

EXHIBIT C

Terrence Cook v City of Calgary Class Action (the “Class Action”)

NOTICE PLAN PURSUANT TO THE NOTICE APPROVAL ORDER PRONOUNCED ON X, 2020 (the “Notice Approval Order”), attached as exhibit “C” to Settlement Agreement dated May 8, 2020 (the “Settlement Agreement”)

This Notice Plan will apply to the following notices provided for in the Settlement Agreement, namely: the Notice of Termination; the Hearing Notice; and, if that relief is granted, the Approval Notice (collectively the “Notices”).

1. Class Counsel will provide the Notices by email, or by mail if no email address is available, to all members of the Proposed Class who are clients of Class Counsel in relation to this Action.
2. For potential members of the Proposed Class for whom the City of Calgary (the “City”) has an email address, the City will email them the Notices directly at their respective email addresses contained in the City’s records.
3. For potential members of the Proposed Class for whom the City does not have their current email addresses, the City will mail them the Notices directly at their respective last mailing addresses known to the City.
4. The Notices will be promptly published on the class counsel’s website at www.higgertylaw.ca;
5. Any other methods and the timing for issuance of the Notices shall be as stipulated by order(s) of the Court.
6. Subject to Court approval, the cost of issuing the Notices shall be paid as specified in the Settlement Agreement.
7. All capitalized groups of words in this Plan which are defined in the Settlement Agreement or in the Notice Approval Order have the same definition in this Plan.