

**NOTICE OF SETTLEMENT OF CLASS ACTION
AGAINST FORD MOTOR COMPANY OF CANADA, LIMITED ("FORD CANADA")
RE: OAKVILLE ASSEMBLY COMPLEX THIRD WORK SHIFT**

Read this notice carefully as it may affect your legal rights.

PURPOSE OF THIS NOTICE

The class proceeding against Ford Canada in connection with the Oakville Assembly Complex Third Work Shift has been settled. The settlement has been approved by the Ontario Superior Court of Justice (the "Court").

This notice is being provided to inform you as to your rights under the settlement.

CLASS

The Class was defined by the Court as follows: "all individuals (or the estates of any deceased individuals) who were offered employment by Ford Canada as general assemblers in connection with Ford Canada's plan to introduce a third shift at the Oakville Assembly Complex, training for which was to commence July 28, 2008, except for those individuals (or estates of any deceased individuals) who, at the time the offers were made, were bargaining unit employees on lay-off from Ford Canada's operations in Windsor, Ontario with recall rights".

OPT-IN

The Class was composed of 355 individuals. Of those individuals, 55 individuals opted-out of the class proceeding through submission of an Opt-Out Form.

Pursuant to the settlement, the Court has permitted individuals who previously opted-out of the class proceeding to opt back in. If you are one of the 55 individuals who opted-out of the class proceeding and now wish to be included in it, you must complete an Opt-In Form and submit it to the Opt-Out Administrator by no later than **February 22, 2012**.

If you are one of the 55 individuals who opted-out, an Opt-In Form is enclosed with this notice. If you do not opt back in to the class proceeding by completing and submitting the Opt-In Form by **February 22, 2012**, you will still be entitled to use the private offer enclosed with this notice. However, you will not receive any other payment or benefit.

TERMS OF SETTLEMENT

The settlement agreed to is without any admission of liability by Ford Canada.

The Class Members who will be entitled to participate in the settlement will include all individuals in the Class, except for those who opted out of the class proceeding and who do not opt back into the class proceeding in accordance with the procedure outlined above.

The settlement contemplates a base payment of compensation to all Class Members. The base payment is estimated to be a minimum payment of \$800.00, however it may be adjusted upwards slightly in accordance with the terms of settlement. The settlement also creates a claims process under which Class Members can make claims for additional compensation up to a maximum of \$10,000. In order to make such claims, Class Members must complete and submit the enclosed Claim Form and any supporting documents by no later than **March 23, 2012**.

The settlement also provides that all individuals in the Class (regardless of whether they have opted-out) will receive a private offer towards the purchase of most Ford vehicles, subject to certain conditions contained in the private offer. The private offer is enclosed with this notice if it is received by mail.

Pursuant to the settlement, all Class Members release and discharge Ford Canada from all legal rights and claims related in any way to the matters raised in the class proceeding.

CLASS COUNSEL FEES

As part of the settlement, the Court approved class counsel fees in the amount of \$328,807.81 inclusive of disbursements and HST to be paid from the settlement monies, which included an amount paid by Ford Canada on account of such costs.

ADDITIONAL INFORMATION

Further questions for class counsel (and information regarding any changes to your home address or other contact information) should be directed to:

Christopher Sweeney	Tel:	416-834-2251
	Fax:	647-477-6891
	E-mail:	c.sweeney@rogers.com

Additional information about the settlement can be found at www.classactionlaw.ca; www.shinehofflaw.ca; www.oakvilleclass.ca.

INTERPRETATION

This notice is a summary of the Judgment. If there is a conflict between the provisions of this notice and the terms of the Judgment, the Judgment will prevail.

**THIS NOTICE HAS BEEN APPROVED BY THE ONTARIO SUPERIOR COURT OF JUSTICE.
QUESTIONS ABOUT THIS NOTICE SHOULD NOT BE DIRECTED TO THE COURT.**