

**A SETTLEMENT HAS BEEN REACHED IN THE  
CLASS ACTION INVOLVING THE VETERANS WHO CURRENTLY  
RESIDE OR HAVE RESIDED AT SAINTE-ANNE HOSPITAL SINCE  
APRIL 1<sup>st</sup>, 2016.**

**THIS SETTLEMENT MAY HAVE SOME IMPACT ON YOU.**

**PLEASE READ THIS NOTICE CAREFULLY, AS IT DESCRIBES THE  
SETTLEMENT AND EXPLAINS HOW IT COULD AFFECT YOUR LEGAL  
RIGHTS.**

In replacement of the Applicant Wolf William Solkin, Louise Solkin, es qualite liquidator to the estate of the late Wolf William Solkin and Joyce B. Saunders Salmon (hereinafter, the « **Applicants** »), present the settlement agreement (hereinafter, the « **Settlement** ») concluded by Wolf William Solkin with the Defendants, namely the Attorney General of Canada, the Attorney General of Québec, and the *Centre Intégré Universitaire de Santé et de Services Sociaux* of the West Island of Montréal (hereinafter, considered collectively, as the « **Defendants** »), in regards to the class action introduced by the Applicant under case file number 500-06-000952-180 (hereinafter, the « **Class Action** »), in which it was alleged that the Defendants failed to maintain the level of care and service the Veterans received from Sainte-Anne Hospital before it was transferred to a provincial health and social services centre.

**A. What is the purpose of this notice?**

This notice is to inform you that the Settlement puts an end to the Class Action. In fact, the parties shall request that the Superior Court of Québec (hereinafter, the « **Court** ») approve the said Settlement.

The Court shall hold a hearing on April, 22, 2021 (hereinafter, the « **Settlement Approval Hearing** ») in order to decide whether the Settlement will be approved.

**B. Who can be considered a member of the class covered by this notice?**

All members of the Class will be impacted by the proposed Settlement. Will be considered a « **Member of the Class** » anyone who fits within the following definition:

« Any and all individuals who are or were Veterans of the Second World War or of the Korean War, and who resided at Sainte-Anne Hospital at any time as of April 1<sup>st</sup>, 2016 or thereafter, as well as their heirs, successors, and assigns. »

**C. What is the settlement that was reached in regard to the Class Action?**

The Applicant Wolf William Solkin and the Defendants have agreed to settle the Class Action in consideration for the payment of a global, final, and definite amount of \$19,008,045.00. The Defendants do not admit any liability or fault in the present case.

The Settlement must be approved by the Court, who shall decide if it is, in fact, fair, reasonable, and in the best interests of the Members of the Class.

Should the Settlement be approved by the Court, it shall cover any and all damages payable in the context of the Class Action, including the professional fees owed to the lawyers who represent the Members of the Class (in an amount of 25 percent (%) of the total global amount), all costs associated with the administration of the Settlement, as well as all applicable interest and taxes.

In order to receive financial compensation in accordance with the Settlement's terms and conditions, Members of the Class shall submit a claim to the administrator in charge of distributing the Settlement proceeds.

Each Member of the Class who will submit a claim supported by the required documents (and whose claim will be deemed admissible by the administrator) will be entitled to a share of the Settlement's proceeds which shall correspond to the number of days they spent at Sainte-Anne Hospital between April 1<sup>st</sup>, 2016 and October 31<sup>st</sup>, 2020 multiplied by a fixed and definite amount to be determined once all statements of claim will have been duly received and processed.

In consideration for the payment of an amount of \$19,008,045.00, the Defendants will be granted a full, final and comprehensive release and discharge of any and all claims arising from facts and/or events which are included in the Class Action and which have occurred between April 1<sup>st</sup>, 2016 and October 31<sup>st</sup>, 2020 inclusively.

The complete text of the proposed Settlement is available on the website [www.savonitto.com](http://www.savonitto.com) or can be obtained by contacting the lawyers representing the Members as appear in section G hereof.

The reasons, grounds, and motives invoked in support of an approval of the Settlement will be explained in detail in the documents which shall be filed with the Superior Court's registry of class actions and shall also be made available on the following website: [www.savonitto.com](http://www.savonitto.com).

