

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

BETWEEN:

MARC CHARETTE and ANDREW CUMMING

Plaintiffs

and

TRINITY CAPITAL CORPORATION,  
TRINITY WOOD CAPITAL CORPORATION,  
CAPITAL STRUCTURES LTD.,  
CAPITAL STRUCTURES 2002 LTD.,  
TC CAPITAL LIMITED, JAMES DOUGLAS BEATTY,  
JAMES GORDON ARNOLD,  
THE JOHN McKELLAR CHARITABLE FOUNDATION,  
FRASER MILNER CASGRAIN LLP, GRAHAM TURNER,  
BDO DUNWOODY LLP and RALPH THOMAS NEVILLE

Defendants

Proceeding under the *Class Proceedings Act, 1992*

**PLAN OF NOTICE**

1. The Notice shall be disseminated as follows:
  - (a) Class Counsel shall post the Notice in English and French on the website at [www.strosbergco.com/class-actions/trinity/](http://www.strosbergco.com/class-actions/trinity/);
  - (b) Class Counsel shall e-mail the Notice to Class Members for whom they have current e-mail addresses;
  - (c) Class Counsel shall mail the Notice to Class Members for whom they have current mailing addresses but no e-mail addresses; and
  - (d) The Third Parties shall provide a copy of the Notice to the Class Members who are or were their clients and for whom they have contact information and the reasonable costs incurred in doing so shall be a Non-Refundable Expense.