

IKEA Settlement

ABICIDAN V. IKEA CANADA LIMITED PARTNERSHIP, 1137446 ONTARIO INC., IKEA LIMITED, IKEA PROPERTIES LIMITED AND INTER IKEA SYSTEMS B.V.

PLEASE READ THIS NOTICE CAREFULLY AS IT MAY AFFECT YOUR LEGAL RIGHTS

If you own an IKEA children’s chests of drawers taller than 60 cm (23 ½ inches) and/or an IKEA adult chests of drawers taller than 75 cm (29 ½ inches) (the "Chests of Drawers"), you are a member of the Class Action Settlement

- The Class action is about a recall that was announced by IKEA on June 28, 2016 regarding Chests of Drawers that did not meet the North American ASTM standard requirements on free-standing stability.
- Under the Settlement, IKEA agrees to provide the Compensation described in Question 8 herein below.
- Visit chestofdrawerssettlement.com to submit a Claim Form. You can also Opt-Out of (exclude yourself from) the Class action, or comment on or object to the Settlement.
- **Please read this notice carefully. Your legal rights will be affected, and you have a choice to make now.**

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS		DEADLINE
ACTIONS TO TAKE AND COMPENSATIONS OFFERED	<ul style="list-style-type: none"> • Visit an IKEA Canada retail location for a free wall anchoring kit • Contact IKEA Customer Support Centre at 1-800-661-9807 to receive a free wall anchoring kit by mail • Install the kit or contact IKEA Customer Support Centre at 1-800-661-9807 for a one-time free in-home anchoring kit installation service • Class Members who would not wish to secure the IKEA Chests of Drawers to the wall may return them to any IKEA location for a refund under the conditions mentioned herein below • Class Members who are not able to return their Chests of Drawers to an IKEA Store, for any reason, can contact IKEA Customer Support Centre at 1-888-444-5596 for a free Pickup Service in the province of Quebec. 	July 28, 2021
EXCLUDE YOURSELF (OPT-OUT)	Get no payment and no Compensation offered. This is the only option that allows you to keep your right to bring any other lawsuit against IKEA for claims related to this case.	June 28, 2021 at 23h59
COMMENT ON OR OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	The written objection must be sent to the Class Counsel, Mtre Joey Zukran, LPC Avocats Inc., by email to the address mentioned herein below by no later than the Objection Deadline. The written objection or comment must include all the elements described in the Settlement Agreement, available at www.lpclex.com/ikea .	June 28, 2021

	You can also ask to speak to the Court at the settlement approval hearing on June 30, 2021 at 9: AM, at the Montreal Courthouse (room 17.09) in person or virtually, which Teams link will be posted on the websites WWW.LPCLEX.COM/IKEA and chestofdrawerssettlement.com .	
DO NOTHING	Get no Compensation. Give up rights.	

- These rights and options - **and the deadlines to exercise them** - are explained in this notice.
- The Court in charge of this case still has to decide whether to approve the Settlement. The Compensations offered will be made if the Court approves the Settlement and after any appeals are resolved.

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BASIC INFORMATION

1. Why did I get this notice?

A Court approved this notice because the class action instituted by a Quebec consumer has been authorized and subsequently settled. Persons described in paragraph 6 of this notice have the right to know about the class action authorization and the proposed Settlement. If you qualify, you could be eligible to a Compensation.

To know if you qualify, see Question 6.

The person who sued is called the Plaintiff. The companies sued, IKEA Canada Limited Partnership, 1137446 Ontario Inc., IKEA Limited, IKEA Properties Limited and Inter IKEA Systems B.V (collectively “IKEA”), are called the Defendants.

2. What is this class action about?

The Class action is about a recall that was announced by IKEA on June 28, 2016 regarding Chests of Drawers that did not meet the North American ASTM standard requirements on free-standing stability (as per the online recall at: <http://www.IKEA.ca/saferhomestogether>).