#### **D. What if the Court refuses to approve the Settlement?**

If the Superior Court refuses to approve the proposed Settlement, the Class Action will continue. In which case the trial may not be held and a judgment rendered before several months, if not several years. There may then be proceedings filed in appeal.

#### **E. What are your rights and options?**

Any Member of the Class or of the public in general may attend the Settlement Approval Hearing which will be held on **April, 22 2021**. Please note that you have no obligation to attend. At least a week before the Settlement Approval Hearing is set to be held, instructions on how to attend remotely or in person will be posted on the website [www.savonitto.com](http://www.savonitto.com).

You may elect to do any of the following:

##### **1. Do Nothing**

Should you not respond or react to this notice in any way, you will be bound by the Settlement's terms and conditions and will be unable to file against the Defendants any kind of judicial proceedings based on any of the facts and/or events referred to in the context of the Class Action. Should the Court approve the proposed

Settlement, and assuming that you qualify as a Member of the Class, you will be entitled to submit a claim in accordance with the procedure described in the Settlement itself, and to receive financial compensation once your claim has been declared admissible.

## **2. Support or oppose the approval of the Settlement**

All the terms and conditions of the Settlement were negotiated in good faith between the Applicants, the lawyers representing the Members of the Class, and the Defendants' attorneys. The Applicants and the lawyers representing the Members of the Class firmly and strongly believe that the Settlement is in the best interests of the Members.

As a Member of the Class, you may (without being obligated to) support or oppose the approval of the Settlement by sending (either by regular or electronic mail, at the coordinates provided below, and no later than April 15, 2021) a written statement to the lawyers representing the Members of the Class. Said lawyers shall, prior to the Settlement Approval Hearing, forward each and every written statement to the Court as well as to the Defendants.

Your written statement must include:

- Your name, address, phone number, and, if you act as the heir, successor, or assign of a Member of the Class, the name of said Member of the Class;
- A brief description of the reasons or grounds you invoke in order to support or oppose the approval of the Settlement.

and specify whether or not you intend to attend the Settlement Approval Hearing.

## **F. When will the Settlement Approval Hearing be held?**

The Settlement Approval Hearing will be held on **April 22, 2021**

Please note that considering the Quebec Superior Court communiqué of November 16, 2020, all hearings that do not require the presence of witnesses will be conducted virtually. The lawyers and parties representing themselves must use the permanent Teams link for the assigned hearing room.

The details to take part in the hearing either virtually or in person will be available at [www.savonitto.com](http://www.savonitto.com) at least a week prior to the settlement approval hearing.

## **G. Who are the lawyers who represent the Members of the Class?**

Two (2) law firms, namely **Laurent Kanemy Legal Services Inc.** and **Savonitto & Associates Inc.**, manage the Class Action on behalf of the Members of the Class, whom they legally represent.

Said law firms can be reached at the following coordinates:

**Laurent Kanemy Legal Services Inc.**  
Me Laurent Kanemy  
Gare Windsor (9<sup>th</sup> floor)  
1100 Avenue des Canadiens de Montréal  
Montréal (Qc), H3B 2S2  
Phone : (514) 843-4855  
E-mail: [lkanemy@ncc-lex.com](mailto:lkanemy@ncc-lex.com)

**Savonitto & Associates Inc.**  
Me Michel Savonitto  
Me Julie Savonitto  
468 St-Jean street (suite 400)  
Montréal (Qc), H2Y 2S1  
Phone: (514) 843-3125  
E-mail: [veterans@savonitto.com](mailto:veterans@savonitto.com)

#### **H. What if I have questions?**

To learn more about the process referred to in this notice, please consult the website [www.savonitto.com](http://www.savonitto.com). In regard to any question or concern not specifically addressed on the website, feel free to contact the law firms mentioned above by phone or e-mail.

#### **I. Interpretation**

This notice only summarizes certain aspects of the Settlement. Should any contradiction, conflict, or discrepancy ever arise between the provisions of this notice and those of the Settlement itself, the latter (whenever applicable) shall prevail.

**PLEASE DO NOT CALL THE DEFENDANTS OR THE COURT REGARDING  
THE CLASS ACTION REFERRED TO IN THIS NOTICE.**

**This Notice has been approved by the Honorable Justice Martin F. Sheehan of the  
Superior Court of Québec.**