

C A N A D A

PROVINCE OF QUEBEC  
DISTRICT OF MONTREAL

NO: 500-06-001227-236

(Class Action)  
SUPERIOR COURT

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EDEN [REDACTED]

Applicant

v.

**FIRMENICH INTERNATIONAL SA (GENEVA)** legal person having its head office at rue de la Bergère 7, 1217 Satigny, Switzerland

and

**FIRMENICH OF CANADA, LIMITED**, legal person having its head office 40 King Street West, Suite 2100, Scotia Plaza, Toronto, Ontario, M5H3C2

and

**GIVAUDAN SA (GENEVA)**, legal person having its principal establishment at Chemin de la Parfumerie 5, 1214 Vernier, Switzerland

and

**GIVAUDAN CANADA CO.**, legal person having its principal establishment at 2400 Matheson Blvd E, Mississauga, Ontario, L4W 5G9

and

**INTERNATIONAL FLAVORS & FRAGRANCES INC. (USA)**, legal person having its head office at 600 NJ-36, Hazlet, New Jersey, 07730, U.S.A.

and

**INTERNATIONAL FLAVORS & FRAGRANCES INC. (CANADA) LTD**, legal person having its head office at 7330 Keele Street, Concord, Ontario, L4K 1Z9

and

**SYMRISE AG (GERMANY)**, legal person having its head office at Mühlenfeldstraße 1, 37603 Holzminden, Germany

and

**SYMRISE PET FOOD CANADA (SPF)**, legal person having its head office 1876 Chemin de la 2 Ligne, St-Blaise-sur-Richelieu, Quebec, J0J 1W0

Defendants

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**APPLICATION TO AUTHORIZE THE BRINGING OF A CLASS ACTION AND TO APPOINT THE STATUS OF REPRESENTATIVE PLAINTIFF**  
(ARTICLES 571 AND FOLLOWING C.C.P)

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**TO ONE OF THE HONOURABLE JUDGES OF THE SUPERIOR COURT, SITTING IN AND FOR THE DISTRICT OF MONTREAL, YOUR APPLICANT STATES:**

**I. GENERAL PRESENTATION**

1. On March 8, 2023, the Swiss Competition Commission ("**COMCO**") opened an investigation into a price-fixing scheme in the fragrance sector, in which the Defendants participated, as it appears from the press release titled "*COMCO investigates possible collusions in the fragrance market*", communicated as **Exhibit P-1**;
2. The press release published by the Swiss Authorities confirms that early morning raids were conducted at the Defendants' locations:

COMCO has indications that several undertakings active in the production of fragrances have violated cartel law. There are suspicions that these undertakings have coordinated their pricing policy, prohibited their competitors from supplying certain customers and limited the production of certain fragrances. Fragrances are used in the manufacture of many products, including in particular cosmetics,

personal care products, detergents and cleaning products. The undertakings involved in the investigation are Firmenich International SA (Geneva), Givaudan SA (Geneva), International Flavors & Fragrances Inc. (USA) et Symrise AG (Germany).

Dawn raids were conducted at various locations. These were carried out in consultation with other competition authorities, namely the European Commission, the US Department of Justice Antitrust Division and the UK Competition and Markets Authority.

3. The Defendants are global leaders in the production and supply of fragrances and fragrance ingredients;
4. To give an idea as to the enormous scope of this case, Applicant communicates herewith extracts of the Defendants websites *en liasse* as **Exhibit P-2**;
5. For example, on the about us section of its website, Defendant Firmenich International SA (Geneva) states:

We create emotions through the sense of taste and smell. With our extensive experience, we create fragrances and flavors for our customers. **Touching over 4 billion consumers several times a day, in more than 100+ markets:** from their breakfast cereals and their coffee in the morning, to their shampoo, shower gel & fine fragrance when they go out at night.

6. The cartel affected natural and legal persons in Canada. According to a Financial Post article published on March 8, 2023, the fragrance cartel impacted a \$5 billion global market, Applicant disclosing **Exhibit P-3**:

The more than \$5 billion scents industry creates and makes fine fragrances for brands including Calvin Klein, Hugo Boss and Gucci, while also designing the smell of household products of global companies such as Procter & Gamble and Colgate-Palmolive.

