

Do you have a taxi owner's permit?

A CLASS ACTION COULD AFFECT YOU. PLEASE READ THIS NOTICE CAREFULLY.

On October 31, 2018, a class action against the Attorney General of Quebec and the Government of Quebec was authorized by the Honorable Justice Mark G. Peacock of the Superior Court of Quebec. The class action includes taxi owner's permit holders in the agglomerations affected by the bill that allows Uber to operate in Quebec.

On January 16, 2020, all taxi owner's permit holders in Quebec since October 28, 2013 were added to the class action against the Attorney General of Quebec and the Government of Quebec.

According to the allegations made by the class representative, Dama Metellus, the Government of Quebec expropriated taxi permit holders without paying them reasonable advance compensation.

WHO ARE THE MEMBERS OF THE CLASS ACTION?

You are a member of the class action if you are or have been a holder of a taxi owner's permit in the province of Quebec since October 28, 2013.

WHAT COULD YOU GET?

You could get compensation equivalent to the loss of value of the taxi owner's permit. Punitive damages of \$1,000 per member are also being claimed.

YOU DO NOT NEED TO DO ANYTHING TO BENEFIT FROM THE CLASS ACTION

There are no fees to pay, and no forms to fill out at this time. If the class action is successful, everyone in the group could be entitled to compensation. If the class action succeeds, notices will be published explaining the process of for obtaining compensation and the Court will determine the lawyers' fees based on a percentage of the compensation awarded.

YOU CAN EXCLUDE YOURSELF FROM THE CLASS ACTION

You have up to February 27, 2020, to exclude yourself from the class action. If you do not exclude yourself from the class action, you will be bound by this action and will not be able to bring your own separate action against the Attorney General of Quebec and the Government of Quebec. If you exclude yourself, you will not receive any compensation that could be paid as a result of this class action.

If you wish to exclude yourself, you must send a letter to the registry of the Superior Court of Quebec at the following address:

1 Notre-Dame Street East, Montreal, Quebec H2Y 1B6

You must specify the file number of the class action, which is 500-06-000811-162.

You must also send a copy of the letter to the lawyers representing the members at the address below.

THE MAIN ISSUES THAT WILL BE TREATED IN COMMON

The main questions of fact and law identified by the judgment authorizing the class action have been amended and are now as follows:

1- Did the government, covertly or otherwise, expropriate taxi owners' permits?

If the answer to the first question is yes, then:

2- When did that expropriation take place?

3- Is there a need to create sub-groups of the members based on when the expropriation took place?

4- What is the date upon which the valuation of the class members' permits should be based?

5- Do the amounts that the government has already paid and will pay to the taxi owner's permit holders constitute fair and reasonable compensation in law, as claimed by the class members?

6- If not, what is the value of the fair and reasonable compensation to be paid to the taxi owner's permit holders?

7- Can the amounts that the government has already paid and will pay to the taxi owner's permit holders be deducted from the fair and reasonable compensation claimed by the class members?

8- Are class members entitled to punitive damages based on a violation of section 6 of the Quebec Charter?

CONCLUSIONS SOUGHT

Here is what the plaintiff is asking the Court on behalf of class members:

ALLOW the plaintiff's class action on behalf of all members of the class;

DEFINE the group as follows:

All natural or legal persons who have held taxi owners' permits in the province of Quebec since October 28, 2013;

CONDEMN the defendant and the Government of Quebec to pay class an amount equivalent to the loss of value of that permit, plus interest at the legal rate and the

additional indemnity provided for in article 1619 of the *Civil Code of Québec*, from the date of the summons;

CONDEMN the defendant to pay punitive damages in the amount of \$1,000.00, plus interest at the legal rate and the additional indemnity provided for in article 1619 of the *Civil Code of Québec*, from the date of the final judgment;

ORDER collective recovery for all claims of the members;

THE WHOLE with full costs, including notice fees and expert fees;

INTERVENTION AND COSTS

A member may apply to the Court to intervene in the class action. The Court will allow the intervention if it is of the opinion that it is useful to the class.

You do not have to pay class members' lawyers to participate in this class action. In the event that the lawyers obtain money or benefits for the class members, the lawyers can ask for professional fees and legal costs to be deducted from the amounts obtained.

STAY INFORMED

If you think you are a member of the class action and wish to receive information on the progress of the file, you can **subscribe** to our mailing list by completing the form on the websites of Trudel Johnston & Lespérance (<http://tjl.quebec/en/class-action/uber-loss-of-value-of-taxi-permits/>) or of Trivium Avocats (<https://www.triviumavocats.com/taxis-contre-ministere-des-transport/>), or **contact** the lawyers for the class members using the information below:



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