3. What is a class action?

In a class action the Plaintiff acts as “**Class Representative**” and sues on behalf of himself and other persons who have similar claims. This group of persons is called the “**Class**,” and the persons in the Class are called “**Class Members**.” One Court resolves the issues for all Class Members, except for people who exclude themselves from the Class. The Honourable Justice Chantal Tremblay of the Superior Court of Quebec, district of Montreal (Canada), is in charge of this case. The case is *Abicidan v. IKEA Canada Limited Partnership, 1137446 Ontario Inc., IKEA Limited, IKEA Properties Limited and Inter IKEA Systems B.V.*, Superior Court of Quebec, court file no: 500-06-000797-163.

4. What is the current procedural step of this Class action?

On December 5, 2018, the Superior Court of Quebec authorized the bringing of a Class action. On March 5, 2019, the Court of Appeal confirmed this judgment. The parties subsequently agreed to settle the case and will be submitting the settlement to the Court for approval.

5. Why is there a Settlement?

The Court did not decide in favor of Plaintiff or Defendants. Instead, both sides agreed to a Settlement. That way, they avoid the costs and risks of a trial, and Class Members receive the Compensation. The Class Representative and his attorneys think the Settlement is a fair and reasonable resolution of the dispute.

WHO IS IN THE SETTLEMENT

6. Who is in the Settlement?

You are a member of the Class and eligible for a Settlement Compensation if, between January 1, 2002 and June 28, 2016, you purchased IKEA’s children Chests of Drawers taller than 60 cm (23½ inches), or adult Chests of Drawers taller than 75 cm (29½ inches), recalled by IKEA Canada, namely the following models: Askvoll, Brimnes, Brusali, Busunge, Hemnes, Hurdal, IKEA Ps 2012, Koppang, Kullen, Malm,

Nornas, Stockholm, Stuva, Sundvik, Tarva, Trogen, Trysil, Tyssedal, Undredal, Alesund, Alleby, Alvesta, Aneboda, Angus, Ånes, Arup, Askedal, Aspelund, Balstar, Bankeryd, Bergsmo, Bialitt, Birkeland, Blimp, Boj, Brett, Boksta, Bjorn, Borkvalla, Diktad, Edland, Elis, Engan, Eksil, Fjell, Fjord, Flaten, Fridolin, Granås, Gute, Haddal, Hajdeby, Hensvik, Herrestad, Holleby, Hovdal, Hopen, Hosteland, Kabin, Kirkenes, Knot, Kusk, Kurs, Kviby, Leksvik, Lo, Lomen, Mac, Mast, Mammut, Mandal, Meråker, Midsund, Natura, Narvik, Nordli, Nordnes, Nyvoll, Ottenby, Rakke, Ramberg, Ranvik, Rodd, Robin, Rustik, Sala, Skarnes, Sandefjord, Stranda, Sveio, Stavanger, Tassa, Tovik, Trandum, Trondheim, Varde, Vajer, Vallvik, Vestby, Vinstra, Visdalen, Vollen (hereinafter the “**Chests of Drawers**”).

7. What should I do if I am still not sure whether I am included?

If you are not sure whether you are included in the Class, you can ask Class Counsel at JZUKRAN@LPCLEX.COM for more information.

THE SETTLEMENT BENEFITS

8. What does the Settlement provide?

To get a Compensation from the Settlement, you may choose one of the following options:

A. Recall Benefits

IKEA has already launched a voluntary recall on June 26, 2016, which is still in force, as per the following website: (<http://www.IKEA.ca/saferhomestogether>). The Recall Benefits are therefore still provided to all Class Members:

- i. Free anchoring kit. Class Members could visit IKEA Canada retail locations for a free wall anchoring kit to use with the Chests of Drawers. To receive the anchoring kit for free by mail, Class Members could contact IKEA Customer Support Centre at 1-800-661-9807; or
- ii. Free in-home anchoring kit installation service. Class Members could install the kit themselves or contact IKEA Customer Support Centre at 1-800-661-9807 for a one-time free in-home anchoring kit installation service.
- iii. Full Refund (Chests of Drawers manufactured between January 2002 and June 2016). Class Members who do not wish to secure the affected IKEA Chests of Drawers manufactured between January 2002 and June 2016 to the wall could return them to any IKEA location for a refund.
- iv. Partial Store Credit (Chests of Drawers manufactured prior to January 2002). Class Members with Chests of Drawers manufactured prior to January 2002 will be eligible for a partial store credit.
- v. Limit of six (6) Chests of Drawers per Class Members. For all the Recall Benefits detailed above, there is a limit of six (6) Chests of Drawers per Class Members.

