

## Schedule B

### Short Form Pre-Approval Notice

# La Place 0-5 Data Breach Class Action Pre-Approval Notice of Settlement Approval Hearing

Detailed information, the Long Form (detailed) version of this notice, and updates are available on the Settlement Website at the following address: [www.place0-5settlement.ca](http://www.place0-5settlement.ca)

## PROCEEDINGS

A proposed Settlement has been reached in a putative class action *Dubé c. Coopérative de services enfancefamille.org and Procureur general du Québec* (500-06-001148-218) relating to the La Place 0-5 data breach that occurred on May 8, 2021, when an unknown third-party was able to gain unauthorized access to certain customer data from the La Place 0-5 records (“**Data Breach**”). This proposed Settlement is subject to Court approval.

The proposed settlement is on behalf of the following Settlement Class:

The 8,589 persons in Québec whose personal information was accessed and downloaded during the Data Breach which occurred on May 8, 2021;

The Defendants in the class action are the Coopérative de services enfancefamille.org (hereinafter the “**Coopérative**”) and the Procureur général du Québec (hereinafter the “**PGQ**”) (hereinafter collectively the “**Defendants**”).

On February 1, 2024, the Superior Court of Quebec authorized the Class Action for settlement purposes only.

## AM I A SETTLEMENT CLASS MEMBER?

You may be a Settlement Class Member if you are one of the 8,589 persons in Québec, whose personal information was accessed and downloaded in the Data Breach which occurred on or about May 8, 2021 (you may have received a letter, email or call from La Place 0-5 advising you that your information was compromised in the context of the Data Breach).

## WHAT DOES THIS SETTLEMENT PROVIDE?

Pursuant to the proposed Settlement, the Defendants will pay a total amount of \$250,000 CAD (the “**Cap**”). This Cap will pay for all administration costs, notice costs and legal fees and disbursements, including all applicable taxes. The remainder (the “**Net Cap**”) will be used toward the reimbursement of certain substantiated costs, losses and/or unreimbursed expenses made from May 8, 2021 to February 1, 2024 by Settlement Class Members who provide evidence to the effect that said losses were caused by the Data Breach and/or incurred as a result of the Data Breach or the receipt of the La Place 0-5 Notices (between May 14, 2021 and June 2, 2021), as accepted by the Claims Administrator (at its discretion) pursuant to the Distribution Protocol attached to the Settlement Agreement. Each Claimant may only make substantiated and

documented monetary claims up to a maximum of \$1,000 CAD per person (the Documentary Supported Claims will be reduced on a *pro rata* basis in case of lack of total funds in the Net Cap).

### **HOW WILL THE LAWYERS BE PAID?**

As part of the settlement of this case, the defendants have agreed to pay class counsel fees in the amount of up to \$75,000, plus applicable taxes, for their fees and \$2,500 for their disbursements, subject to the Court's approval. This amount is payable out of the Cap.

**YOU ARE NOT REQUIRED TO PAY ANY PORTION OF THESE ATTORNEYS' FEES AND DISBURSEMENTS UNDER ANY CIRCUMSTANCES.**

### **WHAT ARE MY OPTIONS?**

If you are a Settlement Class Member, you may (1) object to or comment on the Settlement; (2) exclude yourself from the Class Action (opt-out); or (3) do nothing. If you do not wish to be legally bound by the Class Action, you must exclude yourself from the Class Action (opt-out). To do so, you must complete and submit an Opt-Out Form to the Court by no later March 15, 2024. Anyone who opts out of the Class Action cannot object to or comment on the Settlement and may be eligible to pursue an individual claim. If you do nothing, you will stay in the Class Action and be bound by the Settlement, if approved by the Court.

If you stay in the Class Action, you may object to or comment on the Settlement by submitting a written objection to the Court by no later than February 28, 2024. You have no obligation to object to or comment on the Settlement.

### **WHEN AND WHERE WILL THE COURT DECIDE IF THE SETTLEMENT IS APPROVED?**

The Superior Court of Quebec must be satisfied that the Settlement is fair, reasonable and in the best interests of Settlement Class Members.

The Settlement Approval Hearing will take place on March 19, 2024, at 9:30 A.M. in room 12.61 at the Montreal Courthouse located at 1 Notre-Dame St. East, Montreal, Quebec (or any other courtroom determined by the Court).

**You do not have to attend the hearing but you may do so if you wish.**

If you have submitted a written objection to the Court, you (or your lawyer) may present arguments with regards to the proposed Settlement.

**You do not have to do anything and you do not have to pay anything at all in order to participate in the Class Action and/or the proposed Settlement.**

**You will not be asked to pay anything at any time.**

## **HOW CAN I GET MORE INFORMATION?**

If needed, Settlement Class Members can contact the Class Counsel, Lex Group Inc.

## **WHO REPRESENTS THE PARTIES?**

### **Settlement Class Members**

#### **LEX GROUP INC.**

c/o Mtre David Assor

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Westmount, Québec, H3Z 1A7

[www.lexgroup.ca](http://www.lexgroup.ca)

***This Notice has been approved by the Superior Court of Quebec.***