

NOTICE OF PROPOSED SETTLEMENT OF A CLASS ACTION

Patrice St. Arnaud v. Facebook Inc.

Quebec Superior Court: Court File No. 500-06-000511-101

BE ADVISED that, further to a Settlement Agreement concluded between the Plaintiff and the Defendant (the “**Settlement Agreement**”), the Honourable Justice Michel Déziel of the Superior Court of Québec (the “**Court**”) will be asked on February 9, 2012, to authorize the action as a class action and to approve the said Settlement Agreement, on behalf of all of the members of the Class. The hearing will be held at 9:30 A.M. at the Montreal Courthouse, 1 Notre-Dame East, Montreal, Quebec, H2Y 1B6, in a room to be determined.

SETTLEMENT TERMS

The Settlement Agreement definitively settles the aforementioned dispute, and if approved by the Court, will have the effect of putting an end to all the claims that the Members have or could have against the Defendant.

The Settlement Agreement provides for Defendant’s updated privacy policy to be maintained in substantially the same form or manner for at least three years from the date of implementation.

The Settlement Agreement also provides for the payment by the Defendant of the Plaintiff’s Attorneys’ fees and disbursements up to an amount of \$75,000.00 (including applicable taxes), subject to the approval by the Court in the context of the Settlement Approval Hearing.

A further compensatory payment of \$1,000.00 will be made to the class representative Patrice St. Arnaud.

A COPY OF THE SETTLEMENT AGREEMENT CAN BE OBTAINED FROM PLAINTIFF’S ATTORNEYS AT THE BELOW ADDRESS OR ACCESSED AT THEIR WEBSITE WWW.MERCHANTLAW.COM

**Merchant Law Group LLP
10 Notre-Dame Est, Suite 200
Montréal, Québec, H2Y-1B7
Attention : Me Owen Falquero**

Any Member who wishes to oppose the Settlement Agreement must send a written notice to Plaintiff’s Attorneys to this effect postmarked no later than January 10, 2012, including therein a statement of the reasons for their opposition. Plaintiff’s Attorneys will forward the written notices of opposition to the Honourable Justice Michel Déziel of the Québec Superior Court no later than January 17, 2012.

Any Member who opposes the Settlement Agreement may be present at the Settlement Approval Hearing in order to make representations before Justice Déziel.

Members who do not oppose the Settlement Agreement are not required to appear at the Settlement Approval Hearing or to take any other action to indicate their acceptance of and participation in the Settlement Agreement.