B. Pickup Service

In addition to the Recall Benefits detailed herein above, IKEA will offer a Pickup Service to Authorized Claimants in Quebec who are not able, for whatever reason, to return their Chests of Drawers to an IKEA store. The Pickup Service can be requested during sixty (60) days following the publication of the Notice of Settlement.

- i. Pickup Service Procedure. Class Members can call the IKEA Customer Support Centre at 1-888-444-5596 for a free Pickup service in Quebec.

- ii. Class Members will be asked to provide a proof of purchase of their Chests of Drawers through a Claim Form which will indicate: (1) the name of the Class Member or the residential address of the Class Member; (2) the location of the store in Quebec at which the Class Member purchased his/her Chests of Drawers; and (3) the amount paid for the Chests of Drawers. IKEA will retain its right to reject the Pickup Service or the Recall Benefits if an inquiry determines that the amount in the document was used to purchase items other than a Chest of Drawers.
- iii. The Pickup service will be scheduled to valid claimants after the Settlement is approved
- iv. Limit of one (1) Pickup per Residence and six (6) Chests of Drawers per Pickup. For the Pickup Service detailed above, there is a limit of one (1) Pickup per residence and a limit of six (6) Chests of Drawers being picked up per address.
- v. After the Chests of Drawers have been picked up, for those manufactured between January 2002 and June 2016, the Authorized Claimant will receive a refund card which can be presented in an IKEA store for conversion to the original method payment (for example: credit card or cash or by a refund to a credit card initiated over the phone and completed through a secure portal. A refund card can also be used at any IKEA store in Canada) ("**Refund Card**"). For IKEA Chests of Drawers manufactured prior to January 2002, the Authorized Claimant will receive a Partial Store Credit.
- vi. Avoiding Fraudulent Claims. To avoid inviting fraudulent claims, the claim made by anyone who already received a Refund or Partial Store Credit in the past under Recall Benefits will be rejected by the Claims Administrator.

9. What am I giving up if I stay in the Class?

Unless you exclude yourself with a timely filled out and submitted Opt-Out Form (see Question 13) or are otherwise deemed to have opted-out according to the Law, you cannot sue or be part of any other lawsuit against IKEA about the issues in this case. The "Releases" section in the Settlement Agreement describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement can be viewed at www.lpclex.com/ikea.

THE LAWYERS REPRESENTING YOU

10. Do I have a lawyer in the case?

Yes. The Court appointed Mr. Abicidan to represent the members of the Group. The law firm of LPC Avocats Inc. (Mtre Joey ZuKran) represents Mr. Abicidan and all the Class Members. This firm is called Class Counsel. You will not be charged for its services in this case.

11. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. If you want your own lawyer, you may hire one, but you will be responsible for any payment for that lawyer's services. For example, you can ask your own lawyer to appear in Court for you if you want someone other than Class Counsel to speak for you. You may also appear for yourself without a lawyer.

12. How will the lawyers be paid?

You do not have to pay Class Counsel. Class Counsel will ask the Court for their fees to be paid separately by IKEA. Such fees will not reduce the Compensation offered under the Settlement to the Class Members. Class Counsel has not been paid for services in this case since it began, and will seek

an amount of \$197,500 plus applicable taxes for legal fees, and \$2,500 to cover disbursements and expenses. The fees will compensate Class Counsel for investigating the facts, litigating the case, and negotiating and presenting the Settlement for Court approval. The costs of providing this Notice and administering the Settlement are being assumed by IKEA and will not reduce the Compensation offered under the Settlement to Class Members. Class Counsel will also ask the Court to approve the individual claim of the Class Representative in the amount of \$2,500.

