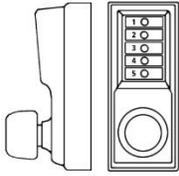


Pre-Approval Notice



If you own or use a Simplex® or Unican™ mechanical pushbutton lock in Quebec, you may have a claim in a proposed class action settlement.

This notice may affect your rights. Please read it carefully.

**Detailed information and updates are available on the Settlement Website:
www.simplexlockcase.ca**

I. The Class Members:

All residents in Quebec who use or own a Simplex® or Unican™ **Model/Series 1000, L1000, 2000, 3000, 6200, 7000, 7100, 8000 or File Guard** mechanical pushbutton lock manufactured before January 1, 2011 (“End-Users”) or who purchased such a lock for re-sale (“Locksmiths”).

II. Purpose of this Notice:

A settlement has been proposed in a class action lawsuit about Simplex® or Unican™ mechanical pushbutton locks (“Settlement”). The Plaintiff asserted in a class action lawsuit filed in the Superior Court of Quebec (“Court”) that Simplex® or Unican™ locks were improperly designed and marketed. The Defendants have denied all claims and continue to deny Plaintiff’s allegations and maintain that Defendants have not engaged in any wrongful acts. This Settlement is not an admission of wrongdoing or an indication that any law was violated. Defendants have nevertheless concluded that it is in their best interests that this lawsuit be resolved subject to and on the terms and conditions set forth herein.

III. The Settlement Benefits:

A) Qualifying End-Users of Simplex® or Unican™ mechanical pushbutton lock models listed above whose claims are approved are eligible to receive one or more of the following, depending upon a variety of different criteria: a free do-it-yourself (“DIY”) Upgrade Kit that addresses the design elements at issue in the lawsuit; a reduced-cost or free do-it-yourself (“DIY”) Shield that addresses the design elements at issue in the lawsuit or free professional installation of the Upgrade Kit.

B) Qualifying Locksmiths with inventory of unused, resalable Simplex® or Unican™ mechanical pushbutton lock models listed above, which the Defendants did not already upgrade are eligible to exchange that inventory for new inventory that has been upgraded to address the design elements at issue in the lawsuit. Inventory of the listed models which has already been upgraded bears a yellow “Check Contents If Seal is Broken” tamper seal on the box flap.

IV. The Claims Process:

To receive Settlement Benefits, qualifying Class Members must submit a Claim Form to the Claims Administrator through the Settlement Website or by mail. The Claim Form is already available on the Settlement Website at www.simplexlockcase.ca or you can obtain one by contacting the Claims Administrator at **1-877-596-5269**. A definite Claim Deadline will be set if and when the Settlement is approved by the Court. Please consult the Settlement

Website for an update of the delays that will be set by the Court. Please also be aware that all claims currently submitted are subject to the Court approving the Settlement.

V. The Hearing on the Approval:

The Superior Court of Quebec will hold a hearing to consider whether to approve the Settlement on **November 22, 2016 at 9:30 A.M. in room 2.08 of the Courthouse located at 1 Notre-Dame St. East, Montreal, Quebec** (“Approval Hearing”). The Court must be satisfied that the Settlement is fair, reasonable and in the best interests of Class Members.

VI. Your Options:

If you are a Class Member, you may (1) send in a Claim Form; (2) object to the Settlement; (3) exclude yourself (Opt-Out); or (4) do nothing.

If you don't want to be legally bound by the settlement, you must opt-out. To do so, you must complete and submit an Opt-Out Form to the Claims Administrator by **November 5, 2016**. The manner in which you opt-out is available on the form found on the Settlement Website. In addition, notice must be given to the Clerk of the Superior Court of Quebec. Anyone who opts out cannot object to the Settlement, will not be bound by the Settlement Agreement, and will not be eligible to claim benefits under the Agreement, but may be eligible to pursue an individual claim.

Class Members who do not wish to object to or make representations regarding the proposed Settlement do not need to attend the Approval Hearing in order to be eligible to benefit from the Settlement, if it is approved by the Court. Class Members who do wish to object to or make representations regarding the proposed Settlement, either directly or through their own legal counsel, must notify the Court, Class Counsel and the attorneys for the Defendants of the nature and grounds of their objections or representations, in writing or by e-mail, by no later than **November 12, 2016**.

VII. Additional Information:

This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement. For more information on the lawsuit and the Settlement, please go to www.simplexlockcase.ca or contact the Claims Administrator at:

RicePoint Administration
PO Box 3355
London, ON
N6A 4K3

Tel: 1-877-596-5269

Email: info@simplexlockcase.ca

VIII. Class Counsel:

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Web: www.clg.org

The Court at the Approval Hearing will also consider a request from Class Counsel for counsel fees, disbursements and taxes. Class Counsel has pursued this lawsuit wholly on a contingency basis and has agreed that they would only be paid their legal fees if there was a Settlement or recovery following a successful outcome. They will seek approval from the Court of \$212,500 plus applicable taxes and an honorarium payment of \$2,500 to the Plaintiff.

This Notice has been approved by the Superior Court of Quebec.