

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, 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**”).

THE SETTLEMENT AGREEMENTS

Since September 2022, three (3) settlement agreements have been reached with certain Defendants named in the Opioid Class Action (the “**Settling Defendants**”) (the settlement agreements are available here: <https://tjl.quebec/en/class-actions/opioid-use-disorder/>):

- 1) 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., F.K.A. 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**”)

In order to settle the Opioid Class Action against them, the Settling Defendants have agreed to pay the lump sum amounts indicated above (collectively, the “**Settlement Amounts**”). 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 20 Defendants.

APPROVAL OF THE 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. In addition, the Opioid Class Action continues against the remaining 20 Defendants.

The Settlement Agreements are ultimately subject to the Court's approval.

If the Settlement Agreements are approved by the Court, they will bind the Class Members who will lose any right to individually sue the Settling Defendants in relation to the Released Claims (as defined in the Settlement Agreements).

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

An application to approve the Settlement Agreements will be heard by one of the Honourable Justices of the Superior Court of Quebec on **May 8, 2023 at 9:30 in room 16.12** of the Montreal courthouse and 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/>.

OBJECTING TO THE SETTLEMENTS

Class Members have the right to object to the Court's approval of the Settlement Agreements. A Class Member will remain a member even if they object to the Settlement Agreements. The presiding judge will take into consideration the objections before approving the settlement agreements.

Class Members who do not oppose the proposed Settlement Agreements do not need to take any further action at this time.

If you wish to object, you must send a written objection no later than **May 3, 2023** by e-mail (info@tjl.quebec) or fax to Class Counsel (514) 871-8800. 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 Counsel will provide the Honourable Justices of the Superior Court of Quebec a copy of all objections received before **May 3, 2023**. Any attempt to object after this time will not be valid.

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

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