

CANADA
PROVINCE DE QUÉBEC
DISTRICT DE MONTRÉAL

N° : 500-06-001041-207

COUR SUPÉRIEURE
(Action collective)

CHAFIK MIHOUBI

Applicant

c.

PRICELINE.COM, L.L.C.

et

HOTWIRE, INC.

et

HOMEAWAY.COM, INC.

et

ACCOR, S.A.

et

BEDANDBREAKFAST.COM, INC.

et

**CANADASTAYS (1760335 ONTARIO
INC.)**

et

HILTON WORLDWIDE HOLDINGS, INC.

et

SIX CONTINENTS HOTELS, INC.

et

ORBITZ WORLDWIDE, L.L.C.

et

HYATT HOTELS CORPORATION

et

WYNDHAM HOTEL GROUP, L.L.C.

et

KAYAK EUROPE, G.M.B.H.

et

**BENJAMIN & BROTHERS, L.L.C.
(RESERVATIONS.COM)**

Defendants

**APPLICATION FOR LEAVE TO ADDUCE RELEVANT EVIDENCE OF
HILTON WORLDWIDE HOLDINGS, INC.**

(Art. 574(3) CCP)

TO THE HONOURABLE JUSTICE MARTIN SHEEHAN J.S.C., SITTING IN AND FOR THE DISTRICT OF MONTREAL, RESPONDENTS HEREBY PLEAD AS FOLLOWS:

1. On January 27, 2020, the Applicant filed an *Application to Authorize the Bringing of a Class Action and to Obtain the Status of Representative Plaintiff* against multiple defendants, including Respondent/Petitioner Hilton Worldwide Holdings, Inc (“**Hilton**”), the whole as more fully appears from the Court record;
2. On December 16, 2020, the Applicant filed a *Modified Application to Authorize the Bringing of a Class Action and to Obtain the Status of Representative Plaintiff* (the “**Application for Authorization**”), the whole as more fully appears from the Court record;
3. As appears from the Application for authorization, the Applicant seeks to represent the following Class:

All consumers who, while located in Quebec, reserved accommodation on the internet with the defendants and who paid a price higher than the price initially advertised, except for any fees payable under a federal or provincial statute where, under such statute, those fees must be collected directly from the consumer for remittance to a public authority.

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

4. The Applicant’s proposed class action alleges that the Respondents would have (i) laid lesser stress, in their advertisements, on the price of a set of goods or services than on the price of any goods or services forming part of the set and (ii) charged consumers a higher price than the one advertised for accommodation reservations.
5. Specifically, the Applicant contends that the Respondents, on their respective reservation websites, would have failed to announce the full price of a stay at the first step of the reservation process, as certain fees would have been added and charged later in said process.
6. The Applicant alleges that he made reservations on one of the Respondents’ websites, www.priceline.com, in 2018 and 2019. He alleges that he paid a price higher than the one advertised at the first step of the reservation process due to the addition of certain service fees.

I. Causes of Action Alleged

7. The proposed class action alleges causes of actions under the *Consumer Protection Act*, sections 224 and 272;
8. Accordingly, the Applicant claims, for himself and on behalf of the putative class, reimbursement of the difference between the alleged announced price and the paid price, with the exception of taxes, as well as punitive damages.

9. As will be further detailed below, the Application for authorization does not provide a complete picture of (a) the booking process on Respondent Hilton's website and (b) the contractual relationship between Respondent Hilton and the class members.
10. Respondent Hilton's proposed relevant evidence therefore aims to fill those gaps and provide a more comprehensive factual and contractual background to the Court for its assessment of the authorization criteria in art. 575 CCP.

II. Respondents' Proposed Relevant Evidence

11. Respondent Hilton seeks to adduce its proposed relevant evidence by way of the draft Sworn Statement of Doriana Ensley filed in support of the present Motion as **Exhibit A**, which refers to the documentary evidence identified as **Exhibits A-1 and A-2**.

