

CANADA
PROVINCE OF QUEBEC
DISTRICT OF MONTREAL

SUPERIOR COURT
(Class Actions)

N° : 500-06-001245-238

ARIELLE NAGAR

Applicant

v.

DESJARDINS SÉCURITÉ FINANCIÈRE,
COMPAGNIE D'ASSURANCE VIE
and
FÉDÉRATION DES CAISSES
DESJARDINS DU QUÉBEC
and
ALLIANCE POUR LA SANTÉ
ÉTUDIANTE AU QUÉBEC INC.
and
UNIVERSITÉ CONCORDIA

Defendants

APPLICATION OF THE DEFENDANT UNIVERSITÉ CONCORDIA FOR LEAVE TO
FILE RELEVANT EVIDENCE
(Article 574, al. 3 C.p.c.)

TO THE HONOURABLE FLORENCE LUCAS, J.C.S., SITTING IN AND FOR THE
DISTRICT OF MONTREAL, AS DESIGNATED JUDGE FOR THIS INSTANCE, THE
DEFENDANT UNIVERSITÉ CONCORDIA RESPECTFULLY SUBMITS THE
FOLLOWING:

1. On June 7, 2023, Mr. Roger Gabriel Salma filed an *Application to Authorize the Bringing of a Class Action (Application for Authorization)* against Desjardins Sécurité financière, Compagnie d'assurance vie (**Desjardins**), Fédération des Caisses Desjardins du Québec, Alliance pour la Santé étudiante au Québec Inc. (**ASEQ**) and Concordia University (**Concordia**).
2. This application was subsequently amended on June 30, 2023. In particular, Mr. Salma was replaced by Ms. Arielle Nagar (**Plaintiff**) as the applicant seeking the status of representative plaintiff for the following class:

All students enrolled or who were enrolled in a CEGEP or university and who were automatically subscribed to a health, medical or dental insurance

plan for which they paid the insurance premiums to or for the benefit of the defendants.

3. The Plaintiff, a former Concordia student, alleges in particular that the Defendants, including Concordia, acted illegally by subscribing students to health and dental insurance policies provided by ASEQ and insured by Desjardins, and that the regime should be explicitly “opt-in” instead of “opt-out”.
4. Concordia hereby seeks permission to adduce into evidence at the authorization hearing the following two documents, which are relevant to the Court’s determination whether the facts alleged justify the conclusions sought as against Concordia within the meaning of article 575(2) *CCP*:
 - a) The Memorandum of Agreement between Concordia and the Concordia Student Union (**CSU**) of which the Plaintiff is a member, dated January 14, 2010 (**Exhibit R-1**); and
 - b) The affidavit of Denis Cossette, Financial Director of Concordia, sworn and dated November 14, 2023 and its Exhibit DC-1 (**Exhibit R-2**).
5. Specifically, this evidence demonstrates that Concordia:
 - a) does not administer the health and dental insurance plans;
 - b) merely lends its administrative assistance to CSU for the collection of the insurance fees, which it undertakes at the request of and on behalf of CSU; and
 - c) does not retain any financial benefit from the collection of fees.
6. As such, Concordia, at all relevant times, merely collected the insurance fees from students for and on behalf of the CSU and cannot be held liable to the Plaintiff in relation thereto or on the basis of the causes of action advanced by the Plaintiff in the Application for Authorization.
7. This evidence is useful, relevant and necessary to complete and correct the facts alleged in the Application for Authorization and to assist the Court in its analysis of the criteria set out in article 575(2) *CCP* for authorization of the class action and determine whether the action should be authorized against Concordia.
8. Finally, the present application complies with the proportionality rules of the preliminary provision and article 18 *CCP* as it is relevant, targeted, reasonable and does not go beyond what is necessary to rule on the Application for Authorization.

WHEREFORE THE DEFENDANT CONCORDIA PRAY THAT THIS HONOURABLE COURT :

GRANT the present *Application for leave to file relevant evidence*.

AUTHORIZE the production of the Memorandum of Agreement between Concordia and the Concordia Student Union (Exhibit R-1).

AUTHORIZE the production of the affidavit of Denis Cossette dated and sworn on November 14, 2023 and its Exhibit DC-1 (Exhibit R-2).

THE WHOLE without costs except if this application is contested.

Montréal, November 14, 2023



**NORTON ROSE FULBRIGHT CANADA S.E.N.C.R.L.,
s.r.l.**

(Me Vincent Rochette, Me Maya Angenot)
Attorneys for Defendant Université Concordia

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Notification : Notifications-mtl@nortonrosefulbright.com

Notre référence : 1001260977

NOTICE OF PRESENTATION
(Articles 146 et 574 C.p.c.)

TO: Me Joey Zukran
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Attorneys for Defendants Desjardins sécurité financière, compagnie d'assurance vie and Fédération des Caisses Desjardins du Québec

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fpare@stikeman.com

Attorneys for Defendant ASEQ

TAKE NOTICE that the present *Application for leave to file relevant evidence* shall be presented for adjudication before the Honourable Florence Lucas Justice of the Superior Court of Quebec, on **December 4, 2023** at a time and in a room to be determined, at the Montreal Courthouse, situated at 1, Notre-Dame Street E, Montreal, Quebec, H2Y 1B6.

GOVERN YOURSELVES ACCORDINGLY.

Québec, November 14, 2023

Norton Rose Fulbright Canada S.E.N.C.R.L., s.r.l.

NORTON ROSE FULBRIGHT CANADA

S.E.N.C.R.L., s.r.l.
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Florence Méthot)

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De : [Nathalie Masse \(elle/she\)](mailto:Nathalie.Masse@stikeman.com)
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Cc : [Maya Angenot](mailto:Maya.Angenot@stikeman.com); [Vincent Rochette](mailto:Vincent.Rochette@stikeman.com); [Florence Methot](mailto:Florence.Methot@stikeman.com)
Objet : QUE-NOTIFICATION / Arielle Nagar c. Desjardins sécurité financière et al. - No cour : 500-06-001245-238 - Application of the defendant Université Concordia for leave to file relevant evidence + Exhibits R-1 and R-2
Date : novembre 14, 2023 16:09:03
Pièces jointes : [APPLICATION OF THE DEFENDANT UNIVERSITÉ CONCORDIA FOR LEAVE TO FILE RELEVANT EVIDENCE - Nov. 14, 2023\(CAN_DMS_1002185958.1\).pdf](#)
[Exhibit R-2 \(Application for leave to file relevant evidence\)\(CAN_DMS_1002185363.1\).pdf](#)
[Exhibit R-1 \(application for leave to file relevant evidence\)\(CAN_DMS_1002185235.1\).pdf](#)

NOTIFICATION PAR COURRIEL / NOTIFICATION BY EMAIL
(Articles 133 et/and 134 C.p.c. / C.C.P.)

