

Schedule "A"

INJURY LEVEL	QUALIFYING CRITERIA AND REQUIRED DOCUMENTATION	COMPENSATION
<p><u>PSYCHOLOGICAL (NON-PHYSICAL) HARM</u></p> <p><u>Level 1</u></p> <p>Class members who consumed the Recalled Product and sustained psychological injuries or trauma for up to 60 days, with an onset after August 17, 2008, with no accompanying bodily injury.</p>	<ol style="list-style-type: none"> 1. Proof of purchase or retained packaging or proof of returned product OR affidavit attesting to purchase; and 2. Declaration attesting to consumption; and 3. Supporting contemporaneous medical documentation showing psychological injury or trauma relating to the recall and consumption of Recalled Meats. 	<p>\$2,000.00 per month to a total of \$4,000.00</p> <p>+ special damages supported by sworn statement and appropriate documentation, including medical documentation</p> <p>+subrogated provincial insurer payments for those insurers who have entered into retainer agreements with Counsel</p>
<p><u>Level 2</u></p> <p>Class members who consumed the Recalled Product and sustained psychological injuries or trauma for up to 60 days, with an onset after August 17, 2008, with no accompanying bodily injury, if the class member falls within a group that is particularly at risk for contracting listeriosis. Health Canada has identified at risk individuals as including pregnant women and their unborn/newborn children, the elderly (65 plus) and people with weakened immune systems.</p>	<ol style="list-style-type: none"> 1. proof of purchase or retained packaging or proof of returned product OR declaration attesting to purchase and/or consumption; and 2. declaration attesting to consumption ;and 3. supporting contemporaneous medical documentation showing psychological injury or trauma relating to the recall and consumption of Recalled Meats; and 4. supporting documentation to show that claimant is a member of a high risk group. 	<p>\$3,000.00 per month to a total of \$6,000.00</p> <p>+ special damages supported by sworn statement and appropriate documentation, including medical documentation</p> <p>+subrogated provincial insurer payments for those insurers who have entered into retainer agreements with Counsel</p>

<p><u>Level 3</u></p> <p>Class members who consumed the Recalled Product and sustained psychological injuries or trauma for more than 60 days, with an onset after August 17, 2008, with no accompanying bodily injury.</p>	<ol style="list-style-type: none"> 1. proof of purchase or retained packaging or proof of returned product OR declaration attesting to purchase and/or consumption; and 2. contemporaneous medical documentation of psychological harm relating to the recall and consumption of recalled products;* and 3. Supporting documentation showing that claimant is a member of a high risk group. 	<p>\$13,500.00</p> <p>+ special damages supported by sworn statement and appropriate documentation</p> <p>+subrogated provincial insurer payments for those insurers who have entered into retainer agreements with Counsel</p> <p>OR, ALTERNATIVELY</p> <p>Arbitration is available for claimants falling into Level 3 psychological harm at the request of the claimant.</p>
<p><u>Level 4</u></p> <p>Class members who consumed the Recalled Product and sustained psychological injuries or trauma more than 60 days, with an onset after August 17, 2008, with no accompanying bodily injury, if the class member falls within a group that is particularly at risk for contracting listeriosis. Health Canada has identified at risk individuals as including pregnant women and their unborn/newborn children, the elderly (65 plus) and people with weakened immune systems.</p>	<ol style="list-style-type: none"> 1. proof of purchase or retained packaging or proof of returned product OR declaration attesting to purchase and/or consumption; and 2. contemporaneous medical documentation of psychological harm relating to the recall and consumption of recalled products;* and 3. Supporting documentation showing that claimant is a member of a high risk group. 	<p>\$17,500.00</p> <p>+ special damages supported by sworn statement and appropriate documentation</p> <p>+subrogated provincial insurer payments for those insurers who have entered into retainer agreements with Counsel</p> <p>OR, ALTERNATIVELY</p> <p>Arbitration is available for claimants falling into Level 4 psychological harm at the request of the Claimant.</p>