A. *The Booking Path*

12. In the Application for authorization, Applicant details, at paragraphs 2.5 to 2.10, and at paragraphs 2.57 to 2.61 for Respondent Hilton more specifically, the alleged steps to complete a reservation, or booking path.
13. However, the Application for authorization fails to present a complete and accurate picture of said booking path.
14. The draft Sworn Statement and Exhibit A-1 will notably demonstrate the fee disclosures provided on multiple occasions in the course of Respondent Hilton's booking path before the reservation is finalized.

B. *Rules and Restrictions of the Contractual Relationship*

15. In the Application for authorization, Applicant fails to make any mention, or produce as evidence, the rules and restrictions of the contractual relationship between Respondent Hilton and members of the putative class at the time of making reservations on the Respondent's website.
16. These rules and restrictions are essential to a complete understanding of the respective parties' rights and obligations, including regarding Hilton's cancellation policy.
17. The draft Sworn Statement and Exhibit A-2 will notably fill the factual gap left by the Application for Leave on this topic, by providing said rules and restrictions which govern the relationship between the parties.

III. Conclusions

18. The evidence that Respondent Hilton wishes to adduce, as detailed in this Motion, is strictly circumscribed to the above two topics.

19. Said evidence is essential to provide this Court with a comprehensive picture of the factual background of the case as well as the contractual relationship between the Respondents and members of the putative class, which are both at the heart of the Applicant's alleged personal cause of action and proposed class action;
20. Accordingly, the Respondents' proposed relevant evidence will be useful for the Court in assessing the arguable test criterion pursuant to paragraph 575 CCP, namely the arguable case criterion and the scope of the class;
21. The present application is well-founded in fact and in law;

FOR THESE REASONS, MAY IT PLEASE THE COURT TO:

- [A] **GRANT** the present *Application for Leave to Adduce Relevant Evidence*;
- [B] **ALLOW** Respondent to file **Exhibit A**, the Sworn Statement of Doriana Ensley, and **Exhibits A-1 to A-2**;
- [C] **THE WHOLE**, with costs to follow.

Montréal, May 25, 2021

Borden Ladner Gervais S.E.N.C.R.L., S.R.L.

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**Attorneys for Six Continents hotels,
inc.**

TAKE NOTICE that the present *Application for leave to Adduce Evidence* will be presented for adjudication before the Honourable Justice Martin F. Sheehan of the Superior Court of Québec, at the Montreal Courthouse, located at 1 Notre-Dame Street East Montreal, Quebec, H2Y 1B6, at a time and in a room to be designated by the Honourable Justice Sheehan.

PLEASE GOVERN YOURSELVES ACCORDINGLY.

Montreal, May 25, 2021

Borden Ladner Gervais S.E.N.C.R.L., S.R.L.

BORDEN LADNER GERVAIS LLP
Lawyers for Respondent
Hilton Worldwide Holdings, Inc

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(RESERVATIONS.COM)**

Defendants

RESPONDENTS' LIST OF EXHIBITS

EXHIBIT A: Sworn Declaration of Doriana Ensley dated May 25, 2021;

EXHIBIT A-1: Screenshots of the www.hilton.com booking process;

EXHIBIT A-2: Screenshot of Hilton's "Rules and Restrictions".

Montreal, May 25, 2021

Borden Ladner Gervais S.E.N.C.R.L., S.R.L.

BORDEN LADNER GERVAIS LLP
Lawyers for Respondent
Hilton Worldwide Holdings, Inc

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(RESERVATIONS.COM)**

Defendants

SWORN DECLARATION OF DORIANA ENSLEY

I, the undersigned, Doriana Ensley, practicing my profession at 7930 Jones Branch Dr., McLean, Virginia, 22102, USA, solemnly declare:

