



The Garden City Group, Inc.

Nortel I and II Canadian Actions

Proposed Legal Notification Campaign

Prepared by:

Jeanne C. Finegan, APR

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INTRODUCTION

Since 1984, The Garden City Group, Inc. (GCG) has established a history of providing successful class action settlement services. Originally a practice unit of KPMG Peat Marwick, the company is now a wholly owned subsidiary of Crawford & Company, the world's largest risk adjusting firm (*NYSE symbols CRD.A/CRD/B*).

For over 20 years, GCG has specialized in the design and implementation of Class Action notification campaigns. GCG's team has designed and implemented large domestic and international campaigns as well as highly focused local campaigns for class action proceedings. GCG has also handled the notice and administration of some of the largest securities settlements of all time. Our recent experience includes the \$6.2 billion *WorldCom* case (where we have processed nearly one million claims); the \$1.1 billion *Royal Ahold* case (which included mailing notice to class members in more than 100 countries); and the \$1 billion *IPO* settlement where we mailed more than 17 million notices.

Jeanne C. Finegan, Senior Vice President, GCG

Jeanne Finegan, APR, has more than 20 years of communications and advertising experience. She is a nationally recognized expert in legal notice programs, both in Federal and State courts. Finegan has lectured and published extensively on various aspects of legal noticing. Her articles have been published in The National Law Journal, The ABA's Class Action Litigation Reporter, and The International Risk Management Institute, among others. She has provided expert testimony before Congress on issues of notice and served the Consumer Product Safety Commission (CPSC) as an expert to determine ways in which the Commission can increase the effectiveness of its product recall campaigns. She is accredited (APR) in Public Relations by the Universal Accreditation Board, a program administered by the Public Relations Society of America.



Finegan has designed and implemented many of the nation's largest and high profile legal notice communication programs. Her multi-national experience includes some of the most high-profile restructuring communications programs involving international Notice. She has designed legal notices for a wide range of class actions and consumer matters that include product liability, construction defect, antitrust, medical/pharmaceutical, human rights, civil rights, telecommunication, media, environment, securities, banking, insurance, and bankruptcies. Attached hereto as Exhibit 1 is Finegan's comprehensive curriculum vitae.

1. Legal Notice Communication Methodology¹

Within the context of "Expert Opinion," two U.S. Supreme Court decisions, Daubert v. Merrell Dow Pharmaceuticals, 509 U.S. 579 (1993), and Kumho Tire Co. v. Carmichael, 526 U.S. 137 (1999), suggest that when we design a media plan for submission to a court for approval, as experts, we must: *1) Apply a technique that can be tested by peers; and 2) Use industry accepted methodology.* Therefore, the following legal notice proposal was developed using a scientific method accepted within the advertising industry for modeling target class members by their demography and media consumption habits.

Most importantly, in formulating a program for delivering "Appropriate Notice," we have been mindful of the natural justice and fair process concerns expressed by the Canadian courts, as well as of the factors listed in the Ontario Class Proceedings Act, S.O. 1992, c. 6, s. 17, the applicable British Columbia statute (R.S.B.C. 1996, c. 50, s. 19), and the relevant provisions in the Quebec Code of Civil Procedure.

The purpose of this document is to fully describe our methodology for modeling a target audience and then appropriately selecting the methods of communication that will best reach them, including direct mail, published notice, third-party outreach, and media relations. It is our

¹ The Canadian plan was calculated based on data provided by the Print Measurement Bureau (PMB) and The Newspaper Audience Databank (NADbank).



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intention to provide to the Courts of Canada a well-formulated notice plan that defines the target audience by its demography and media consumption habits, as well as the percentage reached by this campaign and how frequently the target audience will have the opportunity to see the message as calculated by accepted advertising industry practice.

Our analysis is designed to be rigorous and well calculated based on available research and scientific analysis. However, as with all social sciences, it should be noted that there is no one absolute formula for reaching these conclusions. The calculation of human behavior and media consumption is not an exact science, but instead it is a combination of science and judgment based upon knowledge and experience with advertising industry methodologies that are traditionally utilized in designing legal notice programs.

This proposal is submitted in connection with the Nortel I and Nortel II United States and Canadian class actions.² This proposal addresses only the Canadian outreach effort. Adhering to the highest communication and outreach standards, this Notice Program is based on a scientific methodology that is used throughout the advertising industry and one which has been embraced by Courts in the United States and in Canada. Therefore, GCG has designed a Notice Program to “reach”³ the greatest practicable number of class members.

² The Nortel I Settlement includes three actions covered by Canadian Law: (i) *Law, et al., v. Nortel Networks Corp., et al.*, Ontario Superior Court of Justice Commercial List, Court file No. 02-CL-4605 (the “Ontario Action”); (ii) *Jeffrey, et al., v. Nortel Networks Corp., et al.*, Supreme Court of British Columbia, No. S015159 Vancouver Registry (the “British Columbia Action”); and (iii) *Association de Protection des Epargnants et Investisseurs du Quebec v. Nortel Networks Corp.*, Superior Court, District of Montreal No.: 500-06-000 126-017 (the “Quebec Proceeding”).

The Nortel II Settlement includes two actions governed by Canadian law: (i) *Gallardi v. Nortel Networks Corp.*, Ontario Superior Court of Justice Commercial List, Court No. 05-CV-285606CP (the “Ontario Action”); *Skarstedt v. Nortel Networks Corp.*, Superior Court, District of Montreal, No. 500-06-000277-059 (the “Quebec Proceeding”).

These five actions/proceedings are collectively referred to herein as the Canadian Actions.

³ Reach is the number or percentage of different persons exposed to a specific media schedule.



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2. Multi-National Legal Notice Experience

GCG's ground breaking multi-national efforts are commonly cited by Legal Notice Experts. Our benchmark international cases (see In re: *Vancouver Women's Health Collective Society v. A.H. Robins Co.*, 820 F.2d 1359 (4th Cir. 1987), and In re: *Lindsey v. Dow Corning Corp.*, Civil Action No. CV 94-P-11558-S), have been cited as international legal notice standards. As demonstrated below, GCG is particularly qualified to develop and implement a legal notice program that will effectively and efficiently reach the targeted potential class members in a manner that is similar in scope and form to other multi-national court-approved notice programs.

In re Vancouver Women's Health Collective Soc'y v. A. H. Robins Co., 820 F.2d 1359, 1364 (4th Cir. 1987). In an appellate opinion, the Honorable Robert R. Merhige, Jr., Senior District Judge found that [**15] " the notification program used by Robins was, under the circumstances, reasonable. The evidence indicates that every news outlet in the world received the information. Similarly, there is fairly strong evidence that the news was broadly disseminated worldwide. A battery of world health and welfare organizations also disseminated the information. It appears to this court that the extensive notification program was a success."

Lindsey, et al., v. Dow Corning Corp., et al., Civil Action No. CV 94-P-11558-S. In an order approving the Notice of Settlement, United States District Judge Samuel J Pointer, Jr., stated, "Indeed, the efforts to provide information to such persons must be viewed as among the most extensive and complete ever undertaken." The court finds and concludes that, under these circumstances, the notice program, with all its components, satisfies constitutional requirements and, in the words of Rule 23, constitutes "the best notice practicable under the circumstances, including individual notice to all members who can be identified through reasonable effort."

Other samples of our international experience are included as Exhibit 2.

3. Media Rationale Overview

GCG has designed a Notice Program that is consistent with other United States Court-ordered multi-national notice programs and with the various Canadian class action statutes. In formulating a program for delivering "Appropriate Notice" that meets the concepts of natural justice and fair process we are guided by sound principles of communication. We are



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utilizing nationally syndicated Canadian media research bureaus to provide both demographic and media consumption habits of the Canadian population. These data are used by Canadian advertising agencies as the basis to select media most appropriate to reach specific target audiences.

We are confident that class members will be provided with multiple opportunities to see this Notice through: 1) Mailed notice to all reasonably identifiable class members who purchased Nortel stock during the class period; 2) Publication in Canada in appropriate magazines and newspapers; 3) Internet banner ads; 4) Media relations; 5) a Toll-free information line; and 6) a Web site.

4. Direct Mail

In securities class actions in the United States, the long-accepted practice for disseminating notice to the class members is through direct mailings. However, there is never one defined mailing list of class members. Rather, we need to cull together a complete list from various sources. The first step is to mail notice to all record holders of the subject company's publicly traded securities during the Class Period. This list is provided to us by the company's transfer agent. These record holders, however, are usually just the tip of the iceberg in terms of the potential class members that we reach. The overwhelming majority of class members are found through the network of brokerage firms, banks and other third-party nominees whose clients and/or customers may have purchased a company's stock during the appropriate Settlement Class Period. These firms hold stock in street name on behalf of their customers and, through the years, have developed specialized departments to respond to requests for class member lists.

