

To all persons in Québec who have taken Premarin or Premplus and developed breast cancer:
Your rights will be affected by a class action lawsuit

The Superior Court of Québec has authorized this notice.

- You could be affected by a class action that has been authorized against Pfizer Inc., Pfizer Canada Inc., Wyeth, Wyeth Canada, Wyeth Canada Inc., Wyeth Holdings Canada Inc., Wyeth Pharmaceuticals Inc., and Wyeth-Ayerst International Inc.
- The class action includes all persons in Quebec, including their estates, heirs, and parents if applicable, who bought, ingested or consumed the products Premarin and/or Premplus and who have developed breast cancer.
- The Court has not yet decided whether the Defendants did anything wrong. The Defendants deny that the Representative Plaintiff's claim has merit. The claims against Pfizer et al. have not been proven. If you become a Class Member and money or benefits are obtained, you will be notified about how to ask for a share. There is no money available now and no guarantee there will be. However, your rights are affected and you have a choice to make now.

YOUR OPTIONS AT THIS TIME	
DO NOTHING	<p>Remain a part of this class action and await the outcome of the case. Share in the possible money and benefits, if they are achieved.</p> <p>By doing nothing, you keep the possibility of getting money or other benefits that may come from a trial or settlement. But, in doing so, you give up any rights you might personally have to sue about the same legal claims that are raised in this lawsuit.</p>
REMOVE YOURSELF ("OPT OUT")	<p>Remove yourself from this action. Do not share in any money or benefits from it, if any are achieved, but retain your right to pursue an individual claim.</p> <p>If you remove yourself from the lawsuit, and money or benefits are awarded, you won't have a share in that money or those benefits. If you want, you could sue on your own behalf about the same issues that are raised in this lawsuit.</p>

- Your options are explained more fully in this notice. To be removed, you must act by **April 3rd 2018**.

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1. BACKGROUND INFORMATION

The Honourable Martin Castonguay, Justice of the Superior Court of Québec, is responsible for overseeing this case, known as Sifneos v. Pfizer Inc., Court File No. 500-06-000576-112 in the District of Montreal.

The person who started this lawsuit, Roslyn Sifneos, is known as the Representative Plaintiff (as she is acting on behalf of herself and everyone else who has been included in the lawsuit).

The Defendants named in this lawsuit are: Pfizer Inc., Pfizer Canada Inc., Wyeth, Wyeth Canada, Wyeth Canada Inc., Wyeth Holdings Canada Inc., Wyeth Pharmaceuticals Inc., and Wyeth-Ayerst International Inc. (“Defendants”).

(A) What is this lawsuit about?

On August 10, 2011, the Representative Plaintiff filed a Motion to Authorize the Bringing of a Class Action and to be Ascribed the Status of Representative.

The Representative Plaintiff alleges that the usage of the hormone replacement therapy drugs, Premarin and Premplus, leads to an increased risk of breast cancer, and that the Defendants did not properly warn the putative class members of the health risks associated with Premarin and Premplus.

(B) Why is this notice being issued?

This lawsuit has been "authorized" to proceed as a class action. If you fall within the class definition (and are not subject to exclusions), you have certain legal rights and options that you should consider before the Court decides whether the claims being made against the Defendants on your behalf are valid. This notice explains all of these things, and what you need to do to exercise your rights going forward.

(C) What is a class action?

In a class action, one or more people called “representative plaintiffs” launch a claim on behalf of themselves and others who have similar legal claims. Those with similar claims are referred to as the “class” or “group” or as “class members”. The Court attempts to resolve as many issues as possible in one “common issues” trial for all of the class members (there may be some issues that remain to be decided on an individual basis after the conclusion of the common issues trial). Those who have similar claims and do not remove themselves from the class are bound by the decisions of the Court in this case.

To consult the central registry of class actions in Québec, visit:

<http://services.justice.gouv.qc.ca/dgsj/rrc/Demande/DemandeRecherche.aspx>

(D) How do I know if I am a member of the class?

If you wish to participate in this action, you are included in this lawsuit, and do not need to take any further action at this time, if all of the following are true:

- You were, as of March 16th, 2017, a resident of Québec;
- You have taken Premarin or Premplus; and,
- After taking Premarin or Premplus, you developed breast cancer.