1. I currently am Senior Manager, Dispute Resolution for the defendant Hilton Worldwide Holdings, Inc (“**Hilton**”).
2. I have personal knowledge of the facts set forth herein and I have conducted internal inquiries to determine the information set forth in this affidavit.
3. On May 25, 2021, I visited Hilton’s reservation website, at www.hilton.com.
4. On the same date, I went through the different reservation steps for 3 nights for 3 adults at the Gale South Beach, Curio Collection by Hilton hotel in Miami Beach, and I took the screenshots found at **Exhibit A-1**.
5. As appears from Exhibit A-1, page 6, as soon as a hotel is selected, a disclaimer appears on top of the page stating that “Daily Resort Charge includes: Guest internet access; beach club access with 2 chairs & towels; transportation within a 3 mile area via an electric cart; beach cruiser bikes; 2 bottled waters daily; 2 cups of American Coffee daily; local & toll-free calls.”
6. As appears from Exhibit A-1, page 7, there is a specific mention under the rate for available rooms stating “Plus \$32.00 USD resort charge per night, plus tax”.
7. As appears from Exhibit A-1, page 8, the same disclaimer as the one on page 7 appears on the top of the page regarding the Daily Resort Charge, and the same mention of the amount of the resort charge appears under the available rates from pages 8 to 10.
8. As appears from Exhibit A-1, pages 8 to 10, there is a link on the right of the available rate which provides the detailed rate, including taxes and fees, as appears from page 11.
9. As appears from Exhibit A-1, page 12, as soon as a rate is selected, the detailed rate, including taxes and fees appears on top of the page, as well as a link to the price details.
10. As appears from Exhibit A-1, page 15, the price details also include the taxes and fees.
11. As appears from Exhibit A-1, pages 12 to 18, the detailed rate, including taxes and fees, must be confirmed in order for a reservation to be made.
12. The booking process, as detailed in the screenshots provided as Exhibit A-1, has not undergone significant changes since at least January 2017.
13. The terms and conditions provided as **Exhibit A-2** are Hilton’s Rules and Restrictions, which the clients agrees to at the time of payment, as appears from Exhibit A-1, pages 14 and 17.
14. All of the facts in this affidavit are true and correct.

AND I HAVE SIGNED in McLean, Virginia, this May 25, 2021:

Doriana V. Ensley

Doriana Ensley

DECLARED UNDER OATH REMOTELY
by technological means before me at
Ste-Julie, Québec this May 25, 2021.

Nathalie Angers



Nathalie Angers
Commissioner of Oaths #137908
Commissioner for Oaths for Québec

EXHIBIT A-1

Plans Change

Look for our flexible booking options with free changes and cancellations available at every hotel.

Where to?

Miami Beach, Florida, US

11 OCT
MON

14 OCT
THU

1 Room, 3 Guests

Special Rates

Update

Showing 1 - 20 of 22 hotels

Sort by Distance

Filters

Use Points

 **Earn up to 180,000 Points for future travel.**
Terms Apply. [Learn More](#)

Select Currency ⓘ Hotel ▾

ⓘ Book our latest deals for even more flexibility and savings.

*Price change during stay



Hampton Inn Miami South Beach - 17th Street

0.31 miles
[Hotel Details >](#)

\$153
HONORS PREPAY AND SAVE

[View Rates](#)

