

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

CANADIAN COMMERCIAL WORKERS INDUSTRY PENSION PLAN

Plaintiffs

- and -

ROYAL GROUP TECHNOLOGIES LTD., VIC DE ZEN,
DOUGLAS DUNSMUIR, GARY BROWN, RON GOEGAN, DOMINIC D'AMICO, GREGORY
SORBARA, RONALD SLAGHT and
RALPH BREHN

Defendants

Proceeding Under the *Class Proceedings Act*, 1992

Affidavit of Nicole Young

I, Nicole Young, of the Village of Ailsa Craig, in the Province of Ontario, MAKE OATH AND SAY:

1. I am a law clerk with Siskinds^{LLP} and as such, have knowledge of the following matters:
2. On September 25, 2007, the U.S. Court issued its order approving the form of the notices proposed and the method of distributing it to Class Members, subject to the requirement that it be published in the Wall Street Journal rather than in the Investors' Business Daily as originally proposed.
3. On Friday, October 12, 2007, the Notice of Pendency and Certification of Class Action, Proposed Settlement and Settlement Approval/Fairness Hearings, Summary Notice of Pendency and Certification of Class Action, Proposed Settlement and Settlement Approval/Fairness Hearings, and the Proof of Claim and Release Form were placed on Siskinds website at www.classaction.ca, in both the English and French Language.
4. On Tuesday, October 16, 2007 the Summary Notice of Pendency and Certification of Class Action, Proposed Settlement and Settlement Approval/Fairness Hearings was published in the

English Language in the Globe and Mail (Report on Business), National Post (Financial Post) and the Wall Street Journal, and in the French language in La Presse. Copies of the Summary Notice of Pendency and Certification of Class Action, Proposed Settlement and Settlement Approval/Fairness Hearings as published in each of the above publications are attached as exhibits "A", "B", "C" and "D" respectively.

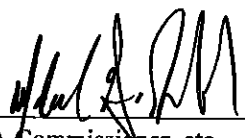
5. On Tuesday, October 16, 2007 the Summary Notice Pendency and Certification of Class Action, Proposed Settlement and Settlement Approval/Fairness Hearing was sent over Marketwire in both the English and French Language and over Businesswire in the English Language. A copy of the press release sent over each of the wire services is attached as exhibit "E".
6. On Tuesday, October 16, 2007, I made a request to SCAS to issue a securities class action alert advising its institutional investor clients of the certification of the Actions for settlement purposes only, the deadlines for opting-out and objecting to the Settlement, and the time and place of the Canadian and U.S. Approval Hearings. SCAS issued such bulletin on October 16, 2007. A copy of the bulletin sent electronically by SCAS is attached as exhibit "F".
7. On Tuesday, October 16, 2007, I made a request to CDS to issue a bulletin to all brokerages participating in the CDS systems, which would contain the long-form Pre-Approval Notice and Proof of Claim and a request from the Courts that each participating brokerage forward a copy of such notice and Proof of Claim to any investors or non-member brokerages who purchased Royal Group securities through the participating brokerage during the Class Period. CDS issued such bulletin on October 19, 2007.
8. Over the period that the notice has been outstanding, Siskinds has been contacted by approximately 25 individuals inquiring about the Settlement. Those individuals generally indicated that they had received the notice package, and were inquiring about what steps they needed to take, or what they might expect to recover upon filing a claim.

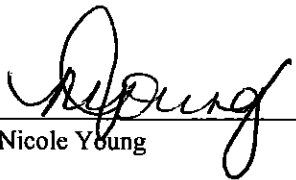
SETTLEMENT FUND ACCOUNTING

- 9. Pursuant to the Stipulation, Siskinds LLP was appointed Escrow Agent for the Settlement Fund.
- 10. Pursuant to the Stipulation, the Settlement Amount began accruing interest for the Class as of March 19, 2007. The Gross Settlement Fund, including interest of \$9,016,752.12 was wired into Siskinds' LLP's trust account on April 10, 2007.
- 11. Between April 10, 2007 and December 4, 2007, the Settlement Fund has accrued interest of \$276,220.36.
- 12. To date, the following expenses have been or are expected to be incurred with respect to the administration of the Settlement:

| Nature of Expense | Amount (CAD\$) |
|---|---|
| Publication of Summary Notice in Globe and Mail, National Post, Journal de Montreal and Wall Street Journal (Invoice attached as Exhibit "G") | Fee: \$80,017.87 GST: \$4,801.07 |
| Invoices from Brokerage Firms for costs of mailing notice to individual clients (Invoices attached as Exhibit "H") | Fee: \$1,968.79 |
| Claims Administrator's Fees | Fee: \$115,000.00 GST: \$6,900.00 |
| Cost of Translation of Notices (Invoice attached as Exhibit "I") | Fee: \$4,000.00 GST: \$240.00 QST: \$318.00 |
| Sub Total GST QST Total | \$200,986.66 \$11,941.07 \$318.00 \$213,245.73 |

SWORN OR AFFIRMED before me at the)
 City of London, in the County of Middlesex)
 of this day of December, 2007.)


 _____)
 A Commissioner, etc.)


 _____)
 Nicole Young)

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at Milton

Proceeding under the *Class Proceedings Act, 1992*

AFFIDAVIT OF NICOLE YOUNG

Siskinds LLP
Barristers & Solicitors
680 Waterloo Street
P.O. Box 2520
London, ON N6A 3V8

A. Dimitri Lascaris (LSUC #: 50074A)
Michael G. Robb (LSUC #: 45787G)
Tel: (519) 660-7872
Fax: (519) 660-7873

Cavaluzzo Hayes Shilton McIntyre & Cornish LLP
474 Bathurst St., Suite 300
Toronto, ON M5T 2S6

Michael Wright (LSUC#: 32522T)
Tel: (416) 964-1115
Fax: (416) 964 5895

Solicitors for the Plaintiff