7. The Defendants and others colluded to fix the prices and supply for the products they sell worldwide, in Quebec and throughout Canada;
8. The Defendants had and continue to have a significant impact on competition by artificially increasing the price of fragrances across Canada;
9. It appears that the Defendants engaged in activities prohibited under the general rules of Quebec civil law, as well as under sections 45 and 46 of the *Competition Act*, which prohibits agreements between two or more persons to prevent or unduly lessen competition or to unreasonably enhance the price of a product;

10. Consequently, Applicant wishes to institute a class action on behalf of the following class of which she is a member, namely:

**Class:**

All persons, entities, partnerships or organizations resident in Canada who purchased at least one product containing a produced or supplied by one of the Defendants;

(hereinafter referred to as the “**Class**”)

## **II. THE DEFENDANTS**

11. Defendant Firmenich International SA (Geneva) is a private Swiss company in the fragrance and flavor business. Its Canadian subsidiary is Firmenich of Canada Limited (collectively “**Firmenich**”);
12. Given the close ties between the Firmenich Defendants, they are solidarily liable for the acts and omissions of the other;
13. Defendant Givaudan SA (Geneva) is a Swiss multinational manufacturer of flavours, fragrances and active cosmetic ingredients. It is a publicly traded company on the Swiss Exchange (SIX: GIVN). Its Canadian subsidiary is Givaudan Canada Co. (collectively “**Givaudan**”);
14. Given the close ties between the Givaudan Defendants, they are solidarily liable for the acts and omissions of the other;
15. Defendant International Flavors & Fragrances Inc. (USA), is a publicly traded American corporation (NYSE: IFF) that produces flavors, fragrances, and cosmetic actives, which it markets and sells. Its Canadian subsidiary is International Flavors & Fragrances Inc. (Canada) LTD (collectively “**IFF**”);
16. Given the close ties between the IFF Defendants, they are solidarily liable for the acts and omissions of the other;
17. Defendant Symrise AG (Germany) is an important producer of flavours and fragrances with annual sales in the billions of Euros. It is publicly traded on Frankfurt Stock Exchange (FWB: SY1). Its Canadian subsidiary is Symrise Pet Food Canada (SPF) who has its head office in the province of Quebec, thereby anchoring jurisdiction to the Superior Court to authorize a national class action (collectively “**Symrise**”);
18. Given the close ties between the Symrise Defendants, they are solidarily liable for the acts and omissions of the other;
19. During the Class Period, all of the Defendants, either directly or through a wholly-owned subsidiary, agent or affiliate, participated in the sale of substantial

quantities of fragrances (or other ingredients) throughout Canada, including within the province of Quebec;

**III. CONDITIONS REQUIRED TO AUTHORIZE THIS CLASS ACTION (S. 575 CCP):**

**A) THE FACTS ALLEGED APPEAR TO JUSTIFY THE CONCLUSIONS SOUGHT**

20. Applicant is member of the Class on behalf of which she wishes to exercise a class action in light of the fact that during the Class Period she has purchased multiple items produced or supplied by the Defendants (including perfumes, shampoos, cleaning products and pet food for her 2 dogs) in the Montreal region and has suffered damages as a result of the Defendants' anti-competitive and unlawful activities;
21. The Defendants' cartel was kept a secret and their price-fixing was not known to Applicant at the time of her purchases, nor could it have been known, even through the exercise of reasonable diligence;
22. Due to the Defendants' anti-competitive and illegal price-fixing activities, the Applicant was deprived of the benefit of a competitive market and therefore paid a higher price for the products she has purchased over the years;
23. Consequently, the Applicant suffered damages caused directly by the intentional fault of Defendants;
24. The damages suffered by Applicant are equal to the difference between the artificially inflated price that she paid for the fragrance-based products (including those listed at para. 19 above) and the price that he should have paid in a competitive market system;
25. The Defendants' violations were intentional, calculated, malicious and vexatious;
26. In these circumstances, the Applicant's claim for damages and punitive damages are justified;

**B) THE CLAIMS OF THE MEMBERS OF THE CLASS RAISE IDENTICAL, SIMILAR OR RELATED ISSUES OF LAW OR FACT:**

27. All Class members, regardless of the fragrance-based products they purchased or which of the Defendants they contracted with (either directly or indirectly through retailers), have a common interest both in proving the commission of unlawful activities (the price fixing of fragrance-based products in the present case) by all of the Defendants and in maximizing the aggregate of the amounts unlawfully charged to them by Defendants (or the increase which the Defendants caused);
28. In this case, the legal and factual backgrounds at issue are common to all the members of the Class, namely whether the Defendants unlawfully engaged in

price fixing and whether the Defendants created or participated in a cartel that affected Canadians;