During its 20-year history of performing class action settlement administration, GCG has built and maintained a proprietary database of the largest brokerage firms, banks, institutions and other nominees (the "Broker Database"). This Broker Database is continually monitored and updated as brokerage firms change addresses, go out of business and/or come into existence. Currently, GCG has more than 2,500 such firms in its U.S. database and thousands more in its international database.



After notice is mailed, these brokerage firms respond in one of two ways. First, many firms provide us with lists of clients believed to be class members (i.e., they purchased the requisite security during the applicable time period). These lists come in the forms of electronic feeds of data as well as hard-copy labels and other formats. GCG, in turn, updates its database records for the appropriate case to reflect these names and addresses and then mails the notice (and usually a claim form) to these individuals and entities. Other nominee firms, ostensibly due to privacy concerns, do not provide names of their clients, but rather, request copies of the notice packet in bulk so that they can forward notice directly to their clients.

In large cases such as this, GCG conducts follow-up telephone campaigns with these nominee firms to make certain that they have received the notice and that they have complied with the requirements described therein. To help ensure compliance, we will also ask these nominee firms to submit to us a compliance certificate, which basically confirms that they searched their records and provided us with names and addresses of potential class members and/or that they actually mailed the notice packets that they requested. We expect to employ this methodology of direct mail notice in both the United States and Canada in connection with the Nortel I and Nortel II Settlements. GCG's database already contains names and addresses of 185 of the largest Canadian nominees to be targeted for all securities mailings. This list was updated through extensive research only a few months ago in connection with another large international settlement. GCG has experience receiving names and requests from these firms in Canada and we are, therefore, confident that we can rely on their participation in this case. We have also worked in the past with Dun & Bradstreet to purchase additional lists of banks and brokerage firms in countries outside the United States. We will work with them to determine whether they have names and addresses that genuinely supplement our Canadian nominee mailings.

However, because we cannot reasonably expect the Canadian brokerage firms to be as comfortable with this process as are the firms in the U.S. – because plainly there is not yet the volume of securities class actions



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settlements in Canada that exists in the U.S. – we are buttressing this direct mail program with a very comprehensive notice publication program, which is described below. We expect that this media program will be at least comparable, if not more fulsome than the program developed for the U.S.

5. Publication

The Canadian Notice plan is calculated based on data provided by The Print Measurement Bureau (PMB). PMB is Canada's leading nationally syndicated media research bureau, which provides data on publication readership, product usage and demographic information. PMB is widely accepted by the top advertising agencies. Additionally, the Canadian plan incorporates data provided by The Newspaper Audience Databank (NADbank). NADbank studies newspapers on a market-by-market basis.

Based on my over 20 years of experience in the field of advertising, public relations and marketing communications, I believe that this syndicated research provides a valid basis for determining the multimedia characteristics of specific target audiences.

The closest definition that PMB provides on which to base our research for the Nortel Legal Notice Program is "*People who own common or preferred stock.*" Based on this definition, we have conducted an extensive analysis of the demographics of the target audience in Canada for their tendencies to read various magazines and newspapers.

Based on this data, the media program alone is estimated to reach 84.22 percent of "Canadians who own common or preferred stock," with an average frequency of 3.82 times.⁴

⁴ Detailed explanations of reach and frequency are found on the Definitions page.



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Demographic highlights of our target audience are summarized in a snapshot below.

Demographic Profile - Canada

Target: People who own common or preferred stock

Men	62.38%
Women	37.62%
Age 35-64	67.15%
Own Home	87.84%
Employed	66.00%
Employed Full Time	62.99%
HHI \$75K-\$150K	57.10%
HHI \$50K+	79.72%
English Canada	76.64%
French Canada	23.36%
Married	77.44%
Ontario	40.29%
Quebec	25.90%
British Columbia	13.59%
Alberta	10.37%
Manitoba/Saskatchewan	5.69%

Source: PMB 2006 Two-Year Readership Database

6. Notice Program Strategy

Demographic profiles have been used for many years by advertising agencies as the standard practice for defining media objectives and selecting media. Demographics provide insight regarding a target audience's age, ethnicity, preferred language, income, population size and geographical distribution. Additionally, data provided by PMB goes beyond basic demographics by analyzing lifestyle characteristics, including media usage habits. These lifestyle characteristics and demographic descriptions are segmented into distinct cluster types. Each cluster uniquely describes demographics, attitudes, and consumer behavior. For the purposes of targeting a legal notice program, these clusters describe media usage patterns, and are used to define the extent of a medium's usage within a given cluster.



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Based on this research, we have developed an approach utilizing broad-reaching publications and more vertically targeted business publications that we know the target has a likelihood of reading. Moreover, our research indicates over 22 percent of the Canadian population speak French. The chart below identifies the percentage of French and/or English spoken by province.

Canadian Province	English	French	Total Population*	% Speak French
Newfoundland and Labrador	500,065	2,180	508,075	0.43%
Prince Edward Island	125,215	5,670	133,385	4.25%
Nova Scotia	834,315	34,155	897,570	3.81%
New Brunswick	465,720	236,775	719,710	32.90%
Quebec	572,085	5,788,655	7,125,580	81.24%
Ontario	8,079,500	493,630	11,285,550	4.37%
Manitoba	836,980	44,775	1,103,700	4.06%
Saskatchewan	825,865	18,035	963,150	1.87%
Alberta	2,405,935	59,735	2,941,150	2.03%
British Columbia	2,865,300	56,100	3,868,875	1.45%
Yukon Territory	24,840	890	28,525	3.12%
Northwest Territories	28,985	965	37,105	2.60%
Nunavut	7,370	400	26,665	1.50%
Total	17,572,175	6,741,965	29,639,040	22.75%

Total French Speakers 6,741,965
 % French Speakers of Total Pop. 22.75%

*Includes people who speak English & French and other languages

Source: Census 2001

Therefore, we have included a number of French general circulation magazines and newspapers geared toward the French speaking population in Canada, most particularly in Quebec.

Additionally, we analyzed total circulation and Readers Per Copy "RPC" of a publication in order to understand its total readership. While this number does not factor out duplication, it is illustrative as to the extent of the program. Also this number only includes these consumer publications, and does not include the multiple other methods of communications we are using, i.e. direct mail, and media relations efforts. These additional methods of communication will only further increase readership.

PMB research indicates that the magazines detailed below are the most appropriate to reach the largest percentage of this target. The magazines used in this Legal Notice program are published in either French and/or English and deliver the broadest appropriate reach of "people who own common or preferred stock."



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Canadian Magazines Selected for this Legal Notice Program

Canadian Business	Bi-Weekly	E	92,000	11.8	1,085,600	½ Page	1
Maclean's	Weekly	E	822,000	7.1	5,836,200	½ Page	2
L'actualite	Monthly	F	191,000	6.0	1,146,000	Full Page	1
Report on Business Magazine (Globe & Mail)	Monthly	E	288,000	5.0	1,440,000	½ Page	1
Financial Post Business Magazine	Monthly	E	221,000	5.9	1,303,900	½ Page	1
Time Canada	Weekly	E	239,000	11.5	2,748,500	½ Page	1
MoneySense	7X/Year	E	115,000	8.2	943,000	½ Page	1
Reader's Digest (English Edition)	Monthly	E	1,990,000	7.2	14,328,000	Full Page	2
Reader's Digest (French Edition)	Monthly	F	250,000	5.2	1,300,000	Full Page	1
Canadian Living	Monthly	E	538,000	8.2	4,411,600	½ Page	1
Coup de Pouce	Monthly	F	230,000	6.2	1,426,000	Full Page	1
Canadian Geographic	Monthly	E	230,000	17.8	4,094,000	½ Page	1
Chatelaine (English Edition)	Monthly	E	697,000	6.4	4,460,800	½ Page	1
Chatelaine (French Edition)	Monthly	F	209,000	6.2	1,295,800	Full Page	1
The National Post (Wed)	Daily	E	248,000	3.4	843,200	½ Page	1
The National Post (Sat)	Daily	E	268,000	2.6	696,800	½ Page	1
The Globe and Mail (Daily - Report on Business Section)	Daily	E	322,000	4.1	1,320,200	½ Page	1
The Globe and Mail (Sat - Report on Business Section)	Daily	E	402,000	3.2	1,286,400	½ Page	1

*Unit Size will depend on final size of Summary Notices.



