

**NOTICE - CONTINUATION OF THE APPROVAL PROCESS FOR THE SETTLEMENT
AGREEMENT ENTERED INTO ON MARCH 31, 2020, IN THE CLASS ACTION CONCERNING
THE STATUS OF QUÉBEC MAJOR JUNIOR HOCKEY LEAGUE PLAYERS**

This notice is intended for persons who are members of the class action instituted against the Québec Major Junior Hockey League (“**QMJHL**”) and all Canadian teams of the QMJHL in the case of Lukas Walter and Thomas Gobeil v. QMJHL et al., Québec Superior Court, district of Montréal No: 500-06-000716-148 (the “**Québec Class Action**”) alleging that major junior hockey players in the QMJHL would be employees subject to applicable provincial employment standards legislation and remunerated as such.

You are a “**QMJHL Class Member**” if you fall under one or more of the following definitions:

- (a) You were a player member of a QMJHL team owned and/or operated by one of the Defendants in the Province of Québec at some point on or after October 29, 2011 and up to June 12, 2018 who has not opted-out of the Québec Class Action; or
- (b) You were a player member of a QMJHL team operated by 9264-8849 Québec Inc. operating under the name Groupe Sags 7-96 and/or Les Saguenéens in the Province of Québec at some point on or after November 5, 2011 and up to June 12, 2018 who has not opted-out of the Québec Class Action; or
- (c) You were a player member of a QMJHL team owned and/or operated by one of the Defendants in the Province of New Brunswick at some point on or after October 29, 2012, and up to July 28, 2017 who has not opted-out of the Québec Class Action; or
- (d) You were a player member of a QMJHL team owned and/or operated by one of the Defendants in the Province of Prince Edward Island at some point on or after October 29, 2012 and up to October 28, 2017 who has not opted-out of the Québec Class Action; or
- (e) You were a player member of a QMJHL team owned and/or operated by one of the Defendants in the Province of Nova Scotia at some point on or after October 29, 2012 and up to July 4, 2016 who has not opted-out of the Québec Class Action.

A. What is the purpose of this notice?

The purpose of this notice is to advise QMJHL Class Members that a hearing will be held on **June 2, 11 and 20, 2025**, in order to complete the approval process for the agreement entered into in 2020 for a total and aggregate amount of \$30 million (the “**Settlement**”), from which will be deducted approximately \$10 million plus taxes for legal fees, disbursements and administrative expenses in the settlement of the Québec Class Action involving 1702 players, as well as parallel class actions instituted in Ontario involving 1448 players in Court File No.: CV-14-511423-00CP (the “**Ontario Class Action**”) and in Alberta involving 1136 players in Court File No.: 1401-11912 (the “**Alberta Class Action**”) following the conclusion of an amended settlement (the “**Amended Settlement**”) with the only change from the Settlement entered into in 2020 being the rewording of the release to reduce its scope.

The Ontario Superior Court has already approved the Amended Settlement on March 15, 2024, for the benefit of the Ontario Class Action members who played in the Ontario Hockey League (OHL).

The Alberta Court of King’s Bench has already approved the Amended Settlement on April 15, 2024, for the benefit of the Alberta Class Action members who played in the Western Hockey League (WHL).

These approvals are conditional to the Québec Court also approving the Amended Settlement. In the absence of approval in Québec, the Amended Settlement will be null and void.

B. Background to this second notice

A Settlement to terminate the Québec Class Action, the Ontario Class Action and the Alberta Class Action (collectively, the “**Class Actions**”) was concluded on March 31, 2020, for a total and aggregate amount of \$30 million.

On or about August 4, 2020, notices were sent to all members of the Class Actions informing them that the Settlement had been concluded and that a joint hearing before the Ontario Superior Court, the Alberta Court of Queen’s Bench and the Québec Superior Court (collectively, the “**Courts**”) would be held on September 15, 2020, to seek approval of the Settlement (the “**2020 Notice**”).