EXPÉDITEUR / SENDER	
NORTON ROSE FULBRIGHT CANADA S.E.N.C.R.L., s.r.l. / LLP Mtres Vincent Rochette and Maya Angenot 1, place Ville-Marie, bureau 2500 Montréal (Québec) H3B 1R1 Tel. : 514 847-4747 Notifications-que@nortonrosefulbright.com maya.angenot@nortonrosefulbright.com vincent.rochette@nortonrosefulbright.com	
Date :	Québec, 14 novembre 2023
Nature du document / Nature of the document :	Application of the defendant Université Concordia for leave to file relevant evidence + Exhibits R-1 and R-2
N° du dossier de Cour / Court File # :	500-06-001245-238
Nom des parties / Name of the parties :	Arielle Nagar c. Desjardins sécurité financière et al.
Heure de transmission / Time of transmission :	Voir le courriel de transmission
Notre référence / Our reference :	1001260977
DESTINATAIRE(S) / RECIPIENT(S)	
Nom / Name : M ^e Joey Zukran Étude / Firm : LPC Avocats Inc. 276 Saint-Jacques Street, Suite 801 Montréal, Québec, H2Y 1N3 jzukran@lpclex.com Attorney for the Applicant Arielle Nagar	Nom / Name : M ^{es} Vincent de l'Étoile and Sandra Desjardins Étude / Firm : Langlois avocats 1250 René-Lévesque W. Boul., 20th floor Montréal, Québec, H3B 4W8 vincent.deletoile@langlois.ca sandra.desjardins@langlois.ca Attorneys for Defendants Desjardins sécurité financière, compagnie d'assurance vie and Fédération des Caisses Desjardins du Québec
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Objet : Relayé : QUE-NOTIFICATION / Arielle Nagar c. Desjardins sécurité financière et al. - No cour : 500-06-001245-238 - Application of the defendant Université Concordia for leave to file relevant evidence + Exhibits R-1 and R-2
Date : novembre 14, 2023 16:09:32
Pièces jointes : [QUE-NOTIFICATION Arielle Nagar c. Desjardins sécurité financière et al. - No cour 500-06-001245-238 - Application of the defendant Université Concordia for leave to file relevant evidence + Exhibits R-1 and R-2.msg](#)

La remise à ces destinataires ou groupes est terminée, mais aucune notification de remise n'a été envoyée par le serveur de destination :
jzukran@lpclex.com (jzukran@lpclex.com) <<mailto:jzukran@lpclex.com>>
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Objet : QUE-NOTIFICATION / Arielle Nagar c. Desjardins sécurité financière et al. - No cour : 500-06-001245-238 - Application of the defendant Université Concordia for leave to file relevant evidence + Exhibits R-1 and R-2

MEMORANDUM OF AGREEMENT made and entered into at Montreal, Province of Quebec, as of January 14, 2010.

BETWEEN

CONCORDIA UNIVERSITY, a corporation duly incorporated by the *Concordia University Act*, S.Q. 1948, c. 91 as amended by S.Q. 1959, c. 191 and S.Q. 2006, c. 69, having its head office at 1455 de Maisonneuve Boulevard West, Suite GM-930, Montreal, Quebec, H3G 1M8, (the "University"), herein represented by Elizabeth Morey, Dean of Students and Roger Côté, Associate Vice-President, Enrolment and Student Services, duly authorized to sign the present agreement on behalf of the University.

AND

CONCORDIA STUDENT UNION, an incorporated student association having its head office at 1455, de Maisonneuve Boulevard West, Suite H-711, Montreal, Quebec, H3G 1M8 (the "CSU"), herein represented by Amine Dabchy, its President, and Sam Moyal, its Finance Vice-President, duly authorized to sign the present agreement on behalf of the CSU pursuant to a resolution of its Council of Representative adopted on January 14, 2010.

WHEREAS the CSU is the recognized accredited representative of all undergraduate students of the University; and

WHEREAS the CSU wishes the administrative assistance of the University in the collection of fees for a health and dental insurance plan provided to the University's full-time and part-time undergraduate students (the "**Student Health and Dental Insurance Plan**" or the "**Plan**"); and

WHEREAS following an undergraduate student referendum held in March 1996, the Board of Governors of the University approved, at its meeting of June 19, 1996, the collection by the University, on behalf of the CSU, of an annual health insurance fee; and

WHEREAS following an undergraduate student referendum held in March 1997, the Board of Governors approved, at its meeting of April 16, 1997, the collection by the University, of behalf of the CSU, of an annual dental insurance fee; and

WHEREAS the collection of annual health and dental insurance fees (the "**Fees**") by the University was made contingent upon the conclusion of a formal agreement between the

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CSU and the University establishing the CSU's responsibility and liability for the implementation of the Student Health and Dental Insurance Plan.

