

CANADA

PROVINCE OF QUEBEC
DISTRICT OF MONTREAL

NO: 500-06-001009-196

(Class Action)
SUPERIOR COURT

HUGO LANGLOIS, domiciled at [REDACTED]
[REDACTED]

Applicant

-vs-

**FÉDÉRATION DES CAISSES DESJARDINS
DU QUÉBEC**, legal person having its head
office at 100, rue des Commandeurs, Lévis,
district of Québec, Province of Québec, G6V
7N5

and

LA CAISSE POPULAIRE DE RAGUENEAU,
legal person having its principal establishment
at 550 Route 138, Ragueneau, District of Baie
Comeau, Province of Québec, G0H 1S0

and

**CAISSE POPULAIRE DESJARDINS DE
HAVRE-SAINT-PIERRE**, legal person having
its principal establishment at 1072 rue de la
Dulcinée, Havre-Saint-Pierre, District of
Mingan, Province of Québec, G0G 1P0

and

**CAISSE POPULAIRE DESJARDINS DE
BAIE-COMEAU**, legal person having its
principal establishment at 267 boulevard
Lasalle, Baie-Comeau, District of Baie-
Comeau, Province of Québec, G4Z 1S7

and

**CAISSE POPULAIRE DESJARDINS DE
MINGAN-ANTICOSTI**, legal person having its

principal establishment at 998, Chemin du roi, CP 40, Longue-Pointe-de Mingan, District of Mingan, Province of Québec, G0G 1V0

and

LA CAISSE POPULAIRE DESJARDINS DE SEPT-ÎLES, legal person having its principal establishment at 760 Laure boulevard, Sept-Îles, District of Mingan, Province of Québec, G4R 1Y4

and

CAISSE DESJARDINS DE PORT-CARTIER legal person having its principal establishment at 8 boul. des Îles, Port-Cartier, District of Mingan, Province of Québec, G5B 2J4

and

CAISSE POPULAIRE DESJARDINS DE HAUTERIVE, legal person having its principal establishment at 990 Laflèche boulevard, Baie-Comeau, District of Baie-Comeau, Province of Québec, G5C 2W9

and

CAISSE POPULAIRE DESJARDINS DE BLANC-SABLON, legal person having its principal establishment at 1056 Dr. Camille-Marcoux boulevard, Lourdes-de-Blanc Sablon, District of Mingan, Province of Québec, G0G 1W0

and

CAISSE POPULAIRE DESJARDINS DU SAGUENAY-SAINT-LAURENT, legal person having its principal establishment at 11 Sirois Street, CP 159, Les Escoumins, District of Baie-Comeau, Province of Québec, G0T 1K0

and

CAISSE POPULAIRE DESJARDINS DE TÊTE-À-LA-BALEINE, legal person having its principal establishment at 101 rue de la Chute, Tête-à-la-Baleine, District of Mingan, Province of Québec, G0G 2W0

and

CAISSE DESJARDINS DU CENTRE DE LA HAUTE-CÔTE-NORD, legal person having its principal establishment at 53, 2^e avenue, Forestville, District of Baie-Comeau, Province of Québec, G0T1E0

and

LA CAISSE POPULAIRE DE LA TABATIÈRE, legal person having its principal establishment at 6, rue Desjardins, Gros-Mécatina (La Tabatière), District of Mingan, Province of Québec, G0G 1T0

and

CAISSE DESJARDINS DE LA BAIE DES CHALEURS, legal person having its principal establishment at 554, boulevard Perron Est, CP 2067, Maria, District of Bonaventure, Province of Québec, G0C 1Y0

and

CAISSE POPULAIRE DESJARDINS MER ET MONTAGNES, legal person having its principal establishment at 2, Rue de Couvent, Grande-Vallée, District of Gaspé, Province of Québec, G0E1K0

and

CAISSE POPULAIRE DESJARDINS DU CENTRE-SUD GASPÉSIEN, legal person having its principal establishment at 70, Boul. René-Lévesque Est, Chandler, District de Gaspé, Province of Québec, G0C 1K0

and

CAISSE DESJARDINS DE LA POINTE DE LA GASPÉSIE, legal person having its principal establishment at 80, Rue Jacques-Cartier, Gaspé, District of Gaspé, Province of Québec, G4X 2V2

and

CAISSE POPULAIRE DESJARDINS DES RAMÉES, legal person having its principal establishment at 1278, Ch. De la Vernière, Les Îles-de-la-Madelaine (L'Étang-du-Nord), District of Gaspé, Province of Québec, G4T 3E6

and

CAISSE POPULAIRE DESJARDINS DE HÂVRE-AUX-MAISONS, legal person having its principal establishment at 38, Ch. Central, Les Îles-de-la-Madelaine, District of Gaspé, Province of Québec, G4T 5G9

and

CAISSE DESJARDINS DU LITTORAL GASPÉSIEN, legal person having its principal establishment at 73, Grande-Allée Est, Grande-Rivière, District of Gaspé, Province of Québec, G0C 1V0

and

CAISSE POPULAIRE DESJARDINS DE LA HAUTE-GASPÉSIE, legal person having its principal establishment at 10, 1^{re} avenue Est, Sainte-Anne-Des-Monts, District of Gaspé, Province of Québec, G4V 1A3

and

CAISSE POPULAIRE DESJARDINS DE RIVIÈRE-DU-LOUP, legal person having its principal establishment at 315, Boul. Armand-

Thériault, Rivière-du-Loup, District of Kamouraska, Province of Québec, G5R 0C5

and

CAISSE DESJARDINS DU BIC-SAINT-FABIEN, legal person having its principal establishment at 157, Rue de Sainte-Cécile-du-Bic, Rimouski, District of Rimouski, Province of Québec, G0L 1B0

and

CAISSE DESJARDINS DE RIMOUSKI, legal person having its principal establishment at 100, Rue Julie-Réhel, Rimouski, District of Rimouski, Province of Québec, G5L 0G6

and

CAISSE DESJARDINS DE MONT-JOLI-EST DE LA MITIS, legal person having its principal establishment at 1553, Boul. Jacques-Cartier, Mont-Joli, District of Rimouski, Province of Québec, G5H 2V9

and

CAISSE DESJARDINS VALLÉE DE LA MATAPÉDIA, legal person having its principal establishment at 15, rue du Pont, Amqui, District of Rimouski, Province of Québec, G5J 0E6

and

CAISSE DESJARDINS DE VIGER ET VILLERAY, legal person having its principal establishment at 91, Rue Saint-Jean-Baptiste, CP 197, L'Isle-Verte, District of Kamouraska, Province of Québec, G0L1K0

and

CAISSE DESJARDINS DE LA MATANIE, legal person having its principal establishment at 300, Rue du Bon-Pasteur, CP 248, Matane,

District of Rimouski, Province of Québec, G4W
3N2

and

CAISSE DESJARDINS DES BASQUES, legal person having its principal establishment at 80, Rue Notre-Dame Ouest, Trois-Pistoles, District of Kamouraska, Province of Québec, G0L 4K0

and

CAISSE DESJARDINS DE LA RIVIÈRE NEIGETTE, legal person having its principal establishment at 24, Rue Principale, Saint-Anaclet-de-Lessard, District of Rimouski, Province of Québec, G0K 1H0

and

CAISSE DESJARDINS DES LACS DE TÉMISCOUATA, legal person having its principal establishment at 415, Av. Principale, Dégelis, District of Kamouraska, Province of Québec, G5T 1L4

and

CAISSE DESJARDINS TRANSCONTINENTAL-PORTAGE, legal person having its principal establishment at 1857, Rue Principale, Pohénégamook, District of Kamouraska, Province of Québec, G0L 1J0

and

CAISSE DESJARDINS DE LA RÉGION DE THETFORD, legal person having its principal establishment at 300, Boulevard Frontenac Est, Thetford Mines, District of Frontenac, Province of Québec, G6G 7M8

and

CAISSE DESJARDINS DES ETCHEMINS, legal person having its principal establishment at 223, 2^{ième} Avenue, Lac-Etchemin, District of Beauce, Province of Québec, G0R 1S0

