

# LINERBOARD/CORRUGATED MATERIAL CLASS ACTION SETTLEMENT CLAIM FORM

TO BE ELIGIBLE FOR COMPENSATION YOUR COMPLETE APPLICATION TOGETHER WITH SUPPORTING DOCUMENTATION MUST BE SENT TO THE CLAIMS ADMINISTRATOR NO LATER THAN **December 14, 2006**.

You must complete all pages of this Form. Attach additional pages if space is insufficient. Please type or print legibly in black ink.

## 1. Instructions for Claim Form

1. If you purchased Corrugated Material Products for delivery in Canada between January 1, 1993 and December 31, 1995 you are a class member. Corrugated Material Products are defined as Corrugated Material and any products that directly or indirectly contain, include, are packaged in or are derived from Corrugated Material. Class Members who purchased Corrugated Material are eligible to submit a Claim Form.

2. Corrugated Material means any grade of paperboard suitable for use as the inner and outer layers of corrugated sheets (also known as linerboard), the fluted inner layer of a corrugated sheet (also known as medium), any combination of medium and linerboard (including corrugated sheets made out of containerboard), and boxes or containers manufactured using corrugated sheets.

3. Corrugated Materials were sold during the relevant period by Stone Container Corp., Jefferson Smurfit Corp., Smurfit-Stone Container Corp., Smurfit-MBI, formerly known as Macmillan Bathurst, Roger Stone, Union Camp Corp., International Paper Co., International Paper Canada, Inc., also known as International Paper Ltd - Canada, Georgia Pacific Corp., Georgia-Pacific Canada, Inc., Weyerhaeuser Paper Co., Weyerhaeuser Company, Weyerhaeuser Company Limited, formerly known as Weyerhaeuser Canada Ltd., Temple-Inland Inc., Inland Paperboard And Packaging, Inc, Gaylord Container Corp., Tenneco, Inc., Tenneco Packaging, and Packaging Corporation Of America. (the "Defendants")

4. Class Members are eligible to receive direct settlement benefits under two Funds: Fund 1 and Fund 2.

5. Fund 1 will directly compensate eligible Settlement Class members who had purchases of Corrugated Material directly from one or more Defendants (excluding purchases from Smurfit-MBI) between January 1, 1993 and December 31, 1995. Settlement Class Members will be given credit for twice the purchase amount of purchases of any grade of paperboard suitable for use as the inner and outer layer of corrugated sheets ("Linerboard"), as opposed to purchases of other types of Corrugated Material

6. Fund 2 will directly compensate eligible Class Members who had purchases of at least \$250,000 of Corrugated Material from one or more non-Defendants, including Smurfit-MBI between January 1, 1993 and December 31, 1995.

7. Class Members may receive compensation from both Fund 1 and Fund 2.

8. Class Members must fill out each applicable section in its entirety. For example, a Class Member who purchased both Corrugated Material from a Defendant and a Non-Defendant must fill out sections 2, 3(a), 3(b), 4 and 5. Sections 2, 4, and 5 must be completed by all Class Members.

9. In each of sections 3(a) and 3(b), Class Members must indicate, by checking the appropriate box, the Product Purchase Verification that is in their possession to support their claim. Product Purchase Verification includes proof of purchase or supplier's sales record (ie. Invoices, Bank Statements, Cancelled Cheques) confirming the dollar value of the Corrugated Material purchased. Class Members must attach Product Purchase Verification to their completed claim form at the time it is submitted.

10. If a Class Member is unable to provide Product Purchase Verification in the nature of proof of purchase information or supplier's sales records, the Class Member may submit to the Claims Administrator other objective verification that is acceptable to the Claims Administrator. If other acceptable verification is submitted, it must be accompanied by an Affidavit outlining the steps taken to obtain proof of purchase and seller's records and the responses, if any, to those steps.

11. Class Members must indicate any previous compensation received in satisfaction of a settlement or judgment on a claim or potential claim concerning the purchase, sale, pricing, discounting, marketing or distributing of Corrugated Material Products between January 1, 1993 and December 31, 1995. If any previous compensation has been received, the Class Member must provide details including who paid the compensation, when the compensation was received, amount of compensation received and the nature of any releases or documentation signed.

12. Claim Forms must be sent by mail to the Claims Administrator postmarked no later than **December 14, 2006**. The Claims Administrator's address is: P.O. Box 3355, London, Ontario, N6A 3K5.

13. Claims which are postmarked after **December 14, 2006** will be rejected by the Claims Administrator.

14. The Claims Administrator may be reached by telephone at 1-866-432-5534 or by email at [claims@nptca.com](mailto:claims@nptca.com)

## 2. Identification of Class Member

Name:

\_\_\_\_\_

Legal Name of Class Member

\_\_\_\_\_

Contact Person (If Class Member is a corporation)

Address:

\_\_\_\_\_

No./Apt./Street

City

Province

Postal Code

Telephone:

\_\_\_\_\_

Area code / phone no. (Ext. if applicable)

### Please Inform the Claims Administrator of all Address Changes in Writing

Identification of person signing this Registration (check one only):

I am an authorized employee, officer or director of the above-identified Class Member. I am signing this Form to register the Class Member for settlement benefits.

I am the trustee, receiver or other representative of the above-identified Class Member. I am signing this Form to register the Class Member for benefits under the Settlement

(Attach copy of court order or other official document appointing you as representative and state your name, title, mailing address and telephone number).