NOW THEREFORE, THE PRESENT AGREEMENT WITNESSES:

1. **Collection of Student Health and Dental Insurance Fees**

- 1.1. The University shall collect from each undergraduate student the Fees as outlined in the relevant yearly Undergraduate Tuition & Other Fees Booklet (currently found at http://tuitionandfees.concordia.ca/09_10/u_pg3.php). For the 2009-2010 academic year, the Fees are as follows:
 - a) for students registered for more than 3 credits in the Fall term only - \$22.67 for health insurance coverage and \$34.00 for dental insurance coverage for the Fall term;
 - b) for students registered for the Fall and Winter terms - \$68.00 for health insurance coverage and \$102.00 for dental insurance coverage for the Fall, Winter and Summer terms;
 - c) for students registered for more than 3 credits in the Winter term only - \$45.33 for health insurance coverage and \$68.00 for dental insurance coverage for the Winter and Summer terms,subject to the exclusions set out in Article 2 below.
- 1.2 The parties recognize that the Fees assessed may change from time to time and the University agrees to modify the assessment following adoption of a resolution by the University's Board of Governors.
- 1.3 During the Fall and Winter terms, a full financial credit will be made to a student's account or a full refund of the Fees shall be provided by the University's Student Accounts Office if a student fully withdraws (DNEs) from all registered courses.
- 1.4 The CSU shall provide students an opportunity to opt out of the Plan and shall be solely responsible for administering the opt-out option. The CSU shall transmit the names, student ID, session flag (Fall or Winter) and coverage code, electronically, of those students opting out of the Plan to the University's Student Accounts Office on at least a twice-weekly basis in the months of September and January and on a weekly basis all other months. Upon receipt of that information, the University shall adjust these students' accounts accordingly.

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2. **International Students and Other Special Cases**

- 2.1 International students with an immigration status that generates an International Health Insurance fee assessment upon registration shall not be assessed the Fees.
- 2.2 In cases where the International Health Insurance fee has been waived and the student wishes to opt into the Student Health and Dental Insurance Plan, the University shall not be involved with the opt-in process nor with the collection of Fees.
- 2.3 Status Indians shall not be assessed the Fees.
- 2.4 Inter-University Agreement undergraduate students where the University is the home university shall be assessed the Fees, while Inter-University Agreement undergraduate students where the University is the host university shall not be assessed the Fees.
- 2.5 Students registered in "privatized programs" (i.e. where no funding is received from the provincial government) and who are not members of a student association shall not be assessed the Fees.
- 2.6 Canadian undergraduate students (including permanent residents) participating in a Canadian or international exchange program where the student pays tuition and other fees to the University shall be assessed the Fees.
- 2.7 Students registered for 3 credits or less in a given term shall not be assessed the Fees.

3. **Administration Fee**

- 3.1 In order to cover the cost of bad debts, an administration fee shall be charged by the University to the CSU. Such fee shall be calculated as follows:

***Fees billed by the University in the current academic year x University
Bad Debt Fee of the preceding academic year***

"Bad Debt Fee" means the loss incurred by the University relative to uncollectable tuition and other fees (whether imposed by the University or student associations) from students in relation to the preceding academic year, expressed as a percentage of the total tuition and other fees billed in that same preceding academic year.

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- 3.2 The applicable Bad Debt Fee for any given academic year shall be disclosed by the University to the CSU V.P. Finance, by e-mail, no later than October 1st of the academic year in which it shall be charged (i.e. in advance), which notice shall contain the detailed basis for the calculation of the Bad Debt Fee.

4. **Disposition of Fees and Communication of Information**

- 4.1 At the end of each month, the University's Student Accounts Office shall transfer the Fees assessed to the CSU account designated for such purpose by the CSU.

- 4.2 The University shall transmit to the CSU at each "student accounts receivable month-end", a cumulative listing of the students in respect of whom the Fees have been assessed and the amount of the Fees assessed as well as a listing of the current month's adjustments. The information shall contain each student's ID number, the student's surname and first name, the student's date of birth, the student's gender, the student's total Fees amount, the Fall/Winter billing/insurance coverage code, the student's residency code (Quebec or non-Quebec residency code) and student's home address.

- 4.3 Additionally, at the beginning of each semester, the University shall also transmit to the CSU a further list of undergraduate students indicating each student's surname and first name, faculty of study, ID number, the student's date of birth, residency code (Quebec or non-Quebec residency code), mailing address, email address and phone number. It is understood that the residency code may not be up to date at the time of transmission of this list.

- 4.4 It is understood that all such information provided to the CSU shall be used for the sole purposes of administering the Student Health and Dental Insurance Plan.

- 4.5 The CSU agrees to take reasonable means to protect the privacy of such personal information as is entrusted to it pursuant to this Agreement and to obtain a similar covenant from its mandatory appointed pursuant to Section 6.1 of this Agreement.

5. **Non-Responsibility for the Plan**

- 5.1 The CSU acknowledges that the administration of the Student Health and Dental Insurance Plan is the sole and exclusive responsibility of the CSU and that the University is merely performing administrative functions on its behalf.

- 5.2 The CSU undertakes to indemnify and hold harmless the University for any and all claims of whatever nature and source related to the administration of the

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Student Health and Dental Insurance Plan unless intentional or gross fault on the part of the University or one of its employees, representatives, agents or mandataries can be demonstrated.

- 5.3. The University shall immediately notify the CSU of any and all claims of which it becomes aware and which are related, either directly or indirectly, to the administration of the Plan. The University agrees to take reasonable steps, upon request and at no direct and extraordinary cost to the University, to assist the CSU in its handling of such claims and to minimize the amount of such claims.

6. **Mandatory**

- 6.1. For the execution of its obligations pursuant to this Agreement, the CSU may act through its mandatory, Alliance pour la santé étudiante au Québec Inc. ("ASEQ"), or such other mandatory as identified by the CSU via notice to the University. For greater certainty, the University is hereby notified by the CSU that ASEQ shall be its mandatory for the purpose of sections 1.4 and 4.1 to 4.3 of this Agreement. The CSU may specify to the University from time to time such other purposes for which its mandatory has been appointed.

7. **Term**

- 7.1. This Agreement is effective upon its execution and shall continue to be in force until either party sends a notice of termination to the other at least six (6) months before the beginning of a Fall academic term.
- 7.2. To the best of the parties' knowledge, prior to the execution of this Agreement, the Parties had been acting pursuant to a verbal agreement on substantially the same terms and conditions.
- 7.3. The parties hereby release each other from any and all claims that they may have one against the other relative to the execution or performance of the said verbal agreement, save any financial adjustments and accounting and the University's obligations to collect and remit Fees and provide data in the current academic year. For greater certainty, it is understood and agreed that no Bad Debt Fee is owing by the CSU to the University relative to the academic years prior to and ending May 31st, 2009.