and

CAISSE DESJARDINS DU SUD DE LA BEAUCE, legal person having its principal establishment at 2880, 25^{ième} Avenue, Saint-Prosper, District of Beauce, Province of Québec, G0M 1Y0

and

CAISSE DESJARDINS DE BELLECHASSE, legal person having its principal establishment at 730, Route Bégin, Saint-Anselme, District of Beauce, Province of Québec, G0R 2N0

and

CAISSE DESJARDINS DE BEAUCE-CENTRE, legal person having its principal establishment at 825, Avenue du Palais, Saint-Joseph-de-Beauce, District of Beauce, Province of Québec, G0S 2V0

and

CAISSE DESJARDINS DE L'ANSE DE LA POCATIÈRE, legal person having its principal establishment at 308, 4^{ième} Avenue, La Pocatière, District of Kamouraska, Province of Québec, G0R 1Z0

and

CAISSE DESJARDINS DES SOMMETS DE LA BEAUCE, legal person having its principal establishment at 9, Route 271 Sud, Saint-Éphrem-de-Beauce, District of Beauce, Province of Québec, G0M 1R0

and

CAISSE DESJARDINS DE LA NOUVELLE-BEAUCE, legal person having its principal establishment at 275, Avenue Marguerite-Bourgeoys, Sainte-Marie, District of Beauce, Province of Québec, G6E 3Y9

and

CAISSE DESJARDINS DE LA MRC DE MONTMAGNY, legal person having its principal establishment at 116, Boulevard Taché Ouest, Montmagny, District of Montmagny, Province of Québec, G5V 3A5

and

CAISSE DESJARDINS DU CENTRE DE KAMOURASKA, legal person having its principal establishment at 620, Rue Taché, Saint-Pascal, District of Kamouraska, Province of Québec, G0L 3Y0

and

CAISSE DESJARDINS DU NORD DE L'ISLET, legal person having its principal establishment at 339, Boulevard Nilus-Leclerc, L'Islet, District of Montmagny, Province of Québec, G0R 2C0

and

CAISSE DESJARDINS DU SUD DE LA CHAUDIÈRE, legal person having its principal establishment at 10555, Boulevard Lacroix, Saint-Georges, District of Beauce, Province of Québec, G5Y 1K2

and

CAISSE DESJARDINS DES CHAMPS ET DES BOIS, legal person having its principal establishment at 487, Avenue de l'École, Saint-Alexandre-de-Kamouraska, District of Kamouraska, Province of Québec, G0L 2G0

and

CAISSE DESJARDINS DU CARREFOUR DES LACS, legal person having its principal establishment at 572, Avenue Jacques-Cartier, Disraëli, District of Frontenac, Province of Québec, G0N 1E0

and

CAISSE DESJARDINS DU SUD DE L'ISLET ET DES HAUTES-TERRES, legal person having its principal establishment at 112, Rue Principale, Saint-Pamphile, District of Montmagny, Province of Québec, G0R 3X0

and

CAISSE DESJARDINS DES CHUTES MONTMORENCY, legal person having its principal establishment at 4, Rue Vachon, Québec, District of Québec, Province of Québec, G1C 2V2

and

CAISSE POPULAIRE DESJARDINS DE CHARLESBOURG, legal person having its principal establishment at 155, 76^e Rue Est, Québec, District of Québec, Province of Québec, G1H 1G4

and

CAISSE DESJARDINS DE BEAUPORT, legal person having its principal establishment at 799, Rue Clemenceau, Québec, District of Québec, Province of Québec, G1C 8J7

and

CAISSE DESJARDINS DE QUÉBEC, legal person having its principal establishment at 150, Rue Marie-de-l'Incarnation, Québec, District of Québec, Province of Québec, G1N 4G8

and

CAISSE DESJARDINS DU PLATEAU MONTCALM, legal person having its principal establishment at 1351, Chemin Sainte-Foy, Québec, District of Québec, Province of Québec, G1S 2N2

and

CAISSE DESJARDINS DE LA CÔTE-DE-BEAUPRÉ, legal person having its principal establishment at 9751, Boulevard Sainte-Anne, Sainte-Anne-de-Beaupré, District of Québec, Province of Québec, G0A 3C0

and

CAISSE DESJARDINS DE L'ÎLE-D'ORLÉANS, legal person having its principal establishment at 1185, Chemin Royal, Saint-Pierre-de-l'Île-d'Orléans, District of Québec, Province of Québec, G0A 4E0

and

CAISSE DESJARDINS DE LIMOILOU, legal person having its principal establishment at 800, 3^{ième} Avenue, Québec, District of Québec, Province of Québec, G1L 2W9

and

CAISSE DESJARDINS DE LA CHAUDIÈRE, legal person having its principal establishment at 103-1190B Rue de Courchevel, Lévis, District of Québec, Province of Québec, G6W 0M6

and

CAISSE DESJARDINS DE LÉVIS, legal person having its principal establishment at 995, Boulevard Alphonse-Desjardins, Lévis District of Québec, Province of Québec, G6V 0M5

and

CAISSE DESJARDINS DE L'OUEST DE PORTNEUF, legal person having its principal establishment at 1075, Boulevard Bona-Dussault, Saint-Marc-des-Carières, District of Québec, Province of Québec, G0A 4B0

and

CAISSE POPULAIRE DESJARDINS DU PIÉMONT LAURENTIEN, legal person having its principal establishment at 1638, Rue Notre-Dame, L'Ancienne-Lorette, District of Québec, Province of Québec, G2E 3B6

and

CAISSE DESJARDINS DE CAP-ROUGE-SAINT-AUGUSTIN, legal person having its principal establishment at 1111, Boulevard de la Chaudière, Québec, District of Québec, Province of Québec, G1Y 3T4

and

CAISSE POPULAIRE DESJARDINS DE LES ECUREUILS, legal person having its principal establishment at 984, Rue Notre-Dame, Donnacona, District of Québec, Province of Québec, G3M1J5

and

CAISSE POPULAIRE DESJARDINS DE SAINT-RAYMOND-SAINTE-CATHERINE, legal person having its principal establishment at 225, Avenue Saint-Maxime, Saint-Raymond, District of Québec, Province of Québec, G3L 3W2

and

CAISSE DESJARDINS DU CENTRE DE PORTNEUF, legal person having its principal establishment at 1, Rue du Jardin, Pont-

Rouge, District of Québec, Province of Québec, G3H 0H6

and

CAISSE POPULAIRE DESJARDINS DE NEUVILLE, legal person having its principal establishment at 757, Rue des Érables, Neuville, District of Québec, Province of Québec, G0A 2R0

and

CAISSE DESJARDINS DU CENTRE DE LOTBINIÈRE, legal person having its principal establishment at 140, Rue Principale, Saint-Apollinaire, District of Québec, Province of Québec, G0S 2E0

and

CAISSE DESJARDINS DE SILLERY- SAINT-LOUIS-DE-FRANCE, legal person having its principal establishment at 1444, Avenue Maguire, Québec, District of Québec, Province of Québec, G1T 1Z3

and

CAISSE DESJARDINS DES RIVIÈRES DE QUÉBEC, legal person having its principal establishment at 2287, Avenue Chauveau, Québec, District of Québec, Province of Québec, G2C 0G7

and

CAISSE DESJARDINS DE L'UNIVERSITÉ LAVAL, legal person having its principal establishment at 1506-2325, Rue de l'Université, Québec, District of Québec, Province of Québec, G1V 0B3

and

CAISSE DESJARDINS DE WENDAKE, legal person having its principal establishment at 155, Rue Chef-Aimé-Romain, Wendake, District of Québec, Province of Québec, G0A 4V0

and

CAISSE DESJARDINS DE SAINTE-FOY, legal person having its principal establishment at 200-990, Avenue de Bourgogne, Québec, District of Québec, Province of Québec, G1W 0E8

and

CAISSE DESJARDINS DE CHARLEVOIX-EST, legal person having its principal establishment at 130, Rue John-Nairne, La Malbaie, District of Charlevoix, Province of Québec, G5A 1Y1

and

CAISSE DESJARDINS DU FLEUVE ET DES MONTAGNES (CHARLEVOIX), legal person having its principal establishment at 2, Rue Saint-Jean-Baptiste, Baie-Saint-Paul, District of Charlevoix, Province of Québec, G3Z1L7

