to all persons and entities, excluding certain persons associated with the Defendants, who acquired securities of Concordia International Corp., known as Concordia Healthcare Corp. prior to June 27, 2016 (“Concordia”) that are or were listed for trading on the TSX or on alternative trading platforms in Canada, during the period from November 12, 2015 to and including August 11, 2016 (the “Class Period”), and held some or all of those securities at the close of trading on August 11, 2016 (collectively, the “Class” or “Class Members”).

On December 22, 2016, a proposed class action was commenced on behalf of Quebec residents against Concordia and others in the Quebec Superior Court: *Landry v. Concordia International Corp., et al*, Court File Number 500-06-000834-164 (the “Quebec Action”). On October 19, 2017, a corresponding action was filed in the Ontario Superior Court of Justice on behalf of non-Quebec residents: *Valliere and Paul v. Concordia International Corp., et al*, Court File Number CV-17-584809-00CP (the “Ontario Action” and collectively, the “Actions”). The Plaintiffs in the Actions allege that the Defendants made misrepresentations and omissions of material facts relating to Concordia’s business practices and public filings and statements.

The settlement of the Actions, without an admission of liability on the part of the Defendants, was approved by Regional Senior Justice Morawetz of the Ontario Superior Court of Justice and The Honourable Justice Pierre-C. Gagnon S.C.J. of the Quebec Superior Court. This notice provides a summary of the settlement.

## SUMMARY OF THE SETTLEMENT TERMS

Concordia will pay USD \$13.9 million, in full and final settlement of all claims against it in both Actions. Class counsel fees, including out-of-pocket expenses and taxes, were fixed by the Courts as a first charge on the Settlement Amount in the amount of USD \$5,294,365.61. The settlement for the Class, less the lawyers’ interim fees and disbursements, administrator’s expenses, and taxes, will be distributed to the Class on a *pro rata* share in accordance with the Court-approved Plan of Allocation. The Settlement Agreement and Plan of Allocation may be viewed at [www.strosbergco.com/concordia](http://www.strosbergco.com/concordia) and [www.faguyco.com/concordia](http://www.faguyco.com/concordia). Distributions to the Québec Class Members will be subject to the levy for the “Fonds d’aide aux actions collectives” as provided for by applicable regulation.

## A CLAIM FOR COMPENSATION MUST BE MADE BY MARCH 19, 2019

**Each Class Member must submit a completed Claim Form on or before March 19, 2019 in order to participate in the settlement.**

**The Claim Form can be accessed or downloaded at [www.concordiasettlement.com](http://www.concordiasettlement.com) or obtained by calling the Administrator at 1-877-400-1211. If you do not submit a completed Claim Form by March 19, 2019, you will not receive any part of the net Settlement Amount.**

The Courts appointed Trilogy Class Action Services as the Administrator of the settlement to, among other things: (i) receive and process Claim Forms; (ii) decide eligibility for compensation; and (iii) distribute the net Settlement Amount to eligible Class Members. The Claim Form should be submitted to the Administrator by using the secure Online Claims System at [www.concordiasettlement.com](http://www.concordiasettlement.com) or by e-mail to [claims@concordiasettlement.com](mailto:claims@concordiasettlement.com). You may submit a paper Claim Form only if you do not have internet access. The paper Claim Form may be sent by mail or courier to:

Trilogy Class Action Services, Administrator, Concordia Class Action Administration  
7B Pleasant Blvd., P.O. Box 1022  
Toronto, Ontario, M4T 1K2  
Or by fax to: 1-416-342-1761

## TO OPT OUT OF THE CLASS ACTION

All Class Members will be bound by the terms of the settlement, unless they opt-out of their class action. Submitting an Opt-Out Form will exclude you from the lawsuit and you will not receive any compensation from the settlement in the Actions. The Opt-Out Form is available at [www.strosbergco.com/concordia](http://www.strosbergco.com/concordia), [www.faguyco.com/concordia](http://www.faguyco.com/concordia) or by calling 1-877-400-1211.

### Quebec Action:

You are a member of the Quebec Action if you are a Quebec-based person or entity who, during the Class Period acquired securities of Concordia that are or were listed for trading on the TSX or on alternative trading platforms in Canada, and held some or all such securities at the close of August 11, 2016.

Members of the Quebec Action wishing to opt-out of the class action must send a completed Opt-Out Form to both:

Greffier de la Cour supérieure du Québec  
Palais de justice de Montréal  
Dossier no : 500-06-00834-164,  
1 rue Notre-Dame Est, room 1.120  
Montréal, Québec H2Y 1B6

Gregory D. Wrigglesworth  
Kirwin Partners LLP  
423 Pelissier Street  
Windsor, ON N9A 4L2  
fax: 519-790-0034  
email: [concordia@kirwinpartners.com](mailto:concordia@kirwinpartners.com)  
Attention: Concordia Class Action

The Opt-Out Form must be received on or before January 3, 2019 at 5:00 pm eastern time.

### Ontario Action:

You are a member of the Ontario Action if you are not a Quebec-based person or entity who, during the Class Period acquired securities of Concordia that are or were listed for trading on the TSX or on alternative trading platforms in Canada, and held some or all such securities at the close of trading in August 11, 2016.

Members of the Ontario Action wishing to opt-out of the class action must send a completed Opt-Out Form to:

Gregory D. Wrigglesworth  
Kirwin Partners LLP  
423 Pelissier Street  
Windsor, ON N9A 4L2  
Fax: 519-790-0034, Email: [concordia@kirwinpartners.com](mailto:concordia@kirwinpartners.com)  
Attention Concordia Class Action

The Opt-Out Form must be received on or before January 3, 2019 at 5:00 pm eastern time.

## **QUESTIONS**

Questions for the Class Members' lawyers may be directed to:

FOR CLASS MEMBERS OF THE ONTARIO CLASS ACTION:

Jay Strosberg  
**Strosberg Sasso Sutts LLP**  
1561 Ouellette Avenue  
Windsor, ON N8X 1K5  
Tel: 519.561.6296  
Fax: 866.316.5308

Hadi Davarinia  
**Morganti & Co., P.C.**  
One Yonge Street, Suite 1506  
Toronto, ON M5E 1E5  
Tel: 647.344.1900 x5  
Fax: 416.352.7638

FOR CLASS MEMBERS OF THE QUEBEC CLASS ACTION:

Shawn Faguy  
**Faguy & Co.**  
329 de la Commune West, Suite 200  
Montreal, PQ H2Y 2E1  
Tel: 514.285.8100 x225  
Fax: 514.285.8050

**This notice has been approved by the Courts. Questions about matters  
in this notice should NOT be directed to the Courts.**