

PREMARIN® / PREPLUS® CLASS ACTION OPT-OUT FORM

Please complete this form if (1) you are a member of the Class, as defined below, (2) you are a resident of a province *other than* Québec, and (3) you do not wish to participate in or be bound by the determinations of the Superior Court of Québec in respect of a settlement that has been reached as between the Plaintiff and the Defendants in *Roslyn Sifneos v Pfizer Inc., Pfizer Canada Inc., Wyeth, Wyeth Canada, Wyeth Canada Inc., Wyeth Holdings Canada Inc., Wyeth Pharmaceuticals Inc., and Wyeth-Ayerst International Inc.*, Superior Court of Québec No. 500-06-000576-112 (the “**Settlement**”).

More information on the settlement, including a copy of the settlement agreement, is available at <http://www.merchantlaw.com/premarin>.

The “**Class**” includes:

All persons in Canada, including their estates, heirs and relatives, if any, who purchased, ingested or consumed Premarin® or Premplus® products manufactured, marketed and distributed by the Defendants and who developed breast cancer, but excluding any person who was a *Stanway* Proceeding Class Member.

A “**Stanway Proceeding Class Member**” means “Any woman who, as of August 25, 2014 (the deadline for opting in or out of the *Stanway* Proceedings), was a resident of British Columbia or who delivered an opt-in form in respect of the *Stanway* Proceedings on or before Friday, October 10, 2014, and who was prescribed Premplus, or Premarin in combination with progestin, in Canada during the period that runs from January 1, 1977 to December 1, 2003 and ingested Premplus, or Premarin in combination with progestin, and were thereafter diagnosed with breast cancer.”

By completing and returning this Opt-Out Form as set out below, you are choosing:

- not to take part in the Settlement,
- not to participate in any way in the class action; and
- not to participate in any benefits arising from the Settlement.

If you complete this Opt-Out Form, you will not be bound by the Settlement or the release in the Settlement, but you will also not be entitled to share in any of the proceeds that may become available as part of the Settlement to Class Members who have not opted out of the Settlement.

In order to be effective, this form must be fully completed and sent to Class Counsel at the address set out below, and must be received no later than **March 30, 2023**. Opt-Out Forms received after **March 30, 2023** will not be accepted.

PREMARIN® / PREPLUS® CLASS ACTION OPT-OUT FORM

Your name: _____ (required)

Your address: _____ (required)

Your telephone number: (_____) _____ - _____ (required)

Your email address: _____

Declaration:

I wish to opt-out of the Settlement. I understand that by submitting this Opt-Out Form, I will not receive any benefits under the Settlement but will not be bound by the Settlement.

Signature

Date

Return completed Opt-Out Form to Class Counsel (which must be received no later than March 30, 2023):

MERCHANT LAW GROUP LLP
224 4th Ave S
Saskatoon, SK S7K 5M5

Via Fax: (306) 975-1983

Via Email: premarin@merchantlaw.com

For assistance or more information, contact:

- For Québec residents: 514-248-7777 / montreal@merchantlaw.com
- For residents of other provinces: 403-219-0182 / heidi@merchantlaw.com