

PARTIAL SETTLEMENT OF A QUEBEC CLASS ACTION LAWSUIT
NOTICE OF HEARING FOR THE PURPOSE OF APPROVING A SETTLEMENT

Raunet et al. v. Attorney General of Quebec et al.
QUEBEC CLASS ACTION
N° 500-06-000793-162
District of Montréal

This notice is given to all persons who paid an amount of money for accessory fees related to an insured service received from a physician or an optometrist, between June 2, 2013, and January 26, 2017, except for amounts paid, in excess of cost, for medications or anesthetic agents, it being understood that the persons who paid such amounts constitute a separate class in the class action *Philippe Léveillé v. Attorney General of Quebec*, Superior Court of Quebec, district of Montréal, No 500-06-000695-144.

This class action is subject to a partial settlement, subject to Court approval.
Please read this notice carefully. It may affect your rights.

On December 7, 2022, the Honourable Justice Stéphane Lacoste authorized a class action against the Attorney General of Québec ("**AGQ**"), the *Régie de l'assurance maladie du Québec* ("**RAMQ**"), as well as the *Fédération des médecins spécialistes du Québec*, the *Fédération des médecins omnipraticiens du Québec* and the *Association des optométristes du Québec* (the "**Federations**"), concerning the billing of accessory fees related to medical and optometric services insured by the *Régie de l'assurance maladie du Québec*.

The case number of the class action is 500-06-000793-162.

The class action was authorized on behalf of the following class:

All persons who paid an amount of money for accessory fees related to an insured service received from a physician or an optometrist between June 2, 2013, and January 26, 2017.

Such accessory fees exclude amounts paid, in excess of cost, for medications or anesthetic agents, it being understood that the persons who paid such amounts constitute a separate class in the class action *Philippe Léveillé v. Attorney General of Québec*, Superior Court of Québec, District of Montréal, No. 500-06-000695-144.

The purpose of this notice to members is to inform you of a hearing to approve a partial settlement agreement reached in this class action between the plaintiffs and the RAMQ.

The details of this partial settlement agreement, as well as details regarding the hearing, are set forth in the following paragraphs.

PARTIAL SETTLEMENT AGREEMENT PROPOSED IN THIS CLASS ACTION

A partial settlement agreement (hereinafter the “**Agreement**”) has been reached between the Plaintiff and the RAMQ, subject to the approval of the Superior Court of Quebec.

The Settlement, if approved by the Court, provides, among other things, that the RAMQ agrees to cooperate with the Plaintiffs and to provide them with documents for the continuation of this proceeding and of the related proceeding, Lèveillé. In consideration thereof, the Plaintiffs will discontinue the class action against the RAMQ, without costs, and the class action will continue against the Attorney General of Québec and the Federations.

IMPORTANT! The Settlement does not bring the class action to an end. The proceeding will continue against the Attorney General of Québec and the Federations. The Settlement does not provide for any financial compensation from the RAMQ, which was sued solely for punitive damages and not for reimbursement of the accessory fees at issue.

You may consult the full text of the Settlement on the Plaintiffs’ counsel’s website at the following link: [Settlement Agreement](#)

HEARING ON THE APPROVAL OF THE SETTLEMENT AGREEMENT

A hearing before the Superior Court of Quebec will take place on September 17, 2026, at 9:30 a.m. at the Montreal Courthouse, located at 1 Notre-Dame Street East, Montreal (Quebec), in room 2.08, 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 PARTIAL SETTLEMENT AGREEMENT

If you are a class member and 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 (*Raunet et al. v. PGQ et al.*, dossier N° 500-06-000793-162);
- 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.

Please note that the Court cannot modify the terms of the Settlement. It otherwise can only accept or reject it. If the Settlement is not approved, the class action will continue, and the RAMQ 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.

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.

The Court's decision regarding the approval of the Settlement Agreement will be published on the plaintiffs' lawyers' website (tjl.quebec) and in the Class Action Registry.

ADDITIONAL INFORMATION

For further information or details regarding the proposed Settlement Agreement, you may contact the Class Counsel listed below

Me Bruce W. Johnston

Me Lex Gill

Me Bruno Grenier

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