

Are you a former Aveos employee?

Or are you the spouse, common law partner, heir or beneficiary of one of those ex-employees?

A CLASS ACTION COULD AFFECT YOU. PLEASE READ THIS NOTICE CAREFULLY.

On May 15, 2018, a class action was authorized against Air Canada by Justice Jean-François Michaud of the Quebec Superior Court.

According to the representative of the class action, Gilbert McMullen, Air Canada violated the *Air Canada Public Participation Act* under which it had the obligation to maintain overhaul and maintenance centers in Montreal, Mississauga and Winnipeg.

WHO ARE THE MEMBERS OF THE CLASS ACTION?

You are a member of this class action if you fit into one of these 2 categories:

- You are an **ex-employee**, unionized or not, of Air Canada's overhaul and maintenance center in Montreal, Mississauga or Winnipeg and you were negatively impacted by Aveos' closure
- You are the **spouse, common law partner, heir or beneficiary** of one of those ex-employees

WHAT COULD YOU RECEIVE?

The class action seeks to obtain, for each member, a compensation for the damages suffered, including loss of income and social benefits (pension), stress, loss of self-esteem and other inconvenient resulting from Aveos' closure. Your spouse or common law partner could also be compensated for his or her loss.

We are also seeking an amount of \$10 000 per person as punitive damages.

YOU HAVE NOTHING TO DO TO BENEFIT FROM THE CLASS ACTION

All persons in the group described above will be entitled to compensation if the class action is successful. You do not have any forms to fill out for the moment or fees to pay.

YOUR RIGHT TO OPT OUT OF THE CLASS ACTION

You have until **Friday, December 7, 2018, 4:00PM EDT** to opt out of this class action. If you do not opt out from the class action, you will be bound by this action and will not be able to bring your own action against Air Canada.

To opt out, you must send a letter to the clerk of the Superior Court of Quebec at the following address:

1, Notre-Dame Street East, Montréal (Québec), H2Y 1B6

You must specify the court number of the class action: 500-06-000814-166.

You must also send a copy of that letter to the class members' lawyers, at the address found below.

THE MAIN ISSUES TO BE TREATED COLLECTIVELY

The authorization decision identified the following questions to be treated collectively for the benefit of class members:

1. Did Air Canada commit a fault by violating subsection 6(1)(d) of the *Air Canada Public Participation Act* before June 22, 2016?
2. Is Air Canada liable for the damages suffered by the plaintiff and the class members?
3. What damage did the plaintiff and the class members suffer?
4. Are the plaintiff and each class member entitled to punitive damages?
5. Have the spouses or common law partners of class members suffered direct and immediate harm?

THE CONCLUSIONS SOUGHT

The plaintiff seeks the following conclusions for himself and the class members:

GRANT the class action Application on behalf of all members of the group;

CONDEMN Air Canada to pay the plaintiff and each member of the class compensation for loss of employment income;

ORDER the collective recovery of class members' claims for loss of employment income;

CONDEMN the defendant to pay the plaintiff and each member of the Class an amount of \$ 15,000 for the non-pecuniary damage suffered by all members, namely stress, questioning, loss of self-esteem, insecurity, feeling of injustice and loss of enjoyment of life and ORDER the collective recovery of this amount;

CONDEMN the defendant to pay the individual claims of members for additional non-pecuniary damages such as psychological problems and insomnia, family problems, divorces and suicides;

CONDEMN the defendant to pay the plaintiff and each member of the Class an amount of \$ 50,000 as punitive damages;

CONDEMN Air Canada to pay, on all of the amounts mentioned above (except for punitive damages), interest at the legal rate and the additional indemnity provided for in article 1619 CCQ, as of the date of service of this Application for leave to institute a class action;

MAKE any other order that the Tribunal considers appropriate to safeguard the rights of the parties;

THE WHOLE with legal costs, including expert fees, notice fees, and costs for claims management.

INTERVENTIONS AND LEGAL COSTS

A class member can ask the Court for permission to intervene in the class action proceedings. The Court will authorize this intervention if it deems it useful to class members.

You do not have to pay class counsel or anyone else to participate in this class action. Indeed, if they obtain money or benefits for class members, class counsel may ask for legal fees and disbursements to be deducted from the sums obtained for class members.

FOR MORE INFORMATION

If you are a member of the class action and wish to receive information on the progress of the file, you can **register** to our mailing list by completing the form on the websites of Trudel Johnston & Lespérance (<http://tjl.quebec/en/>) or Jean-François Bertrand Avocats (<http://jfbertrandavocats.com/actions-collectives-aveos/>), or **contact** class counsel :



Trudel Johnston & Lespérance
750, Côte de la Place d'Armes, bureau 90
Montréal (Québec) H2Y 2X8
Ligne sans frais : 1 844 588-8385
info@tjl.quebec



Jean-François Bertrand Avocats
390, boulevard Charest Est, bureau 400
Québec (Québec) G1K 3H4
418 522-5777
avocats@jfbertrandavocats.com