

NOTICE OF THE CERTIFICATION AND SETTLEMENT OF THE NOBILIS SECURITIES CLASS ACTION

Read this notice carefully.

This notice is directed to all persons, excluding certain persons associated with the defendants, who acquired common shares of Nobilis Health Corp. (“Nobilis”) listed on the Toronto Stock Exchange during the period from: March 23, 2015 to and including January 12, 2016 and who held some or all of those shares at the close of trading on October 8, 2015, November 11, 2015, January 5, 2016, and/or January 12, 2016 (collectively, the “Class or Class Members”).

On January 8, 2016, a proposed class action was commenced against Nobilis and others, in the Ontario Superior Court of Justice, *Cappelli v. Nobilis Health Corp. et al*, Court File Number CV-16-544173 (The “Class Action”). The plaintiff alleges that the defendants misrepresented the financial status of Nobilis.

The parties have reached a settlement of the Class Action, without an admission of liability on the part of Nobilis, which has been approved by the Court. This notice provides a summary of the approved settlement.

THE TERMS OF THE SETTLEMENT

The Class Action will be dismissed against Nobilis.

OTHER IMPORTANT ITEMS

The Class Action has been previously settled in part against Calvetti Ferguson LLP, the former auditor for Nobilis. As a result, counsel for the plaintiff (“Class Counsel”) is currently holding funds in trust for the benefit of the Class (the “Residual Funds”) in the approximate amount of \$608,000.

Class Counsel has asked, and the Court has approved:

- 1) A release of \$100,000 from the Residual Funds to Class Counsel for Legal Fees;
- 2) A cy-près distribution of the balance of the Residual Funds remaining to the Class Proceedings Fund.

(Collectively “Class Counsel’s Requests”)

None of the Residual Funds will be distributed to the Class Members.

Note that Class Members will not be given an opportunity to opt-out of the Class Action or object to the settlement.

THE APPROVAL HEARING

The Court was asked to approve, and did approve the Settlement and Class Counsel’s Requests at a hearing which took place on July 29, 2019 at 10:00 a.m. at the courthouse at 130 Queen Street West, Toronto.

A copy of the Court’s Order approving the Settlement and Class Counsel’s Requests can be found at <https://morgantico.com/wp-content/uploads/2019/08/Order.pdf>, and a copy of the Court’s Reasons for Decision with regards to that Order can be found at <https://www.canlii.org/en/on/onsc/doc/2019/2019onsc4521/2019onsc4521.pdf>.

ADDITIONAL INFORMATION

Class Members who require additional information about the above can view the documents submitted to Court in support of the Settlement and Class Counsel's Requests at <https://morgantico.com/nobilis-health-corp/>.

QUESTIONS

Questions for the Class Members' lawyers may be directed to:

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**This notice has been approved by the Court. Questions about matters
in this notice should NOT be directed to the Court.**