

NEURONTIN® (GABAPENTIN) CLASS ACTION

NOTICE OF CLASS CERTIFICATION

PLEASE READ THIS NOTICE CAREFULLY. IT MAY AFFECT YOUR LEGAL RIGHTS.

TO: all persons in Canada who used the drug Neurontin® prior to August 5, 2004 (the “Class” or “Class Members”)*

***for full class definition please see section 1 below**

1. THE NATURE OF THE LAWSUIT

A class action (*Goodridge et al. v. Pfizer Canada Inc. et al.* – Court File No. 06-CV-307728CP “Action”) has been commenced in the Ontario Superior Court of Justice (“Court”) against Pfizer Canada Inc. and Pfizer Inc. (the “Defendants”) in which it is alleged that use of Neurontin® causes an increased risk of suicidal behaviour and that Neurontin® is ineffective and/or defective or unfit for the purpose for which it was intended. The plaintiffs in the class action seek damages against the Defendants on behalf of the Class. The Defendants deny the plaintiffs' allegations, are defending the Action, and deny any wrongdoing and liability for damages.

On February 18, 2010, the Court certified the Action as a class proceeding. The Class to which the Action applies, as approved by the Court, is defined as:

- (a) all persons resident in Canada who were prescribed and ingested the drug Neurontin® at any time before August 5, 2004; and
- (b) all persons resident in Canada who by virtue of a personal relationship to one or more of such persons described in (a) above with a valid claim, have standing in this action pursuant to s. 61(1) of the *Family Law Act*, R.S.O. 1990, c. F.3, as amended (or a applicable provincial statutory provision or the common law as applicable).

This notice is to advise you of the certification of this Action as a class proceeding and to inform you of your rights as a Class Member. You will be bound by the outcome of the litigation unless you choose to exclude yourself by opting out. The opt-out process is explained in section 2 below.

This notice does not mean that the Court has taken a position as to the likelihood of recovery on the part of any plaintiffs, or as to the merits of the claims or defences asserted by either side.

The Court has determined that the Action only applies to individuals who used brand name Neurontin®. Claims on behalf of individuals who only used generic gabapentin are not included in this Action.

This notice does not constitute medical advice. Patients who have been prescribed Neurontin® should consult with their physicians if they have any questions with respect to their medical condition and should not stop taking Neurontin® without consulting with their health care professional.

The Court may determine a number of issues common to the Class (“Common Issues”) including whether or not Neurontin® can cause suicidal behaviour, whether the defendants properly warned of the alleged risks, and, if there is any liability, if this is an appropriate case to disgorge any part of the proceeds received by the Defendants from selling Neurontin®.

Following a determination of the Common Issues, further stages of litigation may be required. Stage 2, only if necessary, will involve determining the issue of liability on an individual basis. Stage 3, again only

if necessary, will involve the assessment of damages on an individual basis unless damages are assessed on an aggregate basis at the same time or after the Common Issues are determined.

2. WHAT OPTIONS DO CLASS MEMBERS HAVE?

If you wish to remain a member of the Class, you do not have to do anything at this time. If you wish to obtain more information about your rights as a Class Member you may contact the lawyers for the Class (“Class Counsel”), Siskinds LLP, using the contact information provided in section 4 below.

If you wish to exclude yourself from the Action (“opt out”), you must deliver a written notice to Class Counsel (at the address provided below in section 4) specifying your desire to opt out of the Action. Notice of your decision to opt out must be received by April 10 2012.

A Class Member who opts out of the Action will **not** be entitled to participate in the distribution of any monies ultimately collected, if any, as part of the Action.

A Class Member who does not opt out of the Action will be forever barred from instituting or continuing any action against the Defendants relating to allegations, among other things, that Neurontin[®] increases the risk of suicidal behaviour, that Neurontin[®] is ineffective and/or defective, and that the Defendants breached a duty to warn or misrepresented any of the risks of harm from Neurontin[®].

In addition, a Class Member who does not opt out of the Action will be bound by the Courts’ determination of the Common Issues in the Action as against the Defendants, regardless of whether the plaintiffs are successful or unsuccessful in those claims.

3. FINANCIAL CONSEQUENCES

Class Members may be entitled to receive financial compensation from the Defendants if the Action is successful.

No Class member, other than the representative plaintiffs, will be liable for costs with respect to the determination of the common issues. However, once the court has determined the common issues it may be necessary that the individual members of the Class participate in individual proceedings to determine issues which are not common to the Class in order to establish their claim. If this is necessary, Class members will then be entitled to decide whether to participate further. Each member of the Class who chooses to participate may have to bear costs of such individual proceedings and, if unsuccessful, could be liable to pay a portion of the defendants' costs incurred with respect to such individual proceedings.

The representative plaintiffs have entered into an agreement with their lawyers whereby fees and disbursements related to the trial of the Common Issues will be payable only in the event of success in the Action. Any fees sought by Class Counsel will be subject to Court approval.

4. FURTHER INFORMATION

For further information, please contact Class Counsel as follows:

English enquiries: Siskinds^{LLP}
680 Waterloo Street
London ON N6A 3V8

Matthew D. Baer
Tel: (800) 461-6166 x7782
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43 Rue Buade, Bur 320
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Nathalie Boulay
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Further information can also be obtained from Class Counsel’s website: www.classaction.ca

This notice has been authorized by the Ontario Superior Court of Justice