

PLAN OF DISSEMINATION

Notice of Settlement Approval in the Matter of Chocolate Products Class Action Litigation ~ Cadbury and ITWAL Settlements

Terms that are capitalized herein have the meanings attributed to them in the Cadbury and ITWAL Settlement Agreements.

The Notice of Settlement Approval shall be distributed in the following manner:

Short-Form Notice:

1. published once in the following newspapers:
 - (a) The Vancouver Sun;
 - (b) The Province (Vancouver);
 - (c) Calgary Herald;
 - (d) Edmonton Journal;
 - (e) The StarPhoenix (Saskatoon);
 - (f) The Leader Post (Regina);
 - (g) Winnipeg Free Press;
 - (h) The Globe and Mail (National Edition);
 - (i) The Toronto Star;
 - (j) The National Post;
 - (k) Le Journal de Montréal;
 - (l) Le Soleil;
 - (m) The Telegraph-Journal (Saint John, New Brunswick);
 - (n) The Chronicle Herald (Halifax);
 - (o) The Guardian (Charlottetown);
 - (p) The Telegram (St. John's, Newfoundland); and
 - (q) Yukon News.

2. published once in the following industry magazines, assuming reasonable publication deadlines:
 - (a) Canadian Grocer;
 - (b) L'alimentation;
 - (c) C-Store Canada;

- (d) Western Grocer; and
 - (e) YCM (Your Convenience Manager)
3. sent to the following organizations for voluntary distribution to their membership:
- (a) Canadian Counsel of Grocery Distributors;
 - (b) Canadian Federation of Independent Grocers;
 - (c) Canadian Food Industry Council;
 - (d) Retail Counsel of Canada;
 - (e) Retail Advertising Club (RAC) Canada;
 - (f) National Convenience Stores Distributors Association;
 - (g) Canadian Convenience Stores Association;
 - (h) L'Association des détaillants en alimentation du Québec;
 - (i) Conseil québécois du commerce de détail (CQCD); and
 - (j) Association des marchands dépanneurs et épiciers (AMDEC).

Long-Form Notice:

- 4. posted by Class Counsel and Additional Counsel on their respective websites.
- 5. sent by direct mail by Class Counsel to Persons in Canada who purchased Chocolate Products from Cadbury or ITWAL in Canada during the Settlement Class Period, based on the customer information provided by Cadbury and ITWAL pursuant to the terms of the Settlement Agreements. The direct mailing shall occur within 7 days of the first publication of the Short-Form Notice.