

CANADA  
PROVINCE OF QUÉBEC  
DISTRICT OF MONTRÉAL  
No: 500-06-000440-087

(Class action)  
**SUPERIOR COURT**

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**JEAN-FRANÇOIS PARIS**

Plaintiff

v.

**RENAUD LAFRANCE**

-and-

**ALAIN LAFRANCE**

-and-

**COLEEN SMITH**

-and-

**YVON CHOUINARD**

-and-

**ANDRÉ DUQUENNE**

-and-

**MICHEL MORIN**

-and-

**CHUBB DU CANADA COMPAGNIE  
D'ASSURANCE**

Respondents

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**NOTICE TO MEMBERS**

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1. **TAKE NOTICE** that on September 1, 2011, Mr. Justice Robert Mongeon of the Superior Court authorized the bringing of a class action against the Respondents on behalf of : « **All persons who were shareholders of Capital Hubble Inc. and all persons who became shareholders of Les Entreprises BigKnowledge Inc. between June 24, 2005 and December 6, 2005, excluding shareholders who were directors and/or administrators of these companies and excluding shareholders who made a profit pursuant to the sale of their shares.**»

2. The principal questions of fact or law to be dealt with collectively are the following: i) Did the Respondent administrators and/or directors commit a fault in not informing class members, prior to June 23, 2005, that BigKnowledge was no longer a viable business? ii) Did the Respondent administrators and/or directors commit a fault in not informing class members, prior to June 23, 2005, that BigKnowledge was in default with regard to its bankers? iii) Did the Respondent administrators and/or directors commit a fault in using the net product of the money collected for means other than those announced in the prospectus ? iv) Did the Respondent administrators and/or directors commit a fault in using an inadequate method of recording the products? v) Did the Respondent administrators and/or directors commit a fault in erroneously representing the amount of products listed in the financial statements of

BigKnowledge? vi) Did the Respondent administrators and/or directors commit a fault in not disclosing an important event which occurred during the intermediate period? vii) In the affirmative, are the Respondent administrators and/or directors severally liable by way of these faults towards class members? viii) As the insurer of the administrators and directors of BigKnowledge, is respondent Chubb du Canada compagnie d'assurance obliged to pay to class members the amount of their claim? ix) Is it proper to order the collective recovery of the claims of class members?

3. A member who wishes to do so may exclude himself or herself from the group (in particular to present their own claim) by notifying the Clerk of the Superior Court of the judicial district of Montreal by registered mail within 30 days of the publication of the present notice;

4. A member may intervene if the Court considers said intervention to be useful for the group;

5. Members of the group, other than the representative or an intervener, cannot be called upon to pay the costs of the class action;

6. The full text of the notice to members is available at the Office of the Superior Court, district of Montreal, and on the websites of the attorneys of the Petitioner : [www.trudeljohnston.com](http://www.trudeljohnston.com) and [www.lblavocats.ca](http://www.lblavocats.ca).

Field Code Changed

For more information :

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