8. **Notices**

- 8.1. All notices addressed to the University pursuant to the present Agreement shall be given in writing, delivered in person or by messenger to the University at

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1455 de Maisonneuve Boulevard West, Suite H-637, Montreal, Quebec, H3G 1M8
to the attention of the Dean of Students.

- 8.2. Except as specified in Section 3.2, all other notices addressed to the CSU pursuant to the present Agreement shall be given in writing, delivered in person or by messenger, to the CSU at its above-mentioned address to the attention of its President or Vice-President, Finance should the President not be available.

9. **Previous Agreements**

- 9.1. This present Agreement constitutes the entire Agreement between the parties pertaining to the subject matter hereof and supersedes and replaces all prior agreements, undertakings, negotiations and discussions of the parties.

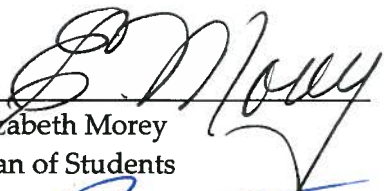
10. **Miscellaneous**

- 10.1. The parties hereto have requested that this Agreement and all correspondence and all documentation relating to this Agreement, be written in the English language. Les parties aux présentes ont exigé que la présente entente, de même que toute la correspondance et la documentation relative à cette entente, soient rédigées en langue anglaise.
- 10.2. The CSU and the University agree and represent to each other that, in the execution of the terms and conditions of this Agreement, they shall abide with all laws and regulations relevant thereto.
- 10.3. This Agreement shall be governed by and construed in accordance with the laws of the Province of Quebec and the laws of Canada applicable therein.
- 10.4. In the event that any portion of this Agreement or any amendments hereto are held illegal, void or ineffective, the remaining portions hereof shall remain in full force and effect.

S.M. AD
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AND THE PARTIES HAVE SIGNED BY THEIR DULY AUTHORIZED REPRESENTATIVES.

CONCORDIA UNIVERSITY



Elizabeth Morey
Dean of Students



Roger Côté
Associate Vice-President,
Enrolment and Student Services

CONCORDIA STUDENT UNION



Amine Dabchy
President



Sam Moyal
Finance Vice-President

INTERVENTION

Alliance pour la santé étudiante au Québec Inc., being the CSU's mandatary pursuant to Section 6.1 of that certain Agreement entered into between Concordia University and the Concordia Student Union as of January 14, 2010 concerning the Student Health and Dental Insurance Plan, hereby agrees to take reasonable means to protect the privacy of such personal information as is entrusted to it pursuant to that Agreement, the whole as of the above-referenced date.



ALLIANCE POUR LA SANTÉ ÉTUDIANTE AU QUÉBEC INC.

Lev Bulkin
President

NO.: 500-06-001245-238

**SUPERIOR COURT
DISTRICT OF MONTREAL**

ARIELLE NAGAR

Applicant

- v. -

**DESJARDINS SÉCURITÉ FINANCIÈRE,
COMPAGNIE D'ASSURANCE VIE**

ET AL.

Defendants

EXHIBIT R-1

BO-0042

1001260977

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vincent.rochette@nortonrosefulbright.com

NORTON ROSE FULBRIGHT CANADA LLP

BARRISTERS & SOLICITORS

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CANADA
PROVINCE DE QUÉBEC
DISTRICT DE MONTRÉAL

COUR SUPÉRIEURE
(Action collective)

N° : 500-06-001245-238

ARIELLE NAGAR

Demanderesse

c.

**DESJARDINS SÉCURITÉ FINANCIÈRE,
COMPAGNIE D'ASSURANCE VIE**

et

**FÉDÉRATION DES CAISSES DESJARDINS DU
QUÉBEC**

et

**ALLIANCE POUR LA SANTÉ ÉTUDIANTE AU
QUÉBEC INC.**

et

UNIVERSITÉ CONCORDIA

Défenderesses

DÉCLARATION SOUS SERMENT DE DENIS COSSETTE

Je, soussigné, DENIS COSSETTE, directeur financier de l'Université Concordia (**Concordia**), domicilié au 408-J, rue St-Eustache, St-Eustache (QC) J7R 2M3, déclare sous serment ce qui suit :

1. Depuis le 1^{er} août 2016, j'occupe le poste de chef de la direction financière de Concordia.
2. À ce titre, je suis responsable de la perception des droits de scolarité et autres frais facturés aux étudiants, incluant ceux relatifs aux régimes de soins de santé et dentaires administrés par les associations étudiantes accréditées, soit la Concordia Student Union (**CSU**) et la Graduate Student Association (**GSA**).

3. Concordia ne joue aucun rôle dans l'administration des régimes de soins de santé et dentaires. Concordia perçoit seulement les primes d'assurance au nom et pour le compte de CSU et de GSA, tel qu'il appert de courriels transmis par Concordia à tous les étudiants en début d'année académique, pièce **DC-1 en liasse**.
4. Concordia ne retient aucun montant des primes d'assurances ainsi perçues.
5. Concordia n'est pas rémunérée et ne reçoit aucun avantage financier de la perception des primes d'assurance pour le compte de CSU et GSA.
6. Concordia ne charge aucun frais ni intérêt pour ce service, que ce soit à CSU ou GSA, ou aux étudiants.
7. Tous les faits allégués dans la présente déclaration sous serment sont vrais.

ET J'AI SIGNÉ : 

DENIS COSSETTE

Affirmé solennellement devant moi, par vidéo-conférence (Teams), le 14 novembre 2023, reconnaissant Denis Cossette, et confirmant qu'il a signé la présente déclaration sous serment. La déclaration sous serment transmise par courriel est véridique.



Commissaire à l'assermentation
Pour le Québec



EXHIBIT DC-1

[View this message in your browser](#)



September 12, 2019

(CSU or GSA) - health insurance

Student ID: #####

Hi ##First_Name## ##Last_Name##,

Please find below some important information about your health and dental insurance, which is administered by the Concordia Student Union (CSU) and the Graduate Student Association (GSA) for their members through an insurance broker called Studentcare.

Please note that Concordia University itself does **not** administer the health and dental plan; the University simply collects the insurance premium fees on behalf of these two student associations.