There are at least two situations where you may be excluded from this class action even if you meet the above three conditions.

1. A previous class action by a plaintiff in British Columbia, known as the Stanway action, addressed similar issues relating to Premarin and Premplus. Québec residents had the option of “opting in” or joining the Stanway action. If you meet the three conditions above but you have already opted in to the Stanway action, you are excluded from participating in this class action. If you meet the three conditions above but you did not “opt in” to the Stanway action, then you will be included in this class action (and do not need to take any action at this time).

2. If you have brought an individual lawsuit regarding the same subject matter as this class action, you will be deemed to have “opted out” of this class action if you do not discontinue your individual action prior to the opt-out deadline, **April 3rd 2018**.

If you are uncertain whether either of these situations applies to you, please contact the lawyers for the Representative Plaintiff for assistance.

(E) What is the Representative Plaintiff seeking in this action?

The Representative Plaintiff is seeking monetary compensation in the form of compensatory, moral, and punitive damages, plus legal fees, costs, and applicable interest. More specifically, the Representative Plaintiff seeks the following conclusions:

GRANT the class action against Defendants;

CONDEMN Defendants to pay an amount in compensatory damages to every Group Member, amount to be determined by the Court, plus interest as well the additional indemnity;

CONDEMN Defendants to pay an amount in moral damages to every Group Member, amount to be determined by the Court, plus interest as well the additional indemnity;

CONDEMN Defendants to pay an amount in punitive and/or exemplary damages to every Group Member, amount to be determined by the Court;

ORDER collective recovery of moral, punitive and/or exemplary damages.

ORDER that, to the extent possible, the compensatory damages be the subject of individual and direct recovery according to the provisions of 599 to 601 C.C.P.

THE WHOLE with full costs including the exhibits, the experts, the expert reports and the publication of notices.

(F) Is money available to me now?

No. The Court has not yet decided whether any of the Defendants did anything wrong, and no settlement has been entered into by the parties. The Defendants deny the allegations of the Representative Plaintiff. There is no guarantee that money or benefits will ever be available to you. If they become available, however, you will be notified and advised of how you can ask for a share of those benefits.

2. YOUR OPTIONS

At this point, you must decide whether to stay in the Class or remove yourself before the matter proceeds to a trial.

If you do nothing at all, and you fit the definition of the Class, you will automatically be included in the lawsuit. You will be bound by all of the decisions of the Court, whether they are favourable to you and the Class or not. If any benefits are awarded, you will have to take certain actions in order to claim your benefits. You will only receive benefits if you meet the criteria that may be established to award benefits to individual Class Members.

If you wish to remove yourself, you must do so on or before **April 3rd 2018**. You will not be bound by the decisions of the Court in this action, but you also will not share in any money or benefits that are recovered as a result of this action. You retain your right to sue the Defendants individually about these matters, if you so choose. Be aware that you cannot change your mind later and “opt in” to the class action once you have opted out.

To remove yourself, complete the Opt Out Form included with this notice and send it via certified or registered mail to:

Clerk of the Superior Court of Québec
Palais de Justice de Montréal
Dossier No. 500-06-000576-112
1 rue Notre-Dame Est, Salle 1.120
Montreal, QC H2Y 1B6

Your Opt Out Form must be received on or before **April 3rd 2018**.

3. THE LAWYERS

(A) Who represents me in this case?

Roslyn Sifneos, the Representative Plaintiff, is represented by Merchant Law Group LLP in this litigation. Merchant Law Group LLP therefore represents her interests and the interests of Class Members, including yourself.

(B) Can I hire my own lawyer?

If you want to be represented by another lawyer, you may hire one at your own expense. Your lawyer would need to obtain permission from the Court to intervene in the class action. Note that an intervening Class Member may be required to submit to examination on discovery or a medical examination, or both, at the request of the Defendants. A Class Member who does not intervene in the class action cannot be required to submit to an examination on discovery or a medical examination absent a decision rendered by the Court.

(C) How will the lawyers be paid?

You are not personally responsible to pay for Ms. Sifneos' lawyers' work on this class action. Ms. Sifneos has entered into a contingency fee agreement whereby her lawyers will receive the greater of (i) 30% of the monetary recovery achieved for the Class as a whole or (ii) four times the ordinary hourly rates of the lawyers involved, plus disbursements and applicable taxes. If no money is recovered, then they will not be paid anything at all. Moreover, any payments made to the lawyers will be subject to the approval of the Court.