29. The claims of every member of the Class are founded on very similar facts to the Applicant's claims;
30. Every Class member purchased a fragrance-based product supplied by one of the Defendants during the Class period;
31. By reason of Defendants' unlawful conduct, Applicant and members of the Class have suffered damages, which they may collectively and solidarily claim against the Defendants;
32. Each Class member has paid an artificially inflated price for fragrance-based products (including perfumes, cleaning and hygiene supplies and certain foods) as a result of the anti-competitive and collusive activities engaged in by the Defendants;
33. Each Class member has suffered damages equivalent to the difference between the artificially inflated price paid for said fragrance-based products and the price that should have been paid in a competitive market system;
34. The damages suffered by the Class members are directly attributable to the Defendants' anti-competitive and illegal price-fixing activities and with respect to which each Class member is justified in claiming damages;
35. Individual questions, if any, pale by comparison to the numerous common questions that are significant to the outcome of the present Application;
36. **The recourses of the Class members raise identical, similar or related questions of fact or law, namely:**
  - a) Did the Defendants conspire, coalesce, or enter into any agreement or arrangement that unduly restricts competition in the sale of fragrance-based products and, if so, during what period did this cartel have its effects on Class members?
  - b) Does the participation of the Defendants in the cartel constitute a fault triggering their solidary liability to Class members?
  - c) Has the effect of the cartel been an increase in the price paid in Canada for the purchase of fragrance-based products sold or distributed by the Defendants and, if so, does the increase constitute a damage for each Class member?
  - d) Did the Defendants act in bad faith?
  - e) What is the total amount of damages suffered by all Class members?

- f) Are Class members entitled to punitive damages?
- g) Is the Defendants' solidary liability triggered with respect to the following costs incurred or to be incurred on behalf of Class members in present matter:
  - the costs of investigation;
  - the extrajudicial fees of counsel for the Applicant, Plaintiff and Class members; and
  - the extrajudicial disbursements by counsel for the Applicant and Class members?

### **C) THE COMPOSITION OF THE CLASS**

- 37. The composition of the Class makes it difficult or impracticable to apply the rules for mandates to take part in judicial proceedings on behalf of others or for consolidation of proceedings;
- 38. Combined, during the class period the Defendants have sold tens of billions of dollars' worth of fragrance-based products to Class members across Canada while the cartel existed;
- 39. The number of persons included in the Class is likely in the tens of millions (many Class members will likely have claims against multiple Defendants for multiple products);
- 40. The names and addresses of all persons included in the Class are not known to the Applicant, however, some may be in the possession of the Defendants;
- 41. Class members are very numerous and are dispersed across Canada and elsewhere;
- 42. These facts demonstrate that it would be impractical, if not impossible, to contact each and every Class member to obtain mandates and to join them in one action;
- 43. In these circumstances, a class action is the only appropriate procedure for all of the members of the Class to effectively pursue their respective rights and have access to justice without overburdening the court system;

### **D) THE REPRESENTATIVE PLAINTIFF**

- 44. The Applicant requests that she be appointed the status of representative plaintiff for the following main reasons:

- a) she is a member of the Class and has a personal interest in seeking the conclusions that she proposes herein;
  - b) she is competent, in that he has the potential to be the mandatary of the action if it had proceeded under article 91 of the *Code of Civil Procedure*;
  - c) her interests are not antagonistic to those of other Class members;
45. Additionally, the Applicant respectfully adds that:
- a) she has the time, energy, will and determination to assume all the responsibilities incumbent upon her in order to diligently carry out the action;
  - b) she mandated her attorneys to file the present application for the sole purpose of having her rights, as well as the rights of other Class members, recognized and protected so that they can be compensated;
  - c) she cooperates and will continue to fully cooperate with her attorneys, who have experience in consumer protection-related class actions;
  - d) she is the proposed plaintiff in another class action concerning the sale of certain shampoos she purchased during Class period (it is possible that the fragrances used in those same shampoos are concerned by the present case);
  - e) she understands the nature of the action;
46. As for identifying other Class members, the Applicant draws certain inferences from the situation and realizes that by all accounts, there is a very significant number of Class members that find themselves in an identical situation, and that it would not be useful to attempt to identify each of them given their sheer numbers;
47. For the above reasons, the Applicant respectfully submits that her interest and competence are such that the present class action could proceed fairly and in the best interest of Class members;