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The Notice program includes publication in the two largest national newspapers in Canada, The National Post and The Globe and Mail. To increase the overall reach and effectiveness of this plan, GCG has added newspapers in the top 10 Census markets. The Legal Notice will appear on both the highest day of circulation as well as the day business editorial is the most highly concentrated.

Toronto Star	Toronto (Ontario)	E	2	1/4 Page	Sat.	673,663	Wed.	462,985
Toronto Sun (Mon-Fri)	Toronto (Ontario)	E	2	1/2 Page Tab	Sun.	337,000	Mon.	194,000
Le Journal de Montreal (Mon-Fri)	Montreal (Quebec)	F	2	Full Page Tab	Sat.	321,000	Wed.	268,000
Montreal Gazette	Montreal (Quebec)	E	2	1/4 Page	Sat.	153,016	Wed.	136,818
La Presse	Montreal (Quebec)	F	1	1/2 Page	Sat.	277,935	N/A	N/A
The Vancouver Sun	Vancouver (British Columbia)	E	2	1/4 Page	Sat.	230,526	Wed.	173,145
Ottawa Citizen	Ottawa-Hull (Ontario-Quebec)	E	2	1/4 Page	Sat.	156,657	Wed.	127,792
La Droit	Ottawa-Hull (Ontario-Quebec)	F	1	1/2 Page	Sat.	39,889	N/A	N/A
Calgary Herald	Calgary (Alberta)	E	2	1/4 Page	Fri.	140,728	Wed.	116,671
Edmonton Journal	Edmonton (Alberta)	E	2	1/4 Page	Fri.	143,312	Wed.	125,827
Le Journal de Quebec	Québec (Quebec)	F	2	Full Page Tab	Sat.	122,863	Wed.	98,165
Quebec City Le Soleil	Québec (Quebec)	F	1	1/2 Page	Sat.	112,660	N/A	N/A
The Hamilton Spectator	Hamilton (Ontario)	E	2	1/4 Page	Sat.	122,572	Wed.	105,643
Winnipeg Free Press	Winnipeg (Manitoba)	E	2	1/4 Page	Sat.	164,106	Wed.	119,392
The London Free Press	London (Ontario)	E	2	1/4 Page	Sat.	112,182	Mon.	92,476
Subtotal:			27			3,108,109		2,020,914

*Unit Size will depend on final size of Summary Notices.

Additionally, we are further enhancing the Notice Program by adding the largest general circulation newspaper in each of the Canadian provinces.

Moncton Times & Transcript	New Brunswick	E	1	1/4 Page	Saturday	45,500
L'Acadie Nouvelle	Moncton (New Brunswick)	F	1	1/2 Page	Saturday	20,436
The Guardian	Prince Edward Island	E	1	1/4 Page	Saturday	20,746
The Halifax Chronicle Herald	Nova Scotia	E	1	1/4 Page	Saturday	111,501
The Star Phoenix	Saskatchewan	E	1	1/4 Page	Friday	60,499
Nunavut News/North	Nunavet	E	1	1/2 Page Tab	Monday	6,213
Yukon News	Yukon	E	1	1/2 Page Tab	Friday	7,850
NWT/News North	Northwest Territories	E	1	1/2 Page Tab	Monday	9,672
The Telegram	Newfoundland	E	1	1/4 Page	Saturday	55,031
Subtotal:			9			337,448

*Unit Size will depend on final size of Summary Notices.



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All unit sizes and pricing presented in this proposal are subject to change depending on the final text of the Summary Notices.

7. Publication Analysis

We have previously identified one way to measure media, which is reach. Reach refers to those people who actually are exposed to a message. Two other media measures of a publication are coverage (i.e., potential exposure through a given publication) and index against a target. Coverage is the percentage of the target audience that reads a magazine. For example, as shown in the chart below, Canadian Business reaches an estimated 10.78 percent of “people who own common or preferred stock.” Canadian Living reaches an estimated 19.01 percent of this target. It should be noted that the overall average estimated reach is calculated through a random duplication formula widely accepted in the advertising industry.

Index is an indicator of the tendency of a consumer to read a certain publication. An index of 100 is a mean. An index greater than 100 indicates a percentage greater than the average tendency to read a publication. For example an index of 110 would mean that the target is 10 percent more likely than the average person to read a publication.

The chart below lists each publication by its reach of those who own common or preferred stock. The magazines selected for this Class either reach a significant percentage of the target audience or they index well. As the chart below indicates, the selected Canadian publications are well read by those who own common or preferred stock. For example, Canadian Business is 176 percent more likely to be read by our target audience of “those who own common or preferred stock” than the average Canadian.



% Coverage and Composition Index

Target: Own Common or Preferred Stock

Canadian Business	10.78%	(276)
Macleans	14.19%	(135)
L'actualite	6.69%	(161)
Report on Business Magazine (Globe & Mail)	14.52%	(279)
Financial Post Business Magazine	13.39%	(285)
Time Canada	12.05%	(121)
MoneySense	7.63%	(224)
Reader's Digest (English Edition)	26.10%	(100)
Reader's Digest (French Edition)	6.02%	(129)
Canadian Living	19.01%	(120)
Coup de Pouce	5.76%	(112)
Canadian Geographic	14.79%	(100)
Chatelaine (English Edition)	17.87%	(111)
Chatelaine (French Edition)	5.62%	(121)
The National Post (Wed)	9.37%	(309)
The National Post (Sat)	8.23%	(322)
The Globe and Mail (Daily - Report on Business Section)	12.25%	(256)
The Globe and Mail (Sat - Report on Business Section)	11.65%	(254)

Source: PMB 2006 Two-Year Readership Database

We have selected broad reaching magazines for this Legal Notice program. Additionally, we are using ad sizes that will be noticed by potential class members, while maintaining cost efficiency. In that regard, we are recommending certain ad unit sizes. For example, we are recommending half-page ads or larger in the magazines, depending on final length of Summary Notice(s). According to Magazine Dimensions 2005, "Studies show that a typical reader of a monthly publication looks at or reads the issue about three times over a 12-week interval. So the vast majority of the audience can be assumed to have scanned all ads (via page openings) *regardless* of ad size or color."

8. Frequency Rationale

Why do we need to expose the target audience to the Legal Notice more than once? Author Michael J. Naples, suggests an answer. He has found a relationship between frequency and message communication success. Among his conclusions: "The weight of evidence suggests strongly that an exposure frequency of at least two (2x) within a purchase cycle is an effective level." Effective Frequency: The Relationship Between



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Frequency and Advertising Effectiveness – Association of National Advertisers, New York, New York 1988.

The table below reviews correlation between various factors and recommended frequency in a notice program.

Factor	High Frequency	Moderate Frequency	Low Frequency

Source – *Guide to Media Research - American Association of Advertising Agencies (AAAA) Research 2001.*

9. Prominent Ad Position, Formatting and “Plain Language”

The concept of “plain language” in Notice is one that has received much attention. Plain language is simply a more conversational form of communication. The same style is used when reporting the news. The concept, now integrated into Legal Notice practice, is one that has received note from various authorities. For additional information, please visit www.fjc.gov/public/home.nsf; www.plainenglish.co.uk and www.plainlanguagenetwork.org.

The published Notice will be formatted in a manner consistent with these and other guidelines, including Federal Judiciary’s guidelines on easy to read, plain language notice.

As noted in a RAND Study, the Louisiana-Pacific Inner Seal Siding Notice (1995) was actually one of the first published plain language notices. It was co-written by Jeanne Finegan. The RAND study suggested



that the plain language text from the L-P notice was more likely than other notices to attract the attention of class members.⁵

Consistent with the Federal Judiciary's guidelines, the black and white Notice will have a bold headline and will call attention, by way of bold type, to important details, such as class definitions, how individuals can obtain more information by way of mail, toll-free numbers or a web address, relevant dates and deadlines, and other salient points. We will make a best effort to request prominent positioning in the magazines, namely right hand page, as far forward as possible.

10. Internet Banner Advertising

Banner advertising is recognized as an effective method of increasing brand recall and product interest. It is also highly cost-efficient as a means of generating brand awareness. GCG will design a banner advertisement for placement on specific heavily trafficked areas on each of the Internet portals. These banners will be targeting finance executives within Investments & Securities.

We would place banner advertising on financial focused websites such as Canada, Sympatico MSN Finance Channel in English & French, Sympatico MSN - Hotmail targeted to financial executives in English & French, Yahoo, National Post Online, Globe & Mail – GlobeInvestor.com, and AOL Money & Technology network targeting Canada. The precise sites will be chosen at the time of the media buy.