and

CAISSE POPULAIRE DESJARDINS DE L'ÎLE-AUX-COUDRES, legal person having its principal establishment at 29, Chemin de la Traverse, L'Isle-aux-Coudres, District of Charlevoix, Province of Québec, G0A 3J0

and

CAISSE DESJARDINS DE CHICOUTIMI, legal person having its principal establishment at 245, Rue Racine Est, CP 8180, Chicoutimi, District of Chicoutimi, Province of Québec, G0A 3J0

and

CAISSE DESJARDINS DU DOMAINE-DU-ROY, legal person having its principal establishment at 841, Boulevard Saint-Joseph, Roberval, District of Roberval, Province of Québec, G8H 2L6

and

CAISSE DESJARDINS DE JONQUIÈRE, legal person having its principal establishment at 2358, Rue Saint-Dominique, CP 991, Jonquière, District of Chicoutimi, Province of Québec, G7X 7W8

and

CAISSE POPULAIRE DESJARDINS D'ALMA, legal person having its principal establishment at 600, Rue Collard Ouest, CP 2036, Alma, District of Alma, Province of Québec, G8B 5W1

and

CAISSE DESJARDINS DES CINQ-CANTONS, legal person having its principal establishment at 535, Rue Saint-Alphonse, Saint-Bruno, District of Alma, Province of Québec, G0W 2L0

and

CAISSE DESJARDINS DE LA BAIE, legal person having its principal establishment at 1262, 6^{ième} Avenue, Saguenay, District of Chicoutimi, Province of Québec, G7B 1R4

CAISSE DESJARDINS DU NORD DU LAC-SAINT-JEAN, legal person having its principal establishment at 1200, Boulevard Wallberg, Dobleau-Mistassini, District of Roberval, Province of Québec, G8L 1H1

and

CAISSE DESJARDINS D'ARVIDA KÉNOG-AMI, legal person having its principal establishment at 1970, Boulevard Mellon, Jonquière, District of Chicoutimi, Province of Québec, G7S 3H1

and

CAISSE DESJARDINS DU BAS-SAGUENAY, legal person having its principal establishment at 243, Rue Saint-Jean-Baptiste, L'Anse-Saint-Jean, District of Chicoutimi, Province of Québec, G0V 1J0

and

CAISSE DESJARDINS DE LA RIVE-NORD DU SAGUENAY, legal person having its principal establishment at 2212, Rue Roussel, Chicoutimi, District of Chicoutimi, Province of Québec, G7G 1W7

and

CAISSE POPULAIRE DESJARDINS DES PLAINES BORÉALES, legal person having its principal establishment at 1032, Rue Saint-Cyrille, Normandin, District of Roberval, Province of Québec, G8M 4H5

and

CAISSE DESJARDINS DE PEKUAKAMI, legal person having its principal establishment at 1838, Rue Ouiatchouan, Mashteuiatsh, District of Roberval, Province of Québec, G0W 2H0

and

CAISSE DESJARDINS DE GENTILLY LÉVRARD-RIVIÈRE DU CHÊNE, legal person having its principal establishment at 1780, Avenue des Hirondelles, Bécancour,

District of Trois-Rivières, Province of Québec,
G9H 4L7

and

CAISSE DESJARDINS DES CHÊNES, legal person having its principal establishment at 242, Rue Sainte-Thérèse, Saint-Germain-de-Grantham, District of Drummond, Province of Québec, J0C 1K0

and

CAISSE DESJARDINS DE GODEFROY, legal person having its principal establishment at 4265, Boulevard Port-Royal, Bécancour, District of Trois-Rivières, Province of Québec, G9H 1Z3

and

CAISSE DESJARDINS DE NICOLET, legal person having its principal establishment at 181, Rue Notre-Dame, Nicolet, District of Trois-Rivières, Province of Québec, J3T 1V8

and

CAISSE POPULAIRE DESJARDINS DE L'EST DE DRUMMOND, legal person having its principal establishment at 330, Rue Notre-Dame, Notre-Dame-du-Bon-Conseil, District of Drummond, Province of Québec, J0C 1A0

and

CAISSE DESJARDINS DES BOIS-FRANCS, legal person having its principal establishment at 300, Boulevard des Bois-Francis Sud, CP, 800, Victoriaville, District of Arthabaska, Province of Québec, G6P 7W7

and

CAISSE DESJARDINS DE L'ÉRABLE, legal person having its principal establishment at 1658, Rue Saint-Calixte, CP 187, Plessisville, District of Frontenac, Province of Québec, G6L 2Y7

and

CAISSE DESJARDINS DE DRUMMONDVILLE, legal person having its principal establishment at 460, Boulevard Saint-Joseph, Drummondville, District of Drummond, Province of Québec, J2C 2A8

and

CAISSE DESJARDINS DU CENTRE-DE-LA-MAURICIE, legal person having its principal establishment at 2500, 105^{ième} Avenue, Shawinigan, District of Saint-Maurice, Province of Québec, G9P 1P6

and

CAISSE DESJARDINS DE L'EST DE TROIS-RIVIÈRES, legal person having its principal establishment at 670, Boulevard Thibeau, Trois-Rivières, District of Trois-Rivières, Province of Québec, G8T 6Z8

and

LA CAISSE POPULAIRE DE MASKINONGÉ, legal person having its principal establishment at 62, Rue Saint-Aimé, Maskinongé, District of Trois-Rivières, Province of Québec, J0K 1N0

and

LA CAISSE POPULAIRE DE NOTRE DAME DU MONT CARMEL, legal person having its principal establishment at 3960, Rue Monseigneur-Béliveau, Notre-Dame-du-Mont-Carmel, District of Trois-Rivières, Province of Québec, G0X 3J0

and

CAISSE DESJARDINS DE TROIS-RIVIÈRES, legal person having its principal establishment at 5625, Boulevard Jean-XXIII, Trois-Rivières, District of Trois-Rivières, Province of Québec, G8Z 4B2

and

LA CAISSE POPULAIRE DE ST-ALEXIS DES MONTS, legal person having its principal establishment at 41, Rue Richard, Saint-Alexis-Des-Monts, District of Saint-Maurice, Province of Québec, J0K 1V0

and

CAISSE DESJARDINS DE MÉKINAC-DES CHENAUX, legal person having its principal establishment at 400, Rue Notre-Dame, Saint-Tite, District of Saint-Maurice, Province of Québec, G0X 3H0

and

CAISSE POPULAIRE DESJARDINS CITÉ DE SHAWINIGAN, legal person having its principal establishment at 1560, Rue Trudel, Shawinigan, District of Saint-Maurice, Province of Québec, G9N 0A2

and

CAISSE DESJARDINS DE LA TUQUE, legal person having its principal establishment at 341, Rue Saint-Joseph, La Tuque, District of Saint-Maurice, Province of Québec, G9X 1L3

and

CAISSE DESJARDINS DE L'OUEST DE LA MAURICIE, legal person having its principal establishment at 75, Avenue Saint-Laurent,