I am the Class Member

**3(a)  Fund 1 – Purchases of Corrugated Material from a Defendant, excluding Smurfit-MBI**

**A. Claim Options (please select only one option):**

- i) The Class Member received a letter from the Claims Administrator detailing the purchases made from the Defendants (other than Smurfit-MBI). The Class Member accepts the Claims Administrator's record of purchases and will not be submitting additional information to support their claim. No further information is required in this section.
- ii) The Class Member received a letter from the Claims Administrator detailing the purchases made from the Defendants (other than Smurfit-MBI). The Class Member wishes to submit additional evidence of purchases from the Defendants. Please complete subsections B and C of this section
- iii) The Class Member received a letter from the Claims Administrator that did not include any purchase information. The Class Member wishes to submit evidence of purchases from the Defendants (other than Smurfit-MBI). Please complete subsections B and C of this section
- iv) The Class Member did not receive a letter from the Claims Administrator detailing the purchases made from the Defendants (other than Smurfit-MBI). The Class Member believes that they qualify for compensation from Fund 1 and will submit evidence of purchases from the Defendants (other than Smurfit-MBI). Please complete subsections B and C of this section.

**B. Please list all purchases of Corrugated Material from a Defendant(s), excluding Smurfit-MBI, made between January 1, 1993 and December 31, 1995 (Complete only if options ii, iii or iv above were selected).**

Please indicate the type of Corrugated Material Purchased. Settlement Class Members will be given credit for twice the purchase amount of purchases of any grade of paperboard suitable for use as the inner and outer layer of corrugated sheets ("Linerboard"), as opposed to purchases of other types of Corrugated Material

|    | Date of Purchase | Volume Purchased | Dollar Value of purchase | Type of Corrugated Material Purchased | Seller's Identity |
|----|------------------|------------------|--------------------------|---------------------------------------|-------------------|
| 1. | _____            |                  |                          |                                       |                   |
| 2. | _____            |                  |                          |                                       |                   |
| 3. | _____            |                  |                          |                                       |                   |
| 4. | _____            |                  |                          |                                       |                   |

Please attach additional sheets if required.

**C. Product Purchase Verification:**

- Proof of purchase confirming the Class Members purchase of Corrugated Material from a Defendant, excluding Smurfit-MBI, between January 1, 1993 and December 31, 1995, and confirming the dollar value of the Corrugated Material purchased;
- Seller's sales record(s) verifying the sale of Corrugated Material to the Class Member between January 1, 1993 and December 31, 1995, and verifying the dollar value of the sale; or
- If a Class Member is unable to provide any of the documentation as specified above, a Class Member may submit to the Claims Administrator such other comparable verification as may be acceptable to the Claims Administrator. Such other objective verification must be accompanied by an Affidavit from the Class Member stating:
  1. the steps taken by the Class Member to obtain the Product Purchase Verification outlined in subparagraphs 1 and 2 above; and
  2. the responses, if any, to those steps.

**3(b)  Fund 2 - Purchases of Corrugated Material from a Non-Defendant and/or Smurfit-MBI**

To be eligible for compensation out of Fund 2, Class Members must establish that they are resident in Canada and had purchases of Corrugated Material of \$250,000 or more from a non-Defendant and/or Smurfit-MBI for delivery in Canada between January 1, 1993 and December 31, 1995.

Please provide evidence of purchases of Corrugated Material of \$250,000. Evidence of additional purchases from a non-Defendant and/or Smurfit-MBI are not required.

**A. Please list \$250,000 of purchases of Corrugated Material purchased from a non-Defendant and/or Smurfit-MBI between January 1, 1993 and December 31, 1995:**

|    | Date of Purchase | Volume Purchased | Dollar Value of purchase | Seller's Identity |
|----|------------------|------------------|--------------------------|-------------------|
| 1. | _____            | _____            | _____                    | _____             |
| 2. | _____            | _____            | _____                    | _____             |
| 3. | _____            | _____            | _____                    | _____             |
| 4. | _____            | _____            | _____                    | _____             |
| 5. | _____            | _____            | _____                    | _____             |

Please attach additional sheets if required.

**B. Product Purchase Verification:**

- Proof of purchase confirming the Class Member's purchase of Corrugated Material from a non-Defendant and/or Smurfit-MBI between January 1, 1993 and December 31, 1995, and confirming the dollar value of the Corrugated Material purchased;
- Seller's sales record(s) verifying the sale of Corrugated Material to the Class Member between January 1, 1993 and December 31, 1995 and verifying the dollar value of the sale; or
- If a Class Member is unable to provide any of the documentation as specified above, a Class Member may submit to the Claims Administrator such other comparable verification as may be acceptable to the Claims Administrator. Such other objective verification must be accompanied by an Affidavit from the Class Member stating:
  1. the steps taken by the Class Member to obtain the Product Purchase Verification outlined in subparagraphs 1 and 2 above; and
  2. the responses, if any, to those steps.

#### 4. Previous Compensation Received

Have you previously received compensation in satisfaction of a settlement or judgment on a claim or potential claim concerning the purchase, sale, pricing, discounting, marketing or distributing of the Corrugated Material Products between January 1, 1993 and December 31, 1995? Yes  No

If yes, please provide details including who paid the compensation, when the compensation was received, amount of compensation, and the nature of any releases or documentation that you signed.

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#### 5. Declaration

I declare under penalty of perjury that the information on this Form is true, correct and complete to the best of my knowledge, information and belief.

\_\_\_\_\_  
Date Signed

\_\_\_\_\_  
Signature (Claimant or Representative)

\* To preserve eligibility for benefits under the settlements, your completed application, together with the required documentation must be submitted to the Claims Administrator no later than **December 14, 2006**.

Please mail this Form to the following address:

Claims Administrator  
PO Box 3355  
London, ON N6A 4K3