You may have noticed that your insurance premium has now been billed. You can confirm the amount by visiting your My Student Center self-service which is accessible through the [MyConcordia](#) portal. (The insurance fee is charged for students registered for more than 3 credits per term.)

Here's what's **really important** for you to know:

- You can choose to **opt out** of the Health and/or Dental Plan between September 3 and September 23, 2019, if you were billed in Fall term.
- The Winter Change-of-Coverage & Opt-Out Period is from January 3 – 24, 2020. Only new students enrolled in the Winter term or those who were not billed in the Fall term are eligible.

Please follow the steps listed below to opt out or make a change to your coverage:

1. Log on to the Studentcare portal: <http://www.studentcare.ca/>
2. Select your student association: Concordia University undergraduate students (CSU) or Concordia University graduate students (GSA)
3. Navigate to the section: Change-of-Coverage & Opt out Period (halfway down the right-hand side)
4. Use your Concordia student ID as your ID

If you opt out of the insurance or change your coverage, an update to your student account will be made after September 23, 2019.

We strongly recommend that you keep the confirmation of your opt-out or coverage change.

If you have any questions concerning your plan, please contact [Studentcare](#).

We wish you success in your studies at Concordia.

Best Regards,

Student accounts office, on behalf of Dean of Students Office

Université Concordia University
Student Accounts Office
studentaccounts@concordia.ca

[View this message in your browser](#)



December 4, 2019

(CSU or GSA) - health insurance

Student ID: #####

Hi ##First_Name## ##Last_Name##,

Please find below some important information about your health and dental insurance, which is administered by the Concordia Student Union (CSU) and the Graduate Student Association (GSA) for their members through an insurance broker called Studentcare.

Please note that Concordia University itself does **not** administer the health and dental plan; the University simply collects the insurance premium fees on behalf of these two student associations.

You may have noticed that your insurance premium has now been billed. You can confirm the amount by visiting your My Student Center self-service which is accessible through the [MyConcordia](#) portal. (The insurance fee is charged for students registered for more than 3 credits per term.)

Here's what's **really important** for you to know:

- The Winter Change-of-Coverage & Opt-Out Period is from January 3 – 24, 2020. Only new students enrolled in the Winter term or those who were not billed in the Fall term are eligible.

Please follow the steps listed below to opt out or make a change to your coverage:

1. Log on to the Studentcare portal: <http://www.studentcare.ca/>
2. Select your student association: Concordia University undergraduate students (CSU) or Concordia University graduate students (GSA)
3. Navigate to the section: Change-of-Coverage & Opt out Period (halfway down the right-hand side)
4. Use your Concordia student ID as your ID

If you opt out of the insurance or change your coverage, an update to your student account will be made after January 3 – 24, 2020.

We strongly recommend that you keep the confirmation of your opt-out or coverage change.

If you have any questions concerning your plan, please contact [Studentcare](#).

We wish you success in your studies at Concordia.

Best Regards,

Student accounts office, on behalf of Dean of Students Office



Université Concordia University
Student Accounts Office
studentaccounts@concordia.ca

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September 14, 2020

(CSU or GSA) - Health insurance

Student ID: #####

Hi ##First_Name## ##Last_Name##,

Please find below some important information about your health and dental insurance, which is administered by the Concordia Student Union (CSU) and the Graduate Student Association (GSA) for their members through an insurance broker called Studentcare.

Please note that Concordia University itself does **not** administer the health and dental plan; the University simply collects the insurance premium fees on behalf of these two student associations.

You may have noticed that your insurance premium has now been billed. You can confirm the amount by visiting your My Student Center self-service which is accessible through the [MyConcordia](#) portal. (The insurance fee is charged for students registered for more than 3 credits per term.)

Here's what's **really important** for you to know:

- You can choose to opt out of the Health and/or Dental Plan between September 8 and September 21, 2020, if you were billed for the Fall 2020 term.
- The Winter Change-of-Coverage & Opt-Out Period is from January 4 – 22, 2021. Only new students enrolled in the Winter term or those who were not billed in the Fall term are eligible.

Please follow the steps listed below to opt out or make a change to your coverage:

1. Log on to the Studentcare portal: <http://www.studentcare.ca/>
2. Select your student association: Concordia University undergraduate students (CSU) or Concordia University graduate students (GSA)
3. Navigate to the section: Change-of-Coverage & Opt out Period (halfway down the right-hand side)
4. Use your Concordia student ID as your ID

If you opt out of the insurance or change your coverage, an update to your student account will be made after September 21, 2020.

We strongly recommend that you keep the confirmation of your opt-out or coverage change.

If you have any questions concerning your plan, please contact [Studentcare](#).

We wish you success in your studies at Concordia.

Best Regards,

Student accounts office, on behalf of Dean of Students Office



Université Concordia University
Student Accounts Office
studentaccounts@concordia.ca

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January 13, 2021

GSA - Health insurance

Student ID: #####

Hi ##First_Name## ##Last_Name##,

Please find below some important information about your health and dental insurance, which is administered by the Graduate Student Association (GSA) for their members through an insurance broker called Studentcare.

Please note that Concordia University itself does **not** administer the health and dental plan; the University simply collects the insurance premium fees on behalf of your student association.

You may have noticed that your insurance premium has now been billed. You can confirm the amount by visiting your My Student Center self-service which is accessible through the [MyConcordia](#) portal.

Here's what's **really important** for you to know:

- The Winter Change-of-Coverage & Opt-Out Period is from January 13 - February 2, 2021. Only new students enrolled in the Winter term or those who were not billed in the Fall term are eligible.

Please follow the steps listed below to opt out or make a change to your coverage:

1. Log on to the Studentcare portal: <http://www.studentcare.ca/>
2. Select your student association: Concordia University graduate students (GSA)
3. Navigate to the section: Change-of-Coverage & Opt out Period (halfway down the right-hand side)
4. Use your Concordia student ID as your ID

If you opt out of the insurance or change your coverage, an update to your student account will be made after February 2, 2021.

We strongly recommend that you keep the confirmation of your opt-out or coverage change.

If you have any questions concerning your plan, please contact [Studentcare](#).

We wish you success in your studies at Concordia.

