

NOTICE OF CERTIFICATION OF CANADA CARTAGE UNPAID OVERTIME CLASS ACTION

If you were employed by Canada Cartage System, Limited, Canada Cartage Diversified GP Inc., or Direct General Partner Corporation at any time at any time between March 1, 2006 and January 30, 2015, your legal rights might be affected. You should read this notice carefully.

1. CERTIFICATION OF CLASS ACTION

On January 30, 2015, an action was certified as a class proceeding by Order of the Ontario Superior Court of Justice. This means that the common issues that have been certified (and which are described at www.canadacartageclassaction.com) will be determined in a single proceeding, the Common Issues Trial, on behalf of members of the Class (defined below) subject to further Order of the court. The Order appointed Marc-Oliver Baroch as representative Plaintiff for the Class.

2. WHAT THE CLASS ACTION IS ABOUT

The representative Plaintiff Marc-Oliver Baroch is a former Canada Cartage shunter.

The Defendants are Canada Cartage System, Limited, Cartage Diversified GP Inc., and Direct General Partner Corporation. Together, the Defendants are defined as “Canada Cartage,” which provides trucking, warehousing, and distribution services throughout Canada. Canada Cartage is an integrated national operation and is subject to federal regulations.

Mr. Baroch, on behalf of himself and the Class of persons described below, is claiming \$75 million in damages from Canada Cartage for breach of contract, negligence and unjust enrichment, along with \$25 million in punitive damages. The core of the Mr. Baroch’s claim is that Canada Cartage failed to properly pay overtime to Class members.

The court has not taken any position as to the truth or merits of the claims or defences asserted by Mr. Baroch or by Canada Cartage. The allegations made by Mr. Baroch have not yet been proven in court.

3. THE CLASS

By court order, the Class in this lawsuit is defined as:

All persons who, at any time between March 1, 2006 and January 30, 2015, inclusive, were employed by Canada Cartage and who were entitled to receive overtime compensation pursuant to the *Canada Labour Code*, R.S.C. 1985, c. L-2 and its regulations.

If you fall within the Class, you may be included in the class action, unless you opt-out by following the opt-out procedures set out below in section four.

4. OPTING OUT OF THE CLASS ACTION

You can “opt-out” of the class action by sending a written request to opt out to the address listed below, postmarked no later than December 31, 2015:

Mail: Lax O’Sullivan Scott Lisus LLP
RE: Canada Cartage Unpaid Overtime Class Action
145 King Street West
Suite 2750
Toronto, Ontario
M5H 1J8

Your written request to opt-out must include: your name, address, the date, a statement that you wish to opt-out of the class action, and your signature.

The deadline for opting-out of the class action to exclude yourself is December 31, 2015. If your written request to opt-out is not received by that date you may remain a Class member.

If you *opt out*, you will not be eligible to participate in the class proceeding (including any settlement or court award, assuming success on the part of the Plaintiff) and will not be bound by any court orders issued in the class action, whether favourable or not. You will, however, be able to bring litigation against the Defendants on your own in respect of the claims discussed in this notice (subject to any defences the Defendants might have).

If you *do not opt out*, you may be able to participate in the class action (including any settlement or court award, assuming success on the part of the Plaintiff) and may be bound by any court orders issued in the class action, whether favourable or not. However, you may not be able to bring litigation against the Defendants on your own in respect of the same claims discussed in this notice (regardless of the final outcome of the lawsuit).

5. FINANCIAL CONSEQUENCES

If the Common Issues Trial is determined in favour of the Class, or at any subsequent appeal, some class members might be entitled to receive financial compensation from the Defendants. In that event, participation of individual class members may be required to determine individual claims. In addition, in the event that the Common Issues Trial is determined in favour of the Class, the court will also determine the amount of legal fees and disbursements for Class Counsel.

If the Common Issues Trial is determined in favour of the Defendants, Class members will not receive any compensation from this lawsuit.

In the meantime, until the common issues are determined, you should keep copies of all documents and evidence that might be relevant to your individual claim. Such documents and evidence might include copies of: your pay stubs or other information about your pay, timesheets, work schedule, or income tax returns.

No Class member, other than the representative Plaintiff, will be liable for costs with respect to the determination of the common issues. Class members may be liable for costs with respect to the determination of their own individual claims if unsuccessful.

Class Counsel have entered into a contingency fee agreement with the representative Plaintiff with respect to legal fees and disbursements. The agreement provides that Class Counsel will only be paid in the event of success in the case (i.e., a settlement or court award). The agreement provides that the Class will pay to Class Counsel a percentage fee out of the total amounts recovered by the Class from the Defendants plus disbursements and applicable taxes. Class Counsel's fees and disbursements must be approved by the court.

6. ADDITIONAL INFORMATION

Lax O'Sullivan Scott Lisus LLP is Class Counsel in this action.

The certification order and other information are available online at:
<http://www.canadacartageclassaction.com/>

For further information, please contact Lax O'Sullivan Scott Lisus LLP at the coordinates listed below:

Mail: Lax O'Sullivan Scott Lisus LLP
RE: Canada Cartage Unpaid Overtime Class Action
Suite 2750, 145 King Street West
Toronto, Ontario
M5H 1J8

Phone: 416-598-1744

Email: info@canadacartageclassaction.com

To ensure that you receive future notices regarding this class action, including notices about any settlement that might be achieved in the class action, please register online at:
<http://www.canadacartageclassaction.com/registration>

This notice has been approved by order of the Ontario Superior Court of Justice. The court offices will be unable to answer any questions about the matters in this notice.