#### **IV. DAMAGES**

48. During the Class Period, it is safe to assume that the Defendants have generated aggregate amounts in the billions of dollars (at least), while intentionally violating price-fixing laws;
49. Of course, the Defendants failed to inform consumers about this important fact (i.e. that they organized a secret cartel) in violation of s. 228 CPA;



50. All of the Defendants' misconduct is reprehensible and to the detriment of unsuspecting Class members;
51. All of the Defendants must be held accountable for the breach of obligations imposed on them by legislation in Canada and Quebec, including:
  - a) The *Competition Act*, notably sections 45 and 46;
  - b) The *Civil Code of Quebec*, notably articles 6, 7, and 1457; and
  - c) The *Consumer Protection Act*, notably articles 215, 219, 228 and 272.
52. In light of the foregoing, the following damages may be claimed against the Defendants:
  - a) compensatory damages, in an amount to be determined, on account of the aggregate of the damages suffered; and
  - b) punitive damages in an amount to be determined on the merits.

#### **V. NATURE OF THE ACTION AND CONCLUSIONS SOUGHT**

53. The action that the Applicant wishes to institute on behalf of the members of the Class is an action in damages and for a declaratory judgment of extracontractual civil liability;
54. The conclusions that the Applicant wishes to introduce by way of an originating application are:

**GRANT** the Representative Plaintiff's action against Defendants on behalf of all the Class members;

**DECLARE** the Defendants solidarily liable for the damages suffered by the Representative Plaintiff and each of the Class members;

**CONDEMN** the Defendants, solidarily, to pay the Representative Plaintiff and the Class members an amount equal to the sum of the Defendants' revenues generated by the artificially inflated portion of the sale price of the fragrance-based products they sell in Canada, and **ORDER** collective recovery of these sums;

**CONDEMN** the Defendants, solidarily, to pay the Representative Plaintiff and the Class members an amount to be determined on account of punitive damages, and **ORDER** collective recovery of these sums;

**CONDEMN** the Defendants, solidarily, to pay the costs incurred for any investigation necessary to establish their liability in the present proceeding, including the extrajudicial class counsel fees and extrajudicial disbursements,

including expert fees, and **ORDER** collective recovery of these sums;

**CONDEMN** the Defendants, solidarily, to pay interest and the additional indemnity on the above sums according to law from the date of service of the Application to Authorize the Bringing of a Class Action;

**ORDER** the Defendants, solidarily, to deposit in the office of this Court the totality of the sums which forms part of the collective recovery, with interest and costs;

**ORDER** that the claims of individual Class members be the object of collective liquidation if the proof permits and alternately, by individual liquidation;

**CONDEMN** the Defendants to bear the costs of the present action including the cost of notices, the cost of management of claims and the costs of experts, if any, including the costs of experts required to establish the amount of the collective recovery orders;

**RENDER** any other order that this Honourable Court shall determine;

55. The interests of justice favour that this Application be granted in accordance with its conclusions;

## VI. JURISDICTION AND NATIONAL CLASS

56. The Applicant suggests that this class action be exercised before the Superior Court of the province of Quebec, in the district of Montreal, for the following reasons:
- a) There exists a real and substantial connection between the province of Quebec and the damages suffered by Applicant and Class members;
  - b) A great number of the Class members, including the Applicant, reside in the district of Montreal, where the damages were suffered;
  - c) Defendant Symrise Pet Food Canada (SPF), who participated in the cartel, has its head office in the province of Quebec, thereby anchoring jurisdiction to the Superior Court to authorize a national class action.
  - d) Under section 36 of the *Competition Act*, private parties can commence legal action in the Federal Court or in a provincial court of superior jurisdiction to recover losses or damages incurred as a result of conduct contrary to section 45 of the *Competition Act*. Considering that the *Competition Act* is a federal legislation that is in force across Canada, any decision by the Superior Court of Quebec concerning section 45 of the *Competition Act* could potentially apply and be enforced uniformly across Canada, should a national class be authorized;

**FOR THESE REASONS, MAY IT PLEASE THE COURT:**

1. **GRANT** the present application;
2. **AUTHORIZE** the bringing of a class action in the form of an originating application in damages and declaratory judgment;
3. **APPOINT** the Applicant the status of representative plaintiff of the persons included in the Class herein described as:

**Class:**

All persons, entities, partnerships or organizations resident in Canada who purchased at least one product containing a produced or supplied by one of the Defendants;

