

C A N A D A

PROVINCE OF QUÉBEC
DISTRICT OF **MONTREAL**

N^o: **500-06-001327-242**

SUPERIOR COURT
(Class Action Division)

MAXIME PAQUIN-CHARBONNEAU

**DANIEL JUNIOR MARC MÉLANÇON-
GAUDREAU**

Applicants

v.

INNOMAR STRATEGIES INC.

CENCORA INC.

Defendants

AFFIDAVIT OF JEFF MACDONALD

I, Jeff MacDonald, Vice-President, Client Specialty Services, having my professional domicile at 3470, Superior Court, in the City of Oakville, Ontario, L6L 0C4, being duly sworn and under oath, state:

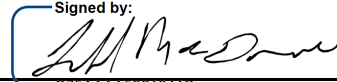
1. I am the Vice-President, Client Specialty Services at Innomar Strategies Inc. ("**Innomar**"). I have been with the company since 2016 and have held my current position for over 9 years.
2. I have reviewed an English translation of the *Demande d'autorisation d'exercer une action collective et pour être représentant modifiée* notified by the Applicants on January 10, 2025.
3. As part of my job responsibilities and duties, I lead a team of over 1,300 associates located across Canada and I am responsible for overseeing patient experience in over 145 patient support programs that Innomar manages nationally.
4. Patient support programs (PSPs) are comprehensive services designed to help patients navigate their healthcare journey and improve health outcomes, especially when dealing with chronic or complex conditions. Patients who are enrolled in PSPs receive personalized assistance in a number of ways, such as education and guidance on prescription medicines and therapy options, assistance in accessing medications, financial aid, and ongoing support from professionals.

- 2 -

5. I was part of the response team to the February 21, 2024 incident that impacted Cencora Inc., Innomar's parent company. As such, I am familiar with the type of information for patients enrolled in PSPs that was potentially affected in the incident.
6. Based on the information that was provided to the response team, I understand that the information potentially affected in the incident is limited to that indicated in the Notice of Data Security Incident (which both Applicants have received and filed as Exhibits R-2, R-16 and R-17) and does not include bank account information, credit card numbers, or social insurance numbers of patients enrolled in PSPs.
7. I have specifically validated that the information relating to the Applicants that
 - a) Innomar collected in the context of the PfizerFlex and Xhale+ PSPs; and
 - b) was potentially affected in the incidentdoes not include the Applicants' bank account information, credit card numbers, or social insurance numbers.
8. All of the facts alleged herein are true.

AND I HAVE SIGNED:

Signed by:



JEFF MACDONALD

SOLEMNLY AFFIRMED BEFORE ME, in
MONTREAL, on April 7, 2025

DocuSigned by:



(#226 539)

Commissioner for taking affidavits

Nº: 500-06-001327-242

SUPERIOR COURT
(Class Action Division)
DISTRICT OF MONTREAL

MAXIME PAQUIN-CHARBONNEAU

**DANIEL JUNIOR MARC MÉLANÇON-
GAUDREAU**

Applicants

v.

INNOMAR STRATEGIES INC.

CENCORA INC.

Defendants

AFFIDAVIT OF JEFF MACDONALD

ORIGINAL

The logo for the law firm Blakes, featuring the word "Blakes" in a stylized, cursive script.

Mtre. Caroline Biron, Ad. E. BB-8098

Mtre. Andréa Daigle

BLAKE, CASSELS & GRAYDON LLP

Barristers & Solicitors

1 Place Ville Marie, Suite 3000

Montréal, Québec H3B 4N8

Tel: 514-982-5021

514-982-4126

Fax: 514 982-4099

Email: caroline.biron@blakes.com

andrea.daigle@blakes.com

Our File: 66137-1

Bruna, Melissa

De: Bruna, Melissa
Envoyé: 7 avril 2025 13:34
À: mlapointe@lapointelegal.ca; schahine@lapointelegal.ca; sdyck@lapointelegal.ca; evilleneuve@lapointelegal.ca
Cc: Biron, Caroline; Daigle, Andrea
Objet: NOTIFICATION - Maxime Paquin-Charbonneau et al. v. Innomar Strategies Inc. et al. (500-06-001327-242) Affidavit of Jeff MacDonald
Pièces jointes: 2025-04-07 - Affidavit Jeff MacDonald.pdf; 2025-04-07 - Endos.pdf
Importance: Haute

Suivi:	Destinataire	Réception	Lire
	mlapointe@lapointelegal.ca		
	schahine@lapointelegal.ca		
	sdyck@lapointelegal.ca		
	evilleneuve@lapointelegal.ca		
	Biron, Caroline	Remis: 2025-04-07 13:35	Lu: 2025-04-07 13:37
	Daigle, Andrea	Remis: 2025-04-07 13:35	Lu: 2025-04-07 13:42

NOTIFICATION BY EMAIL

(Art. 134 C.p.c.)

From : **Mtre. Caroline Biron**
Mtre. Andréa Daigle
Blake, Cassels & Graydon LLP
1 Place Ville Marie, Suite 3000
Montréal, Québec H3B 4N8
caroline.biron@blakes.com
andrea.daigle@blakes.com
(Attorneys for Defendants Cencora Inc. and Innomar Strategies Inc.)

To : **Mtre. Maryse Lapointe**
Mtre. Salam Chahine
Mtre. Stéfan Dyck
Mtre. Esther Villeneuve
Lapointe Légal Inc.
1124 rue Marie-Anne Est, Suite 22
Montréal, Québec H2J 2B7
mlapointe@lapointelegal.ca
schahine@lapointelegal.ca
sdyck@lapointelegal.ca
evilleneuve@lapointelegal.ca
(Attorneys for Applicants)

Parties : *Maxime Paquin-Charbonneau et al. v. Innomar Strategies Inc. et al.*

Court No. : 500-06-001327-242

Nature of document : Affidavit of Jeff MacDonald

=====

The present email constitutes notification of the Affidavit of Jeff MacDonald

Melissa M. Bruna (elle/she)
Adjointe juridique de/Legal Assistant of
Maude Gérin-Lajoie, Andréa Daigle et Samuel Lavoie
melissa.bruna@blakes.com
T. +1-514-982-4068