

OPT-IN FORM
Stanway v. Wyeth et al.
Class Action

If you reside outside of British Columbia, and you want to be included in the class action, *Stanway. v. Wyeth, et al.*, you must fill out this form and return it the following address by **no later than August 25, 2014**:

Klein Lyons
Suite 400, 1385 West 8th Avenue
Vancouver, BC V6H 3V9
Fax: (604) 874-7180

1. Please fill in your name and address:

Name

Street

City

Province

Postal Code

(_____) _____
Telephone

E-mail

2. By signing this form, you agree:

(a) to be bound by a judgment of the courts of British Columbia on the common issues in this class action, whether favourable or not. These are:

- (i) Is there a causal connection between the use of Premplus, or Premarin in combination with progestin, and breast cancer and if so, what is the nature and extent of the connection?
- (ii) Did the Defendants, or any of them, breach a duty of care to class members, and if so, when?
- (iii) If the Defendants, or any of them, breached a duty of care owed to class members, were the Defendants, or any of them, guilty of conduct that justifies punishment?
- (iv) If the answer to common issue [iii] is “yes” and if the aggregate compensatory damages awarded to class members does not achieve the objectives of retribution, deterrence and denunciation in respect of such conduct, what amount of punitive damages is awarded against the Defendants, or any of them?

(b) to not pursue other proceedings, other than this class action, against the Defendants with respect to the claims certified in this class action.

(c) if you are Quebec resident, to be bound by a judgment of the courts of British Columbia on the common issue applicable to Quebec residents, whether favourable or not. This is:

Should any of the common issues certified for the Class as a whole be answered differently for the Quebec subclass in light of the laws applicable in Quebec, including without limitation, the Quebec *Consumer Protection Act*, R.S.Q., c. P-40.1, *Civil Code of Quebec*, S.Q., 1991, c. 64 and *Quebec Charter of Human Rights and Freedoms*, R.S.Q., c. C-12.?

X _____
Signature of Class Member or Legal Representative

Date

X _____
Witness