Louiseville, District of Trois-Rivières, Province of Québec, J5V 1J6

and

CAISSE DESJARDINS DE SAINT-BONIFACE, legal person having its principal establishment at 120, Rue Guillemette, Saint-Boniface, District of Saint-Maurice, Province of Québec, G0X 2L0

and

CAISSE DESJARDINS DES VERTS-SOMMETS DE L'ESTRIE, legal person having its principal establishment at 155, Rue Child, Coaticook, District of Saint-François, Province of Québec, J1A 2B4

and

CAISSE DESJARDINS DE LAC MÉGANTIC – LE GRANIT, legal person having its principal establishment at 4749, Rue Laval, Lac-Mégantic, District of Mégantic, Province of Québec, G6B 1C8

and

CAISSE DESJARDINS DU NORD DE SHERBROOKE, legal person having its principal establishment at 1845, Rue King Ouest, Sherbrooke, District of Saint-François, Province of Québec, J1J 2E4

and

CAISSE DESJARDINS DES SOURCES, legal person having its principal establishment at 535, 1^{re} Avenue, Asbestos, District of Saint-François, Province of Québec, J1T 3Y3

and

CAISSE DESJARDINS DU HAUT-SAINT-FRANÇOIS, legal person having its principal establishment at 46, Rue de l'Hôtel-de-Ville, East Angus, District of Saint-François, Province of Québec, J0B 1R0

and

CAISSE DESJARDINS DU LAC-MEMPHRÉMAGOG, legal person having its principal establishment at 230, Rue Principale Ouest, Magog, District of Saint-François, Province of Québec, J1X 2A5

and

CAISSE DESJARDINS DU VAL-SAINT-FRANÇOIS, legal person having its principal establishment at 77, Rue Saint-Georges, Windsor, District of Saint-François, Province of Québec, J1S 2K5

and

CAISSE DESJARDINS DES DEUX-RIVIÈRES DE SHERBROOKE, legal person having its principal establishment at 1261, Rue King Est, Sherbrooke, District of Saint-François, Province of Québec, J1G 1E7

and

CAISSE DESJARDINS DE BROME-MISSISQUOI, legal person having its principal establishment at 101, Rue Principale, Cowansville, District of Bedford, Province of Québec, J2K 1J3

and

CAISSE DESJARDINS DE GRANBY-HAUTE-YAMASKA, legal person having its principal establishment at 450, Rue Principale, Granby, District of Bedford, Province of Québec, J2G 2X1

and

CAISSE POPULAIRE DE WATERLOO, legal person having its principal establishment at 4990, Rue Foster, Waterloo, District of Bedford, Province of Québec, J0E 2N0

and

CAISSE POPULAIRE DESJARDINS DU BASSIN-DE-CHAMBLY, legal person having its principal establishment at 455, Boulevard Brassard, Chambly, District of Longueuil, Province of Québec, J3L 4V6

and

LA CAISSE POPULAIRE DE ST-THÉODORE D'ACTON, legal person having its principal establishment at 1698, Rue Principale, Saint-Théodore-d'Acton, District of Saint-Hyacinthe, Province of Québec, J0H 1Z0

and

CAISSE DESJARDINS DE LA RÉGION DE SAINT-HYACINTHE, legal person having its principal establishment at 1697, Rue Girouard Ouest, Saint-Hyacinthe, District of Saint-Hyacinthe, Province of Québec, J2S 2Z9

and

CAISSE DESJARDINS DE LA POMME-RAIE, legal person having its principal establishment at 200, Rue Desjardins Est, Farnham, District of Bedford, Province of Québec, J2N 1P9

and

CAISSE DESJARDINS PIERRE-DE SAUREL, legal person having its principal establishment at 385, Boulevard Polinquin, Sorel-Tracy, District of Richelieu, Province of Québec, J3P 5N6

and

CAISSE DESJARDINS D'ACTON VALE-RIVIÈRE NOIRE, legal person having its principal establishment at 1100, Rue Saint-André, Acton Vale, District of Saint-Hyacinthe, Province of Québec, J0H 1A0

and

CAISSE DESJARDINS DE LA SEIGNEURIE DE RAMEZAY, legal person having its principal establishment at 385, Rue Couture, Sainte-Hélène-de-Bagot, District of Saint-Hyacinthe, Province of Québec, J0H 1M0

and

CAISSE DESJARDINS DE ROUVILLE, legal person having its principal establishment at 1111, 3^e Rue, Richelieu, District of Saint-Hyacinthe, Province of Québec, J3L 3Z2

and

CAISSE DESJARDINS DE BELOEIL-MONT-SAINT-HILAIRE, legal person having its principal establishment at 830, Rue Laurier, Beloeil, District of Saint-Hyacinthe, Province of Québec, J3G 4K4

and

CAISSE DESJARDINS DU HAUT-RICHELIEU, legal person having its principal establishment at 730, Boulevard d'Iberville, Saint-Jean-sur-Richelieu, District of Iberville Province of Québec, J2X 3Z9

and

CAISSE DESJARDINS DE JOLIETTE ET DU CENTRE DE LANAUDIÈRE, legal person having its principal establishment at 1995, boulevard Firestone Est,

Notre-Dame-des-Prairies, District of Joliette,
Province of Québec, J6E 0V5

and

CAISSE POPULAIRE DESJARDINS DE ST-ROCH-DE-L'ACHIGAN, legal person having its principal establishment at 40, Rue du Docteur-Wilfrid-Locat, St-Roch-de-l'Achigan, District of Joliette, Province of Québec, J0K 3H0

and

CAISSE DESJARDINS DE LA NOUVELLE-ACADIE, legal person having its principal establishment at 4, Rue Beaudry, Saint-Jacques, District of Joliette, Province of Québec, J0K 2R0

and

CAISSE DESJARDINS DE MONTCALM ET DE LA OUAREAU, legal person having its principal establishment at 3690, Rue Queen, Rawdon, District of Joliette, Province of Québec, J0K 1S0

and

CAISSE POPULAIRE DESJARDINS LE MANOIR, legal person having its principal establishment at 820, Montée Masson, Mascouche, District of Joliette, Province of Québec, J7K 3B6

and

CAISSE DESJARDINS DE D'AUTRAY, legal person having its principal establishment at 701, Avenue Gilles-Villeneuve, Berthierville, District of Joliette, Province of Québec, J0K 1A0

and

CAISSE DESJARDINS DU NORD DE LANAUDIÈRE, legal person having its principal establishment at 20, Rue Saint-Gabriel, Saint-Gabriel-de-Brandon, District of Joliette, Province of Québec, J0K 2N0

and

CAISSE DESJARDINS DE TERREBONNE, legal person having its principal establishment at 801, Boulevard des Seigneurs, Terrebonne, District of Terrebonne, Province of Québec, J6W 1T5

and

CAISSE DESJARDINS PIERRE-LE GARDEUR, legal person having its principal establishment at 477, Rue Notre-Dame, Repentigny, District of Joliette, Province of Québec, J6A 2T6

and

CAISSE DESJARDINS DES MOISSONS-ET-DE-ROUSSILLON, legal person having its principal establishment at 296, Voie de Desserte de la route 132, Saint-Constant, District of Longueuil, Province of Québec, J5A 2C9

and

CAISSE DESJARDINS DE SALABERRY-DE-VALLEYFIELD, legal person having its principal establishment at 120, Rue Alexandre, Salaberry-de-Valleyfield, District of Beauharnois, Province of Québec, J6S 3K4

and

CAISSE POPULAIRE DESJARDINS BEAUHARNOIS, legal person having its principal establishment at 555, Rue Ellice, Beauharnois, District of Beauharnois, Province of Québec, J6N 1X8

and

CAISSE DESJARDINS DU MONT-SAINT-BRUNO, legal person having its principal establishment at 1649, Rue Montarville, Saint-Bruno-de-Montarville, District of Longueuil, Province of Québec, J3V 3T8

and

CAISSE DESJARDINS DES PATRIOTES, legal person having its principal establishment at 1071, Boulevard de Montarville, Boucherville District of Longueuil, Province of Québec, J4B 6R2

and

CAISSE DESJARDINS DE L'OUEST DE LA MONTÉRÉGIE, legal person having its principal establishment at 724, Boulevard Saint-Jean-Baptiste, Mercier, District of Beauharnois, Province of Québec, J6R 0B2

and

CAISSE DESJARDINS DE SAINT-HUBERT, legal person having its principal establishment at 2400, Boulevard Gaétan-Boucher, Longueuil, District of Longueuil, Province of Québec, J3Y 5B7

and

CAISSE DESJARDINS DE CHÂTEAUGUAY, legal person having its principal establishment at 235, Chemin de la Haute-Rivière, Châteauguay, District of Beauharnois, Province of Québec, J6K 5B1

and

CAISSE DESJARDINS DU VIEUX-LONGUEUIL, legal person having its principal establishment at 1, Rue Saint-Charles Ouest, Longueuil, District of Longueuil, Province of Québec, J4H 1C4

and

CAISSE POPULAIRE DE LA PRAIRIE, legal person having its principal establishment at 450, Boulevard Taschereau, La Prairie, District of Longueuil, Province of Québec, J5R 1V1

and

CAISSE DESJARDINS DES SEIGNEURIES DE LA FRONTIÈRE, legal person having its principal establishment at 373, Rue Saint-Jacques, Napierville, District of Iberville, Province of Québec, J0J 1L0

