

NOTICE OF CERTIFICATION AND SETTLEMENT APPROVAL HEARINGS IN THE MATTER OF THE FISHER-PRICE 2010 RECALL CLASS ACTIONS

If you or your child purchased or received as a gift a new Fisher-Price trike, high chair or infant toy in 2010 or earlier, your rights could be affected by a settlement reached in the litigation.

A Settlement has been reached in class proceeding lawsuits against the Defendants, Mattel, Inc., Mattel Canada Inc. and Fisher-Price Inc., in Ontario (Court File no. CV-12-470990-0001, in Toronto) and Quebec (Court File no. 500-06-000526-109, in Montreal). The lawsuits claim that the Defendants were negligent in designing, manufacturing, marketing and selling certain children's trikes, high chairs, Little People® Rampway toys and certain infant toys with inflatable balls, which were subject to recalls announced on September 29 and 30, 2010 (the "Recalled Products"). The "Settlement Class" consists of all persons in Canada who purchased or acquired (including by gift) a Recalled Product. The Settlement provides for the payment of "Settlement Benefits" to members of the Settlement Class who have participated in one of the September 2010 Recalls by requesting and receiving a "Modification Kit". The Settlement provides for total Settlement Benefits of up to \$200,000 to be paid to the Settlement Class. The Settlement further provides for the payment of legal fees and disbursements to Class Counsel in the amount of \$75,000 plus taxes.

The Settlement is a compromise of disputed claims. The Defendants do not admit liability.

The terms of the Settlement, including a detailed list of the product names and numbers of the Recalled Products and details of the Settlement Benefits available to Settlement Class members are contained in the Settlement Agreement entered into by the Defendants and the Plaintiffs in the class proceeding lawsuits, which can be viewed online at www.clg.org or can be obtained from Class Counsel. This notice contains only a summary of the Settlement and Settlement Class members are encouraged to review the complete Settlement Agreement and other information available at www.clg.org.

The proposed Settlement is subject to approval by the Courts. Motions to approve the Settlement will be heard by the Ontario Superior Court of Justice in the City of Toronto on September 16, 2016 at 2:00 P.M. and the Superior Court of Quebec in the City of Montreal on October 12, 2016 at 9:30 a.m. in room 2.08. At these hearings, the Ontario and Quebec Courts will decide whether the action will be certified as a class action for settlement purposes only and, if so, will determine whether the Settlement Agreement is fair, reasonable, and in the best interests of the Settlement Class members.

Settlement Class members who do not oppose the proposed Settlement need not appear at the settlement approval hearings or take any other action at this time to indicate their desire to participate in the Settlement*.

Settlement Class members are entitled to appear and make submissions at the settlement approval hearings. If you wish to comment on or make an objection to the Settlement, a written submission must be delivered to Class Counsel at the address listed below by September 6, 2016. Class Counsel will forward all such submissions to the appropriate Court. All filed written submissions will be considered by the appropriate Court. If you do not file a written submission by the relevant deadline, you may not be entitled to participate, through oral submissions or otherwise, in the settlement approval hearings.

The law firm Consumer Law Group Inc./Consumer Law Group Professional Corporation ("Class Counsel") represents the Plaintiffs and the members of the Settlement Class. Class Counsel can be reached toll free at 1-888-909-7863, in Toronto at (416) 479-4493, in Montreal at (514) 266-7863, in Ottawa at (613) 627-4894, online at www.clg.org, by email to jorenstein@clg.org, or by regular mail at 1030 Berri St., Suite 102, Montreal, Quebec, H2L 4C3, Attention: Jeff Orenstein.

If you have questions that are not answered online at www.clg.org, please contact Class Counsel.

Inquiries should not be directed to the Courts.

Pour obtenir une copie de cet avis ou tout autre information relativement à ce règlement en français, veuillez s'il vous plait consulter le site internet suivant : www.clg.org

*NOTE: You are still entitled to participate in the Fisher-Price Recall Program by visiting <http://service.mattel.com/us/recall.asp> and requesting a modification kit.

THIS NOTICE HAS BEEN AUTHORIZED BY THE ONTARIO SUPERIOR COURT OF JUSTICE AND THE SUPERIOR COURT OF QUEBEC