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<p><u>PHYSICAL HARM (with or without secondary psychological harm)</u></p> <p><u>Level 1</u></p> <p>Class Members who consumed the Recalled Product and sustained Physical symptoms consistent with Listeriosis lasting for 24 to 48 hours subsequent to the ingestion of Recalled Product.</p>	<ol style="list-style-type: none"> 1. Proof of purchase or retained packaging or proof of returned product OR affidavit attesting to purchase; and 2. Affidavit attesting to consumption of Recalled Meats and physical illness consistent with Listeriosis. 	<p>\$750.00 (including FLA claims), to a maximum cap of \$7.5 million for all claims in Physical Level I.</p> <p>If more than 10,000 claimants fall into this category, the \$7.5 million will be evenly divided between all claimants.</p>
<p><u>Level 2</u></p> <p>Class Members who consumed the Recalled Product and sustained Physical symptoms consistent with Listeriosis lasting for 48 hours to 1 week subsequent to the ingestion of Recalled Product.</p>	<ol style="list-style-type: none"> 1. proof of purchase or retained packaging or proof of returned product OR affidavit attesting to purchase; and 2. DECLARATION attesting to consumption of Recalled Meats and physical illness; and 3. contemporaneous medical documentation of physical illness (with or without secondary psychological harm) showing illness was caused by or consistent with physical symptoms of Listeriosis. 	<p>\$3,000.00 (including FLA claims)</p> <p>+ special damages supported by sworn statement and appropriate documentation</p> <p>+subrogated provincial insurer payments for those insurers who have entered into retainer agreements with Counsel</p>

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<p><u>Level 3</u> Class Members who consumed the Recalled Product and sustained Physical symptoms consistent with Listeriosis lasting for 1 week to 2 weeks subsequent to the ingestion of Recalled Product.</p>	<ol style="list-style-type: none"> 1. proof of purchase or retained packaging or proof of returned product OR affidavit attesting to purchase; and 2. Affidavit attesting to consumption of Recalled Meats and physical illness; and 3. contemporaneous medical documentation of physical illness (with or without secondary psychological harm) showing illness was caused by or consistent with physical symptoms of Listeriosis. 	<p>\$5,500.00 (including FLA claims)</p> <p>+ \$750.00 per day for hospitalization</p> <p>+ special damages supported by sworn statement and appropriate documentation</p> <p>+subrogated provincial insurer payments for those insurers who have entered into retainer agreements with Counsel</p>
<p><u>Level 4</u> Physical symptoms consistent with Listeriosis lasting for 2 weeks to 1 month subsequent to the ingestion of Recalled Product.</p>	<ol style="list-style-type: none"> 1. proof of purchase or retained packaging or proof of returned product OR affidavit attesting to purchase; and 2. affidavit attesting to consumption of Recalled Meats and physical illness; and 3. contemporaneous medical documentation of physical illness (with or without secondary psychological harm) showing illness was caused by or consistent with physical symptoms of Listeriosis.* <p>* Upon review of the contemporaneous medical documentation, it is open to the Claims Administrator or arbitrator to determine that the physical illness of the claimant is consistent with or caused by Listeriosis.</p>	<p>\$8,000.00 (including FLA claims)</p> <p>+ \$750.00 per day for hospitalization</p> <p>+ special damages supported by sworn statement and supporting documentation</p> <p>+subrogated provincial insurer payments for those insurers who have entered into retainer agreements with Counsel</p> <p>OR, ALTERNATIVELY</p> <p>Arbitration is available for claimants falling into Level 4 physical harm at the request of the CLAIMANT.</p>

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<p><u>Level 5</u> Class Members who consumed the Recalled Product and sustained Physical symptoms consistent with Listeriosis accompanied by secondary infection including, but not limited to meningitis, pneumonia, septicaemia, etc., but without ongoing and/or permanent physical symptoms.</p>	<ol style="list-style-type: none"> 1. proof of purchase or retained packaging or proof of returned product OR affidavit attesting to purchase; and 2. Affidavit attesting to consumption of Recalled Meats and physical illness; and 3. contemporaneous medical documentation of physical illness (with or without secondary psychological harm) showing that the illness was caused by or consistent with physical symptoms of Listeriosis.* <p>* Upon review of the contemporaneous medical documentation, it is open to the Claims Administrator or arbitrator to determine that the physical illness of the claimant, including the secondary infection is consistent with Listeriosis.</p>	<p>\$35,000.00 (including FLA claims)</p> <p>+ \$750.00 per day for hospitalization</p> <p>+ special damages supported by sworn statement and supporting documentation</p> <p>+subrogated provincial insurer payments for those insurers who have entered into retainer agreements with Counsel</p> <p>OR, ALTERNATIVELY</p> <p>Arbitration is available for claimants falling into Level 5 physical harm at the request of the CLAIMANT.</p>