11. Media Relations

GCG will design a media relations campaign that includes distribution of a press release over PR Newswire including Canadian news wires. The press release will be broadly distributed to the media, as well as focused

⁵ Deborah R. Hensler et al., CLASS ACTION DILEMMAS, PURSUING PUBLIC GOALS FOR PRIVATE GAIN. RAND (2000).



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directly to the securities industry. The press release will alert the media of the details of the case, giving them the opportunity to report on the case and provide additional media exposure by way of news stories to their audiences.

12. Toll Free Information Line

Complementing the Notice Program will be GCG's ancillary telephone support and website established especially for this case. The summary notice will direct class members to the toll-free telephone number and the website URL for additional information about the settlement.

GCG is able to offer automated information about different aspects of the settlement through our Interactive Voice Response (IVR) platform. We will provide (in both French and English) information about deadlines, class members' rights, background of the case, how to submit a claim, and other pertinent information. In addition to this automated platform we will use our call center facility to set up dedicated operators for this settlement. Our call center's main operational site is in Sarasota, Florida. However, we have many other available locations from which we run cases. Here, we anticipate using our Montreal site, where we have the capacity to use more than 100 seats (far more than needed). All of the Representatives in this facility are bilingual (English and French Canadian) professional (most have earned a college degree), and have extensive customer service experience.

Regarding connectivity to our IVR platform, all of our domestic toll free numbers automatically include "Extended Call Coverage" (ECC) which provides connectivity from Canada and all of the U.S. Territories without any additional set up. In addition, the transfer of a call from the IVR to a representative in Montreal will be seamless as the infrastructure is already in place. Our IVR has limitless capacity and can be customized to accommodate any foreign language requirement.

13. Web Site

We also intend to create a case-specific web site that provides answers to frequently asked questions as well as postings of all relevant settlement-



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related documents. Class members will be able to access and download copies of the notices and the claim forms and will have access to relevant Court orders. This web site may be accessed by anyone in Canada or the U.S. and will be available in English and French.

14. Conclusion

Based on our experience in planning and implementing class action Notice it is our judgment that this broad reaching Notice program is reasonably calculated, using appropriate tools and methodology accepted in the advertising industry, to effectively reach targeted class members in Canada.



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15. Budget Overview

Below is a cost summary of the proposed Canadian Notice Program:

National Publications*	\$277,817.17
Local Newspapers - Highest Circ Day*	\$96,303.59
Local Newspapers - Best Business Day*	\$78,096.92
Local Newspapers – Additional*	\$12,817.74
Internet Banner Advertising	\$95,855.33
Media Outreach	\$1,985.00
Affidavits	\$6,600.00
Total	\$569,475.75*

To the extent we are asked to place separate ads for Nortel I and Nortel II, the cost will essentially double. Pricing above based on 2006 pricing and current exchange rate. Subject to change based on exchange rate at time of buy.

* Final pricing will ultimately depend on the size of the final approved Summary Notice(s).



16. Publication Summary

Canadian Business

Provides news, opinion and community for business leaders, entrepreneurs and investors in Canada. Bi-Weekly.

Maclean's

Publishes the latest in health, education, personal finance, entertainment, personalities, politics and sports, plus thought-provoking columnists and special reports. Weekly.

L'actualite

Covers news and culture in Canada. Monthly.

Report On Business Magazine (Globe & Mail)

Considered the most comprehensive compilation of economic news in Canada. Standard Report on Business sections are typically fifteen to twenty pages and include the listings of major Canadian, US, and international stocks, bonds, and currencies. Monthly.

Financial Post Business Magazine

Consistently provides context, analysis and understanding to current trends, companies and issues that are shaping the economy and Canadians' lives. Topics include corporate strategies, profiles of top political and business leaders with articles aimed at the broader interests of its upscale audience. Monthly.

Time Canada

Provides analysis and viewpoints. Provides insight and big-picture perspective on the most important news of the day, at home and around the world. It covers the transformational issues affecting society - socially, politically, economically and culturally. Weekly.



The Garden City Group, Inc.

MoneySense

Covers personal finance in Canada. Each issue contains insightful and informative columns and articles to help consumers make the most of their money. 7x a Year.

Reader's Digest

(English Edition)

Puts the world in perspective through a fusion of timely original editorial and select excerpts of the best journalism in print. It informs, entertains and inspires people to take action at a time when mass media prominently shapes the culture. Monthly.

Reader's Digest

(French Edition)

French edition of the publication. Monthly.

Canadian Living

Provides readers with smart solutions for everyday living. The place to turn to first for I-can-do-it recipes for midweek family suppers and elegant entertaining, up-to-the-minute health and wellness information, and practical parenting and family advice-plus inspiring fashion, beauty and home decor ideas that make real sense in busy lives. Daily.

Coup de Pouce

Committed to helping women and their families living in Quebec, it delivers a wealth of information and practical advice. Editorial covers food, health, beauty and fashion, parenting, travel and home. Monthly.

Canadian Geographic

Delivers unmatched coverage of issues related to Canada and its people, all brought to vivid life through stunning photography and unforgettable writing. Monthly.



Chatelaine

(English Edition)

Covers a variety of women's interests, from fashion and relationships to health information, profiles of successful women and journalism on social and political issues relevant to women. Monthly.

Chatelaine

(French Edition)

French edition of the publication. Monthly.

The National Post

A major Canadian English language national newspaper based in Toronto. Daily.

The Globe and Mail

Often considered the newspaper of record in Canada, it is a major Canadian English language national newspaper based in Toronto. Daily.



The Garden City Group, Inc.

17. Media Definitions

REACH – The number of different people (or homes) exposed to an advertisement one or more times. Reach is expressed as an estimated percentage of the defined target population that has an opportunity to see the ad.

FREQUENCY – The average number of exposures received by the people who were reached by the media schedule.

GROSS IMPRESSIONS – The sum of audiences for all vehicles (such as newspapers and/or magazines) on an advertising schedule.

READERS-PER-COPY (RPC) – The average number of readers-per-copy of a publication is computed by dividing the total number of different people who read or looked into an average issue of a magazine by the magazine's total circulation. This number is based upon the assumption that readers will "pass along" their copy of a magazine for others to read as well.

18. Syndicated Research Definitions

PMB Print Measurement Bureau is Canada's leading syndicated study for single-source data on print readership, non-print media exposure, product usage and lifestyles. Its reputation is based on over 30 years of accurate, in-depth measurement of Canadian consumer behavior.

PMB is a non-profit organization, representing the interests of Canadian publishers advertising agencies, advertisers and other companies.

The first national PMB study was conducted in 1973. Since then, it has grown to the point where it now uses an annual sample of 24,000 to measure the readership of over 120 publications and consumer usage of over 2,500 products and brands. The PMB 2006 study is based on 25,165



The Garden City Group, Inc.

interviews conducted over 24 months (October 2003 – September 2005).

**See www.pmb.ca/public/e/index.htm.*

INTERACTIVE MARKET SYSTEMS (IMS) – IMS is the leading international provider of information systems and solutions for the media industry. IMS provides media planning and analysis software for both industry and proprietary research. One function of IMS software is to run a reach and frequency report based on formula models such as IMS Modal and Metheringham. These formulas create a reach and frequency estimate.

NADbank – The NADbank 2005 study is the most comprehensive data source for market level data on newspaper readership, retail shopping and product category data in Canada.

Exhibit 1

JEANNE C. FINEGAN, APR

BIOGRAPHY

Jeanne Finegan, Senior Vice President of The Garden City Group, Inc., has more than 20 years of communications and advertising experience. She is a nationally recognized expert in class action, bankruptcy and mass tort notification campaigns. Finegan, is accredited (APR) in Public Relations by the Universal Accreditation Board, a program administered by the Public Relations Society of America.

She has provided expert testimony before Congress on issues of notice. Additionally, she has provided expert testimony in both State and Federal Courts regarding notification campaigns and conducted media audits of proposed notice programs for their adequacy under Fed R. Civ. P. 23(c)(2) and similar state class action statutes.

She has lectured, published and has been cited extensively on various aspects of legal noticing, product recall and crisis communications and has served the Consumer Product Safety Commission (CPSC) as an expert to determine ways in which the Commission can increase the effectiveness of its product recall campaigns.

Finegan has developed and implemented many of the nation's largest and most high profile legal notice communication and advertising programs. In the course of her class action experience, Courts have recognized the merits of, and admitted expert testimony based on, her scientific evaluation of the effectiveness of notice plans. She has designed legal notices for a wide range of class actions and consumer matters that include product liability, construction defect, anti-trust, medical/pharmaceutical, human rights, civil rights, telecommunication, media, environment, securities, banking, insurance, mass tort, restructuring and product recall.

