

LEGAL NOTICE

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA

If you are a dentist who purchased a NobelDirect implant, except NobelDirect Groovy, a class action lawsuit may affect your rights.

A court authorized this Notice. This is not a solicitation from a lawyer.

A dentist has sued Nobel Biocare Holding, AG, Nobel Biocare AB, and Nobel Biocare USA, LLC (together the “Defendants” or “Nobel”). The Judge for the case has certified the claims as a “Class Action.” You may be a member of the Class. Please read this notice carefully. This Document contains critical information regarding the Class Action lawsuit.

Basic Information

1. Why did I get this Notice?

Nobel's records show that you may have purchased the Nobel Direct implant. This Notice explains that the Court has certified a class action lawsuit that may affect you. You have legal rights and options that you may exercise before the Court holds a trial. The trial is to decide whether the claims being made against Nobel, on your behalf, are correct. The Honorable Judge Jacqueline H. Nguyen of the United States District Court for the Central District of California is overseeing this class action. The lawsuit is known as *Yamada v. Nobel Biocare Holding AG*, Case No. 2:10cv04849.

2. Nature of the action and who is involved.

This lawsuit has been certified as a Class Action. Dr. Jason Yamada has sued on behalf of himself and all other dentists in the United States who have similar claims. The Court has concluded that the matter may proceed as a Class Action with Dr. Yamada as the Class Representative. There are three (3) Defendants in the action: Nobel Biocare Holding AG, Nobel Biocare AB and Nobel Biocare USA, LLC (collectively referred to in this Notice as "Defendants" or "Nobel"). In a Class Action, all of the issues in the lawsuit are resolved in a single lawsuit and affects every person in the class except for those who timely elect to exclude themselves from the Class Action.

3. Am I a Member of the Class?

The Court has defined the Class as "all dentists in the United States who have purchased any NobelDirect dental implant other than the 'NobelDirect Groovy.' The class shall include individual dentists who purchased or acquired the NobelDirect dental implant by and through any partnerships, corporations or other similar entities." That means that if you are a dentist practicing in the United States who purchased one or more NobelDirect Implants (other than NobelDirect Groovy) you are a member of the Class certified by the Court.

4. Why is this lawsuit a class action?

The Court decided that this lawsuit can be a class action and move towards a trial because it meets the requirements of Federal Rule of Civil Procedure 23, which governs class action in Federal Courts. Specifically, the Court found that: (1) There are legal questions and/or facts that are common to each Class Member; (2) Doctor Yamada's claims are typical of the claims of the rest of the Class; (3) Dr. Yamada, and the lawyers representing the Class will fairly and adequately represent the interests of the Class; (4) The common legal questions and facts are more important than questions that affect only individuals; and (5) This class action will be more efficient than having many individual lawsuits.

The lawsuit can be found at www.nobeldirectadministration.com, the Court-approved website.

5. What is this lawsuit about?

In the class action lawsuit, the Plaintiff claims that NobelDirect implants (other than the NobelDirect Groovy) and Nobel's recommended implant procedures are defective. In the suit, it is claimed that as a

result of the defects, patients may suffer complications including bone loss, bone resorption, lack of implant osseointegration, gingival retraction, gingival pitting with metallic discoloration and/or failed and failing implants. The suit maintains that as a result of the complications, dentists must remove and replace the NobelDirect implants resulting in financial loss to the dentists. The suit seeks recovery for the alleged financial losses including past and future damages incurred by class members.

6. Nobel's position

Nobel denies that there is any design defect in the NobelDirect implants, denies that the implants caused the complications claimed in the lawsuits and maintains that the implants are free from defects and that the recommended implant procedures are proper. Nobel also maintains that all of the claims asserted in the lawsuit are barred by the applicable statute of limitations.

7. Has the Court decided who is right?

The Court has not decided whether Nobel or the Plaintiffs are correct. By establishing the Class and issuing this Notice, the Court is not suggesting that the Plaintiffs will win or lose this case.

8. Am I part of this class?

If you bought a NobelDirect implant (other than the NobelDirectGroovy) at any time prior to August 12, 2011, then you will be included in the class unless you ask to be excluded from the class.

9. I'm still not sure if I am included, or I have other questions about the Action; who should I contact?

If you are still not sure whether you are included or if you have any other questions, you should contact the attorneys that represent you and the class at 1.877.775.6337. (See below for details regarding the attorneys.)

10. What happens if I do nothing at all?

You don't have to do anything now if you want to keep the possibility of getting money or benefits from this lawsuit. By doing nothing, you are staying in the Class. If you stay in and the Plaintiffs obtain money or benefits, either as a result of the trial or a settlement, you will be notified about how to apply for a share (or how to ask to be excluded from any settlement). Keep in mind that if you do nothing now, regardless of whether the Plaintiffs win or lose the trial, you will not be able to sue, or continue to sue, Nobel – as part of any other lawsuit – about the same legal claims that are the subject of this lawsuit. You will also be legally bound by all of the Orders the Court issues and judgments the Court makes in this class action.

11. Why would I ask to be excluded from the Class?

If you exclude yourself from the Class – which also means to remove yourself from the Class (and is sometimes called “opting out” of the Class) – you won't be bound by any judgments in this class action and you will keep any rights you may have to sue the Defendants for these same claims now or in the future. If you do ask to be excluded, you will not get any money or benefits from this lawsuit even if the

Plaintiffs obtain them as a result of the trial or from any settlement (that may or may not be reached) between Nobel and the Plaintiffs.

If you start your own lawsuit against Nobel after you exclude yourself, you'll have to hire and pay your own lawyer for that lawsuit, and you'll have to prove your claims. If you do exclude yourself so you can start or continue your own lawsuit against Nobel, you should talk to your own lawyer soon, because your claims may be subject to a statute of limitations.

12. How do I ask the Court to exclude me from the class?

To ask to be excluded, you must send an "Exclusion Request" in the form of a letter sent by mail, stating that you want to be excluded from the *Yamada v. Nobel Biocare Holding AG* case. Be sure to include your name and address, and sign the letter. You must mail your Exclusion Request postmarked by November 21, 2011 to Yamada v. Nobel Biocare Holding A.G., c/o Kurtzman Carson Consultants LLC, PO Box 6177, Novato, CA 94948-6177.

The Lawyers Representing You

13. Do I have a lawyer in this case, and how do I contact them?

The Court decided that the law firms of Audet & Partners, LLP, Lopez McHugh, LLP, and Stephen D. Ochs, M.D., J.D. are qualified to represent you and all Class Members. Together the law firms are called "Class Counsel". You can reach them at 1.877.775.6337 (toll free) or by emailing Nobel@audetlaw.com. They are experienced in handling similar cases. More information about the case, the Court's Orders and other filings, these law firms, and their experience is available at <http://NobelDirect-Litigation.com>.

14. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you will have to pay that lawyer. For example, you can ask him or her to appear in Court for you if you want someone other than Class Counsel to speak for you.

Getting More Information

15. Are more details available?

You may visit the Court-approved website, www.nobeldirectadministration.com, where you will find this notice, the Class Action First Amended Complaint, the Defendants' Answer to the First Amended Complaint and the Court's Order certifying the class. You may also speak to the Class Counsel that have been appointed by the Court by calling 1.877.775.6337 or by writing to NobelDirect Attorneys, c/o Audet & Partners, LLP, 221 Main Street, Suite 1460, San Francisco, CA 94105 or by emailing Class Counsel at Nobel@audetlaw.com. Plaintiffs' counsel have also created a website for Class Members. See <http://NobelDirect-Litigation.com>.

Please do not call the Court.