and

CAISSE DESJARDINS DU HAUT-SAINT-LAURENT, legal person having its principal establishment at 4B, Rue Bridge, Ormstown, District of Beauharnois, Province of Québec, J0S 1K0

and

CAISSE DESJARDINS CHARLES-LEMOYNE, legal person having its principal establishment at 477, Avenue Victoria, Saint-Lambert, District of Longueuil, Province of Québec, J4P 2J1

and

CAISSE DESJARDINS DE BROSSARD, legal person having its principal establishment 8800, Boulevard Leduc, Brossard, District of Longueuil, Province of Québec, J4Y 0G4

and

CAISSE DESJARDINS PIERRE-BOUCHER, legal person having its principal establishment at 2401, Boulevard Rolland-Therrien, Longueuil, District of Longueuil, Province of Québec, J4N 1C5

and

CAISSE POPULAIRE KAHNAWAKE, legal person having its principal establishment at Kahnawake Complexe Services, River Road, CP 1987, Kahnawake, District of Longueuil, Province of Québec, J0L 1B0

and

CAISSE DESJARDINS DE LA VALLÉE DES PAYS-D'EN-HAUT, legal person having its principal establishment at 218, Rue Principale, Saint-Sauveur, District of Terrebonne, Province of Québec, J0R 1R0

and

CAISSE DESJARDINS THÉRÈSE-DE BLAINVILLE, legal person having its principal establishment at 201, Boulevard du Curé-Labelle, Sainte-Thérèse, District of Terrebonne, Province of Québec, J7E 2X6

and

CAISSE DESJARDINS DE LA RIVIÈRE-DU-NORD, legal person having its principal establishment at 100, Place du Curé-Labelle, Saint-Jérôme, District of Terrebonne, Province of Québec, J7Z 1Z6

and

CAISSE DESJARDINS DE MONT-TREMBLANT 470, Rue Charbonneau, Mont-Tremblant, District de Terrebonne, Province of Québec, J8E 3H4

and

CAISSE DESJARDINS DU COEUR DES HAUTES-LAURENTIDES, legal person having its principal establishment at 597, Boulevard Albiny-Paquette, Mont-Laurier, District of Labelle, Province of Québec, J9L 1L5

and

CAISSE DESJARDINS DU LAC DES DEUX-MONTAGNES, legal person having its principal establishment at 100, Rue Notre-Dame, Oka, District of Terrebonne, Province of Québec, J0N 1E0

and

CAISSE POPULAIRE DESJARDINS DE SAINTE-AGATHE-DES-MONTS, legal person having its principal establishment at 77, Rue Principale Est, Sainte-Agathe-des-Monts, District of Terrebonne, Province of Québec, J8C 1J5

and

CAISSE POPULAIRE DESJARDINS DE MIRABEL, legal person having its principal establishment at 8000, Rue Saint-Jacques, Mirabel, District of Terrebonne, Province of Québec, J7N 2B7

and

CAISSE DESJARDINS DE SAINT-MARTIN DE LAVAL, legal person having its principal establishment at 2466, Boulevard Curé-Labelle, Laval, District of Laval, Province of Québec, H7T 1R1

and

CAISSE POPULAIRE DESJARDINS DE L'ENVOLEE, legal person having its principal

establishment at 13845, Boulevard du Curé-Labelle, CP 1200, Mirabel, District of Terrebonne, Province of Québec, J7J 1A1

and

CAISSE DESJARDINS D'ARGENTEUIL, legal person having its principal establishment at 570, Rue Principale, Lachute, District of Terrebonne, Province of Québec, J8H 1Y7

and

CAISSE DESJARDINS DE LA ROUGE, legal person having its principal establishment at 550, Rue de l'Annonciation Nord, Rivière-Rouge, District of Labelle, Province of Québec, J0T 1T0

and

CAISSE DESJARDINS DU NORD DE LAVAL, legal person having its principal establishment at 396, Boulevard Curé-Labelle, Laval, District of Laval, Province of Québec, H7L 4T7

and

CAISSE DESJARDINS DE L'OUEST DE LAVAL, legal person having its principal establishment at 440, Autoroute Chomedey, Laval, District of Laval, Province of Québec, H7X 3S9

and

CAISSE DESJARDINS DE CHOMEDEY, legal person having its principal establishment at 3075, Boulevard Cartier Ouest, Laval, District of Laval, Province of Québec, H7V 1J4

and

CAISSE DESJARDINS DU CENTRE ET DE L'EST DE LAVAL, legal person having its

principal establishment at 4433, Boulevard de la Concorde Est, Laval, District de Laval, Province of Québec, H7C 1M4

and

CAISSE DESJARDINS DE SAINT-EUSTACHE-DEUX-MONTAGNES, legal person having its principal establishment at 575, Boulevard Arthur-Sauvé, Saint-Eustache, District of Terrebonne, Province of Québec, J7P 4X5

and

CAISSE DESJARDINS DES GRANDS BOULEVARDS DE LAVAL, legal person having its principal establishment at 3111, Boulevard Saint-Martin Ouest, Laval, District of Laval, Province of Québec, H7T 0K2

and

CAISSE DESJARDINS DU SUD-OUEST DE MONTRÉAL, legal person having its principal establishment at 4545 rue Notre-Dame Ouest, Montréal, District of Montréal, Province of Québec, H4C 1S3

and

CAISSE DESJARDINS DU QUARTIER-LATIN DE MONTRÉAL, legal person having its principal establishment at 1255, Rue Berri, Montréal, District of Montréal, Province of Québec, H2L 4C6

and

CAISSE DESJARDINS DU CENTRE-NORD DE MONTRÉAL, legal person having its principal establishment at 7915, Boulevard Saint-Laurent, Montréal, District of Montréal, Province of Québec, H2R 1X2

and

CAISSE DESJARDINS DU PLATEAU-MONT-ROYAL, legal person having its principal establishment at 435, Avenue du Mont-Royal Est, Montréal, District of Montréal, Province of Québec, H2J 1W2

and

CAISSE DESJARDINS DE BORDEAUX—CARTIERVILLE—SAINT-LAURENT, legal person having its principal establishment at 145-3500 Boulevard de la Côte-Vertu, Montréal, District of Montréal, Province of Québec, H4R 1P8

and

CAISSE DESJARDINS DES VERSANTS DU MONT ROYAL, legal person having its principal establishment at 1145, Avenue Bernard, Montréal, District of Montréal, Province of Québec, H2V 1V4

and

CAISSE DESJARDINS DE NOTRE-DAME-DE-GRÂCE, legal person having its principal establishment at 3830, Boulevard Décarie, Montréal, District of Montréal, Province of Québec, H4A 3J7

and

CAISSE DESJARDINS DE L'ÎLE-DES-SOEURS—VERDUN, legal person having its principal establishment at 5035, Rue de Verdun, Verdun, District of Montréal, Province of Québec, H4G 1N5

and

CAISSE DESJARDINS DE LACHINE, legal person having its principal establishment at

910, Rue Provost, Lachine, District of Montréal, Province of Québec, H8S 1M9

and

CAISSE DESJARDINS DE VAUDREUIL - SOULANGES, legal person having its principal establishment at 1-100, Boulevard Don-Quichotte, L'Île-Perrot, District of Beauharnois, Province of Québec, J7V 6L7

and

CAISSE DESJARDINS DE L'OUEST-DE-L'ÎLE, legal person having its principal establishment at 303, Boulevard Brunswick, Pointe-Claire, District of Montréal, Province of Québec, H9R 4Y2

and

CAISSE DESJARDINS DE LASALLE, legal person having its principal establishment at 7700, Boulevard Newman, Montréal, District of Montréal, Province of Québec, H8N 1X8

and

CAISSE DESJARDINS DU COMPLEXE DESJARDINS, legal person having its principal establishment at 226-5 Complexe Desjardins, Niveau Promenade, CP 244, Succ. Desjardins, Montréal, Province of Québec, H5B 1B4

and

CAISSE DESJARDINS DE ROSEMONT – LA-PETITE-PATRIE, legal person having its principal establishment at 2597, Rue Beaubien Est, Montréal, District of Montréal, Province of Québec, H1Y 1G4