Her work includes:

In re: UAW v. General Motors Corporation, Case No: 05-73991
Class Action, United States District Court Eastern District of Michigan
Southern Division (2006).

In re: Wicon, Inc. v. Cardservice International, Inc., BC 320215
Class Action Superior Court of the State of California for the County of
Los Angeles (2004).

**In re: Varacallo, et al. v. Massachusetts Mutual Life Insurance
Company, et al.**, Civil Action No. 04-2702 (JLL), United States District
Court for the District of New Jersey (2004).

*(Preliminary Approval Order at 9). ... the Court
found that ... “all of the notices are written in simple
terminology, are readily understandable by Class
Members, and comply with the Federal Judicial
Center's illustrative class action notices.”*

*... By working with a nationally syndicated
media research firm, [Finegan's firm] was able to
define a target audience for the MassMutual Class
Members, which provided a valid basis for determining
the magazine and newspaper preferences of the Class
Members. (Id. at ¶ 5.2). ... The Court agrees with
Class Counsel that this was more than adequate.*

**In re: John's Manville (Statutory Direct Action Settlement,
Common Law Direct Action and Hawaii Settlement)** Index No 82-11656
(BRL) United States Bankruptcy Court Southern District of New York
(2004). The nearly half-billion dollar settlement constituted three separate
notification programs, which targeted all persons, who had asbestos
claims whether asserted or unasserted, against the Travelers Indemnity
Company.

In the Findings of Fact and Conclusions of a Clarifying
Order Approving the Settlements, the Honorable Chief Judge
Burton R. Lifland said:

*“As demonstrated by Findings of Fact, the
Statutory Direct Action Settlement notice program was
reasonably calculated under all circumstances to
apprise the affected individuals of the proceedings and
actions taken involving their interests, Mullane v. Cent.
Hanover Bank & Trust Co; 339 U.S. 306, 314 (1950),
such program did apprise the overwhelming majority of
potentially affected claimants and far exceeded the
minimum notice required. The Court concludes that
mailing direct notice via U.S. Mail to law firms and
directly to potentially affected claimants, as well as
undertaking an extensive print media and Internet
campaign met and exceeded the requirements of due
process. The Court's conclusion in this regard is*

buttressed by the results over 26,000 phone calls, 20,000 requests for information 8,000 website visits and 4,000 users registered to download documents. The results simply speak for themselves.”

In re: Wilson v. Massachusetts Mutual Life Insurance Company, Case No. D-101-CV 98-02814 (First Judicial District Court County of Santa Fe State of New Mexico 2002.) This was a nationwide notification program that included all persons in the United States who owned, or had owned, a life or disability insurance policy with Massachusetts Mutual Life Insurance Company and had paid additional charges when paying their premium on an installment bases. The class was estimated to exceed 1.6 million individuals. (www.insuranceclassclaims.com/).

In granting preliminary approval to the settlement agreement, the Honorable Art Encinias commented:

“The Notice Plan was the best practicable and reasonably calculated, under the circumstances of the action. ...[and] that the notice meets or exceeds all applicable requirements of law, including Rule 1-023(C)(2) and (3) and 1-023(E), NMRA 2001, and the requirements of federal and/or state constitutional due process and any other applicable law.”

In re: Deke, et al. v. Cardservice International, Case No. BC 271679 Superior Court of the State of California for the County of Los Angeles. (2004)

In the Final Order dated March 1, 2004, The Honorable Charles W. McCoy commented:

“The Class Notice satisfied the requirements of California Rules of Court 1856 and 1859 and due process and constituted the best notice practicable under the circumstances.”

In re: Sager v. Inamed Corp. and McGhan Medical Breast Implant Litigation, Case No. 01043771, Superior Court of the State of California County of Santa Barbara. (2004).

In the Final Judgment and Order, dated March 30, 2004, the Honorable Thomas P. Anderle stated:

“Notice provided was the best practicable under the circumstances.”

In re: Florida Microsoft Antitrust Litigation Settlement. Index number 99-27340 CA 11, 11th Judicial District Court of Miami – Dade County, Florida. (2003)

In the Final Order Approving the Fairness of the Settlement, The Honorable Henry H. Harnage said:

“The Class Notice ... was the best notice practicable under the circumstances and fully satisfies the requirements of due process, the Florida Rules of

Civil Procedure, and any other applicable rules of the Court.”

In re: Montana Microsoft Antitrust Litigation Settlement. No. DCV 2000 219, Montana First Judicial District Court – Lewis & Clark Co. (2003).

In re: South Dakota Microsoft Antitrust Litigation Settlement. Civ. No. 00-235, State of South Dakota county of Hughes in the circuit Court Sixth Judicial Circuit.

In re: Kansas Microsoft Antitrust Litigation Settlement. Case No. 99C17089 Division No. 15 Consolidated Cases, District Court of Johnson County, Kansas Civil Court Department. In the Final Order and Final Judgment, the Honorable Allen Slater stated:

“The Class Notice provided was the best notice practicable under the circumstances and fully complied in all respects with the requirements of due process and of the Kansas State. Annot. §60-22.3.”

In re: North Carolina Microsoft Antitrust Litigation Settlement. No. 00-CvS-4073 (Wake) 00-CvS-1246 (Lincoln), State of North Carolina, Wake and Lincoln Counties in the General Court of Justice Superior Court Division North Carolina Business Court.

In the multiple state cases, Plaintiffs generally allege that Microsoft unlawfully used anticompetitive means to maintain a monopoly in markets for certain software, and that as a result, it overcharged consumers who licensed its MS-DOS, Windows, Word, Excel and Office software. The multiple legal notice programs targeted both individual users and business users of this software. The scientifically designed notice programs took into consideration both media usage habits and demographic characteristics of the targeted class members.

In re: MCI Non-Subscriber RatePayers Litigation, MDL Docket No. 1275, (District Court for Southern District of Illinois 2001). The advertising and media notice program was designed with the understanding that the litigation affects all persons or entities who were customers of record for telephone lines presubscribed to MCI/World Com, and were charged the higher non-subscriber rates and surcharges for direct-dialed long distance calls placed on those lines. (www.rateclaims.com).

After a hearing to consider objections to the terms of the settlement, The Honorable David R. Herndon stated:

“As further authorized by the Court, [Ms. Finegan’s company] ... published the Court-approved summary form of notice in eight general-interest magazines distributed nationally; approximately 900 newspapers throughout the United States and a Puerto Rico newspaper. In addition, [Ms. Finegan’s company] caused the distribution of the Court-approved press release to over 2,500 news outlets throughout the United

States... The manner in which notice was distributed was more than adequate..."

In re: Sparks v. AT&T Corporation, Case No. 96-LM-983 (In the Third Judicial Circuit, Madison County, Illinois.) The litigation concerned all persons in the United States who leased certain AT&T telephones during the 1980's. Finegan designed and implemented a nationwide media program designed to target all persons who may have leased telephones during this time period, a class that included a large percentage of the entire population of the United States.

In granting final approval to the settlement, the Court commented:

"The Court further finds that the notice of the proposed settlement was sufficient and furnished Class Members with the information they needed to evaluate whether to participate in or opt out of the proposed settlement. The Court therefore concludes that the notice of the proposed settlement met all requirements required by law, including all Constitutional requirements."

In re: Pigford v. Glickman and U.S. Department of Agriculture, Case No. CA No. 97-19788 (PLF), (District Court for the District of Columbia 1999). This was the largest civil rights case to settle in the United States in over 40 years. The highly publicized, nation-wide paid media program was designed to alert all present and past African-American farmers of the opportunity to recover monetary damages against the U.S. Department of Agriculture for alleged loan discrimination.

In his Opinion, the Honorable Paul L. Friedman commented on the notice program by saying:

"The parties also exerted extraordinary efforts to reach class members through a massive advertising campaign in general and African American targeted publications and television stations."

Judge Friedman continued:

"The Court concludes that class members have received more than adequate notice and have had sufficient opportunity to be heard on the fairness of the proposed Consent Decree."

In re: SmithKline Beecham Clinical Billing Litigation, Case No. CV. No. 97-L-1230 (Illinois Third Judicial District Madison County, 2001.) Finegan designed and developed a national media and Internet site notification program in connection with the settlement of a nationwide class action concerning billings for clinical laboratory testing services.