Best Regards,

Student accounts office, on behalf of Dean of Students Office



Université Concordia University
Student Accounts Office
studentaccounts@concordia.ca

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January 15, 2021

CSU - New Virtual Health Care (Telemedicine)

Student ID: #####

Hi ##First_Name## ##Last_Name##,

Please find below some important information about a **new** service, Virtual Health Care (Telemedicine), which is administered by the Concordia Student Union (CSU) for their members through an insurance broker called Studentcare.

You may have noticed that the telemedicine fee has now been charged to your student account. You can confirm the amount by visiting your My Student Center self-service which is accessible through the [MyConcordia](#) portal.

Please note that Concordia University itself does **not** administer the telemedicine plan; the University simply collects the fees on behalf of your student association.

Here's what's **really important** for you to know:

- You can choose to opt-out of the new Telemedicine fee.
- The Opt-Out Period is from January 13 - February 2, 2021.

Please follow the steps listed below to opt out or make a change to your coverage:

1. Log on to the Studentcare portal: <http://www.studentcare.ca/>
2. Select your student association: Concordia University undergraduate students (CSU)
3. Navigate to the section: Change-of-Coverage & Opt out Period (halfway down the right-hand side)
4. Use your Concordia student ID as your ID

If you opt out of the telemedicine service, an update to your student account will be made after February 2, 2021. We strongly recommend that you keep the confirmation of your opt-out or coverage change.

If you have any questions concerning your plan, please contact [Studentcare](#).

We wish you success in your studies at Concordia.

Best Regards,

Student accounts office, on behalf of Dean of Students Office



Université Concordia University
Student Accounts Office
studentaccounts@concordia.ca

[View this message in your browser](#)



September 15, 2021

GSA - Health insurance

Student ID: #####

Hi ##First_Name## ##Last_Name##,

Please find below some important information about your health and dental insurance, which is administered by the Graduate Student Association (GSA) for their members through an insurance broker called Studentcare.

Please note that Concordia University itself does **not** administer the health and dental plan; the University simply collects the insurance premium fees on behalf of your student association.

You may have noticed that your insurance premium has now been billed. You can confirm the amount by visiting your My Student Center self-service which is accessible through the [MyConcordia](#) portal.

Here is what is **important** for you to know:

- The Health and Dental plan opt-out period is September 7 to September 23, 2021.

Please follow the steps listed below to opt out or make a change to your coverage:

1. Log on to the Studentcare portal: <http://www.studentcare.ca/>
2. Select your student association: Concordia University graduate students (GSA)
3. Navigate to the section: Change-of-Coverage & Opt out Period (halfway down the right-hand side)
4. Use your Concordia student ID as your ID

We strongly recommend that you keep the confirmation of your opt-out or coverage change.

If you have any questions concerning your plan, please contact [Studentcare](#).

We wish you success in your studies at Concordia.

Best Regards,

Student accounts office, on behalf of Dean of Students Office



Université Concordia University
Student Accounts Office
studentaccounts@concordia.ca

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September 15, 2021

CSU - Health insurance and New Virtual Health Care (Telemedicine)

Student ID: #####

Hi ##First_Name## ##Last_Name##,

Please find below some important information regarding changes to the Telemedicine (Virtual Health Care) program in addition to your health and dental insurance, which is administered by the Concordia Student Union (CSU) for their members.

You can confirm the amount by visiting your My Student Center self-service which is accessible through the [MyConcordia](#) portal.

Please note that Concordia University does **not** administer the health, dental and telemedicine plan; the University simply collects the insurance premium fees on behalf of your student association.

Here is what is **important** for you to know:

1. The Health, Dental and Telemedicine opt-out period is September 7 to September 23, 2021
2. You can choose to opt-out of the **Health and/or Dental plan** as follows:
 - o Log on to the Studentcare portal: <http://www.studentcare.ca/>
 - o Select your student association: Concordia University undergraduate students (CSU)
 - o Navigate to the section: Change-of-Coverage & Opt out Period (halfway down the right-hand side)
 - o Use your Concordia student ID as your ID
3. You can choose to opt-out of the **Telemedicine** program as follows:
 - o Visit the Maple website: <https://www.getmaple.ca/csu/>
 - o Navigate to the section: Opting out (halfway down the left-hand side)
 - o Complete the Opt-out form for Maple virtual care program

We strongly recommend that you keep the confirmation of your opt-out or coverage change.

If you have any questions concerning your Health and/or Dental plan, please contact [Studentcare](#).

For questions regarding the Telemedicine program, please contact [Maple](#).

We wish you success in your studies at Concordia.

Best Regards,

Student accounts office, on behalf of Dean of Students Office



Université Concordia University
Student Accounts Office
studentaccounts@concordia.ca

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January 11, 2022

GSA - Health insurance

Student ID: #####

Hi ##First_Name## ##Last_Name##,

Please find below some important information about your health and dental insurance, which is administered by the Graduate Student Association (GSA) for their members through an insurance broker called Studentcare.

Please note that Concordia University itself does **not** administer the health and dental plan; the University simply collects the insurance premium fees on behalf of your student association.

You may have noticed that your insurance premium has now been billed. You can confirm the amount by visiting your My Student Center self-service which is accessible through the [MyConcordia](#) portal.

Here is what is **important** for you to know:

- The Health and Dental plan opt-out period is January 6 - January 24, 2022.

Please follow the steps listed below to opt out or make a change to your coverage:

1. Log on to the Studentcare portal: <http://www.studentcare.ca/>
2. Select your student association: Concordia University graduate students (GSA)
3. Navigate to the section: Change-of-Coverage & Opt out Period (halfway down the right-hand side)
4. Use your Concordia student ID as your ID

We strongly recommend that you keep the confirmation of your opt-out or coverage change.

If you have any questions concerning your plan, please contact [Studentcare](#).

We wish you success in your studies at Concordia.

Best Regards,

Student accounts office, on behalf of Dean of Students Office



Université Concordia University
Student Accounts Office
studentaccounts@concordia.ca

[View this message in your browser](#)



January 11, 2022

CSU - Health insurance and Virtual Health Care (Telemedicine)

Student ID: #####

Hi ##First_Name## ##Last_Name##,

Please find below some important information regarding changes to the Telemedicine (Virtual Health Care) program in addition to your health and dental insurance, which is administered by the Concordia Student Union (CSU) for their members.

