

HEARING NOTICE

Dear (merge filed, insert name),

Court of King's Bench of Alberta Court File Number 1901-04984
(the "CEF Representative Action")

**Were you a CEF Depositor in the Lutheran Church – Canada,
Church Extension Fund ("CEF")
who suffered a loss on your investment and did not opt-out of the
Representative Action sanctioned by the Court of King's Bench of
Alberta in Action No. ABQB No. 1501-00955
(the "CCAA Proceedings")?**

This notice may affect your legal rights. Please read it carefully.

A class action has been commenced against various Defendants on behalf of the following proposed Class (the "CEF Representative Action Class"):

- a. A class of people resident in Alberta, including persons, estates of depositors, corporations and societies, sole proprietorships and partnerships and congregations affiliated with the Lutheran-Church Canada (the "Alberta Lutheran Sub-Class"); and
- b. An extra-provincial class of people outside of Alberta, including persons, estates of depositors, corporations and societies, sole proprietorships and partnerships and congregations affiliated with the Lutheran-Church Canada (the "Extra-Provincial Lutheran Sub-Class"); and
- c. A class of people resident in Alberta who were resident in Alberta, and the estates of such persons, who were not members of the Lutheran-Church congregation, including corporations and societies, sole proprietorships and partnerships and any other depositors (the "Alberta Non-Lutheran Sub-Class"); and
- d. An extra-provincial class of people resident outside of Alberta, and the estates of such persons, who were not members of a Lutheran-Church congregation, including corporations and societies, sole proprietorships and partnerships any other depositors (the "Extra-Provincial Non-Lutheran Sub-Class"); AND WHO
- e. Invested in the Lutheran-Church-Canada Alberta and British Columbia District's Church Extension Fund (the "CEF") as depositors toward the fund

Except for "Excluded Persons" which shall be defined as follows:

- (i) A Defendant in this class action; or

- (ii) Any past and present subsidiaries, affiliates, officers, directors, senior employees, partners, legal representatives, heirs, successors, predecessors, and assigns of the Defendants; or
- (iii) All members of the putative Classes or Sub-Classes who submitted no later than December 15, 2016 an opt-out form in the manner prescribed by the District Sanction Order filed August 5, 2016 in Alberta Court of King's Bench of Alberta Action No. 1501-00955

A partial settlement has been reached with the Defendants Francis Taman, Bishop & McKenzie LLP, a Partnership, Ronald Chowne and Prowse Chowne LLP, a Partnership (the "Third Settling Parties"). The Third Settling Defendants, while not admitting liability, have agreed to a settlement of their portion of this lawsuit subject to court approval and partial certification of the CEF Representative Action for the purpose of approval of such settlement only, on terms as set out in a settlement agreement dated March 25, 2025, a copy of which is available for viewing on www.mnp.ca/ceflccsettlement (the "Third Settlement Agreement"). All capitalized groups of words in this Hearing Notice which are defined in the Third Settlement Agreement have the same definition in this Hearing Notice.

If you are a member of the CEF Representative Action Class, **you will automatically be included** in the CEF Representative Action and are not required to take any further steps at this stage.

The Terms of the Proposed Settlement

The Settlement Funds paid by the Settling Defendants are to be allocated to augment the existing litigation holdback fund to cover costs associated with the approval process, potential future costs and disbursements in the Representative Action, and to cover ("self insure") the Representative Plaintiffs in this Action against potential adverse court costs, or in such other amount as the court may direct. The settlement funds to be paid are not substantial enough to warrant a feasible cash distribution amongst the large number of Class Members.

Accordingly, if the settlement is approved, and subject to court approval, members of the Representative Action Class will not be paid a proportionate share of the Settlement Funds at this stage in the litigation. The Subcommittee's intention is that any unexpended holdback funds at the conclusion of this Class Action would be subject to a final distribution amongst the Direct Depositors.

A copy of the Settlement Agreement, redacted for the Consideration [total settlement amount], can be found on the Administrators Website: www.mnp.ca/ceflccsettlement

No Further Opt-Out

The Representative Plaintiffs in the CEF Representative Action will be asking the Court to direct that no further opt-out process be required as an opt-out process has already been completed in the CCAA Proceedings and further sanctioned and approved by the Honourable Associate Chief

Justice J.D. Rooke in the CEF Representative Action pursuant to an Order pronounced November 25, 2021 and filed with the Court on December 16, 2021 (the “2021 Order”).

IF NO FURTHER OPT-OUT PROCESS IS ORDERED, ANY JUDGMENT OBTAINED ON THE COMMON ISSUES FOR THE PROPOSED CLASS, WHETHER REACHED BY SETTLEMENT OR NOT, WHETHER FAVOURABLE OR NOT, WILL BIND ALL CLASS MEMBERS WHO HAVE NOT ALREADY OPTED OUT OF THIS ACTION.

The Partial Settlement Approval and Partial Certification Hearing and Your Right to Observe or Participate

An Application to approve the partial settlement of the CEF Representative Action and to partially certify the CEF Representative Action as a class proceeding for the purpose of approving such partial settlement only, is scheduled to be heard on January 23, 2026 at 1:00 pm at the Court of King’s Bench of Alberta in Calgary, Alberta at 601 5 St SW. Class Counsel will also seek to confirm their appointment as Class Counsel and ask the Court to approve an award of fees and disbursements for their work in achieving the settlement.

If you agree with the proposed settlement and wish to participate in it, you do not have to do anything at this time.

The Application will proceed before the Court by videoconference. If you wish to attend the Application as an observer, you may do so by using the videoconference link and password found on Class Counsel’s website.

If you disagree with the proposed settlement, you have the right to object. To object, you must provide a letter to Class Counsel and to Gowling WLG, Attn: Mr. David Bishop, Counsel for the Non-Settling Defendants, using their respective contact information below. Your letter must include your name, contact information, and a brief statement of the nature and reasons for your objection, and be received no later than January 16, 2026. If you wish to attend the Application to speak about your objection, you must also provide a further letter in the same fashion to Class Counsel and to Gowling WLG, Attn: Mr. David Bishop requesting to do so by no later than January 16, 2026. Upon such request, you will be provided with a separate password which, when used in conjunction with the videoconference link on Class Counsel’s website, will enable the Court to hear you. The Court will decide during the hearing of the Application whether you will be permitted to speak about your objection.

What are the Financial Consequences?

No member of the CEF Representative Action Class, other than the Representative Plaintiffs, will be liable for costs.

Class Counsel has entered into an agreement with the Representative Plaintiffs and the CEF Subcommittee, which was established in the CCAA Proceedings, with respect to legal fees and disbursements. This agreement provides that counsel will not receive payment for their work unless and until the CEF Representative Action is successful or monies are recovered from the Defendants. This agreement was approved by the Court pursuant to the 2021 Order.

All capitalized groups of words in this Notice which are defined in the Third Settlement Agreement have the same definition in this Notice.

FOR MORE INFORMATION, OR TO MAKE INQUIRIES ABOUT THIS ACTION, PLEASE CONTACT CLASS COUNSEL AT:

Napoli Shkolnik Canada

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Gowling WLG (Counsel for Non-Settling Defendants)

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MNP Ltd. (Putative Claims Administrator)

Attention: Rick Anderson
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For further information: <https://ceflccsettlement@mnp.ca>