

SCHEDULE B-2
MACBOOK BUTTERFLY KEYBOARD CLASS ACTION SETTLEMENT
QUEBEC CLASS ACTION SETTLEMENT
SHORT-FORM NOTICE OF HEARING FOR SETTLEMENT APPROVAL AND OPT-OUT
SIMARD V. APPLE CANADA INC. ET AL. CLASS ACTION

(Court File N°: 500-06-001140-215)

If you live in Quebec and purchased, own, or owned a MacBook laptop sold between 2015 and 2019 equipped with a “Butterfly” keyboard (“Computer”),

-or-

If you live elsewhere but purchased such a Computer in Quebec, this class action settlement notice affects your rights.

SUMMARY OF THE PROPOSED CLASS ACTION

Representative Plaintiff alleges that the “butterfly” keyboard mechanism in certain MacBook laptops is defective and is seeking authorization of a class action against Apple Canada Inc. and Apple Inc. (collectively “**Apple**”), on behalf of persons in Quebec who purchased, own or owned a MacBook laptop sold between 2015 and 2019 equipped with a “butterfly” keyboard. *See full list of class Computers at the end of this notice.

Apple denies all of the allegations made in the Class Action, denies that any MacBooks are defective, and denies that Apple did anything improper or unlawful.

PROPOSED SETTLEMENT

The proposed settlement, if approved by the Superior Court of Québec, requires Apple to compensate affected Class Members. The settlement is not an admission of liability, wrongdoing or fault.

If the proposed settlement is approved, the following Class Members can receive compensation:

- **Group 1** Class Members who received at least two **Topcase Replacements** (i.e., the replacement of the full keyboard module) will be paid **\$545 CAD** per Computer.
- **Group 2** Class Members who received a single **Topcase Replacement** that did not resolve their keyboard issues can submit a Claim Form to receive **\$173 CAD** per Computer.
- **Group 3** Class Members who received one or more **Keycap Replacements** (i.e., the replacement of one or more keycaps on a keyboard and does not involve replacement of the full keyboard module) that did not resolve their keyboard issues can submit a Claim Form to receive **\$69 CAD** per Computer.

For full details and conditions, please consult the Long Form Notice, available here: laptopkeyboardclassaction.com/documents.aspx.

SETTLEMENT APPROVAL HEARING

A hearing before the Superior Court of Québec will be held on **October 31, 2023 at 9:30 a.m.**, at the Montréal courthouse located at 1 Notre-Dame East Street, Montréal, Québec, in **room 15.09**, or via a TEAMS link. This date may be subject to adjournment by the Court without further publication of notice to the Class Members, other than such notice which will be posted on Class Counsel’s website www.lexgroup.ca or on the Claim’s Administrator’s website: laptopkeyboardclassaction.com.

HOW TO EXCLUDE YOURSELF?

If you wish to remain a Class Member, you have nothing to do and nothing to pay.

If you wish to opt out, you have until **October 23, 2023** to advise in writing the registry of the Superior Court of Québec, District of Montréal, at 1 Notre Dame Street East, Room 1.120, Montreal, Québec, H2Y 1B6, that you wish to opt out. Please make sure to mention file no. 500-06-001140-215 in your correspondence.

HOW TO OBJECT?

If you wish, you have the right to comment on or object to the settlement (certain Court-ordered requirements and deadlines apply and are detailed in the Long Form Notice, available here: laptopkeyboardclassaction.com/documents.aspx).

Class Members who do not oppose the proposed Settlement Agreement have nothing to pay and do not need to appear at any hearing or take any other action to indicate their desire to support the proposed Settlement Agreement.

If the settlement is approved, another notice to Class Members will be sent explaining the method of distributing settlement funds.

MORE INFORMATION

For more information about the proposed settlement or to read the Long Form Notice, the Settlement Agreement and/or the other relevant Judgments or proceedings, visit the Settlement Website at laptopkeyboardclassaction.com or contact the Claims Administrator:

RicePoint Administration Inc.

P.O. Box 3355

London, Ontario, N6A 4K3

1-866-573-1796

laptopkeyboardclassaction.com

The attorneys representing the Class (“**Class Counsel**”) are the firm of Lex Group Inc. (c/o Mtre. David Assor), which can be contacted at info@lexgroup.ca.

THE PUBLICATION OF THIS NOTICE TO CLASS MEMBERS HAS BEEN APPROVED AND ORDERED BY THE SUPERIOR COURT OF QUÉBEC.

***Computer** means any of the following Apple computer models:

- MacBook (Retina, 12-inch, Early 2015)
- MacBook (Retina, 12-inch, Early 2016)
- MacBook (Retina, 12-inch, 2017)
- MacBook Air (Retina, 13-inch, 2018)
- MacBook Air (Retina, 13-inch, 2019)
- MacBook Pro (13-inch, 2016, Two Thunderbolt 3 Ports)
- MacBook Pro (13-inch, 2017, Two Thunderbolt 3 Ports)
- MacBook Pro (13-inch, 2019, Two Thunderbolt 3 Ports)
- MacBook Pro (13-inch, 2016, Four Thunderbolt 3 Ports)
- MacBook Pro (13-inch, 2017, Four Thunderbolt 3 Ports)
- MacBook Pro (15-inch, 2016)
- MacBook Pro (15-inch, 2017)
- MacBook Pro (13-inch, 2018, Four Thunderbolt 3 Ports)
- MacBook Pro (15-inch, 2018)
- MacBook Pro (13-inch, 2019, Four Thunderbolt 3 Ports)
- MacBook Pro (15-inch, 2019)