In re: MacGregor v. Schering-Plough Corp., Case No. EC248041 (Superior Court of the State of California in and for the County of Los Angeles 2001). This nationwide notification was designed to reach all persons who had purchased or used an aerosol inhaler manufactured by Schering-Plough. Because no mailing list was available, notice was accomplished entirely through the media program.

In re: Swiss Banks Holocaust Victim Asset Litigation Case No. CV-96-4849, (Eastern District of New York 1999). Finegan managed the design and implementation of the Internet site on this historic case. The site was developed in 21 native languages. It is a highly secure data gathering tool and information hub, central to the global outreach program of Holocaust survivors. (www.swissbankclaims.com/).

In re: Louisiana-Pacific Inner-Seal Siding Litigation, Civil Action Nos. 879-JE, and 1453-JE U.S.D.C., (District of Oregon 1995 and 1999). Under the terms of the Settlement, three separate Notice programs were to be implemented at three-year intervals over a period of six years. In the first Notice campaign, Finegan implemented the print advertising and Internet components of the Notice program.

In approving the legal notice communication plan, the Honorable Robert E. Jones stated:

“The notice given to the members of the Class fully and accurately informed the Class members of all material elements of the settlement...[through] a broad and extensive multi-media notice campaign.”

In reference to the third-year Notice program for Louisiana-Pacific, Special Master Hon. Judge Richard Unis, commented:

“In approving the third year notification plan for the Louisiana-Pacific Inner-Seal™ Siding litigation, the court referred to the notice as ‘...well formulated to conform to the definition set by the court as adequate and reasonable notice.’

Indeed, I believe the record should also reflect the Court's appreciation to Ms. Finegan for all the work she's done, ensuring that noticing was done correctly and professionally, while paying careful attention to overall costs.” Her understanding of various notice requirements under Fed. R. Civ. P. 23, helped to insure that the notice given in this case was consistent with the highest standards of compliance with Rule 23(d)(2).

In re: Thomas A. Foster and Linda E. Foster v. ABTco Siding Litigation, Case No. 95-151-M, (Circuit Court of Choctaw County, Alabama 2000). This litigation focused on past and present owners of structures sided with Abitibi-Price siding. The notice program that Finegan designed and implemented was national in scope.

In the Order and Judgment Finally approving settlement, Judge J. Lee McPhearson said:

“The Court finds that the Notice Program conducted by the Parties provided individual notice to all known Class Members and all Class Members who could be identified through reasonable efforts and constitutes the best notice practicable under the circumstances of this Action. This finding is based on the overwhelming evidence of the adequacy of the notice program ...The media campaign involved broad national notice through television and print media, regional and local newspapers, and the Internet (see id. ¶¶9-11) The result: over 90

percent of Abitibi and ABTco owners are estimated to have been reached by the direct media and direct mail campaign.”

In re: Exxon Valdez Oil Spill Litigation, Case No. A89-095-CV (HRH) (Consolidated) U.S. District Court for the District of Alaska (1997, 2002). Finegan designed and implemented two media campaigns to notify native Alaskan residents, trade workers, fisherman, and others impacted by the oil spill of the litigation and their rights under the settlement terms.

In re: Georgia-Pacific Toxic Explosion Litigation Case No. 98 CVC05-3535, (Court of Common Pleas Franklin County, Ohio 2001). Finegan designed and implemented a regional notice program that included network affiliate television, radio and newspaper. The notice was designed to alert adults living near a Georgia-Pacific plant that they had been exposed to an air-born toxic plume and their rights under the terms of the class action settlement.

In the Order and Judgement finally approving the settlement the Honorable Jennifer L. Bunner said:

“...Notice of the settlement to the Class was the best notice practicable under the circumstances, including individual notice to all members who can be identified through reasonable effort. The Court finds that such effort exceeded even reasonable effort and that the Notice complies with the requirements of Civ. R. 23(C).”

In re: Johns Manville Phenolic Foam Litigation Case No. CV 96-10069, (District Court for the District of Massachusetts 1999). The nationwide multi-media legal notice program was designed to reach all Persons who own any structure, including an industrial building, commercial building, school, condominium, apartment house, home, garage or other type of structure located in the United States or its territories, in which Johns Manville PFRI was installed, in whole or in part, on top of a metal roof deck.

In re: James Hardie Roofing Litigation Case No. CV. No. 00-2-17945-65SEA (Superior Court of Washington in and for King County 2002). The nationwide legal notice program included advertising on television, in print and on the Internet. It was national in scope and designed to reach all persons who own any structure with JHBP roofing products.

In the Final Order and Judgement the Honorable Steven Scott stated:

“The notice program required by the Preliminary Order has been fully carried out.... [and was] extensive. The notice provided fully and accurately informed the Class Members of all material elements of the proposed Settlement and their opportunity to participate in or be excluded from it; was the best notice practicable under the circumstances; was valid, due and sufficient notice to all Class Members; and complied fully with Civ. R. 23, the United States Constitution, due process, and other applicable law.”

In re: First Alert Smoke Alarm Litigation, Case No. CV-98-C-1546-W (UWC), (District Court for the Northern District of Alabama Western Division 2000). Finegan designed and implemented a nationwide legal notice and public information program. The public information program is scheduled to run over a two-year period to inform those with smoke alarms of the performance characteristics between photoelectric and ionization detection. The media program includes network and cable television, magazine and specialty trade publications.

In the Findings and Order Preliminarily Certifying the Class, The Honorable C.W. Clemon wrote that the notice plan:

“...Constitutes due, adequate and sufficient notice to all Class Members; and meets or exceeds all applicable requirements of the Federal Rules of Civil Procedure, the United States Constitution (including the Due Process Clause), the Alabama State Constitution, the Rules of the Court, and any other applicable law.”

In re: American Cyanamid, Civil Action CV-97-0581-BH-M United States District court for the Southern District of Alabama 2001. The media program targeted those Farmers who had purchased crop protection chemicals manufactured by American Cyanamid.

In the Final Order and Judgment, the Honorable Charles R. Butler Jr. wrote:

“The Court finds that the form and method of notice used to notify the Temporary Settlement Class of the Settlement satisfied the requirements of Fed. R. Civ. P. 23 and due process, constituted the best notice practicable under the circumstances, and constituted due and sufficient notice to all potential members of the Temporary Class Settlement.”

In re: Bristow v Fleetwood Enterprises Litigation Case No Civ 00-0082-S-EJL (District Court for the District of Idaho 2001). Finegan designed and implemented a legal notice campaign targeting present and former employees of Fleetwood Enterprises, Inc., or its subsidiaries who worked as hourly production workers at Fleetwood's housing, travel trailer, or motor home manufacturing plants. The comprehensive notice campaign included print, radio and television advertising.

In re: New Orleans Tank Car Leakage Fire Litigation, Case No 87-16374. (Civil District Court for the Parish of Orleans, State of Louisiana 2000). This case resulted in one of the largest settlements in US History. This campaign consisted of a media relations and paid advertising program to notify individuals of their rights under the terms of the settlement.

In re: Garria Spencer v. Shell Oil Company, Case No. CV 94-074, District Court, Harris County Texas (1995). The nation wide notification program was designed to reach individuals who owned real property or structures in the United States which contained polybutylene plumbing with acetyl insert or metal insert fittings.

In re: Rene Rosales v. Fortune Insurance Company, Case No 99-04588 CA (41) Circuit Court of the 11th Judicial Circuit in and for Miami-Dade County, Florida (2000). Finegan provided expert testimony in this matter. She conducted an audit on behalf of intervening attorneys for the proposed notification to individuals insured with personal injury insurance. Based upon the audit, Ms. Finegan testified that the proposed notice program was inadequate. The Court agreed and signed an Order Granting Intervenors' Objections to Class Action settlement... The Honorable Jose M. Rodriques said:

"The Court finds that Ms. Finegan is qualified as an expert on class notice and effective media campaigns. The Court finds that her testimony is credible and reliable."

Based in part on Finegan's testimony, the Court ruled in favor of the intervening parties and disapproved the parties' original settlement agreement, vacating the order of preliminary approval.

In re: Hurd Millwork Heat Mirror™ Litigation Case No. CV-772488, (Superior Court of the State of California for the County of Santa Clara 2000). This nationwide multi-media notice program was designed to reach class members with failed heat mirror seals on windows and doors, and alert them as to the actions that they needed to take to receive enhanced warranties or window and door replacement.

In re: Laborers District Counsel of Alabama Health and Welfare Fund v Clinical Laboratory Services, Inc. Case No. CV -97-C-629-W (Northern District of Alabama 2000.) Finegan designed and developed a national media and Internet site notification program in connection with the settlement of a nationwide class action concerning alleged billing discrepancies for clinical laboratory testing services.

