

NOTICE OF HEARING IN THE LINERBOARD/CORRUGATED MATERIAL CLASS ACTION LITIGATION

PLEASE READ THIS NOTICE CAREFULLY. IT MAY AFFECT YOUR LEGAL RIGHTS.

TO: All persons who, in Canada, purchased Corrugated Material Products for delivery in Canada between January 1, 1993 and December 31, 1995, except the Defendants, subsidiaries or affiliates of each Defendant, and the entities in which each Defendant or any of that Defendant's subsidiaries or affiliates have a controlling interest.

"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.

"Corrugated Material Products" means Corrugated Material and any products that directly or indirectly contain, include, are packaged in or are derived from Corrugated Material.

I. THE PURPOSE OF THIS NOTICE

Class proceedings have been initiated alleging a conspiracy to fix prices in the market for Corrugated Material. A previous notice in this case was distributed pursuant to Court orders which advised of hearings to approve two settlement agreements with certain defendants. The previous notice can be viewed at www.classaction.ca.

A third settlement agreement (the "Stone Agreement") has now been reached between the Plaintiffs and the remaining defendants, Stone Container Corp., Jefferson Smurfit Corp., Smurfit-Stone Container Corp., Smurfit-MBI, formerly known as Macmillan Bathurst, and Roger Stone (the "Stone Defendants"). This notice is to advise you of the Stone Agreement and to inform you of your rights as a class member under the settlements. You will be bound by the terms of the settlements unless you exclude yourself by opting out of the settlements. Opting out is explained below.

A hearing has already been conducted in Ontario concerning the first two settlements. The Orders of Justice Hoy dated May 24, 2006, approving the settlements can be viewed at www.classaction.ca. In addition to seeking approval of the first two settlements at hearings scheduled in the Supreme Court of British Columbia in the City of Vancouver (800 Smithe Street) on June 21, 2006 at 9:00 a.m. and the Quebec Superior Court in Quebec City (300 Boulevard Jean-Lesage, courtroom 3.37) on July 4, 2006 at 9:30 a.m., the motions in British Columbia and Quebec will now also seek to approve the Stone Agreement and the method of distributing the settlement monies for all three settlements. A further hearing has been scheduled in the Ontario Superior Court of Justice for August 15, 2006 to approve the Stone Agreement, legal notice to be provided, and the method of distributing the settlement monies.

Settlement Class Members are entitled to appear and make submissions at the settlement approval hearings. If you wish to comment on or make an objection to the settlements, a written submission should be delivered to Class Counsel at the address listed below, no later than June 14, 2006. Class Counsel will forward all such submissions to the Court. All timely filed written submissions will be considered by the Court. If you do not timely file a written submission, you may not be entitled to participate in the hearing(s). If all three settlements receive Court approval, a further notice will be published to advise of such Court approval and explain how eligible class members can make a claim for direct compensation pursuant to the distribution protocol.

Settlement Class Members who do not oppose the proposed settlements need not appear at the hearings or take any other action at this time to indicate their desire to participate in the settlements.

II. THE SETTLEMENTS AND DISTRIBUTION

Under the terms of the Stone Agreement, the Stone Defendants will, in exchange for a full dismissal of claims against them relating to the Proceedings, pay US\$830,000.00 into a Settlement Fund for the benefit of class members to be held in trust by Class Counsel along with the payments made under the first two settlements, pending further orders of the Courts approving the claims

administrator and distribution protocol. The total amount to be held in the Settlement Fund in respect of all three settlements is US\$850,000.00 and CDN\$935,528.00.

The Defendants consent to the certification of the Proceedings as class proceedings solely for the purpose of settlement approval. The Defendants do not admit any wrongdoing or liability on their part. The proposed settlements are a compromise of disputed claims. If all three settlements are approved, the class proceedings will be dismissed and will not continue against any Defendant.

Class Counsel will propose, and publish on www.classaction.ca, a distribution protocol which will govern the allocation of settlement funds to eligible Settlement Class Members. It is Class Counsel's intention that tiered cash payments be available to those Settlement Class Members with the greatest volume of purchases from the Settling Defendants and that a sum of money will also be available to an organization which will be an indirect benefit to smaller purchasers in light of the high cost of administering modest settlement payments. It is Class Counsel's expectation that the distribution protocol will be published on www.classaction.ca shortly after the publication of this notice.

III. OPTING OUT OF THE PROCEEDINGS

You will be bound by the terms of the settlements, if approved, unless you "opt out". This means that you will not be able to bring or maintain any other claim or legal proceeding against the Defendants in connection with allegations of conspiracy in the market for Corrugated Material Products, unless you opt out. The deadline to opt out of the proceeding will be set by the Courts at the Certification and Settlement Approval Hearings and will be published in the future notice.

If you opt out of the Proceedings, you will not be able to participate in these settlements.

IV. CLASS COUNSEL

The law firm of Siskind, Cromarty, Ivey & Dowler ^{LLP} represents class members in provinces other than Quebec, and corporate entities in Quebec, and can be reached toll-free at 1-800-461-6166 ext. 455 or by mail at 680 Waterloo Street, London, ON N6A 3V8.

The law firm of Siskinds, Desmeules s.e.n.c.r.l. represents the Quebec consumers. Quebec Class Counsel can be reached at 418-694-2009 or by mail at Les promenades du Vieux-Quebec, 43 rue De Buade, bureau 320, Quebec City, QC G1R 4A2.

Class Counsel will be seeking approval of their fees and disbursements at the hearings. Class Counsel collectively will be requesting legal fees of 25% of the Settlement, plus disbursements and applicable taxes.

V. QUESTIONS ABOUT THE SETTLEMENTS

If you would like a copy of the settlements, or have questions, you can call Class Counsel's Information Line at 1-800-461-6166 ext. 455. This notice contains only a summary of the settlements and proposed distribution protocol and class members are encouraged to review the entire documents. Copies of the settlements and proposed distribution protocol can be obtained free of charge at www.classaction.ca or they can be mailed to you at a cost of \$20, which represents the cost of photocopying and mailing. INQUIRIES SHOULD NOT BE DIRECTED TO THE COURT.

If you would like to register to directly receive future notice, please contact Class Counsel via the contact information noted above.

VI. INTERPRETATION

This notice contains a summary of some of the terms of the settlements and proposed distribution protocol. If there is a conflict between the provisions of this notice and the settlements and/or distribution protocol, including any appendices, the terms of the settlements and/or distribution protocol shall prevail.