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<p><u>Level 6</u></p> <p>Class Members who consumed the Recalled Product and sustained Physical symptoms consistent with Listeriosis with or without additional complications, with ongoing and/or permanent physical symptoms.</p>	<ol style="list-style-type: none"> 1. proof of purchase or retained packaging or proof of returned product OR affidavit attesting to purchase; and 2. Affidavit attesting to consumption of Recalled Meats and physical illness; and 3. contemporaneous medical documentation of physical illness (with or without secondary psychological harm) showing that the illness was caused by or consistent with physical symptoms of Listeriosis.* and 4. Defendants at their option and expense may require medical examinations by physicians of their choosing. <p>* Upon review of the contemporaneous medical documentation, it is open to the Claims Administrator or arbitrator to determine that the physical illness of the claimant is consistent with Listeriosis.</p>	<p>\$75,000.00 (including FLA claims)</p> <p>+ \$750.00 per day for hospitalization</p> <p>+ special damages LOSS OF INCOME supported by sworn statement and supporting documentation</p> <p>+subrogated provincial insurer payments for those insurers who have entered into retainer agreements with Counsel</p> <p>OR, ALTERNATIVELY</p> <p>Arbitration is available for claimants falling into Level 6 physical harm at the request of the CLAIMANT.</p>
<p><u>Level 7</u></p> <p>Class Members who consumed the Recalled Product and suffered physical symptoms consistent with Listeriosis accompanied by secondary complications involving the central nervous system (including, but not limited to, meningoenephalitis or cerebritis, rhombencephalitis, brain abscess, septic shock) and/or focal infections (including, but not</p>	<ol style="list-style-type: none"> 1. proof of purchase or retained packaging or proof of returned product OR affidavit attesting to purchase; and 2. Affidavit attesting to consumption of Recalled Meats and physical illness; and 3. contemporaneous medical documentation of physical illness (with or without secondary psychological harm) showing that the illness was caused by or consistent with physical symptoms 	<p>\$125,000.00</p> <p>\$10,000 to FLA claimants for spouses, children and parents</p> <p>+ \$750.00 per day for hospitalization</p> <p>+ special damages LOSS OF INCOME supported by</p>

<p>limited to oculo-glandular syndrome, lymphadenitis, pneumonia, empyema, myocarditis, endocarditis, septic arthritis, osteomyelitis, prosthetic joint infections, arteritis, prosthetic graft infections, spinal and brain abscess and cholecystitis, acute hepatitis, and peritonitis among others) resulting in serious and permanent impairment of physical and/or mental function</p>	<p>of Listeriosis.* and</p> <p>4. Defendants at their option and expense may require medical examinations by physicians of their choosing.</p> <p>* Upon review of the contemporaneous medical documentation, it is open to the Claims Administrator or arbitrator to determine that the physical illness of the claimant is consistent with Listeriosis.</p>	<p>sworn statement and supporting documentation</p> <p>+cost of future care expenses</p> <p>+subrogated provincial insurer payments for those insurers who have entered into retainer agreements with Counsel</p> <p>OR, ALTERNATIVELY</p> <p>Arbitration is available for claimants falling into Level 7 physical harm at the request of the CLAIMANT.</p>
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<p><u>Level 8</u> Physical symptoms consistent with Listeriosis resulting in death</p>	<ol style="list-style-type: none"> 1. proof of purchase or retained packaging or proof of returned product OR affidavit attesting to purchase; and, 2. affidavit (on information and belief if direct knowledge is not possible) attesting to consumption of Recalled Meats and physical illness; and 3. proof of death; and 4. Medical documentation of physical illness (with or without secondary psychological harm) and confirming evidence indicating that death was caused by or consistent with physical symptoms of Listeriosis. <p>* Upon review of the contemporaneous medical documentation, it is open to the Claims Administrator or arbitrator to determine that the physical illness and death of the claimant is consistent with Listeriosis.</p>	<p>\$120,000.00 for the estate; and,</p> <p>\$35,000.00 to FLA claimants for spouse of deceased; and,</p> <p>\$30,000.00 to FLA claimants for children of the deceased; and,</p> <p>\$20,000 to FLA claimants for parents of the deceased; and,</p> <p>\$5,000.00 to FLA claimants for siblings and grandchildren of the deceased; and,</p> <p>Funeral expenses up to \$13,500.00 +subrogated provincial insurer payments for those insurers who have entered into retainer agreements with Counsel</p> <p>OR, ALTERNATIVELY</p> <p>Arbitration is available for claimants falling into Level 7 physical harm at the request of the estate representative of the claimant.</p>