In re: StarLink Corn Products Liability Litigation Case No. 01 C 1181, (Northern District of Illinois, Eastern Division 2002). Finegan designed and implemented a nationwide notification program designed to alert potential class members of the terms of the settlement.

In re: Albertson's Back Pay Litigation, Case No. 97-0159-S-BLW, U.S. District Court of Idaho (1997). Finegan designed and

developed a secure Internet site, where claimants could seek case information confidentially.

In re: Georgia Pacific Hardboard Siding Recovering Program, Case No. CV-95-3330-RG, Circuit Court for the County of Mobile, State of Alabama (1997). Finegan designed and implemented a multi-media legal notice program, which was designed to reach class members with failed G-P siding and alert them of the pending matter. Notice was provided through advertisements which aired on national cable networks, magazines of nationwide distribution, local newspaper, press releases and trade magazines.

In re: Diet Drug Litigation, Finegan has worked on many state notification programs and worked as a consultant to the National Diet Drug Settlement Committee on notification issues.

In re: ABS II Pipes Litigation, Case No. 3126, Contra Costa Superior Court, State of California (1998 and 2001). The Court approved regional notification program designed to alert those individuals who owned structures with the pipe, that they were eligible to recover the cost of replacing the pipe. (www.abspipes.com/).

In re: Avenue A Inc. Internet Privacy Litigation
District Court for the Western District of Washington Case No: C00-1964C.

In re: Lorazepam and Clorazepate Antitrust Litigation, MDL No. 1290 (TFH) United States District Court for the District of Columbia.

In re: Providian Financial Corporation ERISA Litigation Case No C-01-5027 United States District Court for the Northern District of California.

In re: H & R Block, et al Tax Refund Litigation State of Maryland Circuit Court for Baltimore City Case No. 97195023/CC4111

In re: American Premier Underwriters, Inc. U.S. Railroad Vest Corp. Boone Circuit Court – Boone County, Indiana. Cause No: 06C01-9912

In re: Sprint Corporation Optical Fiber Litigation District Court of Leavenworth Co, Kansas Case No: 9907 CV 284

In re: Shelter Mutual Insurance Company Litigation District Court in and for Canadian Co. State of Oklahoma Case No. CJ-2002-263

In re: Conseco, Inc. Securities Litigation Southern District of Indiana Indianapolis Division Case No: IP-00-0585-C Y/S CA

In re: National Treasury Employees Union, et al United States Court of Federal Claims Case No: 02-128C

In re: City of Miami Parking Litigation Circuit Court of the 11th Judicial Circuit in and for Miami Dade County, Florida Case Nos: 99-21456 CA-10, 99-23765 – CA-10.

In re: Prime Co. Incorporated D/B/A/ Prime Co. Personal Communications, United States Court Eastern District of Texas Beaumont Division – Civil Action No. L 1:01CV658.

In re: Alsea Veneer v. State of Oregon A.A., Case No. 88C-11289-88C-11300.

A Sample of Finegan's Bankruptcy Experience –

Finegan has designed and implemented literally hundreds of domestic and international bankruptcy notice programs. A sample case list includes the following:

In re: United Airlines, Case No. 02-B-48191 (Bnkr. N.D Illinois Eastern Division) Finegan worked with United and its restructuring attorneys to design and implement global legal notice programs. The notice was published in 11 countries and translated into 6 languages. Finegan worked closely with legal counsel and UAL's advertising team to select the appropriate media and to negotiate the most favorable advertising rates. (www.pd-ual.com/).

In re: Enron, Case No. 01-16034 (Bankr. S.D.N.Y.) Finegan worked with Enron and its restructuring attorneys to publish various legal notices.

In re: Dow Corning, Case No. 95-20512 (Bankr. E.D. Mich.) Finegan originally designed the information website. This Internet site is a major information hub that has various forms in 15 languages.

In re: Harnischfeger Industries, Case No. 99-2171 (RJW) Jointly Administered U.S. Bankr., District of Delaware. Finegan designed and implemented 6 domestic and international notice programs for this case. The notice was translated into 14 different languages and published in 16 countries.

In re: Keene Corporation, Case No. 93B 46090 (SMB) U.S. Bankr. Eastern District of Missouri, Eastern Division. Finegan designed and implemented multiple domestic bankruptcy notice programs including notice on the plan of reorganization directed to all creditors and all Class 4 asbestos-related claimants and counsel.

In re: Lamonts, Case No. 00-00045 U.S. Bankr. Western District of Washington. Finegan designed an implemented multiple bankruptcy notice programs.

In re: Monet Group Holdings, Case Nos. 00-1936 (MFW) U.S. Bankr. District of Delaware. Finegan designed and implemented a bar date notice.

In re: Laclede Steel Company, Case No 98-53121-399 US Bankr. CT, Eastern District of MO, Eastern Division. Finegan designed and implemented multiple bankruptcy notice programs.

In re: Columbia Gas Transmission Corporation, Case No. 91-804 Bankr., Southern District of New York; Finegan developed multiple nation-wide legal notice notification programs for this case.

In re: U.S.H. Corporation of New York, et al., and (BRL) Bankr. Southern District of New York; she designed and implemented a bar date advertising notification campaign.

In re: Best Products Co., Inc., Bankr. Case No. 96-35267-T, Eastern District of Virginia; she implemented a national legal notice program that included multiple advertising campaigns for notice of sale, bar date, disclosure and plan confirmation.

In re: Lodgian, Inc., et al – Southern District Court of New York Case No. 16345 (BRL) Factory Card Outlet – 99-685 (JCA), 99-686 (JCA)

In re: International Total Services, Inc., et al – Eastern District Court of New York, Case No: 01-21812, 01-21818, 01-21820, 01-21882, 01-21824, 01-21826, 01-21827 (CD) Under Case No: 01-21812

In re: Decora Industries, Inc and Decora, Incorporated. District of Delaware Case No: 00-4459 and 00-4460 (JJF)

In re: Genesis Health Ventures, Inc., et al - District of Delaware Case No. 002692 (PJW)

In re: Telephone Warehouse, Inc., et al – District of Delaware Case No. 00-2105 through 00-2110 (MFW)

In re: United Companies Financial Corporation, et al. District of Delaware Case No. 99-450 (MFW) through 99-461 (MFW)

In re: Caldor, Inc. New York, The Caldor Corporation, Caldor, Inc. CT, et al. Southern District of New York Case No: 95-B44080 (JLG)

In re: Physicians Health Corporation, et al. District of Delaware Case No: 00-4482 (MFW)

In re: GC Companies., et al. District of Delaware Case Nos:00-3897 through 00-3927 (MFW)

In re: Heilig-Meyers Company, et al. Eastern District of Virginia (Richmond Division) Case Nos: 00-34533 through 00-34538.

Product Recall and Crisis Communication

Reser's Fine Foods – Reser's is a nationally distributed brand and manufacturer of food products through giants such as Albertsons, Costco, Food Lion, WinnDixie, Ingles, Safeway and Walmart. Finegan

designed an enterprise wide crisis communication plan that included communications objectives, crisis team roles and responsibilities, crisis response procedures, regulatory protocols, definitions of incidents that require various levels of notice, target audiences, and threat assessment protocols. Finegan worked with the company through two nationwide, high profile recalls, conducting extensive media relations efforts.

Background

Prior to joining The Garden City Group, Inc., Finegan co-founded Huntington Advertising, a nationally recognized leader in legal notice communications. After Fleet Bank purchased her firm in 1997; she grew the company into one of the nation's leading legal notice communication agencies.

Prior to that, Finegan spearheaded Huntington Communications, (an Internet development company) and The Huntington Group, Inc., (a public relations firm). As a partner and consultant, she has worked on a wide variety of client marketing, research, advertising, public relations and Internet programs. During her tenure at the Huntington Group, client projects included advertising (media planning and buying), shareholder meetings, direct mail, public relations (planning, financial communications) and community outreach programs. Her past client list includes large public and privately held companies: Code-A-Phone Corp., Thrifty-Payless Drug Stores, Hyster-Yale, The Portland Winter Hawks Hockey Team, U.S. National Bank, U.S. Trust Company, Morley Capital Management, and Durametal Corporation.

Prior to Huntington Advertising, Finegan worked as a consultant and public relations specialist for a West Coast-based Management and Public Relations Consulting firm.

Additionally, Finegan has experience in news and public affairs. Her professional background includes being a reporter, anchor and public affairs director for KWJJ/KJIB radio in Portland, Oregon, as well as reporter covering state government for KBZY radio in Salem, Oregon. Finegan worked as an assistant television program/promotion manager for KPDX directing \$50 million in programming. Additionally she was the program/promotion manager at and KECH-22 television.

