

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N :

CELIA SANKAR

Plaintiff

- and -

BELL MOBILITY INC.

Defendant

Proceeding under the *Class Proceedings Act, 1992*

NOTICE OF CERTIFICATION OF A CLASS PROCEEDING

TO:

All persons in Ontario who were prepaid, pay-per-use wireless telephone customers of Bell Mobility, Virgin Mobile Canada and Solo Mobile and had balances remaining in their accounts which expired between May 4, 2010 and December 16, 2013 (the "Class Period").

This Notice is published by order of the Ontario Superior Court of Justice

The Ontario Superior Court of Justice has allowed a class action lawsuit to proceed, which seeks compensation if your prepaid wireless balances expired.

The Court has not yet determined whether or not the lawsuit will succeed. You are being provided with this notice because you may be a member of the class described below. If you do not want to participate in the lawsuit, you must choose to "opt out" of the lawsuit as described below.

The lawsuit alleges that the defendant, Bell Mobility Inc. ("Bell") breached its contracts during the Class Period with its Ontario customers who used the Bell Mobility, Virgin Mobile Canada and Solo Mobile prepaid wireless services by seizing prepaid balances too early, and/or by imposing expiry dates on prepaid balances contrary to provincial regulations applicable to gift cards.

Bell's terms of service create a contract between prepaid wireless customers and Bell.

Celia Sankar has been appointed the representative plaintiff, and the law firms of Sotos LLP and Sack Goldblatt Mitchell LLP ("Class Counsel") have been approved by the Ontario Superior Court of Justice to act for the Class Members.

Please contact Class Counsel with any questions about this class action:

Sotos LLP
ATTN: Tanya Atherfold-Desilva
180 Dundas Street West, Suite 1200
Toronto, ON M5G 1Z8
tatherfold@sotosllp.com

More information is available at <http://www.bellmobilityclassaction.ca>

This Notice is published by order of the Ontario Superior Court of Justice and explains:

1. The lawsuit
2. Who might benefit from the lawsuit
3. Your right to choose whether to participate in the lawsuit
4. Financial consequences for you
5. Fees and Funding
6. Other matters

1. The Lawsuit

On May 4, 2012, Celia Sankar commenced a lawsuit against Bell. The lawsuit alleges that Bell breached its contracts during the Class Period with its Bell Mobility, Virgin Mobile Canada and Solo Mobile prepaid wireless telephone customers in Ontario by seizing prepaid balances before it was entitled to under the contracts. It also alleges that Bell's seizure of prepaid wireless telephone balances was contrary to regulations applicable to gift cards under Ontario's *Consumer Protection Act*. Bell denies that it acted in breach of contract and further denies that provincial gift card regulations apply.

2. Who Might Benefit from the Class Action

All persons in Ontario who contracted with Bell (through its brands Bell Mobility, Virgin Mobile Canada and Solo Mobile) for prepaid wireless telephone services subject to Bell's Terms and Conditions, paid on a pay-per-use basis, and had balances remaining in their accounts at the end of an active period which expired within the Class Period (i.e. between May 4, 2010 and December 16, 2013) are members of the Class and may benefit from this lawsuit.

3. Your Right to Choose Whether or Not to Be Part of the Lawsuit

(a) *You have a right to take part in this class action lawsuit*

DO NOTHING IF YOU WISH TO TAKE PART IN THIS LAWSUIT. If you are a person falling within the Class definition described above, you will automatically be included in the Class unless you

opt out of this proceeding. This means that you will be bound by the result in the lawsuit, win or lose.

(b) *How to be excluded from the Class:*

IF YOU DO NOT WANT TO BE PART OF THIS LAWSUIT, you must fill out the “opt-out” form below (or write a letter setting out the same information) and send it care of Class Counsel at the following address or e-mail address:

To: Tanya Atherfold-Desilva
180 Dundas Street West, Suite 1200
Toronto, ON M5G 1Z8
prepaidclassaction@sotosllp.com

The deadline for opting out is November 17, 2014. If your written request to opt out is not received by 5:00 pm on that date, you will remain a member of the Class.

