

NOTICE TO MEMBERS
in the class action of the plaintiff *Andrée Ménard v. Lino P. Matteo et al.*
also known as the Mount Real class action
No. 500-06-000453-080

The Mount Real class action continues against certain defendants who were not parties to the settlement agreement that led to the payout. Indeed, this agreement allows the plaintiff, Ms. Ménard, to continue the class action against the individual defendants, namely Lino P. Matteo and Paul D'Andrea as well as the respondents Laurence Henry, Lowell Holden, Joseph Pettinicchio and Andris Spura.

In order to continue the class action against the individual defendants, the plaintiff has entered into an agreement with Paul D'Andrea, the main terms of which are the full and final release from any claim against the latter in exchange for his full cooperation. A copy of the agreement is available on TJL's website: <https://tjl.quebec/wp-content/uploads/2021/01/MountReal-Entente-DAndrea.pdf>.

By this agreement, Paul D'Andrea undertook to assist the plaintiff's attorneys, at his own expense, in the progress of the class action by identifying documents relevant to the litigation and testifying to what he knew.

As a member, you have the right to make any claims regarding the approval of this agreement. To do this, if you do not agree with the agreement, you can submit a written objection no later than February 11, 2021, by email or fax to TJL, at the following coordinates:

Fax: (514) 871-8800
Email: info@tjl.quebec

TJL's lawyers will provide the Honorable Justice Buffoni of the Superior Court of Quebec with any e-mail received before February 12, 2021. You can also explain your claims to Judge Buffoni at the agreement approval hearing, if you wish. Please indicate in your correspondence if you wish to speak to Justice Buffoni.

The hearing in which TJL's lawyers will address the Honorable Justice Buffoni to have this agreement approved will take place on February 12, 2021, at 9:30 at the Montreal courthouse, unless judge Buffoni orders otherwise.

If the judge approves the Settlement Agreement, a new notice will be sent to let you know. If you have any questions, please do not hesitate to contact TJL:

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