You can confirm the amount by visiting your My Student Center self-service which is accessible through the [MyConcordia](#) portal.

Please note that Concordia University does **not** administer the health, dental and telemedicine plan; the University simply collects the insurance premium fees on behalf of your student association.

Here is what is **important** for you to know:

1. The Health, Dental and Telemedicine opt-out period is January 6 - January 24, 2022
2. You can choose to opt-out of the **Health and/or Dental plan** as follows:
 - o Log on to the Studentcare portal: <http://www.studentcare.ca/>
 - o Select your student association: Concordia University undergraduate students (CSU)
 - o Navigate to the section: Change-of-Coverage & Opt out Period (halfway down the right-hand side)
 - o Use your Concordia student ID as your ID
3. You can choose to opt-out of the **Telemedicine** program as follows:
 - o Visit the Maple website: <https://www.getmaple.ca/csu/>
 - o Navigate to the section: Opting out (halfway down the left-hand side)
 - o Complete the Opt-out form for Maple virtual care program

We strongly recommend that you keep the confirmation of your opt-out or coverage change.
If you have any questions concerning your Health and/or Dental plan, please contact [Studentcare](#).
For questions regarding the Telemedicine program, please contact [Maple](#).
We wish you success in your studies at Concordia.
Best Regards,

Student accounts office, on behalf of Dean of Students Office



Université Concordia University
Student Accounts Office
studentaccounts@concordia.ca

[View this message in your browser](#)



September 9, 2022

GSA - Health insurance

Student ID: #####

Hi ##First_Name## ##Last_Name##,

Please find below some important information about your health and dental insurance, which is administered by the Graduate Student Association (GSA) for their members through an insurance broker called Studentcare.

Please note that Concordia University itself does **not** administer the health and dental plan; the University simply collects the insurance premium fees on behalf of your student association.

You may have noticed that your insurance premium has now been billed. To verify the amount, please log into the [Student Hub](#), then select [My CU Account](#).

Here is what is **important** for you to know:

- The Health and Dental plan opt-out period is September 6 - September 23, 2022.

Please follow the steps listed below to opt out or make a change to your coverage:

1. Log on to the Studentcare portal: <http://www.studentcare.ca/>
2. Select your student association: Concordia University graduate students (GSA)
3. Navigate to the section: Change-of-Coverage & Opt out Period (halfway down the right-hand side)
4. Use your Concordia student ID as your ID

We strongly recommend that you keep the confirmation of your opt-out or coverage change.

If you have any questions concerning your plan, please contact [Studentcare](#).

We wish you success in your studies at Concordia.

Best Regards,

Student accounts office, on behalf of Dean of Students Office



Université Concordia University
Student Accounts Office
studentaccounts@concordia.ca

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September 9, 2022

CSU - Health insurance and Virtual Health Care (Telemedicine)

Student ID: #####

Hi ##First_Name## ##Last_Name##,

Please find below some important information regarding changes to the Telemedicine (Virtual Health Care) program in addition to your health and dental insurance, which is administered by the Concordia Student Union (CSU) for their members.

To verify the amount, please log into the [Student Hub](#), then select [My CU Account](#).

Please note that Concordia University does **not** administer the health, dental and telemedicine plan; the University simply collects the insurance premium fees on behalf of your student association.

Here is what is **important** for you to know:

1. The Health, Dental and Telemedicine opt-out period is September 6 - September 23, 2022
2. You can choose to opt-out of the **Health and/or Dental plan** as follows:
 - o Log on to the Studentcare portal: <http://www.studentcare.ca/>
 - o Select your student association: Concordia University undergraduate students (CSU)
 - o Navigate to the section: Change-of-Coverage & Opt out Period (halfway down the right-hand side)
 - o Use your Concordia student ID as your ID
3. You can choose to opt-out of the **Telemedicine** program as follows:
 - o Visit the Maple website: <https://www.getmaple.ca/csu/>
 - o Navigate to the section: Opting out (halfway down the left-hand side)
 - o Complete the Opt-out form for Maple virtual care program

We strongly recommend that you keep the confirmation of your opt-out or coverage change.
If you have any questions concerning your Health and/or Dental plan, please contact [Studentcare](#).
For questions regarding the Telemedicine program, please contact [Maple](#).
We wish you success in your studies at Concordia.
Best Regards,

Student accounts office, on behalf of Dean of Students Office



Université Concordia University
Student Accounts Office
studentaccounts@concordia.ca

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January 12, 2023

GSA - Health insurance

Student ID: #####

Hi ##First_Name## ##Last_Name##,

Please find below some important information about your health and dental insurance, which is administered by the Graduate Student Association (GSA) for their members through an insurance broker called Studentcare.

Please note that Concordia University itself does **not** administer the health and dental plan; the University simply collects the insurance premium fees on behalf of your student association.

You may have noticed that your insurance premium has now been billed. To verify the amount, please log into the [Student Hub](#), then select [My CU Account](#).

Here is what is **important** for you to know:

- The Health and Dental plan opt-out period is January 9 - January 24, 2023.

Please follow the steps listed below to opt out or make a change to your coverage:

1. Log on to the Studentcare portal: <http://www.studentcare.ca/>
2. Select your student association: Concordia University graduate students (GSA)
3. Navigate to the section: Change-of-Coverage & Opt out Period (halfway down the right-hand side)
4. Use your Concordia student ID as your ID

We strongly recommend that you keep the confirmation of your opt-out or coverage change.

If you have any questions concerning your plan, please contact [Studentcare](#).

We wish you success in your studies at Concordia.

Best Regards,

Student accounts office, on behalf of Dean of Students Office



Université Concordia University
Student Accounts Office
studentaccounts@concordia.ca

[View this message in your browser](#)



January 12, 2023

CSU - Health insurance and Virtual Health Care (Telemedicine)

Student ID: #####

Hi ##First_Name## ##Last_Name##,

Please find below some important information regarding changes to the Telemedicine (Virtual Health Care) program in addition to your health and dental insurance, which is administered by the Concordia Student Union (CSU) for their members.

