

## **Exhibit R-3 – Notice Dissemination Plan**

*Natrop v. Sanofi-Aventis Canada Inc, et al; QBG 2757 of 2015 (Saskatchewan)*  
*Michaud c. Sanofi-Aventis Canada et al., 500-06-000772-158 (Quebec)*

Paul Battaglia, President of Trilogy Class Action Services (“**Trilogy**”) proposes the following method of dissemination of the Notice through conventional print and social media to the Settlement Class Members regarding the Pre-Approval Motion and Settlement Motion (“**Notice Program**”), and the procedures to object, opt-out or file a claim as a Settlement Class Member (“**Claims Administration**”).

The Plaintiff’s Counsel and Defence Counsel will retain Trilogy to design and implement the Notice Program to disseminate the Notice to Settlement Class Members and to receive opt-out forms or other written documentation from any Settlement Class Member. The Plaintiffs and Defence Counsel will also ask that the Court appoint Trilogy as the Claims Administrator.

### **Class Action Notice Program**

Due to the nature and size of the class and settlement, a cost-effective, print, digital and social media strategy will be employed for both Notice Programs.

The Notice Programs will consist of a Short Form Notice and a Long Form Notice (the “**Notices**”).

The Notices will be written in both English and French to inform Settlement Class Members of the settlement approval hearing, opt-out deadline, the Settlement and claims process and the Extended Exchange Program to be disseminated as agreed to by the parties and approved by the Courts.

All Notices will include a toll-free number, email addresses, website addresses, post office box address, and fax number for the objection, opt-out and claims administration.

### **Trilogy will execute two separate Notice Programs**

**1) To provide Settlement Class Members adequate notice of the pending settlement and provide Settlement Class Members the options in regards to objecting or opting-out of the Settlement:** The Opt-Out Deadline is 30 days after the Pre-Approval Notice is published and any opt-out notices shall be delivered to both Plaintiffs’ and Defendants’ Counsel within 1 business day after the Opt-Out Deadline.

**2) To notify Settlement Class Members once the Settlement has been finalized and to file a Claim Form:** The objective of the Notice Program is to provide adequate notice of the Settlement and provide important information to Settlement Class Members, including the claims administration protocol. Settlement Class Members will be notified of the existence and terms of the Extended Exchange Program through the Notice approved by the Court.

To effect the Notice Program, Trilogy shall:

1. Establish, maintain and monitor a toll-free telephone line for Settlement Class Members' inquiries (in French and English).
2. Establish, maintain and monitor a post office box for receipt of documentation related to the class action.
3. Establish, maintain, and monitor a dedicated e-mail address to which Settlement Class Members may direct written inquiries.
4. Format the Notice to facilitate electronic versions of the notices for digital means.
5. Create and maintain a database for all communication and contact with Settlement Class Members.
6. Establish a web site address which will contain the Short Form Notice, Long Form Notice, as well as necessary forms, information on hearing dates, deadlines, and contact information for Trilogy Class Action Services and class counsel, Merchant Law Group LLP.
7. Publish the Short Form Notice in the following newspapers through placing one advertisements in each publication on a weekday:
  - a. The National Post (in English);
  - b. Montreal Gazette (in English);
  - c. Journal de Québec (in French);
  - d. The Globe and Mail (national edition) (in English);
  - e. The Vancouver Sun (in English);
  - f. Journal de Montreal (in French); and
  - g. The Toronto Star (in English).
8. Execute digital social media advertising campaigns for a minimum of two weeks prior to (i) the opt-out settlement approval hearing, and (ii) the finalization of the Settlement and the deadline to file a Claim Form, by:
  - a. utilizing sponsored advertising tools, being text and display banner adverts, known as display advertising containing headlines about the certification or settlement of the class action on various websites and platforms such as Twitter, Facebook, LinkedIn, Google, and other websites or mobile apps, to serve advertisements relating to the notice to relevant populations including Canadian consumers, pharmacists, and physicians; and,
  - b. establishing accounts on the LinkedIn, Twitter, and Facebook social media services to provide targeted advertising of the notices to Canadian consumers, pharmacists, and physicians.