The 2020 Notice described the Settlement, mentioned that the members of the Class Actions could support or oppose approval of the Settlement by sending their submissions in writing (by mail or email) to their counsel, by September 10, 2020, and specified the information that the written submissions should include.

The full text of the Settlement and the 2020 Notice is available at www.CHLClassAction.ca.

On September 15, 2020, the joint hearing to approve the Settlement took place as scheduled before the Courts.

On October 22, 2020, the Courts refused to approve the Settlement on the grounds that the wording of the release was too broad. They authorized the parties to submit an amended release and indicated that they would subsequently rule on the application for approval of the Settlement without the need for a new hearing and a new notice to members of the Class Actions.

In the spring of 2023, all Plaintiffs representing members of the three Class Actions, including Plaintiffs representing QMJHL Class Members, signed the Amended Settlement, with the only change being a new release worded to address the concerns of the Courts. The text of the Settlement and the text of the Amended Settlement are available at www.CHLClassAction.ca.

The Plaintiffs now intend to seek annulment of the Settlement, because they believe that their consent had been vitiated when the Settlement was signed in March 2020. They also believe that the Amended Settlement is not in the best interests of the QMJHL Class Members and therefore intend to oppose its approval at the June 2, 11 and 20, 2025 hearing. They wish to take this case to trial on the merits, so that a Court can determine whether class members were employees during the relevant periods and, if so, whether they are entitled to compensation, which they believe could be greater than that provided for in the Amended Settlement.

However, other QMJHL Class Members support the approval of the Amended Settlement and have retained legal counsel to make submissions in support of the approval of the Amended Settlement at the hearing on June 2, 11 and 20, 2025.

The Defendants believe that the Plaintiffs' consent had not been vitiated when they entered into the Settlement in 2020 and intend to oppose the application for annulment of the Settlement.

C. Counsel for the parties

The Plaintiffs representing the QMJHL Class Members and who intend to request the annulment of the Settlement and oppose the approval of the Amended Settlement are represented by the following counsel:

Consumer Law Group

(Me Jeffrey Orenstein)
1030 Berri Street, Suite 102
Montréal, Québec H2L 4C3
Tel.: 514-266-7863 Ext. 2 / 3
Fax: 514-868-9690
jorenstein@clg.org

The Defendants are represented by the following counsel:

Torys Law Firm LLP

(Me Sylvie Rodrigue, Ad. E.)

D. What are your rights and options?

Class Members and members of the public may attend the Amended Settlement approval hearing on **June 2, 11 and 20, 2025**, but are not required to do so. Details on how to attend the hearing in person or remotely will be available at www.CHLClassAction.ca.

As one of the QMJHL Class Members, you are entitled, but not obligated, to express your opinion about the proposed Amended Settlement and whether it should be approved by the Québec Court.

If you wish to make submissions to the Court supporting or objecting to the proposed Amended Settlement, you must send your written submission (by email) to the Notice Administrator, RicePoint Administration Inc. ("RicePoint"), at the following address: chlclassaction@veritaglobal.com.

Your written submission must be submitted by March 14, 2025. The written submission must include:

- Your name, address and telephone number;
- A brief statement of the reasons why you support or oppose the proposed Amended Settlement terms; and
- Whether you plan to attend the Amended Settlement approval hearing.

RicePoint will transfer the submissions received to counsel for the parties and, unless otherwise instructed, will also send the communications received from the QMJHL Class Members who support the Amended Settlement to the counsel who has been instructed by certain QMJHL Class Members to support the approval of the Amended Settlement.

All other questions must be submitted in writing to RicePoint and will be answered jointly in writing by counsel for the parties through RicePoint.

This process does not prevent the QMJHL Class Members from communicating at any time with Me Orenstein, the Plaintiffs' counsel, if they so wish.

QMJHL Class Members who support the Amended Settlement will not be responsible for the fees and expenses of the counsel already retained by certain QMJHL Class Members to support the Amended Settlement.

QMJHL Class Members who object to the Amended Settlement will not be responsible for the fees and expenses of Plaintiffs' counsel.

This notice was approved by the Superior Court of Québec.