To verify the amount, please log into the [Student Hub](#), then select [My CU Account](#).

Please note that Concordia University does **not** administer the health, dental and telemedicine plan; the University simply collects the insurance premium fees on behalf of your student association.

Here is what is **important** for you to know:

1. The Health, Dental and Telemedicine opt-out period is January 9 - January 24, 2023
2. You can choose to opt-out of the **Health and/or Dental plan** as follows:
 - o Log on to the Studentcare portal: <http://www.studentcare.ca/>
 - o Select your student association: Concordia University undergraduate students (CSU)
 - o Navigate to the section: Change-of-Coverage & Opt out Period (halfway down the right-hand side)
 - o Use your Concordia student ID as your ID
3. You can choose to opt-out of the **Telemedicine** program as follows:
 - o Visit the Maple website: <https://www.getmaple.ca/csu/>
 - o Navigate to the section: Opting out (halfway down the left-hand side)
 - o Complete the Opt-out form for Maple virtual care program

We strongly recommend that you keep the confirmation of your opt-out or coverage change.
If you have any questions concerning your Health and/or Dental plan, please contact [Studentcare](#).
For questions regarding the Telemedicine program, please contact [Maple](#).
We wish you success in your studies at Concordia.
Best Regards,

Student accounts office, on behalf of Dean of Students Office



Université Concordia University
Student Accounts Office
studentaccounts@concordia.ca

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September 6, 2023

GSA - Health insurance

Student ID: #####

Hi ##First_Name## ##Last_Name##,

Please find below some important information about your health and dental insurance, which is administered by the Graduate Student Association (GSA) for their members through an insurance broker called Studentcare.

Please note that Concordia University itself does **not** administer the health and dental plan; the University simply collects the insurance premium fees on behalf of your student association and remits the fees to it.

You may have noticed that your insurance premium has now been billed. To verify the amount, please log into the [Student Hub](#), then select [My CU Account](#).

Here is what is **important** for you to know:

- The Health and Dental plan opt-out period is September 5 - September 25, 2023.

Please follow the steps listed below to opt out or make a change to your coverage:

1. Log on to the Studentcare portal: <http://www.studentcare.ca/>
2. Select your student association: Concordia University graduate students (GSA)
3. Navigate to the section: Change-of-Coverage & Opt out Period (halfway down the right-hand side)
4. Use your Concordia student ID as your ID

We strongly recommend that you keep the confirmation of your opt-out or coverage change.

If you have any questions concerning your plan, please contact [Studentcare](#).

We wish you success in your studies at Concordia.

Best Regards,

Student accounts office, on behalf of Dean of Students Office



Université Concordia University
Student Accounts Office
studentaccounts@concordia.ca

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September 6, 2023

CSU - Health, Dental and Virtual Health Care (Telemedicine) plan

Student ID: #####

Hi ##First_Name## ##Last_Name##,

Please find below some important information regarding changes to the Telemedicine (Virtual Health Care) program in addition to your health and dental insurance, which is administered by the Concordia Student Union (CSU) for their members.

To verify the amount, please log into the [Student Hub](#), then select [My CU Account](#).

Please note that Concordia University does **not** administer the health, dental and telemedicine plan; the University simply collects the insurance premium fees on behalf of your student association and remits the fees to it.

Here is what is **important** for you to know:

4. The Health, Dental and Telemedicine opt-out period is September 5 - September 25, 2023
5. You can choose to opt-out of the **Health and/or Dental plan** as follows:
 - Log on to the Studentcare portal: <http://www.studentcare.ca/>
 - Select your student association: Concordia University undergraduate students (CSU)
 - Navigate to the section: Change-of-Coverage & Opt out Period (halfway down the right-hand side)
 - Use your Concordia student ID as your ID
6. You can choose to opt-out of the **Telemedicine** program as follows:
 - Visit the Maple website: <https://www.getmaple.ca/csu/>
 - Navigate to the section: Opting out (halfway down the left-hand side)
 - Complete the Opt-out form for Maple virtual care program

We strongly recommend that you keep the confirmation of your opt-out or coverage change.
If you have any questions concerning your Health and/or Dental plan, please contact [Studentcare](#).
For questions regarding the Telemedicine program, please contact [Maple](#).
We wish you success in your studies at Concordia.
Best Regards,

Student accounts office, on behalf of Dean of Students Office



Université Concordia University
Student Accounts Office
studentaccounts@concordia.ca

NO.: 500-06-001245-238

**SUPERIOR COURT
DISTRICT OF MONTREAL**

ARIELLE NAGAR

Applicant

- v. -

**DESJARDINS SÉCURITÉ FINANCIÈRE,
COMPAGNIE D'ASSURANCE VIE**

ET AL.

Defendants

EXHIBIT R-2

BO-0042

1001260977

Mtre. Vincent Rochette, Mtre. Maya Angenot

maya.angenot@nortonrosefulbright.com

vincent.rochette@nortonrosefulbright.com

NORTON ROSE FULBRIGHT CANADA LLP

BARRISTERS & SOLICITORS

1 Place Ville Marie, Suite 2500

Montréal, Quebec H3B 1R1

Telephone: 514.847.4310|418.640.5921

Fax: 514.286.5474

Notifications-mtl@nortonrosefulbright.com

NO.: 500-06-001245-238

**SUPERIOR COURT
DISTRICT OF MONTREAL**

ARIELLE NAGAR

Applicant

- v. -

**DESJARDINS SÉCURITÉ FINANCIÈRE,
COMPAGNIE D'ASSURANCE VIE**

ET AL.

Defendants

**APPLICATION OF THE DEFENDANT
UNIVERSITÉ CONCORDIA FOR LEAVE TO FILE
RELEVANT EVIDENCE
(Article 574, al. 3 C.p.c.)**

BO-0042

1001260977

Mtre. Vincent Rochette, Mtre. Maya Angenot

maya.angenot@nortonrosefulbright.com

vincent.rochette@nortonrosefulbright.com

NORTON ROSE FULBRIGHT CANADA LLP

BARRISTERS & SOLICITORS

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Montréal, Quebec H3B 1R1

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Notifications-mtl@nortonrosefulbright.com