If you hire your own lawyer, you are responsible for paying any fees or charges levied by your lawyer.

4. NEXT STEPS

(A) The Common Issues Trial

If the case is not settled or otherwise dismissed by the Court, the Representative Plaintiff will have to prove her claims and the claims of the Class at a trial. The trial would be held in Montreal, Quebec. During the trial, the Court would hear all of the evidence and make a decision about whether the Representative Plaintiff or the Defendants should prevail.

(B) The Common Questions

Following are the principal questions of law and fact that are to be answered through the common issues trial:

- (a) Does the consumption or ingestion of Premarin and/or Premplus provoke an increased risk for consumers to develop breast cancer?
- (b) Were the Defendants negligent in the developing, testing, manufacturing, distribution and sale labelling of Premarin and/or Premplus?
- (c) Did Defendants adequately inform the Class Members of the risks of developing breast cancer associated with the use of Premarin and/or Premplus?
- (d) Are Defendants liable to pay damages to the Group Members as a result of their negligence and/or misrepresentations in manufacturing, marketing, distributing or selling of Premarin and/or Premplus?
- (e) Are Defendants liable to pay compensatory damages to the Group Members, and if so in what amount?
- (f) Are Defendants liable to pay moral damages to the Group Members, and if so in what amount?
- (g) Are Defendants liable to pay exemplary or punitive damages to the Group Members, and if so in what amount?

(C) Will I receive money after the common issues trial?

There is no guarantee that the Representative Plaintiff will win any money or benefits for the Class.

If the Representative Plaintiff obtains money or benefits as a result of a trial or settlement, you will be notified about how to ask for a share or what your other options are at that time. You may be required to prove your individual claim, and may be responsible for the costs of doing so. At that time, you may opt to retain Merchant Law Group LLP to assist, or you may hire another lawyer of your own choosing.

(D) How will I know what is happening?

Lawyers for the Representative Plaintiff may occasionally transmit court-approved notices to Class Members on the status of the action.

If you would like to receive these notices, please call Merchant Law Group LLP at (514) 248-7777 or visit <http://www.merchantlaw.com/premarin> to sign up for the notification list.

5. FOR MORE INFORMATION

To view related court documents and information, visit:

<http://www.merchantlaw.com/premarin>

You can get more information about this case and opting out by contacting:

Merchant Law Group LLP
10 rue Notre-Dame Est, Suite 200
Montreal, Quebec H2Y 1B7

Tel: (514) 248-7777 or toll free 1-866-567-7777
Fax: (514) 842-6687

Roch Dupont (rdupont@merchantlaw.com)
Erik Lowe (elowe@merchantlaw.com)

OPT-OUT FORM

CANADA
PROVINCE OF QUÉBEC
DISTRICT OF MONTREAL

S U P E R I O R C O U R T
(CLASS ACTION)

No. 500-06-000576-112

ROSLYN SIFNEOS

Plaintiff

v.

PFIZER INC., PFIZER CANADA INC.
WYETH, WYETH CANADA, WYETH CANADA
INC., WYETH HOLDINGS CANADA INC., WYETH
PHARMACEUTICALS INC., and WYETH-AYERST
INTERNATIONAL INC.

Defendants

Complete this opt-out form only if you are a Member of the Class (as described in the Notice of Authorization) and you wish to be excluded or removed from participating in the class action Sifneos v Pfizer Inc., Superior Court of Quebec File No. 500-06-000576-112 (District of Montreal). This form must be received by the Clerk of the Superior Court of Quebec on or before **April 3rd 2018** at the following coordinates:

Clerk of the Superior Court of Québec
Palais de Justice de Montréal
Dossier No. 500-06-000576-112
1 rue Notre-Dame Est, Salle 1.120
Montreal, QC H2Y 1B6

Your Name: _____

Your Mailing Address: _____

Telephone Number: _____

Email Address: _____

By signing below, I certify that I do not wish to participate in the Sifneos v Pfizer Premarin/Premplus Class Action and I understand that, by opting out, I will not receive any part of the money or benefits that may be obtained on behalf of Class Members by the Representative Plaintiff.

Signature

Date