

Merlo/Davidson Settlement - Overall Notice Plan

The following operations will be carried out as part of the Notice Plan:

1. News Release and News Conference announcing the proposed Settlement
2. Postings on Websites and Social Media
3. Notices, to be published in major newspapers across Canada and Other Supporting Advertizing
4. Direct Mail to Class Members
5. Ongoing Media Relations
6. Possible Additional Measures
7. Various Control and evaluation Measures
8. Possible Follow-up Measures

Subject to approval from the Court, the RCMP will forward the list of past and present female employees going back to September 16 1974. This list will be used to prepare the direct mail operation, as well as the advertizing program.

1. News Release and News Conference Announcing the Proposed Settlement

A news conference was held on October 6, 2016, as early as possible after the government of Canada approved the projected Settlement Agreement to prevent leaks that might have resulted in rumours, bad or incomplete information, and confusion. See Schedule A.

2. Postings on Websites and Social Media

The independent assessor has his own website that became operational as of October 6, 2016. The full content of the website is described in Schedule B to this plan. The website contains full information on the settlement. Official documents, as well as all the forms required by the Claimants, will be added pending the Court's approval.

Hyperlinks will also be created with the websites of the RCMP, and Klein Lawyers and Kim Orr.

The independent assessor will also create a Facebook page, a Twitter account, a Youtube channel and TO BE DETERMINED. These will act as touts to the website.

3. Notices to be Published in Major Newspaper Across Canada and Other Supporting Advertizing if Required

A NOTICE OF CERTIFICATION AND SETTLEMENT APPROVAL HEARING was published in major Canadian newspapers on DATES (see Schedule B to this plan).

A NOTICE OF SETTLEMENT will be published in the 7 to 10 day period following the Court's approval of the Settlement.

A specialized media placement agency has been retained. Following best practices, this agency will analyse the information on the list of class members once it becomes available to construct a media placement plan designed to reach the greatest number of Class Members.

4. Direct Mail to Class Member

As provided for in the Agreement.

5. Ongoing media relations

Beyond the initial news conference, the independent assessor will regularly update the media on his activities. The advertising program itself will be announced before it is carried out. Regular updates will be published. A media spokesperson will be available at all times.

6. Possible Additional Measures

State-of-the-art communications plans rely on research, the most reliable often being that conducted with the primary targets of the campaign, here, the Class Members. We have no access to Class Members. We have suggested to their lawyers they might ask them about what they feel would be the most effective means to reach them, apart from the direct mail operation which will be carried out. For instance, have they turned to other support networks, such as unions, women's groups or community networks? Have they themselves formed into a network we could work with to better inform them? What third-party source would they trust as a source of information? If we are provided with additional information of this nature, we will refine our plan accordingly.

7 Various Control and Evaluation Measures

Evaluation will remain difficult. We have no way of determining if women who do not answer have chosen not to participate or were never cognisant of the Settlement. The only way to determine this would be to poll women on the list that have not answered, asking them whether they knew about the Settlement or not, an obviously difficult proposition ethically since the very fact of being questioned could cause additional anxiety.

Several indicators will be closely monitored to evaluate the efficiency of the independent assessor's Notice and Communications Plan. These include:

News conference and Ongoing Media Relations

- Number of media present
- Coverage
- Follow-up requests

Website and Social Media

- Number of visits on the different pages of the website and social media
- Number of downloads of the forms

Direct mail

- Number of delivered/returned envelopes
- Number of requests for forms, either by telephone or through the website

Advertising program (traditional and social media)

- Reach and frequency are calculated beforehand using recognized statistical tools.

Confidential call-in telephone line

- Number of calls
- Topics

8. Possible Follow-up Measures

The direct mail and advertising program will be concentrated in the first 40 days following the first announcement of the Settlement. Should the various control and evaluation measures indicate a low response rate, advertising through traditional and social media, and media relations, could be intensified.

SCHEDULES

Schedule A:

Statistics on the number of journalist and media attending the press conference, as well as details of the e-mailing of material to journalists not attending, will be added here. We might also append the material distributed to the media.

Schedule B:

Detailed description of the content of the website, including indications as to content to be added pending the Court's approval of the Settlement.