

ZONOLITE ATTIC INSULATION ("ZAI") **CLASS ACTION SETTLEMENT**

FREQUENTLY ASKED QUESTIONS & ANSWERS

1. WHY DID I RECEIVE THIS LETTER?

You received this letter because you filed a claim with Rust Consulting Inc., claims processing agent, prior to the Claims Bar Date of December 31, 2009 as referenced below.

2. HOW DID THIS SETTLEMENT COME ABOUT?

ZAI is a loose-fill, non-roll vermiculite home attic insulation which may contain naturally-occurring asbestos. It was sold from approximately the 1920s to 1984. It was sold or manufactured by Grace under the brand name of "Zonolite Attic Insulation" and by others under various names including Attic Fill, House Fill, Home Insulation, Zonolite Insulating Fill, Econofill, Quiselle Insulating Fill, Sears Micro Fill, Ward's Mineral Fill, Wickes Attic Insulation, Cashway Attic Insulation, Attic Plus, Unifil, and Mica Pellets Attic Insulation. The granules are shaped like a small nugget and expanded like an accordion and may have a silvery, gold translucent or brownish colour. After years in the attic, the granules may darken to black or grey. ZAI may be found underneath insulation that was installed later on.

It was determined that the ZAI may include asbestos. A number of lawsuits were commenced.

Grace and its related companies filed for bankruptcy protection under Chapter 11 of the United States Bankruptcy Code. The companies also received Court protection in Canada under the provisions of the *Companies Creditors Arrangements Act* ("CCAA"). A settlement was entered into to pay valid Canadian ZAI claims.

Canadian ZAI property damage claims ("Canadian ZAI PD") claims will be paid from a fund established in Canada.

Canadian ZAI PD claims were required to be filed by **December 31, 2009.**

In addition, Canadian ZAI personal injury claims ("Canadian ZAI PI claims") will be channelled to a U.S. trust. Valid claims will be paid by the trust pursuant to trust distribution procedures.

Canadian ZAI PD claims relate only to property located in Canada and do not include claims related to personal injury.

3. HOW MUCH WILL I RECEIVE?

Collectiva, the Court-appointed claims administrator will make payments pursuant to certain procedures set-out in the settlement agreement for valid Canadian ZAI PD claims, as approved by the Court.

Collectiva has established the criteria to determine what is necessary to satisfy and establish an allowed Canadian ZAI claim.

There are two levels of compensation. All property owners who can prove the existence of ZAI in their property will receive a one-time lump-sum payment of \$300.00. Individuals who are able to prove the presence of ZAI at their property and that they incurred costs for major remediation of that property, will be entitled to a *pro rata* distribution (up to the actual amount spent on major remediation) from the Settlement Fund, after payment of the \$300.00 level claims.

4. WHAT IS A BAR DATE?

The bar date is the date set by the Court as the date by which all persons and entities who have claims must file proofs of claim or forever be barred from asserting any such claims against the Debtors.

Claims in this case were required to be filed by **December 31, 2009**.

5. IF I LOOK IN MY ATTIC AND SEE WHAT I THINK IS ZAI, SHOULD I SEND IN A SAMPLE?

No. You are not required to send in samples of ZAI.

WARNING: PLEASE NOTE THAT ZAI CAN BE DANGEROUS IF DISTURBED. IF YOU ARE NOT CERTAIN IF YOU HAVE ZAI IN YOUR HOME, YOU SHOULD SERIOUSLY CONSIDER RETAINING AN EXPERT TO CARRY-OUT AN INSPECTION. YOU SHOULD BE VERY CAREFUL NOT TO DISTURB THE ZAI OR OTHERWISE EXPOSE YOURSELF OR OTHERS TO IT.

6. WHAT INFORMATION IS REQUIRED FOR ME TO PROVE A CLAIM AND BE ENTITLED TO COMPENSATION?

You need to provide information or documentation to Collectiva to prove your claim. The required information includes:

1. an invoice/receipt from the original installation of ZAI;
2. a certificate of analysis of the insulation identifying the existence of ZAI;
3. a photograph of a label from a bag of ZAI in your attic, or a photograph of the ZAI in your attic;
4. an invoice or report indicating that ZAI has been removed from your property; or,
5. an energy efficiency evaluation report or home inspection report referencing the presence of ZAI at your property.

For individuals who are unable to submit one or more items of documentation referenced above, Collectiva will accept a sworn affidavit from the property owner indicating presence of ZAI.

7. HOW DO I MAKE A PERSONAL INJURY CLAIM?

All Canadian ZAI personal injury claims will be channelled to a U.S. Asbestos Trust that will be set-up pursuant to the Debtor's Plan of Reorganization. The trust provisions relating to the U.S. Asbestos Trust will detail the manner in which claims must be made, what has to be proven, etc. For more information please consult the website www.wrgraceasbestostrust.com .

8. DO I NEED A LAWYER?

You may choose to retain a lawyer, however, you are not required to do so in order to file a claim. If you do retain a lawyer on your own, you will be responsible for that cost.

You can also contact the Claims Administrator Collectiva, which is responsible for administration of the settlement. Contact information is listed below.

9. HOW DO I OBTAIN FURTHER INFORMATION?

Further information is available from the Claims Administrator as set-out below:

Collectiva Class Action Services Inc.

533, rue Ontario Est, bureau 206

Montreal (Québec) H2L 1N8

Telephone: (514) 287-1000

Toll Free: 1-800-287-8587

Email: info@collectiva.ca

Website: www.collectiva.ca