

Welcome to the information line for the class actions brought against London Life and Great-West Life on behalf of their participating policyholders. Please be advised that all of the information contained on this phone line is also available at [www.parpolicyclassaction.com](http://www.parpolicyclassaction.com) under the heading "Important questions and answers".

This information line is provided as part of a notice program to class members approved by the Ontario Superior Court of Justice. The service provided relates only to these class action lawsuits. It is not equipped to provide information or answers to any other inquiries.

**[Menu of options]**

Please listen carefully to all of the following options:

For assistance in determining whether or not you are a class member, press 1.

For a description of the lawsuits and what they seek, press 2.

For information on your rights as a class member, press 3.

For information on costs and expenses associated with the litigation, press 4.

For information on the right to opt- out, press 5.

To obtain a copy of the court approved notice, press 6.

For other information or to leave a question for class counsel by voicemail, press 7.

**[Box 1]**

These cases only apply to owners of participating life insurance policies of London Life and Great-West Life as at November 26, 1997 or after. For clarity, owners of participating policies issued prior to November 26, 1997 are included only if the policies continued in force after that date.

You should be able to determine if you have a participating policy by looking at your policy contract. In addition to a death benefit, participating policies allow their owner to share in the profits of London Life or Great-West Life in the form of a monetary dividend, a bonus increase to your insurance coverage or a credit towards the cost of your premiums.

You are encouraged to review your policy contract or annual policy statement to see whether or not you own a participating life insurance policy issued by London Life or Great-West Life as at November 26, 1997 or after. The policy contract should state whether you have participating insurance. Alternatively, look for a reference to dividends which are benefits provided by participating policies. If you cannot locate your insurance contract or an annual statement, call the London Life or Great-West Life call centre, which will be able to confirm whether your policy is part of these class actions.

**[Box 2]**

These class actions challenge the involvement of the participating accounts of London Life and Great-West Life in the financing of the purchase of the parent company of London Life in 1997.

Participating accounts are separate accounts maintained by the defendants in respect of their issued participating life insurance policies. Dividends, bonuses and credits are paid to participating policyholders from the assets of the participating accounts.

It is alleged that these contributions were contrary to law, including certain requirements of the Insurance Companies Act.

The plaintiffs seek damages, including a special payment to class members, declarations of law, orders restraining London Life and Great-West Life from taking certain future steps in relation to the participating accounts, and the unwinding of the transactions involving the participating accounts.

London Life, Great-West Life and Great-West Lifeco Inc. claim that all requirements were met and deny all allegations made by the plaintiffs.

The two lawsuits are certified as class actions and will proceed in tandem before the same Judge at the same time.

The Court has not yet determined whether the actions will be successful. Further court proceedings will be required to determine whether or not the defendants in either action have any liability to class members, and whether or not any remedy will be awarded.

### **[Box 3]**

Class members are not required or expected to take an active role in these lawsuits. The representative plaintiffs and their counsel have the responsibility to run the litigation on behalf of class members.

If the actions are successful, the Court will determine the amounts to which the class members may be entitled and how such amounts should be distributed to or for the benefit of the people affected.

If the litigation is unsuccessful, no benefits will be paid to the class.

Other than the Court-approved contingency fees, which will be deducted from any judgment or settlement amount, class members are not required to pay any legal fees, or costs of any kind. Legal fees and costs of class counsel will only be paid on a contingency basis by deduction from any settlement or judgment amount won for the class, to the extent that they are not paid by the defendants. Class counsel's fees are subject to Court approval and cannot exceed 33% of any monetary amount awarded to the class. Class counsel will not receive payment for fees and disbursements if the actions are unsuccessful.

Class members have the right to opt out of the litigation. Any person who does not opt out prior to January 31, 2009 will be a class member. Class members will be bound by the outcome whether the actions are successful or unsuccessful and will not have the right as individuals to sue London Life and Great-West Life or Great-West Lifeco, in respect of the matters in issue in these class actions.

### **[Box 4]**

Other than Court-approved contingency fees, which will be deducted from any judgment or settlement amount, class members are not required to pay any legal fees or costs of any kind.

Class counsel have entered into contingency fee agreements with the representative Plaintiffs with respect to legal fees and costs. Class counsel's fees are subject to Court approval and cannot exceed 33% of any monetary amount class members may be awarded.

If the actions are successful, Class counsel will apply to the Court for payment of fees and disbursements out of the proceeds of any settlement or judgment in favour of the class members to the extent that such fees and disbursements are not otherwise payable by the Defendants.

Class counsel will not receive payment for fees and disbursements if the actions are unsuccessful.

### **[Box 5]**

You have the right to opt-out of the lawsuit. If you do so, you will exclude yourself from the class and will not be entitled to receive any direct monetary benefits obtained through the case.

If you do not opt out you will be a class member and will be bound by the Court's judgment, whether favourable or not.

If you choose to opt-out and wish to pursue your own individual claim, you must seek and be granted permission to proceed by the case management judge in this litigation in London, Ontario. If you do so,

Class Counsel cannot provide any assistance whatsoever to you. You will be responsible for all legal fees and disbursements you may incur.

If you wish to opt-out, you must complete in full the opt-out coupon contained in the notice and deliver it to class counsel **by regular mail or fax by** no later than January 31, 2009. You may not opt out of these actions by telephone or e-mail. A copy of the notice and opt-out coupon can be obtained at [www.parpolicyclassaction.com](http://www.parpolicyclassaction.com).

**[Box 6]**

You may obtain a copy of the notice to class members on-line at [www.parpolicyclassaction.com](http://www.parpolicyclassaction.com).

**[Box 7]**

Updates regarding the progress of these lawsuits will be posted at [www.parpolicyclassaction.com](http://www.parpolicyclassaction.com).

You may leave a voicemail message for class counsel. In order to do so, you must begin by providing your name and telephone # so that a response can be provided if necessary.

Class counsel will endeavour to answer proper questions pertaining to these class action lawsuits within 10 business days.

Please be advised that questions which do not pertain to these lawsuits cannot be answered. If you have a question about your policy that does not relate to these lawsuits, please contact London Life or Great-West Life.