

SETTLEMENT OF A QUEBEC CLASS ACTION LAWSUIT

NOTICE OF HEARING FOR THE PURPOSE OF APPROVING A SETTLEMENT

Huard v. Innovation Tootelo Inc.
QUEBEC CLASS ACTION
No. 500-06-000943-189
District of Montreal

This notice is given to all persons, both physical and moral, who paid a sum of money to Bonjour-santé to obtain an appointment for which an insured service was paid for by the Régie de l'assurance maladie du Québec between September 20, 2015, and June 16, 2026.

PLEASE READ THIS NOTICE CAREFULLY. IT MAY AFFECT YOUR RIGHTS.

THIS CLASS ACTION IS SUBJECT TO A SETTLEMENT, SUBJECT TO COURT APPROVAL.

On February 15, 2021, a class action was authorized by the Honorable Judge Donald Bisson against Innovation Tootelo Inc. (the “**Defendant**”), concerning the billing of sums to obtain an appointment for which an insured service has been paid by the Régie de l'assurance maladie du Québec between September 20, 2015 and June 16, 2026. The case number of the class action is 500-06-000943-189.

The purpose of this notice to members is to inform you of a hearing to approve a settlement agreement reached between the parties in this class action, without admission of liability. The details of this settlement agreement, as well as details regarding the hearing, are set forth in the following paragraphs.

SETTLEMENT AGREEMENT PROPOSED IN THIS CLASS ACTION

A Transaction and Release (hereinafter the “**Agreement**”) has been reached between the Plaintiff and the Defendant, subject to the approval of the Superior Court of Quebec.

The Agreement puts an end to the class action and provides for a global settlement of one million dollars (**\$1,000,000.00**). After deduction of class counsel's fees (30%, inclusive of all taxes) and disbursements, the remaining amount will be divided equally between two academic institutions for research purposes aimed at promoting an equitable and accessible healthcare system, in particular through the use of technology. However, the Agreement does not provide for any individual financial compensation to members.

You may consult the full text of the Agreement, which sets out the reasons for the settlement, on the claimant's lawyers' website at the following link: [Settlement Agreement](#)

A detailed motion setting out the advantages and drawbacks of the settlement, considering the context of the case and the interests of the members, will also be filed by class counsel prior to the hearing and made publicly available.

The Court must approve class counsel fees before they are paid. Approval of the settlement is not conditional upon approval of class counsel fees.

HEARING ON THE APPROVAL OF THE SETTLEMENT AGREEMENT

A hearing before the Superior Court of Quebec will take place on September 15, 2026, at 9:30 a.m. at the Montreal Courthouse, located at 1 Notre-Dame Street East, Montreal (Quebec), in room 17.09, or via a TEAMS link. This date may be adjourned by the Court without further notice to Class Members, other than a notice to be posted on the Class Counsel's website (www.tjl.quebec). In the event of an adjournment, Class Counsel will nevertheless take all reasonable steps to inform Class Members of this change.

IF YOU OBJECT TO THE TERMS OF THE PROPOSED SETTLEMENT AGREEMENT

If you disagree with the Proposed Settlement Agreement, you may object by submitting your arguments in writing no later than one week before the hearing by filing them with the Court or with Class Counsel in accordance with the Proposed Settlement Agreement and containing the following information:

- A reference to this proceeding (*Huard v. Innovation Tootelo Inc.*, No. 500-06-000943-189);
- Your name, phone number, email address, and, if you are represented by an attorney, the name, business address, phone number, and email address of your attorney;
- A statement indicating whether you intend to appear at the Approval Hearing, either in person or through an attorney;
- A statement explaining why you consider yourself to be a member of the Class;
- A statement of your objection and the grounds supporting your objection;
- Copies of all documents on which your objection is based, if any; and
- Your signature.

You must send your objection to Class Counsel at the address listed below. Class Counsel will forward all objections received in accordance with the instructions above in their entirety to the Court. Objections are part of the Court's public record.

Class Members who do not object to the Proposed Settlement do not need to appear at any hearing or take any other action to indicate their support for the Proposed Settlement.

Please note that the Court cannot modify the terms of the Settlement, except those relating to class counsel fees. It otherwise can only accept or reject it. If the Settlement is not approved, the class action will continue, and Innovation Tootelo Inc. will remain a defendant in the case. Any objections will be considered by the Court in determining whether or not to approve the Settlement Agreement.

If the Agreement is approved, another notice will be sent to Class Members to inform you.

ADDITIONAL INFORMATION

For further information or details regarding the proposed Settlement Agreement, you may contact the Class Counsel listed below. Your name and any information provided will be kept confidential. Please do not contact the Defendant or the Superior Court Judges.

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**THE PUBLICATION OF THIS NOTICE TO THE CLASS MEMBERS HAS BEEN
APPROVED AND ORDERED BY THE SUPERIOR COURT OF QUEBEC**