and

CAISSE DESJARDINS DU COEUR-DE-L'ÎLE, legal person having its principal

establishment at 2050, Boulevard Rosemont, Montréal, District of Montréal, Province of Québec, H2G 1T1

and

CAISSE DESJARDINS DE MERCIER-EST – ANJOU, legal person having its principal establishment at 7000, Boulevard Joseph-Renaud, Anjou, District of Montréal, Province of Québec, H1K 3V5

and

CAISSE DESJARDINS DE POINTE-AUX-TREMBLES, legal person having its principal establishment at 13120, Rue Sherbrooke Est, Montréal, District of Montréal, Province of Québec, H1A3W2

and

CAISSE DESJARDINS DU CENTRE-EST DE MONTRÉAL, legal person having its principal establishment at 6955, Rue Jean-Talon Est, Montréal, District of Montréal, Province of Québec, H1S 1N2

and

CAISSE POPULAIRE DESJARDINS D'HOCHELAGA-MAISONNEUVE, legal person having its principal establishment at 3871, Rue Ontario Est, Montréal, District of Montréal, Province of Québec, H1W 1S7

and

CAISSE POPULAIRE DESJARDINS UKRAINIENNE DE MONTRÉAL, legal person having its principal establishment at 3250, Rue Beaubien Est, Montréal, District of Montréal, Province of Québec, H1X 3C9

and

CAISSE DESJARDINS DE SAULT-AU-RÉCOLLET - MONTRÉAL-NORD, legal

person having its principal establishment at 10205, Boulevard Pie IX, Montréal, District of Montréal, Province of Québec, H1H 3Z4

and

CAISSE DESJARDINS DE RIVIÈRES-DES-PRAIRIES, legal person having its principal establishment at 8300, Boulevard Maurice-Duplessis, Montréal, District of Montréal, Province of Québec, H1E 3A3

and

CAISSE POPULAIRE DESJARDINS CANADIENNE ITALIENNE, legal person having its principal establishment at 6999, Boulevard Saint-Laurent, Montréal, District of Montréal, Province of Québec, H2S 3E1

and

CAISSE DESJARDINS DE HULL-AYLMER, legal person having its principal establishment at 250 boulevard Saint-Joseph, Gatineau, District of Gatineau, Province of Québec, J8Y 3X6

and

CAISSE DESJARDINS DES COLLINES-DE L'OUTAOUAIS, legal person having its principal establishment at 88 rue Principale Est, La Pêche, District of Gatineau, Province of Québec, J0X 2W0

and

CAISSE POPULAIRE DESJARDINS DE GATINEAU, legal person having its principal establishment at 655, Boulevard Saint-René Ouest, Gatineau, District of Gatineau, Province of Québec, J8T 8M4

and

CAISSE POPULAIRE DESJARDINS GRACEFIELD, legal person having its principal establishment at 32, rue Principale, C.P. 99, Gracefield, District of Gatineau, Province of Québec, J0X 1W0

and

CAISSE DESJARDINS DES RIVIÈRES DE PONTIAC, legal person having its principal establishment at 175 rue Principale, CP 70, Fort-Coulonge, District of Pontiac, Province of Québec, J0X 1V0

and

CAISSE POPULAIRE DESJARDINS DE LA HAUTE-GATINEAU, legal person having its principal establishment at 100 rue Principale Sud, bureau 29, Maniwaki, District of Labelle, Province of Québec, J9E 3L4

and

CAISSE DESJARDINS DU COEUR-DES-VALLÉES, legal person having its principal establishment at 104 rue Maclaren Est, Gatineau, District of Gatineau, Province of Québec, J8L 1K1

and

CAISSE DESJARDINS DE LA PETITE-NATION, legal person having its principal establishment at 105 rue Principale, Saint-André-Avellin, District of Gatineau, Province of Québec, J0V 1W0

and

CAISSE DESJARDINS DU TÉMISCAMINGUE, legal person having its principal establishment at 51 rue Sainte-Anne, Ville-Marie, District of Témiscamingue, Province of Québec, J9V 2B6

and

CAISSE DESJARDINS DE ROUYN-NORANDA, legal person having its principal establishment at 75 avenue Québec, Rouyn-Noranda, District of Rouyn-Noranda, Province of Québec, J9X 7A2

and

CAISSE DESJARDINS DE L'EST DE L'ABITIBI, legal person having its principal establishment at 602 3^e Avenue, Val-d'Or, District of Abitibi, Province of Québec, J9P 1S5

and

CAISSE DESJARDINS DE L'ABITIBI-OUEST, legal person having its principal establishment at 66 5^e Avenue Est, La Sarre, District of Abitibi, Province of Québec, J9Z 1K9

and

CAISSE DESJARDINS D'AMOS, legal person having its principal establishment at 2 rue Principale Nord, C.P. 670, Amos, District of Abitibi, Province of Québec, J9T 3X2

and

CAISSE DESJARDINS DE CHIBOUGAMAU, legal person having its principal establishment at 519, 3^e Rue, Chibougamau, District of Abitibi, Province of Québec, G8P 1N8

and

CAISSE DESJARDINS EENOU EYYOU, legal person having its principal establishment at 136 Amanda, Suite 200, Mistissini, District of Abitibi, Province of Québec, G0W 1C0

and

CAISSE DESJARDINS DE L'ADMINISTRATION ET DES SERVICES PUBLICS, legal person having its head office at 1035, rue De la Chevrotière, Québec, District of Québec, Province of Québec, G1R 5X4

and

CAISSE DESJARDINS DU RÉSEAU MUNICIPAL (MONTRÉAL, LONGUEUIL, REPENTIGNY), legal person having its principal establishment at 2600 boulevard Saint-Joseph, Montréal, District of Montréal, Province of Québec, H1Y 2A4

and

CAISSE DESJARDINS DES TRANSPORTS, legal person having its principal establishment at 5705 rue Sherbrooke Est, Montréal, District of Montréal, Province of Québec, H1N 1A8

and

CAISSE DESJARDINS DES POLICIERS ET POLICIÈRES, legal person having its principal establishment at 460 rue Gilford, Montréal, District of Montréal, Province of Québec, H2J 1N3

and

CAISSE DESJARDINS HYDRO, legal person having its principal establishment at 75 boulevard René-Lévesque Ouest, Suite 57, Montréal, District of Montréal, Province of Québec, H2Z 1A3

and

CAISSE D'ÉCONOMIE DESJARDINS DU PERSONNEL MUNICIPAL (QUÉBEC), legal person having its principal establishment at 600, boulevard Pierre-Bertrand, Suite 100,

Québec, District of Québec, Province of Québec, G1M 3W5

and

CAISSE DESJARDINS DES TECHNOLOGIES DE L'INFORMATION, legal person having its principal establishment at 288 rue Saint-Joseph, La Tuque, District of Saint-Maurice, Province of Québec, G9X 1K8

and

CAISSE D'ÉCONOMIE DESJARDINS DE LA MÉTALLURGIE ET DES PRODUITS FORESTIERS (SAGUENAY-LAC-SAINT-JEAN), legal person having its principal establishment at 1936 boulevard Mellon, Jonquière, District of Chicoutimi, Province of Québec, G7S 3H3

and

CAISSE DESJARDINS DES RESSOURCES NATURELLES, legal person having its principal establishment at 500 rue Arnaud, Sept-Îles, District of Mingan, Province of Québec, G4R 3B5

and

CAISSE DESJARDINS DU SECTEUR PUBLIC DE L'ESTRIE, legal person having its principal establishment at 560 rue Bowen Sud, Sherbrooke, District of Saint-François, Province of Québec, J1G 2E3

and

CAISSE DESJARDINS DES TRAVAILLEUSES ET TRAVAILLEURS UNIS, legal person having its principal establishment at 545 boulevard Crémazie Est, Suite 302, Montréal, District of Montréal, Province of Québec, H2M 2V1

and

CAISSE DESJARDINS DES MILITAIRES, legal person having its principal establishment at 190 rue Dubé, suite 109, Centre commercial Canex, Courcelette, District of Charlevoix, Province of Québec, G0A 1R1

and

CAISSE DESJARDINS PORTUGAISE, legal person having its principal establishment at 4244 boulevard Saint-Laurent, Montréal, District of Montréal, Province of Québec, H2W 1Z3

