

***Employment and Pension Class Action Against The Shaw Group Inc. et al***

**To:** Former employees of Shaw Canada L.P., Stone & Webster Canada Holding One (N.S.), ULC. or Stone & Webster Canada Holding Two, Inc.

**And To:** Beneficiaries of the Employees Retirement Plan of Stone & Webster Canada L.P., registration number 0515908 (the “Shaw Canada Pension Plan”)

**And To:** Recipients of any long-term disability program in respect of Shaw Canada L.P.

**And To:** Surviving spouses, heirs, guardians, administrators, executors, trustees, estate trustees, successors and assigns of each of the former employees, pension plan beneficiaries and recipients identified above

**Please read this notice carefully as it may affect your legal rights.**

This notice is addressed to people who may be “class members” in this proposed class action. It provides information about a hearing before the Ontario Superior Court of Justice (Commercial List) on October 9, 2013 at 330 University Ave., Toronto, Ontario at 9:30 am. The parties have reached a settlement of the action and will be asking the court to certify the action as a class action and to approve the settlement.

In 2013, after Shaw Canada L.P., Stone & Webster Canada Holding One (N.S.), ULC. or Stone & Webster Canada Holding Two, Inc. had each made an assignment in bankruptcy, Ian Sansom, Robert Lukas, John McNab and Ed Dorr (collectively, the “plaintiffs”) commenced a proposed representative action in the Ontario Superior Court of Justice (Commercial List) against The Shaw Group Inc., and certain of its affiliates, directors and other parties.

The plaintiffs alleged that The Shaw Group Inc., the ultimate parent corporation of Shaw Canada L.P., and other defendants are liable for damages relating to, among other things, wrongful dismissal and the underfunding of the Shaw Canada Pension Plan arising from the bankruptcy of Shaw Canada L.P. The defendants deny the allegations and deny any wrongdoing or liability.

The plaintiffs have reached a settlement with the defendants and, for the purposes of implementing the settlement, the action will be converted to a class action. The settlement includes payment of CDN \$9.4 million, inclusive of all costs and fees, including legal fees and administration costs, to provide benefits to eligible class members and to satisfy certain claims against The Shaw Group Inc. and the bankrupt estates of Shaw Canada L.P., Stone & Webster Canada Holding One (N.S.), ULC. or Stone & Webster Canada Holding Two, Inc.

If this settlement is approved by the court, class members can choose to either (1) opt out of the settlement; or (2) they may participate in the settlement, which provides for a distribution of settlement funds among eligible class members in accordance with a settlement distribution protocol.

The parties will appear before the Ontario Superior Court of Justice (Commercial List) on October 9, 2013 at 330 University Ave., Toronto, Ontario at 9:30 am to ask the court to certify the action as a class action and to approve the settlement. Class members may attend the hearing and may make submissions regarding the settlement. Any class members who wish to object

must provide written notice of their objection to class counsel, Koskie Minsky LLP, by October 4, 2013.

To obtain additional information or to object to the propose settlement, please contact Koskie Minsky LLP at the address below:

Koskie Minsky LLP  
20 Queen St. W., Suite 900, Toronto, ON M5H 3R3  
Attention: Andrew Hatnay  
Tel: 416-595-2083  
Email: ahatnay@kmlaw.ca

A copy of the settlement agreement and other information about the proposed settlement is available on class counsel's website at: [www.kmlaw.ca/ShawClassAction](http://www.kmlaw.ca/ShawClassAction).

**PLEASE DO NOT CONTACT THE COURT ABOUT THIS CLASS ACTION.**