

**NOTICE OF CLASS ACTION REGARDING PASSENGERS ON AIR FRANCE FLIGHT
358 WHICH CRASHED AT PEARSON INTERNATIONAL AIRPORT, TORONTO ON
AUGUST 2, 2005**

Court File No. 05-CV-294746 CP

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

HUSSEIN ABDULRAHIM and FADI ABEDRABBO

Plaintiffs

and

**AIR FRANCE, GREATER TORONTO AIRPORTS AUTHORITY,
NAV CANADA, JOHN DOE #1, JOHN DOE #2, GOODRICH CORP.
and AIRBUS S.A.S.**

Defendants

Proceeding under the *Class Proceedings Act, 1992*

If you were a passenger on Air France Flight 358 or if you are a family member of such a passenger, you may be a member of this class-action. Please read this notice.

What is the case about?

On August 2, 2005, Air France Flight 358 crashed off the end of Runway 24L at Pearson International Airport. The Airbus A340 aircraft touched down long, overran the runway, careened down a slope and came to a violent stop in a gulley and burst into flames. All passengers and crew members survived, but some experienced personal injury during the landing and/or the emergency evacuation. The baggage of all passengers was destroyed.

A class action has been commenced on behalf of the passengers on Air France Flight 358 and on behalf of family members of such passengers.

The common issues in the claim include whether any or all of Air France, the Greater Toronto Airports Authority ("GTAA"), Nav Canada, Airbus S.A.S., the manufacturer of the aircraft, or Goodrich Corp., the manufacturer of the aircraft's emergency evacuation slides, are liable to the passengers and the family members of the passengers, for any personal injury suffered by the passengers, including emotional distress, psychological or psychiatric symptoms.

International law governs the claims of passengers against Air France and as a result some passengers and their family members are not able to sue Air France before the Courts of Canada and will not be entitled to

Any communication that you have with class counsel will be kept strictly confidential. Do not contact the Ontario Superior Court as they cannot respond to any of your inquiries.

Do I have to pay anything? – Fee Agreements with Class Counsel

Class counsel have agreed to act on the basis they will not be paid any legal fees unless and until the class action is either settled or successfully tried to judgment and the class members are entitled to recover damages. The law firms will apply to the court at the conclusion of the case to have their legal fees approved. The law firms will pay for all case expenses incurred in prosecuting the case and if the case is successful, the law firms will apply to the court to be reimbursed for these case expenses. If the case is not successfully settled or tried, the law firms will not be paid or be reimbursed for any case expenses.

What if I want to go to court in this class-action?

If any class member wishes to participate directly in an action against the defendants, he or she may do so by making an application to the court. Class members who wish to do so should contact class counsel for more information in this regard.

What if I do not want to participate?- Opting Out

If you do not wish to participate in this class-action or you do not wish to be bound by the results of the class-action, you must opt out no later than the _____ day of _____, 2006. If you wish to opt out, please do so by completing the attached “Opt Out Form” and sending the form to Camp Fiorante Matthews by any of the following means:

1. Mail the completed form to the attention of Morgan Andersen, at Camp Fiorante

Matthews, 4th Floor, Randall Building, 555 West Georgia Street, Vancouver, BC, V6B 1Z6;

2. Fax the completed form to the attention of Morgan Andersen at Camp Fiorante Matthews, fax number 604-689-7554; or

3. E-mail the completed form to the attention of Morgan Andersen at Camp Fiorante Matthews, email address: mandersen@cfmlawyers.ca.

If you opt out, you will not be entitled to share in any recovery or take the benefit of any ruling in this case, but you will be free to bring your own claim if you wish. **If you choose to opt out of the class proceeding and wish to bring your own claim, you should be aware that your claim may be subject to a limitation period.**

If you were a passenger on Flight 358 and you opt out, any claims which your family members may have pursuant to the Family Law Act of Ontario will also be automatically excluded from the class action.

the benefit of any ruling on the common issues pertaining to the liability of Air France. However, these passengers and family members are entitled to sue the other defendants before the Courts of Canada, and thus, form part of the class for this purpose. The issue of which passengers and family members can sue Air France in Canada depends on a number of factors. Class counsel recommend that all passengers contact them for legal advice on this issue.

On the ____ day of _____, 2006 the Superior Court of Ontario ordered that this action may proceed as a class-action.

What does this mean to me?

If you are a member of the class (i.e. a passenger or an eligible family member), you are entitled to the benefit of any ruling on the common issues. If the action is successful against any or all of the defendants, you may be entitled to recover damages for any injuries suffered by you including psychological or psychiatric symptoms. If the action is not successful against any of the defendants, you will not be able to recover damages. If the action is not successful against any of the defendants, class members, other than the representative plaintiff, are not responsible for any of the costs or case expenses associated with the action. Class members who do not opt-out are bound by the results of the class action.

Do my family members have any claims?

Under Ontario law, the spouse, children, grandchildren, grandparents, brothers and sisters of a passenger are entitled to claim damages for:

- (a) any expenses incurred for the benefit of an injured passenger;
- (b) a reasonable allowance for travel expenses actually incurred in visiting the injured passenger during his or her treatment or recovery;

- (c) any nursing, housekeeping or other services provided to an injured passenger including a reasonable allowance for loss of income or the value of the services; and
- (d) an amount to compensate for the loss of guidance, care and companionship that the claimant might reasonably have expected to receive from the injured passenger if the injury had not occurred.

Passengers who receive this notice are asked to inform their family members of this class-action as family members will not receive separate notification.

How do I get more information and participate in the class-action?

Contact class counsel, the lawyers acting for the representative plaintiffs:

Camp Fiorante Matthews
4th Floor, Randall Building
555 West Georgia Street
Vancouver, BC V6B 1Z6
Tel: (604) 689-7555
Fax: (604) 689-7555

Attention: J.J. Camp, Q.C., Joe Fiorante or Morgan Andersen

Will Barristers: Morin & Miller LLP
401 Bay Street, Box 96
Toronto, Ontario M5H 2Y4

Tel: (416) 360-1194
Fax: (416) 360-8469

Attention: Paul Miller or Gary Will

You may also access further information online as follows: visit www.cfmlawyers.ca and click on the Air France link under Class Actions.

You may contact any of these lawyers for more information about this class-action and to advise them whether you wish to participate in the class-action