

SCHEDULE “C2” - NOTICE OF PROPOSED SETTLEMENT AND SETTLEMENT APPROVAL HEARING (LONG FORM)

NOTICE OF PROPOSED SETTLEMENT AND SETTLEMENT APPROVAL HEARING

YOUR LEGAL RIGHTS MAY BE AFFECTED

A class action settlement has been reached in *Heimbürger v BigSteelBox Corporation*, court file no. ABB-S-S-02704.

The British Columbia Supreme Court has certified the class action for the purposes of implementing the proposed settlement. The settlement is a compromise of disputed claims and is not an admission of liability by the defendants. The proposed settlement is subject to Court approval.

The defendant is BigSteelBox Corporation (the “Defendant”).

WHAT IS THE LAWSUIT ABOUT?

The plaintiffs allege that the Defendant is liable to class members for water damage to property they kept in storage containers at the Defendant’s facility located at 37400 North Parallel Road, Abbotsford, BC V3G 2K1. The class members’ property was damaged during a flood impacting areas throughout Abbotsford between November 14, 2021 to December 17, 2021. The plaintiffs sought to recover damages from the Defendant on behalf of the class. The Defendant denies all allegations against it and denies any liability to the class. Liability and damages have not been proven. The settlement is a compromise, without any admission of liability by the Defendant.

WHO ARE IN THE CLASS AND AFFECTED BY THE SETTLEMENT?

The Action was brought on behalf of a “Class” of all individuals, legal persons, businesses and estates whose property was stored in containers at the Defendant’s property at 37400 North Parallel Road, Abbotsford, British Columbia, during the period November 14, 2021 to December 17, 2021, or some portion thereof, and who claim their property was damaged due in any way to flood water entering a storage container at the Defendant’s property.

The Court appointed the plaintiffs, Steven Heimbürger and David John Buddle, as representative plaintiffs on behalf of the Class.

The law firm of Zacharias McCann LLP, 301-45890 Hocking Ave., Chilliwack, British Columbia, are counsel for the plaintiffs and the class (“Class Counsel”).

WHAT ARE THE TERMS OF THE SETTLEMENT?

The Defendant will pay the all-inclusive sum of **\$1,000,000**, without any admission of liability, in exchange for a full and final release by the Class of all claims in issue in the class action against the Defendant.

The Court will determine the amount to be paid to Class Counsel for their legal fees and disbursements.

A further hearing will be held on June 12, 2026 to seek Court approval for the Settlement Agreement. The hearing will take place at 32375 Veteran's Way, Abbotsford, BC, V2T 0B3, before the Honourable Mr. Justice Caldwell or before such other justice of the Court as may be appointed. If approved, the settlement will be binding on all members of the Class who did not opt out of the Action.

The full settlement terms and court documents are available at the following link:
www.mnp.ca/bigsteelboxsettlement.

HOW DO I PARTICIPATE IN THE LAWSUIT?

If you are a member of the Class, you do not need to do anything. You are automatically included, unless you opted out of the Action. After the settlement is approved, a process will be announced setting out the procedure and manner for members of the Class to submit their individual claims for a share of the settlement funds.

WHAT IF I DO NOT WANT TO PARTICIPATE?

If you do not want to participate, you may exclude yourself from the Action ("opt-out").

Those who do not wish to be part of the Action and settlement can opt out and thereafter take no part in the proceedings. When you opt-out, you lose your right to make a claim for money through the class action. Opting-out is a final decision that cannot be undone.

In order to opt out, you must complete and sign an opt out form and deliver it to Class Counsel by mail, courier, or email so that Class Counsel receives it by no later than May 7, 2026 at 5:00 p.m. Pacific Standard Time. The opt-out form is available at www.mnp.ca/bigsteelboxsettlement or you may request a copy of the form by emailing Class Counsel at bigsteelboxclassaction@zmlp.ca.

WILL I RECEIVE COMPENSATION FROM THIS SETTLEMENT?

The amount of compensation each member of the Class is entitled to will be determined by reference to a distribution protocol that is subject to Court approval, and to a process to ensure each claimant qualifies as a Class member.

OBJECTIONS

All Class members have the right to let the Court know of any objection they have to the approval of the Settlement Agreement, Class Counsel fees or the honorarium to the representative plaintiffs by delivering the written objection form available at www.mnp.ca/bigsteelboxsettlement by email to Class Counsel at bigsteelboxclassaction@zmlp.ca, to be received by Class Counsel on or before May 7, 2026 at 5:00 p.m. Pacific Standard Time. Class Members may also attend the settlement approval hearing.

If a Class member wishes to object, they must submit their objection using the following form available at www.mnp.ca/bigsteelboxsettlement or you may request a copy of the form by emailing Class Counsel at bigsteelboxclassaction@zmlp.ca.

More information on the case is available at: www.mnp.ca/bigsteelboxsettlement.

You may also contact Class Counsel with questions at bigsteelboxclassaction@zmlp.ca.

***This notice has been authorized by the British Columbia Supreme Court.**