



Montreal, September 2, 2022

By Email

The Honourable Pierre-C. Gagnon, J.S.C.

Cour supérieure du Québec
Palais de justice de Longueuil
1111, boul. Jacques-Cartier Est, Bureau R-140
Longueuil, Québec, J4M 2J6

Subject: *Abihsira c. Vivid Seats LLC et als*
C.S.M. no: 500-06-000754-156
Our file: JZ-103

Dear Honourable Justice Gagnon, J.S.C.

The present letter is formal request sent in accordance with article 101 al. 2 C.C.P.

On February 23, 2022, the Court rendered a judgment ordering that Velvet Payments replace Collectiva as Claims Administrator in this file (*Abihsira c. Stubhub inc.*, 2022 QCCS 696). In particular, Velvet Payments was tasked with notifying each International Sub-Group Member by email that they can complete the online claim form within the 100 days as provided for in the Transaction. As a brief reminder, the Quebec Group Members automatically received a credit and the International Sub-Group Members had to attest that they were physically located in Quebec to receive the credit.

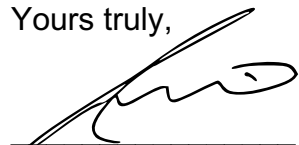
Following the February 23, 2022 judgment, the notices were sent to the International Sub-Group Members by email and the claims period terminated on June 30, 2022. The Claims Administrator recently sent the final claims report to each of the Settling Defendants indicating the number of emails sent and the number of claims made. Unfortunately, in the case of Defendants Vivid Seats, they noticed that the number of emails sent did not correspond to the number of International Sub-Group Members in their records. In short, I was informed by counsel for Vivid Seats that Collectiva had received two lists of International Sub-Group Members from Vivid Seats and only sent one of those lists to Velvet Payments after the February 23, 2022 judgment.

All of the other Settling Defendants have confirmed that the correct number of notices were sent to their respective International Sub-Group Members.

Therefore, the concerned parties (i.e. Vivid Seats and the Plaintiff) are asking the Court's permission to send the notices attached to the Vivid Seats International Sub-Group Members on the second list (i.e. those that did not receive the notices after the February 23, 2022 judgment) and to give them at least 100 days to complete the claim form (i.e. until December 31, 2022). Velvet Payments is on standby and will be able to send the notices immediately upon the Court's permission.

We remain available should the Court have any questions.

Yours truly,

A handwritten signature in black ink, appearing to read "Joey Zukran", is written over a horizontal line.

Joey Zukran
jzukran@lpclex.com

c.c. Counsel for all Defendants

500-06-000754-156

(Class Action)
**SUPERIOR COURT
DISTRICT OF MONTREAL**

STEVE ABIHSIRA

Representative Plaintiff

v.

**VIVID SEATS LLC
ET ALS.**

Defendants

APPLICATION TO APPROVE NOTICES

(Arts. 101, 581 and 590 C.C.P.)

ORIGINAL

Me Joey Zukran
LPC AVOCAT INC.
276, rue Saint-Jacques, Suite 801
Montréal, Québec, H2Y 1N3
Téléphone: (514) 379-1572 • Télécopieur: (514) 221-4441
Email: jzukran@lpclex.com

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