

Quebec Opioid Class Action
Jean-François Bourassa v. Abbott Laboratories Ltd. et al.
No. 500-06-001004-197

PLEASE READ THIS NOTICE CAREFULLY AS IT MAY AFFECT YOUR RIGHTS

In 2019, an application for authorization of a class action against several defendants (“**Defendants**”) who manufactured, marketed, distributed and/or sold prescription opioids to Quebec residents between 1996 and the present day was filed in the Superior Court of Quebec, and was last amended on December 17, 2021. This class action (the “**Opioid Class Action**”) seeks to compensate every resident of Quebec who suffers, or has suffered from, opioid use disorder following the use of prescription opioid products (the “**Class Members**”).

SETTLEMENT AGREEMENTS

Four (4) settlement agreements with several Defendants named in the Opioid Class Action (the “**Settling Defendants**”) have been reached:

- 1) a settlement agreement with Roxane Laboratories Inc. and Boehringer Ingelheim (Canada) Ltd. that provides for a full and final release of all claims against them, as well as against Hikma Labs Inc., in exchange for the payment of CAD \$125,000 (the “**R&B Settlement**”),
- 2) a settlement agreement with BGP Pharma ULC and Mylan Pharmaceuticals ULC that provides for the full and final release from all claims against them in exchange for the payment of USD \$199,000 (the “**B&M Settlement**”);
- 3) a settlement agreement with Merck Frosst Canada & Co. (“**MFC**”) that provides for the full and final release from all claims against it in exchange for the payment of CAD \$145,000 (the “**MFC Settlement**”); and
- 4) a settlement agreement with Sanis Health Inc. (“**Sanis**”) that provides for the full and final release from all claims against it in exchange for the payment of CAD \$180,000 (the “**Sanis Settlement**”)

(collectively, the “**Settlement Agreements**”).

In order to settle the Opioid Class Action against them, the Settling Defendants have agreed to pay the amounts indicated above (collectively, the “**Settlement Amounts**”). Apart from the cost of notices to Class Members, which may be payable under the Settlement Agreements, the Settlement Amounts are all inclusive, including interest, costs and Class Counsel’s legal fees (which shall be fixed by the Court) and no other amount is payable by the Settling Defendant. The Settling Defendants deny all allegations of wrongdoing made against them in the Opioid Class Action and have entered into the Settlement Agreements without any admission of liability.

The Settlement Agreements allow the Plaintiff to continue the Opioid Class Action against the remaining Defendants, excluding the Settling Defendants and Hikma Labs Inc.

The Settlement Agreements are available on Class Counsel's website: <https://tjl.quebec/en/class-actions/opioid-use-disorder/>

APPROVAL OF SETTLEMENT AGREEMENTS

Plaintiff and Class Counsel believe that the Settlement Agreements are in the best interests of the Class Members given the Settling Defendants' minimal sales of prescription opioid products in Quebec and given the continuation of the Opioid Class Action against the remaining Defendants. **The Settlement Agreements are ultimately subject to the Court's approval.**

An application to approve the Settlement Agreements will be heard by Justice Morrison of the Superior Court of Quebec on **March 28, 2022 at 14:00 in room 15.08** of the Montreal courthouse or by means of a digital hearing. The date and time of the hearing may be subject to change by the Court; if so, an update will be posted on Class Counsel's website: <https://tjl.quebec/en/class-actions/opioid-use-disorder/>.

If the proposed Settlement Agreements are approved, they will be binding on the Class Members (unless they opt-out of the Class Action).

If the proposed Settlement Agreements are approved, the Settlement Amounts will be deposited into Class Counsel's trust account and the funds shall not be paid out except in accordance with an order of the Court.

OBJECTING TO THE SETTLEMENT

Class Members have the right to object to the Court's approval of the Settlement Agreements. A Class Member will remain a Class Member whether they object to the Settlement Agreements or not. If the Settlement Agreements are approved by the Court, all Class Members will lose any right to sue the Settling Defendants in relation to the Released Claims (as defined in the Settlement Agreements), unless they opt-out.

If you wish to object, you must send a written objection no later than **March 22, 2022** by e-mail (info@tjl.quebec) or fax to Class Counsel (514) 871-8800.

Class Counsel will provide Justice Morrison a copy of all objections received before **March 22, 2022**. Any attempt to object after this time will not be valid. A written objection must include:

- ✓ The name of the lawsuit and court file number, being: *Bourassa v. Abbott Laboratories Ltd. et. al.* **No. 500-06-001004-197**;
- ✓ your full name, address, e-mail and telephone number;
- ✓ a brief statement of the reasons for your objection; and
- ✓ whether you plan to attend the hearing in person or through a lawyer and, if by lawyer, the name, address, e-mail address and telephone number of the lawyer.

Class Members who do not oppose the proposed Settlement Agreements need not appear at the settlement approval hearing or take any other action at this time.

If you have any questions, please do not hesitate to contact Class Counsel representing the Plaintiff and the Class Members:

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