EXCLUDING YOURSELF FROM THE CLASS AND SETTLEMENT (OPTING OUT)

If you do not want to be included in the Class and do not want Compensation from the proposed Settlement, and you want to keep your right, if any, to sue IKEA on your own about the legal issues in this case, then you must take steps to get out of the Class (and proposed Settlement). This is called excluding yourself from - or “opting out” of - the class action (and Settlement).

13. How do I get out of the Class and Settlement?

You may download an Opt-Out Form from the website www.lpclex.com/ikea and on the Claims Administrator’s website at chestofdrawerssettlement.com

You must submit the Opt-Out Form to the Clerk of the Superior Court of Quebec by registered or certified mail, postmarked **no later than June 28, 2021 at 23h59**, to the following address:

Superior Court of Quebec
Class Action Division
Montreal Courthouse, 1 Notre-Dame Street East,
Montreal, Quebec, H2Y 1B6
Court File No. 500-06-000797-163

14. If I don’t Opt-Out, can I sue IKEA for the same thing later?

No. Unless you Opt-Out, you give up the right to sue IKEA for the claims the Settlement resolves. You must exclude yourself from the Class if you want to pursue your own lawsuit.

15. What happens if I Opt-Out?

If you Opt-Out of the Class (and Settlement), you will not have any rights as a Class Member or member of the Settlement Class under the Settlement. You will not be eligible for any Compensation offered under this Settlement, you will not be bound by any further orders or judgments in this case and you will keep the right, if any, to sue IKEA on the claims alleged in the class action at your own expense.

OBJECTING TO THE SETTLEMENT

16. How do I tell the Court that I don’t like the Settlement?

If you’re a Class Member and do not Opt-Out of the Class, you can ask the Court to deny approval of the Settlement by filing an objection. You cannot ask the Court to order a larger settlement; the Court can only approve or deny the Settlement. If the Court denies approval, no Compensation as per Question 8, paragraph B, will be put in place and the lawsuit will continue. If that is what you want to happen, you must object by respecting the conditions below.

You must object to or comment on the proposed Settlement in writing. You may also appear at the Approval hearing **on June 30, 2021, at 9:30 AM at the Montreal Courthouse** (room 17.09) or **virtually, which Teams link will be posted on the websites WWW.LPCLEX.COM/IKEA and chestofdrawerssettlement.com**, either in person or through your own attorney. If you appear through your own attorney, you are responsible for paying that attorney's fees and disbursements.

To object or comment, you must submit your document to Mtre. Joey Zukran (JZUKRAN@LPCLEX.COM) by saying that you object to the proposed Settlement in the case of *Abicidan v. IKEA Canada Limited Partnership, 1137446 Ontario Inc., IKEA Limited, IKEA Properties Limited and Inter IKEA Systems B.V.*, Superior Court of Quebec, court file no: 500-06-000797-163, and you must include the following:

1. A heading indicating the following information: *Abicidan v. IKEA Canada Limited Partnership, 1137446 Ontario Inc., IKEA Limited, IKEA Properties Limited and Inter IKEA Systems B.V.*, Superior Court of Quebec, court file no: 500-06-000797-163;
2. Your full name, telephone number(s), email address(es), and residential address;
3. If represented by counsel, the full name, telephone number, email address and address of all counsel;
4. A detailed statement of your objection, including the grounds for the objection together with any evidence that you think supports it;
5. Confirmation as to whether you intend to appear at the settlement approval hearing on your behalf or through counsel;
6. Your dated and handwritten or electronic signature.

