

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**”).

ORDER APPROVING THE SETTLEMENT AGREEMENTS

On August 9, 2022, Justice Morrison of the Superior Court of Quebec issued an order authorizing the Opioid Class Action (the “**Order**”) for the settlement purposes and approving the following four (4) settlement agreements entered into with several Defendants (the “**Settling Defendants**”):

- 1) a settlement agreement with Roxane Laboratories Inc. and Boehringer Ingelheim (Canada) Ltd. which 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 which provides for a 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**”).

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

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 Defendants.

OPTING OUT OF THE CLASS ACTION

If you do not want to be bound by the approved Settlement Agreements or any decision which would be rendered in connection with the Opioid Class Action, you must opt-out of the Opioid Class Action.

The need to opt out so as not to be bound applies to all class action members and not only to those who consumed prescription opioid medication manufactured, marketed, distributed and/or sold by any of the Settling Respondents.

Opting out means that you will not benefit from the Settlement Agreements or any decision(s) rendered in the Opioid Class Action which continues against the other Defendants. If you do opt out, you will be opting out of the entire Opioid Class Action and not just the class action pertaining to the present settlement agreements.

However, if you opt-out, you will preserve the right to sue the Defendants, including the Settling Defendants, by instituting your own individual action, at your own expense, regarding the allegations made in the Opioid Class Action.

If you decide to opt-out of the entire Opioid Class Action, you must complete and submit before 11:59 p.m. September 16, 2022, a written opt-out letter containing all the following information:

- ✓ 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 and current address;
- ✓ The name and address of your lawyer, if you have one;
- ✓ A statement that you are a Class Member;
- ✓ A statement that you want to opt-out of the Opioid Class Action; and
- ✓ Your signature and the date on which you signed the opt-out letter.

Your opt-out letter must be completed and mailed before 11:59 p.m. on September 16, 2022 to the following address:

Montreal Court House Clerk of the Superior Court of Quebec (C.S.M. 500-06-001004-197) 1, Notre-Dame Street East, Montreal (QC) H2Y 1B6	Att. Opioid Class Action 750 Côte de la Place d'Armes, Suite 90 Montreal (QC) H2Y 2X8 Fax : 514-871-8800 info@tjl.quebec
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Your opt-out letter must be postmarked before 11:59 p.m. on September 16, 2022.

If you do not comply with these opt-out procedures, you will remain a Class Member. As a Class Member, your rights will be determined by all judgments rendered in the Opioid Class Action.

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@tjl.quebec