

**Email Subject: NOTICE OF APPROVAL OF A CLASS ACTION SETTLEMENT WITH AIRBNB
- AVIS D'APPROBATION DU RÈGLEMENT AVEC AIRNB**

La version française suit ci-dessous

**TO CLAIM YOUR AIRBNB SETTLEMENT BENEFIT, YOU MUST CLICK ON THIS LINK BY
JUNE 30, 2020: [\[URL provided in email sent by Claims Administrator\]](#)**

We are contacting you once again, in accordance with Quebec Superior Court judgments dated February 3, 2020 and May 6, 2020 (File No: 500-06-000884-177) which have approved the settlement of a class action against Airbnb Ireland UC, Airbnb, Inc. and Airbnb Payments UK Ltd. ("**Airbnb**") and ordered that Airbnb contact group members by email. **We are pleased to inform you that it is now time to make your claim!**

Please read this notice carefully

The Settlement reached between Martin Preisler-Banoon (the "**Plaintiff**") and Airbnb in a class action commenced by the Plaintiff against Airbnb before the Superior Court of Quebec (the "**Class Action**") has been approved by the Superior Court of Quebec. This puts an end to the Class Action. The Settlement and the simple Claims Process are described in greater detail below.

Why have I received this email?

You are receiving this email because you are a Quebec resident and you booked an accommodation offered by a third-party host on the Airbnb Platform during the class period, being between August 22, 2014 and June 26, 2019, for purposes other than business travel. If you meet all of these conditions, you are automatically eligible to receive one Redeemable Credit (described below) if you successfully follow the claims process as described herein.

You are automatically included and bound by the Settlement unless you opt out (by following the process detailed below). The Settlement provides the only remedy and the only relief you now have in relation to the Class Action. All other claims against Airbnb in relation to the Class Action are now captured by a full release and not permitted.

If you do not wish to benefit from and be bound by the Settlement, you must opt out within the specified time period and may then be allowed to join another related class action (described below).

What does the Settlement provide for?

The Plaintiff's allegations were never proven in Court and Airbnb contests the claims made in the Class Action; Airbnb's position is that it has complied at all times with all applicable legislation. Without any admission of liability, for the purpose of avoiding a trial and the additional costs and expenses related thereto, Airbnb agrees to:

1. Implement a business practice whereby the price advertised to a Quebec consumer on the Airbnb Platform (at the first step of browsing) for the booking of an accommodation offered by a third-party host, will represent a price including applicable service charges (all inclusive), excluding applicable taxes;
2. Remit to each group member eligible to receive reparation, a single redeemable credit of a **value of up to CAD \$45.00 each**, depending on the total number of approved claims (a "**Redeemable Credit**"). Redeemable Credits may be used to book an accommodation offered by a third-party host on the Airbnb Platform in any location worldwide. Redeemable Credits are one-time use only, non-transferable, non-refundable, non cash-convertible, and cannot be combined with any other offer, discount or coupon. In order to be able to redeem a Redeemable Credit, an eligible group

member must accept the most recent version of Airbnb's Terms of Service and not be prohibited from using the Airbnb Platform (in accordance with the Terms of Service). Once issued, a Redeemable Credit expires after twenty-four (24) months.

In exchange, group members (i) acknowledge that the foregoing is in full and complete settlement of the claims of the group members; and (ii) agree to give up any claims they have against Airbnb arising from the display of prices on the Airbnb Platform before the practice change was implemented, including claims advanced in the Class Action.

How do I claim my compensation?

1. All you must do is click on the following link and Airbnb will issue the Redeemable Credit of up to \$45.00 to your account:

[\[URL provided in email sent by Claims Administrator\]](#)

2. Your Claim will automatically be registered and will be associated with your Airbnb account.
3. Once submitted, your Claim will be validated and the Redeemable Credit will be issued to your Airbnb account after the Claims Administrator processes the requests, and it will be automatically applied to a future accommodation booking.

How long do I have to make a claim?

Act now! The Claims Deadline is **June 30, 2020**. No Claims will be accepted and no Redeemable Credit will be issued for Claims received after the Claims Deadline. All you have to do is click here: [\[URL provided in email sent by Claims Administrator\]](#)

Additional Information

Other class action

Please further note that on December 5, 2019, the Federal Court of Canada certified a national class action relating to the display of prices on the Airbnb Platform in the matter of *Lin v. Airbnb, Inc. et al.* in court file T-1663-17. The class action certified by the Federal Court is:

All individuals residing in Canada who, from October 31, 2015 to June 25, 2019:

- a. reserved an accommodation for anywhere in the world using Airbnb;*
- b. whose reserved accommodation matched the parameters of a previous search made by that individual on the search results page of Airbnb; and*
- c. paid, for the reserved accommodation, a price (excluding applicable sales and/or accommodation taxes) that is higher than the price (or "Listing Fee") displayed by Airbnb on the said search results page for this accommodation.*

Individuals who reserved an accommodation primarily for business travel are excluded.

No settlement has been reached in the Federal Court case and Airbnb intends to vigorously defend against the claims made against it before the Federal Court, which are brought under the federal *Competition Act*. **The certification judgment is currently under appeal to the Federal Court of Appeal.**

Airbnb intends to argue that group members who are bound by this Settlement cannot be class members in the Federal Court case. Therefore, a group member would need to opt out of this Settlement in order to participate in the Federal Court case.

Opting-out

If you do not wish to be bound by this Settlement for any reason whatsoever, you must take steps to exclude yourself from the group, which will result in your exclusion from the Settlement. If you opt-out of the Quebec Settlement (file no: 500-06-000884-177), you will not receive the benefits provided for in the Settlement.

How can I exclude myself?

If you wish to opt-out of the Quebec Settlement, you may do so by **June 30, 2020**, by sending to the clerk of the Superior Court of Quebec, a duly signed request for exclusion containing the following information:

1. The Court docket number of the Class Action: *Preisler-Banoon v. Airbnb*, C.S.M. 500-06-000884-177;
2. Your name and contact information;
3. Your email address associated with your Airbnb account; and
4. A declaration stating that you wish to exclude yourself from this class action.

The request for exclusion must be sent by registered or certified mail before **June 30, 2020** to the Court, with copy to Class counsel, at the following address:

Greffes de la Cour supérieure du Québec
PALAIS DE JUSTICE DE MONTRÉAL
1, Notre-Dame Street East, Room 1.120
Montreal, Quebec H2Y 1B5

Reference : *Preisler-Banoon v. Airbnb Ireland UC, Airbnb Inc., Airbnb Payments UK Ltd.*
Class Action – 500-06-000884-177

How can I obtain more information?

For more information and access to the text of the settlement, the schedules and the various forms, please go to the following website:

- Settlement website: <https://www.velvetpayments.com/airbnb>
- Class Counsel: <https://lpclex.com/airbnb>

You may also contact class counsel identified below. Your name and any information provided will be kept confidential. Please do not contact Airbnb, or the judges of the Superior Court.

LPC Avocats
Mtre Joey Zukran
276 Saint-Jacques Street, Suite 801
Montreal, Quebec, H2Y 1N3
Tel: (514) 379-1572
Email: JZUKRAN@LPCLEX.COM

There will be no further notice in relation to this class action Settlement. In case of discrepancies between this notice and the Settlement, the Settlement shall prevail.

The publication and dissemination of this notice has been approved by the Court.