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 multiple pharmaceutical companies ("**Defendants**") who, as alleged, manufactured, marketed, distributed and/or sold prescription opioids in Quebec between 1996 and the present day, was filed in the Superior Court of Quebec, and was last amended on September 30, 2022. 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**").

ORDER APPROVING THE SETTLEMENT AGREEMENTS

On May 18, 2023, Justice Donald Bisson of the Superior Court of Quebec issued an order authorizing the Opioid Class Action (the "**Order**") for settlement purposes and approving the following three (3) settlement agreements entered into with some of the Defendants (the "**Settling Defendants**") (The Order and the Settlement Agreements are available on Class Counsel's website: https://tjl.quebec/en/class-actions/opioid-use-disorder/):

- a settlement agreement with Aralez Pharmaceuticals Canada Inc. that provides for a full and final release of all claims against it in exchange for payment of CAD \$145,000 (the "Aralez Settlement");
- 2) a settlement agreement with Valeant Canada Limited, Valeant Canada LP and 4490142 Canada Inc., formerly known as Meda Valeant Pharma Canada Inc. (together "Valeant") that provides for a full and final release of all claims against them in exchange for payment of CAD \$350,000 (the "Valeant Settlement"); and
- 3) a settlement agreement with Church & Dwight Canada Corp. that provides for a full and final release of all claims against it in exchange for payment of CAD \$145,000 (the "Church & Dwight Settlement").

(collectively, the "Settlement Agreements")

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 whatsoever and strictly to avoid the costs, delays and disruption resulting from protracted litigation.

The Settlement Agreements allow the Plaintiff to continue the Opioid Class Action against the remaining 20 Defendants.

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

FISHMAN FLANZ MELAND PAQUIN LLP

4100-1250 René-Lévesque Blvd. West Montreal QC H3B 4W8 Tel. 514-932-4100 Fax 514-932-4170 info@ffmp.ca TRUDEL JOHNSTON & LESPÉRANCE

750 Côte de la Place d'Armes Montreal, QC H2Y 2X8 Tel. 514-871-8385 Fax 514-871-8800 info@til.quebec