(hereinafter referred to as the “**Class**”)

4. **DECLARE** the nature of the action to be one of extracontractual civil liability;
5. **IDENTIFY** the principle questions of fact and law to be treated collectively as the following:
  - a) Did the Defendants conspire, coalesce, or enter into any agreement or arrangement that unduly restricts competition in the sale of fragrance-based products and, if so, during what period did this cartel have its effects on Class members?
  - b) Does the participation of the Defendants in the cartel constitute a fault triggering their solidary liability to Class members?
  - c) Has the effect of the cartel been an increase in the price paid in Canada for the purchase of fragrance-based products sold or distributed by the Defendants and, if so, does the increase constitute a damage for each Class member?
  - d) Did the Defendants act in bad faith?
  - e) What is the total amount of damages suffered by all Class members?
  - f) Are Class members entitled to punitive damages?
  - g) Is the Defendants’ solidary liability triggered with respect to the following costs incurred or to be incurred on behalf of Class members in present matter:

- the costs of investigation;

- the extrajudicial fees of counsel for the Applicant and Class members; and
- the extrajudicial disbursements by counsel for the Applicant and Class members?

6. **IDENTIFY** the conclusions sought by the class action to be instituted as being the following:

**GRANT** the Representative Plaintiff's action against Defendants on behalf of all the Class members;

**DECLARE** the Defendants solidarily liable for the damages suffered by the Representative Plaintiff and each of the Class members;

**CONDEMN** the Defendants, solidarily, to pay the Representative Plaintiff and the Class members an amount equal to the sum of the Defendants' revenues generated by the artificially inflated portion of the sale price of the fragrance-based products they sell in Canada, and **ORDER** collective recovery of these sums;

**CONDEMN** the Defendants, solidarily, to pay the Representative Plaintiff and the Class members an amount to be determined on account of punitive damages, and **ORDER** collective recovery of these sums;

**CONDEMN** the Defendants, solidarily, to pay the costs incurred for any investigation necessary to establish their liability in the present proceeding, including the extrajudicial class counsel fees and extrajudicial disbursements, including expert fees, and **ORDER** collective recovery of these sums;

**CONDEMN** the Defendants, solidarily, to pay interest and the additional indemnity on the above sums according to law from the date of service of the Application to Authorize the Bringing of a Class Action;

**ORDER** the Defendants, solidarily, to deposit in the office of this Court the totality of the sums which forms part of the collective recovery, with interest and costs;

**ORDER** that the claims of individual Class members be the object of collective liquidation if the proof permits and alternately, by individual liquidation;

**CONDEMN** the Defendants to bear the costs of the present action including the cost of notices, the cost of management of claims and the costs of experts, if any, including the costs of experts required to establish the amount of the collective recovery orders;

**RENDER** any other order that this Honourable Court shall determine;

7. **ORDER** the publication of a notice to the class members in accordance with article 579 C.C.P. pursuant to a further order of the Court, and **ORDER** the Defendants to pay for said publication costs;
8. **FIX** the delay of exclusion at thirty (30) days from the date of the publication of the notice to the members, date upon which the members of the Class that have not exercised their means of exclusion will be bound by any judgment to be rendered herein;
9. **DECLARE** that all members of the Class that have not requested their exclusion, be bound by any judgment to be rendered on the class action to be instituted in the manner provided for by the law;
10. **RENDER** any other order that this Honourable Court shall determine;
11. **THE WHOLE** with costs including publication fees.

Montreal, March 8, 2023

*(s) LPC Avocat Inc.*

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**LPC AVOCAT INC.**

Mtre Joey Zukran

Attorney for the Applicant

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**SUMMONS**  
(ARTICLES 145 AND FOLLOWING C.C.P)

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**Filing of a judicial application**

Take notice that the Applicant has filed this Application for Authorization to Institute a Class Action and to Appoint the Status of Representative Plaintiff in the office of the Superior Court in the judicial district of Montreal.

**Defendant's answer**

You must answer the application in writing, personally or through a lawyer, at the courthouse of Montreal situated at 1 Rue Notre-Dame E, Montréal, Quebec, H2Y 1B6, within 15 days of service of the Application or, if you have no domicile, residence or establishment in Québec, within 30 days. The answer must be notified to the Applicant's lawyer or, if the Applicant is not represented, to the Applicant.

**Failure to answer**

If you fail to answer within the time limit of 15 or 30 days, as applicable, a default judgement may be rendered against you without further notice and you may, according to the circumstances, be required to pay the legal costs.

