

Wanland & Associates, Inc.
v. Nortel Networks Corp., et al.
Settlement Administrator
P.O. Box 43446
Providence, RI 02940-3446

NTW

**DID YOU LEASE A MATRIX BOX FROM NORVERGENCE?
A CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS**

Wanland & Associates, Inc. (“Plaintiff”) v. Nortel Networks Corporation, et al., United States District Court for the District of New Jersey, Case No. 3:05-cv-01191-MLC-TJB.

This Notice is directed to the “Settlement Class,” who are defined as:

All persons, including businesses, in the United States of America and its territories who, between January 1, 2001, through June 30, 2004, entered into a written agreement with NorVergence, Inc. for the **lease of one or more Matrix boxes, Matrix SoHo boxes, or other network equipment provided by NorVergence, Inc.** Excluded from the Settlement Class are the presiding judges in *Wanland & Associates, Inc. v. Nortel Networks Corporation, et al.*, Case No. 3:05-cv-01191-MLC-TJB (D.N.J.), *In re NorVergence, Inc.*, Case No. 04-32079-RG (Bankr. D.N.J.), *In re Nortel Networks Inc.*, Case No. 09-10138 (Bankr. D. Del.), *In re Nortel Networks Limited*, Case No. 09-10166-KR (Bankr. D. Del.), and *In the Matter of a Plan of Compromise or Arrangement of Nortel Networks Corp.*, Case No. 09-CL-7950 (Ontario Super. Ct. of Justice (Canada)), the staff of each of the presiding judges in the afore-mentioned proceedings, Class Counsel (defined below), the in-house and outside counsel of the Settling Nortel Defendants (defined below) and of Nortel Networks Corporation, and the respective immediate families of all persons listed above.

In this class action, Plaintiff alleges that, beginning in 2001, Nortel Networks Limited (“NNL”), Nortel Networks Inc. (“NNI”), Qwest Communications International Inc., Thomas N. Salzano, Alexander L. Wolf and Robert J. Fine (“Defendants”) and third party NorVergence, Inc. defrauded persons and businesses by inducing them to enter into equipment leases without disclosing that the leases purported to create an absolute obligation to pay, regardless of any telecommunications services actually delivered and even though the value of the equipment was far less than the leased price. NNL and NNI are currently debtors in bankruptcy proceedings pending before the Ontario Superior Court of Justice in Canada and the United States Bankruptcy Court for the District of Delaware, respectively. Plaintiff and Defendants NNL and NNI (the “Settling Nortel Defendants”) have reached a settlement. The purpose of this Notice is to provide Settlement Class members with information about the settlement and the Final Approval Hearing. The important terms of the settlement are:

(1) Settlement Class members who file valid, timely claims will receive a **cash payment**, which will be calculated as a share of the net distributions on an allowed general unsecured bankruptcy claim totaling \$400,000 against NNI. The amount of each Settlement Class member’s payment is unknown at this time, and shall depend on (i) the number of Settlement Class members who submit timely, valid claims; (ii) the percentage recovery for general unsecured creditors on allowed claims in NNI’s bankruptcy proceedings; and (iii) the costs of this notice and class settlement administration, which will be deducted, together with a \$10,000 incentive award for the class representative, from the amount recovered on the \$400,000 allowed claim before any distribution (of the remaining amount) is made to the Settlement Class members. A hearing regarding confirmation of NNI’s Chapter 11 Plan is scheduled for January 24, 2017, at 10:00 a.m. EST and any objections to that Plan are due by January 9, 2017, at 4:00 p.m. EST. Information on NNI’s Chapter 11 Plan can be found at <http://dm.epiq11.com/#/case/NNI/info>. A copy of the confirmation hearing notice appears at www.NetworkEquipmentClassAction.com.

(2) All Settlement Class members who do not timely opt out of the settlement will forever release all legal claims, known and unknown, against the Settling Nortel Defendants relating to the equipment leases they entered into with NorVergence, Inc. for the lease of the Matrix boxes, Matrix Soho boxes or other network equipment provided by NorVergence, Inc. between January 1, 2001, and June 30, 2004, and will not be able to assert any claims against the Settling Nortel Defendants on account of that issue.

(3) The law firms of Schnader Harrison Segal & Lewis LLP, Cafferty Clobes Meriwether & Sprengel LLP, and Rosenfeld Hafron Shapiro & Farmer (“Class Counsel”) will apply to the Court for attorney’s fees and costs up to \$100,000. Any fees and costs actually awarded and paid to Class Counsel will be determined by the courts, and will be deemed an allowed general unsecured claim against NNI.

(4) A Final Approval Hearing will be held on **May 24, 2017, at 10:00 a.m.**, before the Honorable Rosemary Gambardella of the United States Bankruptcy Court for the District of New Jersey located at 50 Walnut Street, Third Floor, Newark, NJ 07102. Settlement Class members may attend only if they file a timely objection to the settlement with notice of intent to appear. You may opt out of this settlement by mailing a written request to Wanland v. Nortel Networks Corp. Settlement Administrator, P.O. Box 43446, Providence, RI 02940-3446, by **February 27, 2017**. If you opt out, you will not be entitled to receive the cash payment described above. Moreover, the Defendants will retain the rights to dispute any claim asserted by you in the future. If you wish to object to the fairness of the settlement, you must file a written objection with the Court on or before **February 27, 2017**, and by the same date you must send a copy of that written objection to both (1) Class Counsel, Nyran Rose Rasche, Cafferty Clobes Meriwether & Sprengel LLP, 150 S. Wacker Drive, Suite 3000, Chicago, IL 60606, and (2) NNI’s counsel, Matthew J. Livingston, Cleary Gottlieb Steen & Hamilton LLP, One Liberty Plaza, New York, NY 10006. You will receive no further notice about this case. Additional information about the case, including the settlement agreement, may be reviewed in the court file or by visiting www.NetworkEquipmentClassAction.com. Class members may file claims for payment from the settlement fund at that website. The deadline to file a claim is **April 13, 2017**.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS	
FILE A CLAIM	<p>You may file a claim for a cash payment at: www.NetworkEquipmentClassAction.com</p> <p>Claims must be filed by April 13, 2017, and will only be distributed if the settlement is approved. If you do not have access to the internet and wish to make a claim, you must call 888-240-4541 by April 1, 2017, to request a paper claim form.</p>
OBJECT TO THE SETTLEMENT or OPT OUT OF THE SETTLEMENT	<p>You can ask the Court to deny approval of the settlement by filing an objection by February 27, 2017.</p> <p>You can opt out of the settlement by mailing a written request by February 27, 2017.</p> <p>You do not need to do anything if you want the settlement to be approved.</p>
ATTEND THE HEARING	<p>If you object to the settlement and file a timely objection with notice of intent to appear, you may attend the Final Approval Hearing on May 24, 2017, at 10:00 a.m. Class members planning to attend should check the court file or www.NetworkEquipmentClassAction.com, or call 888-240-4541, to confirm that the date has not been changed.</p>

DO NOT TELEPHONE THE COURT FOR INFORMATION ABOUT THE SETTLEMENT.