

**NOTICE OF SETTLEMENT APPROVAL HEARING**  
**CANADIAN AMS WOMEN'S PELVIC MESH LITIGATION**  
Please read carefully. Ignoring this notice will affect your legal rights

**WHAT IS THE PROPOSED SETTLEMENT AND WHO IS INCLUDED?**

A Canada-wide settlement has been reached in litigation against American Medical Systems Canada Inc., American Medical Systems Inc., and Endo Pharmaceuticals Inc. ("AMS"). If you are a woman resident in Canada who is or was implanted with AMS Women's Pelvic Mesh Device(s) for treatment of Stress Urinary Incontinence (SUI) and/or for treatment of Pelvic Organ Prolapse (POP), you may be entitled to receive compensation. The settlement provides for the payment of \$20.8 million (Canadian dollars) which will be used to pay claimant compensation, the administration of the settlement, health care expenses incurred by Provincial Health insurers and Class Counsel legal fees, disbursements and applicable taxes ("Class Counsel Fees").

**THE PROPOSED SETTLEMENT REQUIRES COURT APPROVAL**

To become effective, the Settlement Agreement must be approved by the Ontario Superior Court at a hearing which will be held on **October 4, 2019**. At the hearing, the Court will decide whether to approve the settlement and the "Compensation Protocol," which will govern how the settlement will be paid to the Class, as being fair, reasonable and in the best interests of the Class. Class Counsel will also seek approval of Class Counsel Fees.

**OBJECTING TO THE PROPOSED SETTLEMENT AND OPPORTUNITY TO APPEAR**

If you wish to object to the Settlement Agreement, the Compensation Protocol, or Class Counsel Fees you must submit a written objection to Siskinds LLP at [amsmeshclassactions@siskinds.com](mailto:amsmeshclassactions@siskinds.com) by **no later than September 11, 2019** and, if you do so, you may also make oral submissions to the Court at the hearing. Class Counsel will file copies of all objections with the Court. **Do NOT send an objection directly to the Court.**

**EXPANDED CLASS DEFINITION AND OPTING OUT**

As part of the settlement of the action, the Class Definitions have been expanded to include women resident in Canada who were implanted with AMS SUI Transvaginal Mesh Devices or with AMS POP Transvaginal Mesh Devices on or after May 29, 2015, women resident in Canada who were implanted with an Additional AMS SUI and POP Mesh Device (each of Straight-In Sacral Colpopexy System, InteMesh Silicone-coated sling/silicone-coated surgical mesh with or without InhibiZone, InteXen Porcine Dermal Matrix, IntePro Large pore polypropylene Y mesh and Triangle), at any time, and certain persons with personal relationships with those women. Copies of the amendment orders and the amended class definitions, including a list of applicable devices, are available at [www.amsmeshclassactions.ca](http://www.amsmeshclassactions.ca).

If you were implanted with an AMS SUI Transvaginal Mesh Device or an AMS POP Transvaginal Mesh Device prior to **May 29, 2015**, and did not opt out of the action prior to July 28, 2015 you are a member of this class and may not opt out now, even if you have one of the Additional AMS SUI and POP Mesh Devices.

If you were first implanted with an AMS SUI Transvaginal Mesh Device or an AMS POP Transvaginal Mesh Device on or after **May 29, 2015** or were implanted only with an Additional SUI and POP Mesh Device, however, you may "opt out." Opting out means that you will not be entitled to any compensation if the settlement is approved, but you will be able to commence your own lawsuit or continue any lawsuit you already have brought.

If you would like to opt out, you must do so **no later than September 11, 2019**. More information about how to opt out is available online at [www.amsmeshclassactions.ca](http://www.amsmeshclassactions.ca) or by requesting it from Class Counsel. For English-language assistance, contact Class Counsel at 1-800-461-6166 x2367 or, for assistance in French, 1-800-461-6166 x2409.

**PARTICIPATING IN THE SETTLEMENT**

If the Settlement Agreement is approved by the Court, a further notice will be distributed detailing how to make a claim. It is important that you start to collect your relevant medical records now, as it may take some time to do so. If you have any questions, contact Class Counsel.

**FOR MORE INFORMATION:**

If you have questions about the Settlement Agreement and/or would like to obtain more information, please visit the settlement website at [www.amsmeshclassactions.ca](http://www.amsmeshclassactions.ca). You can also contact Class Counsel at any of the following firms:

**Siskinds LLP**

680 Waterloo St.  
London, ON N6A 3V8  
Elizabeth deBoer  
Tel: 1-800-461-6166 x2367

**Rochon Genova LLP**

900-121 Richmond St.W.  
Toronto, ON M5H 2K1  
Joel P. Rochon  
Tel: 416-363-1867

**Siskinds, Desmeules sencl**

Les Promenades du Vieux-Québec  
43, rue Buade, bur 320  
Québec, QC G1R 4A2  
Erika Provencher  
Tel: 418-694-2009

**Merchant Law Group**

100-2401 Saskatchewan Dr.  
Regina, SK S4P 4H8  
Evatt Merchant  
Tel: 306-359-7777

This Notice contains a summary of some of the terms of the Settlement Agreement. If there is a conflict between this Notice and the Settlement Agreement, the terms of the Settlement Agreement shall prevail.

*This Notice has been approved by the Ontario Superior Court of Justice*