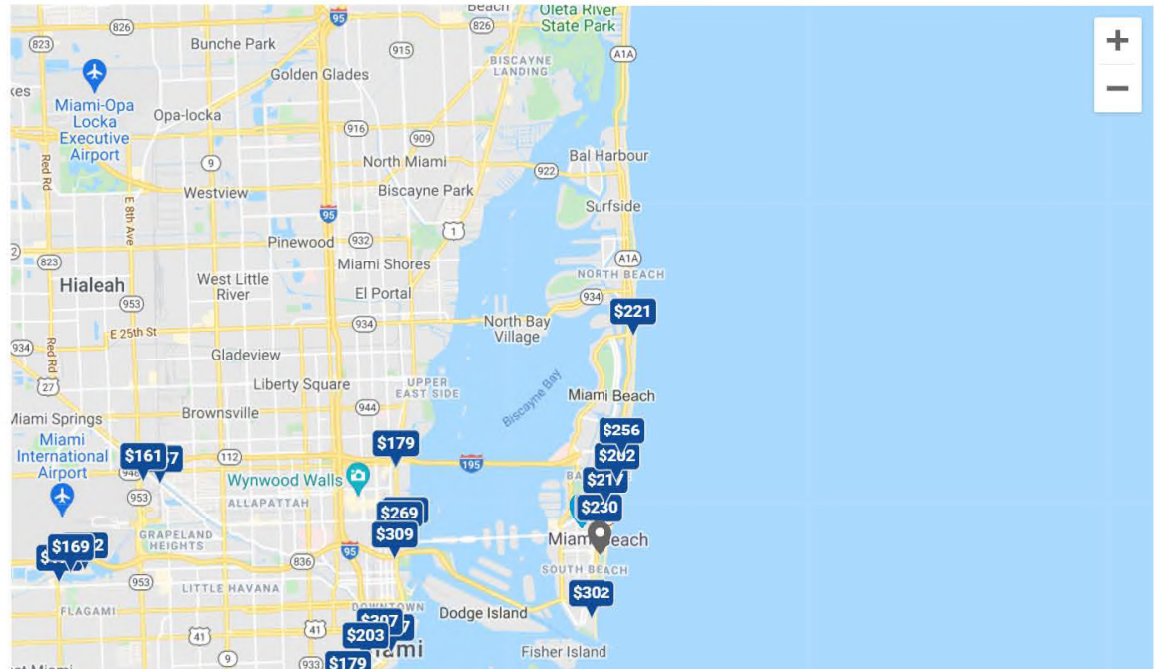


Gale South Beach, Curio Collection by Hilton

0.32 miles
[Hotel Details >](#)

\$230
HONORS PREPAY AND SAVE

[View Rates](#)





Hilton Grand Vacations at McAlpin-Ocean Plaza

0.59 miles
[Hotel Details >](#)

Sold out during your travel dates

[Check Available Dates](#)



The Gates Hotel South Beach - a DoubleTree by Hilton

0.61 miles
[Hotel Details >](#)

\$217
HONORS PREPAY AND SAVE

[View Rates](#)



Hilton Garden Inn Miami South Beach

1.07 miles
[Hotel Details >](#)

\$202*
HONORS PREPAY AND SAVE

[View Rates](#)



Hampton Inn Miami Beach - Mid Beach

1.52 miles
[Hotel Details >](#)

\$256
HONORS DISCOUNT

[View Rates](#)