Finegan's multi-level communication background gives her a thorough, hands-on understanding of media, the communication process, and how it relates to creating effective and efficient legal notice campaigns.

Articles

Co-Author, "Approaches to Notice in State Court Class Actions," – For The Defense, Vol. 45, No. 11 -- November, 2003.

Citation – "Recall Effectiveness Research: A Review and Summary of the Literature on Consumer Motivation and Behavior" U.S. Consumer Product Safety Commission, CPSC-F-02-1391, p.10, Heiden Associates – July 2003.

Author, "The Web Offers Near, Real-Time Cost Efficient Notice," – American Bankruptcy Institute - ABI Journal, Vol. XXII, No. 5. -- 2003.

Author, "Determining Adequate Notice in Rule 23 Actions," – For The Defense, Vol. 44, No. 9 -- September, 2002,

Author, Legal Notice, What You Need To Know and Why, - Monograph, July 2002.

Co-Author, "The Electronic Nature of Legal Noticing," - The American Bankruptcy Institute Journal -Vol. XXI, No. 3, April 2002.

Author, "Three Important Mantras for CEO's and Risk Managers in 2002" - International Risk Management Institute - irmi.com/ January 2002.

Co-Author, "Used the Bat Signal Lately" - The National Law Journal, Special Litigation Section - February 19, 2001.

Author, "How Much is Enough Notice" - Dispute Resolution Alert, Vol. 1, No. 6. March 2001.

Author, "Monitoring the Internet Buzz" – The Risk Report, Vol. XXIII, No. 5, Jan. 2001.

Author, "High-Profile Product Recalls Need More Than the Bat Signal" - International Risk Management Institute - irmi.com/ July 2001.

Co-Author, "Do you know what 100 million people are buzzing about today?" Risk and Insurance Management – March 2001.

Quoted Article: "Keep Up with Class Action" Kentucky Courier Journal – March 13, 2000.

Author, "The Great Debate - How Much is Enough Legal Notice?" American Bar Association – Class Actions and Derivatives Suits Newsletter, Winter edition 1999.

Speaker/Expert Panelist/Presenter

Practicing Law Institute	Faculty Panelist – CLE Presentation -11 th Annual Consumer Financial Services Litigation. Presentation: Class Action Settlement Structures – Evolving Notice Standards in the Internet Age. New York/Boston (simulcast), NY March 2006; Chicago, IL April 2006 and San Francisco, CA May 2006.
U.S. Consumer Product Safety Commission	Ms. Finegan participated as an Expert to the Consumer Product Safety Commission to discuss ways in which the CPSC could enhance and measure the recall process. As an expert panelist, Ms Finegan discussed how the CPSC could better motivate consumers to take action on recalls and how companies could scientifically measure and defend their outreach efforts. Bethesda MD, September 2003.
Weil, Gotshal & Manges	CLE presentation “ A Scientific Approach to Legal Notice Communication” New York, June 2003.
Sidley & Austin	CLE presentation “A Scientific Approach to Legal Notice Communication” Los Angeles, May 2003.
Kirkland & Ellis	Speaker to restructuring group addressing “The Best Practicable Methods to Give Notice in a Tort Bankruptcy.” Chicago, April 2002.
Georgetown University Law Center Mass Tort Litigation Institute	CLE White Paper: What are the best practicable methods to give notice? Dispelling the communications myth -- A notice disseminated is a notice communicated. Faculty – Mass Tort Litigation Institute - Washington D.C., November 1, 2001.
American Bar Association	How to Bullet-Proof Notice Programs and what communication barriers present due process concerns in legal notice. Presentation to the ABA Litigation Section Committee on Class Actions & Derivative Suits - Chicago, IL, August 6, 2001.
McCutchin, Doyle, Brown & Enerson	Speaker to litigation group in San Francisco and simulcast to four other McCutchin locations, addressing the definition of effective notice and barriers to communication that affect due process in legal notice. San Francisco, CA - June 2001.
Marylhurst University	Guest lecturer on public relations research methods. Portland, OR - February 2001.

University of Oregon	Guest speaker to MBA candidates on quantitative and qualitative research for marketing and communications programs. Portland, OR - May 2001.
Judicial Arbitration & Mediation Services (JAMS)	Speaker on the definition of effective notice. San Francisco and Los Angeles, CA - June 2000.
International Risk Management Institute	Expert Commentator on Crisis and Litigation Communications. www.irmi.com/
The American Bankruptcy Institute Journal (ABI)	Past Contributing Editor – Beyond the Quill. www.abi.org/ .

Memberships and Professional Credentials

APR - Accredited Public Relations - The Universal Board of Accreditation Public Relations Society of America.

Member Portland Advertising Federation
Member of the Public Relations Society

Exhibit 2

GCG's Sample Multi-National experience

In re Federal-Mogul Global Inc., No. 01-10578 (AMW) (Bankr. D. Del. 2003). The worldwide notice program for the Federal-Mogul Bankruptcy case was published in 127 countries, 307 publications, and 69 languages. In addition, the notice was published in 28 major publications in United Kingdom and in 14 major publications in the United States. (<http://www.fmoplan.com/>).

Complexities: *The Class consisted of multiple sets of demographics; both white collar and blue collar workers. We analyzed the media and media habits of these populations in the involved countries and published the notice as was necessary to reach both groups effectively. A four-tiered rationale was tailored, so that notice was distributed in an effective manner. Countries were assigned to a tier according to their level of business with Federal Mogul.*

In Re Western Union Money Transfer Litig., Master File No. CV 01 0335 (CPS) (E.D.N.Y 2002). The court approved a worldwide settlement and notice program. The Legal Notice was published in more than 160 publications, in more than 80 countries and in more than 20 languages, it is one of the largest international notice programs ever. (<http://www.cruzlitigation.com/>).

Complexities: *The web site was developed in 20 native languages. This notice program was developed after thorough analysis of the data relating to the amount of and number of transactions conducted around the world. Publications in countries were determined by the volume of money and transactions both inbound from and outbound to the United States. For example, when it was shown that a large amount of money was transferred from the United States to Guatemala, ethnic publications catering specifically to the Guatemalan populations in the United States were used. Also the reverse was true, when large amounts of money were transferred to the United States from other countries, we analyzed the widely circulated, well read publications in those countries. This complex analysis and implementation effectively reached all the targeted populations.*

In re: Swiss Banks Holocaust Victim Asset Litigation Case No. CV-96-4849, (E.D.N.Y. 1999). Finegan managed the design and implementation of the Internet site. The site was developed in 21 native languages. It is a highly secure data gathering tool and information hub, central to the global outreach program of Holocaust survivors. The website can be viewed at www.swissbankclaims.com/.

Complexities: *The web site had to be developed in 21 native languages. The site also had to be designed to work under the lowest common browser. The site was tested across more than 100 different platforms so that a wide range of visitors could easily access this site. Because of the sensitive nature of the information collected on this site, extraordinary security measures had to be established and actively managed to protect it from intrusion and to this day cannot be fully disclosed.*

At several points during the notice campaign the site was used as a platform for real-time press conference coverage at four sites simultaneously. Press conferences were held in New York, Tel Aviv, Paris and Budapest.

In re: Mexico Money Transfer Litigation Settlement, 164 F. Supp. 2d 1002 (N.D. Ill. 2000). (need to bring up the text) This case involved the alleged failure of Western Union and Money Gram to pass along currency conversion discounts to their customers and to post the currency conversion rates in stores. GCG was extensively involved in helping the corporate defendants identify settlement options and related costs.

<http://www.gardencitygroup.com/cases/pdf/WES/WESNotice.pdf>

Complexities: *The challenges in this case were numerous in light of the sheer volume of data from the money transfer companies (approximately 47 million records). GCG designed and formatted bilingual notices and claim forms and implemented an extremely complex notice program that included United States and Mexico radio, TV, and newspapers, as well as an 800-number telephone support system in Mexico and the United States. Extensive tracking and reporting of all activities was required for each of three defendants. We recently implemented the claims phase of this settlement with the completed mailing of over 5,000,000 claim forms. Once the processing of claims is complete later this spring, we will begin mailing thousands of coupons to approved claimants. As a follow-up to this settlement, we have just recently initiated the notice phase of a settlement entitled **Amorsolo v. Western Union Financial Services, Inc.** This case of over 3.2 million California-only class members mimics the process described above. GCG is responsible for implementing all phases of the settlement.*