By opting out of this Class, you are confirming that you do not wish to participate in this class action. If you decide to opt out of this class action, you will be excluded from any settlement or award of damages awarded by the Court.

Once you opt out of this class action, you will receive no further communications regarding this action from class counsel.

4. Financial consequences for you

If the lawsuit is successful, the Court may award compensation to the Class as a whole or some portion of the Class. In the alternative, the Court may also establish a process, including individual hearings, to review the amount of damages each individual Class Member may claim and to assess the amount of damages each individual Class Member may be entitled to receive.

If the class action lawsuit is not successful, the Class will not be awarded damages and you will not receive any money. The members of the Class will NOT be responsible for any legal costs of the class action lawsuit and will NOT have any other financial obligations because of the class action lawsuit.

Whether or not the class action lawsuit is successful, all members of the Class who do not opt out of the class action will be bound by the judgment of the Court. This means, for example, that after this lawsuit is over, if you remain a class member in this proceeding you could not start your own lawsuit against Bell in relation to the matters at issue in the lawsuit.

As of the date of this notice the Court has not set a date for trial.

5. Fees/Funding

Ms. Sankar has retained Sotos LLP and Sack Goldblatt Mitchell LLP to represent her and the Class in the lawsuit. Class counsel will be paid legal fees only if the lawsuit is successful. These legal fees and costs must be approved by the Court.

Ms. Sankar has received indemnification and funding from the Class Proceedings Fund (“CPF”). The CPF was established by the Law Foundation of Ontario to provide financial support to class action plaintiffs. In the event that Ms. Sankar is successful at trial, the CPF will receive a levy in the amount of 10% of any awards or settlements in favour of the plaintiff and any other class member, together with a return of any funded disbursements.

6. Other matters

If you wish to participate personally in the lawsuit, you may apply to the Court for permission to do so.

The Court papers in this lawsuit are available for inspection at the office of the Superior Court of Justice, Courthouse, 393 University Ave., Toronto, Ontario, Court File CV-12-452867-00CP.

PLEASE DO NOT CONTACT BELL OR THE COURTHOUSE ABOUT THIS CLASS ACTION. THEY WILL NOT BE ABLE TO ANSWER YOUR QUESTIONS ABOUT THE LAWSUIT.

More information is available at <http://www.bellmobilityclassaction.ca/>

This notice is published pursuant to section 17 of the Class Proceedings Act, 1992 and was approved by the court.

REQUEST TO BE REMOVED FROM EXPIRED PREPAID CELL PHONE BALANCES
CLASS ACTION AGAINST BELL MOBILITY INC.

By completing this Opt-Out Form, you are deciding to remove yourself from the class action against Bell Mobility Inc. in respect of expiring prepaid cell phone balances for Bell Mobility, Virgin Mobile and Solo Mobile brands. By opting out, you are confirming that you do not wish to participate in this class action and you will be excluded from any settlement or damages that may be awarded by the Court. Once you opt-out of this class action, you will receive no further communications regarding this action.

This form must be fully completed and must be received no later than **November 17, 2014**. Opt-Out Forms received after that date will not be accepted.

For more information on the expired prepaid cell phone balances class action against Bell Mobility Inc., please see the Notice located at <http://www.bellmobilityclassaction.ca/notice>.

Your Name: _____ (required)

Your Address: _____ (required)

_____ (required)

_____ (required)

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

Your Bell mobile service provider(s) between May 4, 2010 and December 16, 2013 (Bell Mobility, Virgin Mobile, Solo Mobile): _____ (required)

Your mobile phone number with the Bell mobile service provider between May 4, 2010 and December 16, 2013 _____ (required)

Your current email address: _____ (optional)

DECLARATION

I declare that I wish to opt out of the class action against Bell Mobility in respect of expiring prepaid cell phone balances. I understand that by submitting this Opt-Out Form, I will be removed from the class action and will not be bound by its outcome. As a result, I will be excluded from any settlement or any damages that may be awarded by the Court.

Signature

Date

Return your completed Opt-Out Form to:

Sotos LLP
ATTN: Tanya Atherfold-Desilva
180 Dundas Street West, Suite 1200
Toronto, ON M5G 1Z8
prepaidclassaction@sotosllp.com