and

CAISSE DESJARDINS DU CHAÎNON, legal person having its principal establishment at 315 rue MacDonald, Suite 102, Saint-Jean-sur-Richelieu, District of Iberville, Province of Québec, J3B 8J3

and

CAISSE DESJARDINS DE L'ÉDUCATION, legal person having its principal establishment at 9405 rue Sherbrooke Est, Suite 2500, Montréal, District of Montréal, Province of Québec, H1L 6P3

and

CAISSE D'ÉCONOMIE DES LITUANIENS DE MONTRÉAL "LITAS" (faisant affaires sous la dénomination Montreal Lithuanian Credit Union "**Litas**"), legal person having its principal establishment at 1475, rue De Sève, Montréal, District of Montréal, Province of Québec, H4E 2A8

and

CAISSE D'ÉCONOMIE DESJARDINS DES EMPLOYÉS EN TÉLÉCOMMUNICATION, legal person having its principal establishment at 1050 Côte du Beaver Hall, Suite 340, Montréal, District of Montréal, Province of Québec, H2Z 0A5

and

CAISSE DESJARDINS DE LA CULTURE, legal person having its principal establishment at 215 rue Saint-Jacques Ouest, Suite 200, Montréal, District of Montréal, Province of Québec, H2Y 1M6

and

CAISSE DESJARDINS DU SECTEUR DE L'ENSEIGNEMENT DES BASSES-LAURENTIDES, legal person having its principal establishment at 500, chemin des Anciens, Deux-Montagnes, District of Terrebonne, Province of Québec, J7R 6A7

and

CAISSE D'ÉCONOMIE SOLIDAIRE DESJARDINS, legal person having its principal establishment at 155 boulevard Charest Est, Suite 500, Québec, District of Québec, Province of Québec, G1K 3G6

and

CAISSE DESJARDINS DES EMPLOYÉS DE VILLE DE LAVAL, legal person having its principal establishment at 4210 rue Garand, Laval, District of Laval, Province of Québec, H7L 5Z6

and

CAISSE DESJARDINS DU RÉSEAU DE LA

SANTÉ, legal person having its principal establishment at 2100 boulevard de Maisonneuve Est, Suite 102, Montréal, District of Montréal, Province of Québec, H2K 4S1

Defendants

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

I. INTRODUCTION

1. On June 20, 2019, Guy Cormier, the President and CEO of the Defendant, Fédération des caisses Desjardins du Québec ("**Desjardins**"), admitted publicly that the personal data of 2.9 million of its members (including personal and business accounts) was improperly and unlawfully accessed and shared by one of its employees to third parties,
2. Desjardins is a merchant operating in the financial services industry, either directly or through the various "Caisse Desjardins" Defendants, who are financial services cooperatives and members of Desjardins' credit unions, the Applicant referring to Desjardins' *CIDREQ* report (**Exhibit P-1**) and the *Act respecting financial services cooperatives*. All of the Defendants herein form part of the same network. The financial group to which Desjardins and the other Defendants belong is known as the "Mouvement Desjardins". The Applicant maintains that the Defendants are solidarily liable for the damages claimed herein;
3. Several media outlets reported, on June 20, 2019, on Desjardins' admission, the Applicant disclosing, as examples, the Journal de Montréal article as **Exhibit P-2** and the CBC News article as **Exhibit P-3**;
4. Pursuant to the articles and the admissions made by Desjardins, Desjardins did not have a sufficient system or adequate measures in place to adequately protect the risks of its members' personal and highly sensitive information being: (a) improperly accessed by employees who should not have had access to such information; (b) stolen; and (c) compromised given that Mr. Cormier stated the following during his June 20, 2019 interview, disclosed as **Exhibit P-4**, in reference to steps that Desjardins took *subsequent* to the breaches in question:

"Je peux vous assurer que ce stratagème-là ne pourra plus jamais être mis en vigueur chez Desjardins"

5. During the same interview, Mr. Cormier reiterated the following, the Applicant

disclosing **Exhibit P-5**:

“Ça là, ça a été annulé complètement comme stratagème et plus personnes chez Desjardins est en mesure de faire ça aujourd’hui.”

6. On June 20, 2019, Desjardins acknowledged that its affected members are entitled to compensation by offering them a 12-month credit monitoring plan, which includes access to daily credit reports, alerts of any changes, and identity theft insurance;
7. By doing so, Desjardins admits, without limitation, that credit monitoring services *are* necessary in this situation given the theft and disclosure of class members’ personal information to third parties;
8. However, the “compensation” offered by Desjardins is insufficient and leaves its members exposed and vulnerable after 12 months given that the risks to which they are exposed (which Desjardins admits) do not disappear after that period and members will, thereafter, continue to have to pay approximately \$19.95 per month plus tax for their own credit monitoring plan;
9. This Court has previously found (see *Zuckerman c. Target Corporation*, 2017 QCCS 110) that “*setting up credit monitoring and security alerts, obtaining credit reports, and cancelling cards or closing accounts and replacing them are not “ordinary annoyances, anxieties and fears that people living in society routinely, if sometimes reluctantly, accept” but may amount to something more*” (para. 73);
10. Consequently, the Applicant seeks to institute a class action on behalf of the following class:

Class:

All natural and legal persons affected by the Desjardins data breaches reported on June 20, 2019;

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

II. CONDITIONS REQUIRED TO AUTHORIZE THIS CLASS ACTION AND TO APPOINT THE STATUS OF REPRESENTATIVE PLAINTIFFS (SECTION 575 C.C.P.):

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

11. The Applicant has had an active account with the Defendant, Caisse Desjardins Beloeil-Mont-St-Hilaire, since approximately 2000 (the “**Account**”);
12. When the Applicant opened the Account, he was required to pay a \$5.00 fee as his “part de qualification” to become a Desjardins member. All Class members are

required to pay fees to become Desjardins members.

13. The Applicant pays monthly fees to the Defendant, Caisse Desjardins Beloeil-Mont-St-Hilaire, for the Account;
14. The Applicant's contractual relationship with the Defendant, Caisse Desjardins Beloeil-Mont-St-Hilaire, includes and requires that such Defendant and Desjardins take adequate measures and precautions to safeguard the personal and confidential information he provides them with;
15. In other words, part of the fees paid by the Applicant to the Defendant, Caisse Desjardins Beloeil-Mont-St-Hilaire, and such Defendant's contractual obligations towards the Applicant include the protection and non-disclosure of his personal and confidential information;
16. According to Mr. Cormier's June 20, 2019 admissions, class members' information that was compromised includes their names, addresses, birth dates, social insurance numbers, email addresses and information about their transaction habits;
17. Desjardins' security measures in place before the breach were insufficient as its President and CEO indicated that additional security measures had to be put in place to protect its customers' personal information in the future;
18. Therefore, the Applicant did not receive what he paid for to the Defendants, Caisse Desjardins Beloeil-Mont-St-Hilaire and Desjardins, and is entitled to a reduction of his obligations, as well as punitive damages of \$300.00;
19. The Applicant's claim for damages is based on breaches by the Defendant, Caisse Desjardins Beloeil-Mont-St-Hilaire, and the Defendant, Desjardins, of the following legislation:
 - a) Section 16 of Quebec's *Consumer Protection Act* (with respect to members of the Class who are consumers);
 - b) Articles 1458 and 1463 of the *Civil Code of Quebec*; and
 - c) Sections 5 and 9 of the *Québec Charter*;
20. The Applicant further submits that Desjardins should be required to pay for his credit monitoring for a period of at least 10 years (after the initial 12-months of credit monitoring offered by Desjardins,) the Applicant will have to pay approximately \$240.00 plus taxes per year to monitor his credit due to Desjardins' breaches and negligence;
21. The Applicant's damages are a direct and proximate result of Desjardins' omissions, breaches and negligence;

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

22. All Class members, regardless of which of the Defendants they contracted with, have a common interest in proving Desjardins' liability;
23. In this case, the legal and factual backgrounds at issue are common to all members of the Class;
24. Every Class member paid a portion of their monthly/annual fees to their respective Caisse Desjardins under the term that their private information would be safeguarded, whereas Defendants failed in doing so;
25. Every member of the Class should be entitled to a reduction of their obligations and a credit monitoring plan for more than 12-months (the Applicant requests 10 years);
26. Each Class member is also justified in claiming moral damages, punitive damages, and damages troubles and inconvenience;
27. All of the damages to the Class members are a direct and proximate result of the Defendants' negligence and breaches;
28. Individual questions, if any, pale by comparison to the common questions that are significant to the outcome of the present Application;
29. **The recourses of the Class members raise identical, similar or related questions of fact or law, namely:**
 - a) Were Defendants negligent in the storing and safekeeping of the personal and financial information of the Class members whose information was compromised?
 - b) Are Class members entitled to compensatory, moral or punitive damages and in what amounts?