You can submit your objection or comments to the Class Counsel at the following coordinates, which must be dated, signed and with a detailed objection letter (and attached documents, if any), postmarked **no later than June 28, 2021**:

Mtre. Joey Zukran
LPC AVOCATS INC.
276 Saint-Jacques Street, Suite 801
Montreal, Quebec, H2Y 1N3
Tel: 514-379-1572
Fax: 514-221-4441
Email: jzukran@lpclex.com
www.lpclex.com

17. What's the difference between objecting and opting out?

Objecting or commenting is telling the Court that you don't like something about the Settlement but wish to remain included in the Class. You can object to or comment on the Settlement only if you do not Opt-Out of the Class (and Settlement). Opting out of the Class is telling the Court that you don't want to be part of the Class and Settlement. If you Opt-Out of the Class, you cannot object to or comment on the Settlement because it no longer affects you. **You cannot Opt-Out and object to the Settlement.**

THE COURT'S APPROVAL HEARING

18. When and where will the Court decide whether to approve the Settlement?

The Court will hold an approval hearing **on June 30, 2021, at 9:30AM, at the Montreal Courthouse at 1 Notre-Dame Street East, Montreal, Quebec, H2Y 1B6** (room 17.09) or **virtually, which Teams email address will be posted on the websites WWW.LPCLEX.COM/IKEA and chestofdrawerssettlement.com.**

At this hearing, the Court will consider whether the Settlement and Class Counsel's fees are fair, and reasonable. If there are objections, the Court will consider them. The Court will listen to Class Members who have asked to speak at the hearing, if any.

You do NOT have to appear at the hearing or do anything else if you wish to remain included in the Class and wish to potentially benefit from the Settlement (if ultimately approved by the Court). However, if the Settlement is approved, you will need to take the appropriate steps as detailed in Question 8 herein above.

The Court may reschedule the approval hearing or change any of the deadlines described in this Notice. The date of the approval hearing may change without further notice to the Class Members. Be sure to check the website www.lpclex.com/ikea for news of any such changes.

19. Do I have to come to the Approval hearing?

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish. If you send an objection, you do not have to come to the hearing to talk about it. As long as you submitted your dated, signed and detailed written objection on time (see Question 16), the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

20. May I speak at the hearing?

You may ask the Court for permission to speak at the approval hearing. To do so, you must include a statement in your written objection/comment (discussed above at Question 16) that you intend to appear at the hearing. Be sure to include all the information detailed in Question 16 above.

You cannot speak at the hearing if you Opt-Out of the Class.

IF I DO NOTHING

21. What happens if I do nothing at all?

If you do nothing, you'll be a member of the Class and bound by any procedures, judgment and notices issued in the case and bound by the releases contained in the Settlement. If you do not request any Compensation as detailed in Question 8, you will get no Compensation from this Settlement, and you won't be able to sue IKEA for the facts alleged in this case either.

GETTING MORE INFORMATION

22. Are more details about the Settlement available?

Yes. This Notice summarizes the proposed Settlement - more details are in the Settlement Agreement, the Distribution Protocol, and other important case documents. You can get a copy of these and other documents at www.lpclex.com/ikea. If you have questions, you can contact the Representative's lawyers, the law firm LPC Avocat Inc., by mail, email or phone. Your name and any information provided will be kept confidential. Please do not contact IKEA or their lawyers, nor any of the judges of the Superior Court.

Mtre Joey Zukran
LPC Avocats Inc.
276 Saint-Jacques Street, Suite 801
Montreal, Quebec, H2Y 1N3
Tel: 514-379-1572
Fax: 514-221-4441

Email: jzukran@lpclex.com
Website: www.lpclex.com

The Settlement Agreement, and its exhibits, contains the entire Agreement between the Parties and supersedes this Notice and all prior understandings, agreements, or writings regarding the subject matter of the proposed Settlement.

23. How do I get more information?

The Settlement Website (chestofdrawerssettlement.com) has the Claim Form, answers to questions about the Settlement and other information to help you determine whether you are eligible for a Compensation, including copies of all relevant documents and judgments in the case, are available on the web sites **WWW.LPCLEX.COM/IKEA** et **chestofdrawerssettlement.com**.

You can view more information on the recall online at: <http://healthy Canadians.gc.ca/recall-alert-rappel-avis/hc-sc/2016/59040r-eng.php>.

The Superior Court of Quebec authorized the publication of this Notice. This is not a solicitation from a lawyer.