Hilton Bentley Miami/South Beach

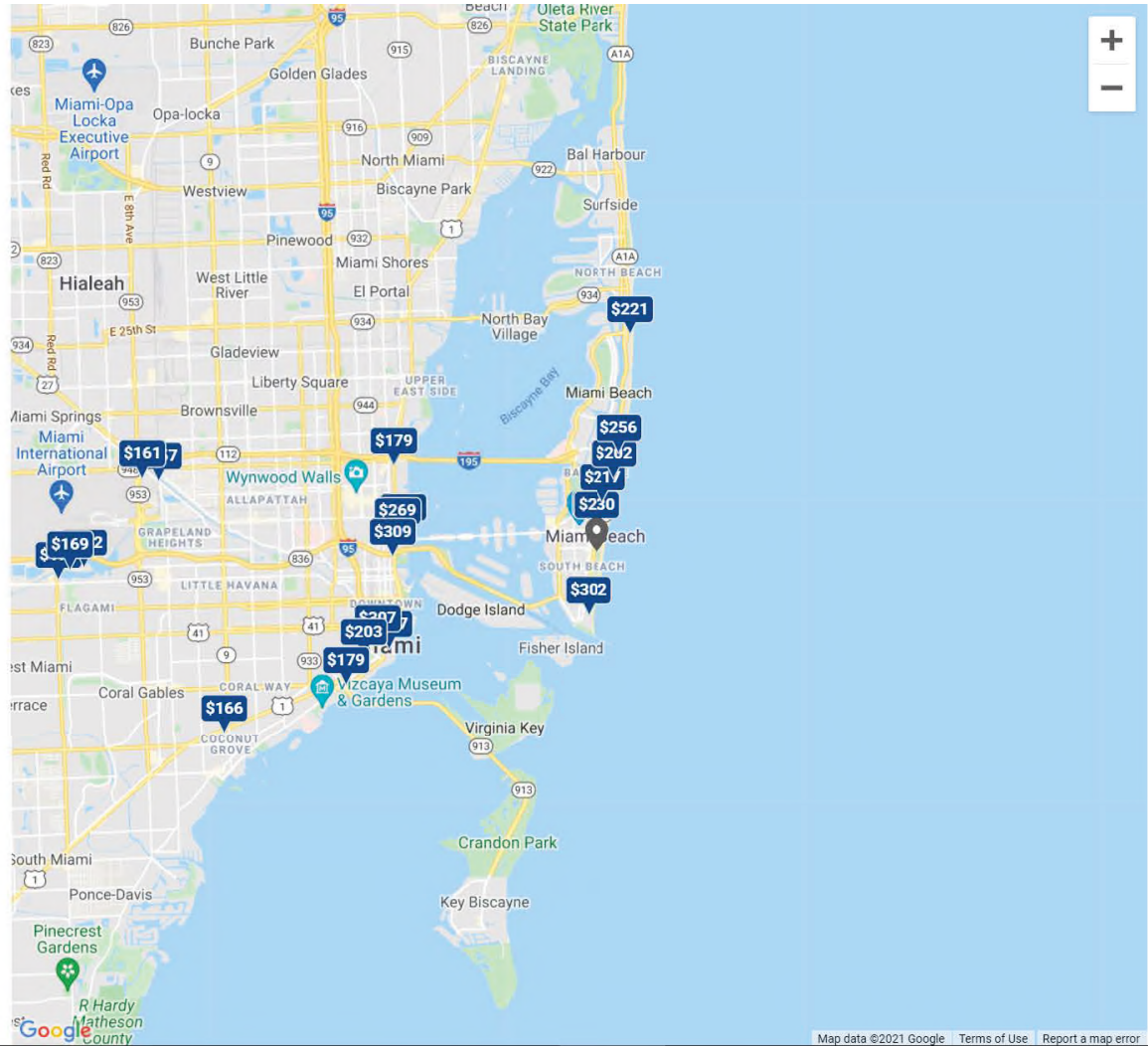
1.65 miles
[Hotel Details >](#)

\$302
HONORS PREPAY AND SAVE

[View Rates](#)



DoubleTree by Hilton Grand Hotel Biscayne Bay



Map data ©2021 Google Terms of Use Report a map error



3.24 miles
Hotel Details >

\$309
HONORS DISCOUNT
[View Rates](#)



Hilton Miami Downtown
3.34 miles
Hotel Details >

\$269
HONORS DISCOUNT
[View Rates](#)



The Gabriel Miami, Curio Collection by Hilton
3.46 miles
Hotel Details >

\$309
HONORS DISCOUNT
[View Rates](#)



Hampton Inn & Suites Miami Midtown
3.58 miles
Hotel Details >

\$179*
HONORS PREPAY AND SAVE
[View Rates](#)



