

November 6, 2017

Mr. William Knights
Mr. John Spencer
3400-130 King Street West
Toronto, ON M5X 1K6

Dear Mr. Knights and Mr. Spencer:

Re: Pre-86/Post-90 Hepatitis C Class Action Settlement
File No: 96233

As you know, the Pre-86/Post-90 Hepatitis C Tainted Blood settlement is in a deficit. As a result there are many class members who have made applications who will not receive the compensation for which they would otherwise qualify under the settlement. Attached is a position paper prepared by members of the class urging that Canada make an application to the supervising courts to have funds transferred from the 86-90 Hepatitis C Tainted Blood settlement, which has a surplus.

Our understanding is that there will be a hearing in the 86-90 class action on November 22, 2017 to deal with issues related to the surplus. This would be an ideal time for Canada to signal its intention to bring application to transfer funds to Pre/Post. An application by Canada would provide sufficient ground for class counsel in the Pre/Post class actions to seek intervener status to support the application.

We again ask that you seek your client's instructions on this important matter. We thank you for your consideration and look forward to hearing from you.

Yours sincerely,



David A. Klein*

*Member of the British Columbia, Ontario and Washington State Bars