**Content of answer**

In your answer, you must state your intention to:

- negotiate a settlement;
- propose mediation to resolve the dispute;
- defend the application and, in the cases required by the Code, cooperate with the Applicant in preparing the case protocol that is to govern the conduct of the proceeding. The protocol must be filed with the court office in the district specified above within 45 days after service of the summons or, in family matters or if you have no domicile, residence or establishment in Québec, within 3 months after service;
- propose a settlement conference.

The answer to the summons must include your contact information and, if you are represented by a lawyer, the lawyer's name and contact information.

**Change of judicial district**

You may ask the court to refer the originating Application to the district of your domicile or residence, or of your elected domicile or the district designated by an agreement with the plaintiff.

If the application pertains to an employment contract, consumer contract or insurance

contract, or to the exercise of a hypothecary right on an immovable serving as your main residence, and if you are the employee, consumer, insured person, beneficiary of the insurance contract or hypothecary debtor, you may ask for a referral to the district of your domicile or residence or the district where the immovable is situated or the loss occurred. The request must be filed with the special clerk of the district of territorial jurisdiction after it has been notified to the other parties and to the office of the court already seized of the originating application.

### **Transfer of application to Small Claims Division**

If you qualify to act as a plaintiff under the rules governing the recovery of small claims, you may also contact the clerk of the court to request that the application be processed according to those rules. If you make this request, the plaintiff's legal costs will not exceed those prescribed for the recovery of small claims.

### **Calling to a case management conference**

Within 20 days after the case protocol mentioned above is filed, the court may call you to a case management conference to ensure the orderly progress of the proceeding. Failing this, the protocol is presumed to be accepted.

### **Exhibits supporting the application**

In support of the Application to Authorize the Bringing of a Class Action and to Appoint the Status of Representative Plaintiff, the Applicant intends to use the following exhibits:

**Exhibit P-1:** Copy of Swiss press release titled "*COMCO investigates possible collusions in the fragrance market*";

**Exhibit P-2:** *En liasse*, extracts of the Defendants' websites;

**Exhibit P-3:** Copy the Financial Post article published on March 8, 2023;

These exhibits are available on request.

### **Notice of presentation of an application**

If the application is an application in the course of a proceeding or an application under Book III, V, excepting an application in family matters mentioned in article 409, or VI of the Code, the establishment of a case protocol is not required; however, the application must be accompanied by a notice stating the date and time it is to be presented.

Montreal, March 8, 2023

*(s) LPC Avocat Inc.*

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**LPC AVOCAT INC.**

Mtre Joey Zukran

Attorney for the Applicant

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**NOTICE OF PRESENTATION**  
(articles 146 and 574 al. 2 CCP)

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**TO: FIRMENICH INTERNATIONAL SA (GENEVA)**

rue de la Bergère 7  
1217 Satigny, Switzerland

**FIRMENICH OF CANADA, LIMITED**

40 King Street West, Suite 2100, Scotia Plaza  
Toronto, Ontario, M5H3C2

**GIVAUDAN SA (GENEVA)**

Chemin de la Parfumerie 5  
1214 Vernier, Switzerland

**GIVAUDAN CANADA CO.**

2400 Matheson Blvd E.  
Mississauga, Ontario, L4W 5G9

**INTERNATIONAL FLAVORS & FRAGRANCES INC. (USA)**

600 NJ-36, Hazlet  
New Jersey, 07730, U.S.A.

**INTERNATIONAL FLAVORS & FRAGRANCES INC. (CANADA) LTD**

7330 Keele Street  
Concord, Ontario, L4K 1Z9

**SYMRISE AG (GERMANY)**

Mühlenfeldstraße 1  
37603 Holzminden, Germany

**SYMRISE PET FOOD CANADA (SPF)**

1876 Chemin de la 2 Ligne  
St-Blaise-sur-Richelieu, Quebec, J0J 1W0

**TAKE NOTICE** that Applicant's *Application to Authorize the Bringing of a Class Action and to Appoint the Status of Representative Plaintiff* will be presented before the Superior Court at **1 Rue Notre-Dame E, Montréal, Quebec, H2Y 1B6**, on the date set by the coordinator of the Class Action chamber.

**GOVERN YOURSELVES ACCORDINGLY.**

Montreal, March 8, 2023

*(s) LPC Avocat Inc.*

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**LPC AVOCAT INC.**

Mtre Joey Zukran

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