C) THE COMPOSITION OF THE CLASS

30. 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;
31. According to Exhibits P-2 and P-3, there are 2.7 million individuals and approximately 173,000 businesses affected;
32. Class members are very numerous and are dispersed across the province, across Canada, and elsewhere;

33. These facts demonstrate that it would be impossible to contact each and every Class member to obtain mandates and to join them in one action;
34. 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 CLASS MEMBER REQUESTING TO BE APPOINTED AS REPRESENTATIVE PLAINTIFF IS IN A POSITION TO PROPERLY REPRESENT THE CLASS MEMBERS

35. The Applicant requests that he be appointed the status of representative plaintiff for the following main reasons:
 - a) he is a member of the Class and has a personal interest in seeking the conclusions proposed herein;
 - b) he 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) his interests are not antagonistic to those of other Class members;
36. Additionally, the Applicant respectfully adds that:
 - a) he has the time, energy, will and determination to assume all the responsibilities incumbent upon him in order to diligently carry out the action;
 - b) he mandated his attorneys to file the present application for the sole purpose of having his rights, as well as the rights of other Class members, recognized and protected so that they can be compensated and have their credit monitored free of charge for a period of more than the 12-months currently offered by Defendants;
 - c) he cooperates and will continue to fully cooperate with his attorneys, who have experience in consumer protection-related class actions;
 - d) he understands the nature of the action;
37. 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;
38. For the above reasons, the Applicant respectfully submits that his interest and competence are such that the present class action could proceed fairly and in the best interest of Class members;

III. NATURE OF THE ACTION AND CONCLUSIONS SOUGHT

39. The action that the Applicant wishes to institute on behalf of the members of the Class is an action in damages;

40. The conclusions that the Applicants wish to introduce by way of an originating application are:

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

CONDEMN the Defendants to pay the Representative Plaintiff and Class members compensatory damages in an amount to be determined;

CONDEMN the Defendants to pay the Representative Plaintiff and Class members moral damages and damages for troubles and inconvenience in an amount to be determined;

CONDEMN the Defendants to pay Class members an amount to be determined on account of punitive damages;

ORDER the collective recovery of all damages to the Class members;

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

DECLARE that Defendant, the Fédération des Caisses Desjardins du Québec, is solidarily liable with each of the 227 "Caisses Desjardins" Defendants named herein for the monetary condemnation pronounced against the latter;

ORDER the Defendants 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 at all levels, including the cost of all exhibits, 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;

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

IV. JURISDICTION

42. The Applicant suggests that this class action be exercised before the Superior Court in the district of Montreal, since he is domiciled and resides in the district of Montreal and his attorneys practice in such district.

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;
3. **APPOINT** the Applicant the status of Representative Plaintiff of the persons included in the Class herein described as:

Class:

All natural and legal persons affected by the Desjardins data breaches reported on June 20, 2019;

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

or any other Class to be determined by the Court;

4. **IDENTIFY** the principle questions of fact and law to be treated collectively as the following:
 - a) Were Defendants negligent in the storing and safekeeping of the personal and financial information of the Class members whose information was compromised by their employee?
 - b) Are Class members entitled to compensatory, moral or punitive damages and in what amounts?
5. **IDENTIFY** the conclusions sought by the class action to be instituted as being the following:
 - a) **GRANT** the Representative Plaintiff's action against the Defendants on behalf of all the Class members;
 - b) **CONDEMN** the Defendants to pay the Representative Plaintiff and Class members compensatory damages in an amount to be determined;
 - c) **CONDEMN** the Defendants to pay the Representative Plaintiff and Class members moral damages and damages for troubles and inconvenience in an amount to be determined;

- d) **CONDEMN** the Defendants to pay Class members an amount to be determined on account of punitive damages;
 - e) **ORDER** the collective recovery of all damages to the Class members;
 - f) **CONDEMN** the Defendants to pay interest and the additional indemnity on the above sums according to law from the date of service of the *Application to Authorize a Class Action*;
 - g) **DECLARE** that the Defendant, the Fédération des Caisses Desjardins du Québec, is solidarily liable with each of the 227 “Caisses Desjardins” Defendants named herein for the monetary condemnation pronounced against the latter;
 - h) **ORDER** the Defendants to deposit in the office of this Court the totality of the sums which forms part of the collective recovery, with interest and costs;
 - i) **ORDER** that the claims of individual Class members be the object of collective liquidation if the proof permits and alternately, by individual liquidation;
 - j) **CONDEMN** the Defendants to bear the costs of the present action at all levels, including the cost of all exhibits, 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;
 - k) **RENDER** any other order that this Honourable Court shall determine;
6. **DECLARE** that all members of the Class that have not requested their exclusion, be bound by any judgement to be rendered on the class action to be instituted in the manner provided for by the law;
7. **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 judgement to be rendered herein;
8. **ORDER** the publication of a notice to the members of the Class in accordance with article 579 C.C.P. within sixty (60) days from the judgement to be rendered herein in the “News” sections of the Saturday editions of Le Journal de Montréal and the Montreal Gazette;
9. **ORDER** that said notice be published on the Defendants’ various websites, Facebook pages and Twitter accounts, in a conspicuous place, with a link stating “Notice of a Class Action”;

10. **ORDER** the Defendants to send an Abbreviated Notice by e-mail to each Class member, to their last known e-mail address, with the subject line "Notice of a Class Action";
11. **ORDER** the Defendants to send a Notice by regular mail to each Class member, to their last known physical address, with the subject line "Notice of a Class Action";
12. **RENDER** any other order that this Honourable Court shall determine;
13. **THE WHOLE** with costs, including the court stamp, bailiff fees, stenographer fees and publication fees.

Montreal, June 21, 2019

(s) LPC Avocat Inc.

LPC AVOCAT INC.
Co-Counsel for Applicant

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Montreal, June 21, 2019

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

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 for Authorization to Institute a Class Action and to Appoint the Status of Representative Plaintiff, the Applicant intends to use the following exhibits:

- Exhibit P-1:** Extract of the enterprises' information statement from the Quebec enterprise register ("CIDREQ") for Fédération des caisses Desjardins du Québec;
- Exhibit P-2:** Copy of June 20, 2019 Journal de Montréal article titled "Des infos de 2,9 millions de membres dans la nature";
- Exhibit P-3:** Copy of June 20, 2019 CBC News article titled "Personal data of 2.9 million people leaked from Desjardins";
- Exhibit P-4:** Excerpt #1 of the press conference given by Mr. Guy Cormier on June 20, 2019;
- Exhibit P-5:** Excerpt #2 of the press conference given by Mr. Guy Cormier on June 20, 2019.

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, June 21, 2019

Montreal, June 21, 2019

(s) LPC Avocat Inc.

(s) Kugler Kandestin S.E.N.C.R.L.

LPC AVOCAT INC.
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NOTICE OF PRESENTATION
(articles 146 and 574 al. 2 C.C.P.)

TO: ALL DEFENDANTS

TAKE NOTICE that Applicants' *Application for Authorization to Institute 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 Division.

Montreal, June 21, 2019

Montreal, June 21, 2019

(s) *LPC Avocat Inc.*

(s) *Kugler Kandestin S.E.N.C.R.L.*

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500-06-001009-196

(Class Action)
SUPERIOR COURT
DISTRICT OF MONTREAL

HUGO LANGLOIS

Applicant

v.

**FÉDÉRATION DES CAISSES DESJARDINS DU
QUÉBEC ET ALS.**

Defendants

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

ORIGINAL

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