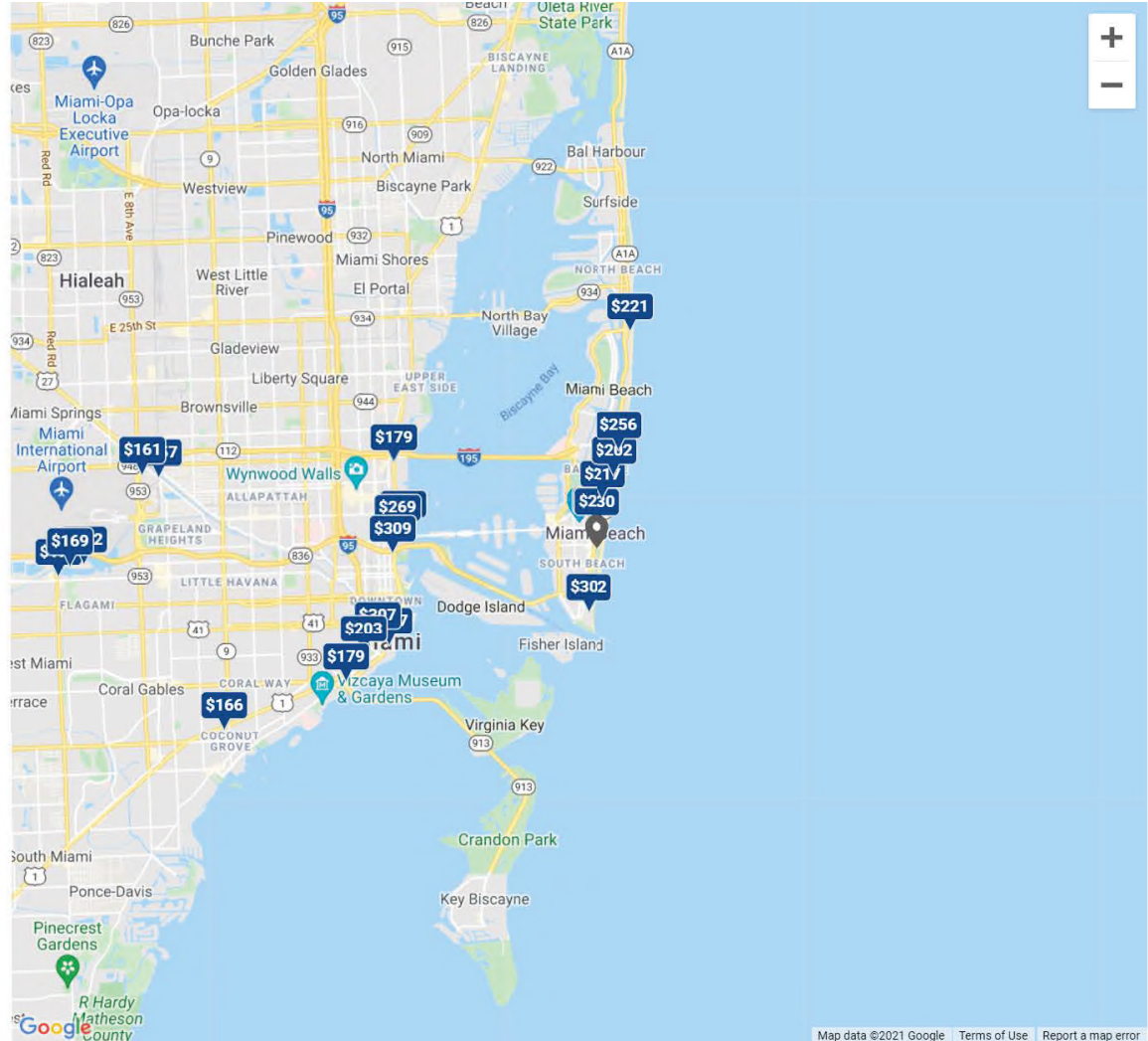
Hilton Cabana Miami Beach
3.64 miles
Hotel Details >

\$221
HONORS PREPAY AND SAVE
[View Rates](#)



Conrad Miami
4.16 miles
Hotel Details >

\$407*





\$407*
HONORS TRAVEL/SAVE

[View Rates](#)



Hampton Inn & Suites Miami/Brickell-Downtown

4.27 miles
[Hotel Details >](#)

\$307
HONORS DISCOUNT ADVANCE PURCHASE

[View Rates](#)



Homewood Suites by Hilton Miami Downtown/Brickell

4.65 miles
[Hotel Details >](#)

\$203
HONORS DISCOUNT

[View Rates](#)



Hilton Garden Inn Miami Brickell South

5.17 miles
[Hotel Details >](#)

\$179
HONORS PREPAY AND SAVE

[View Rates](#)



Hampton Inn Miami-Coconut Grove/Coral Gables

7.52 miles
[Hotel Details >](#)

\$166
HONORS DISCOUNT ADVANCE PURCHASE

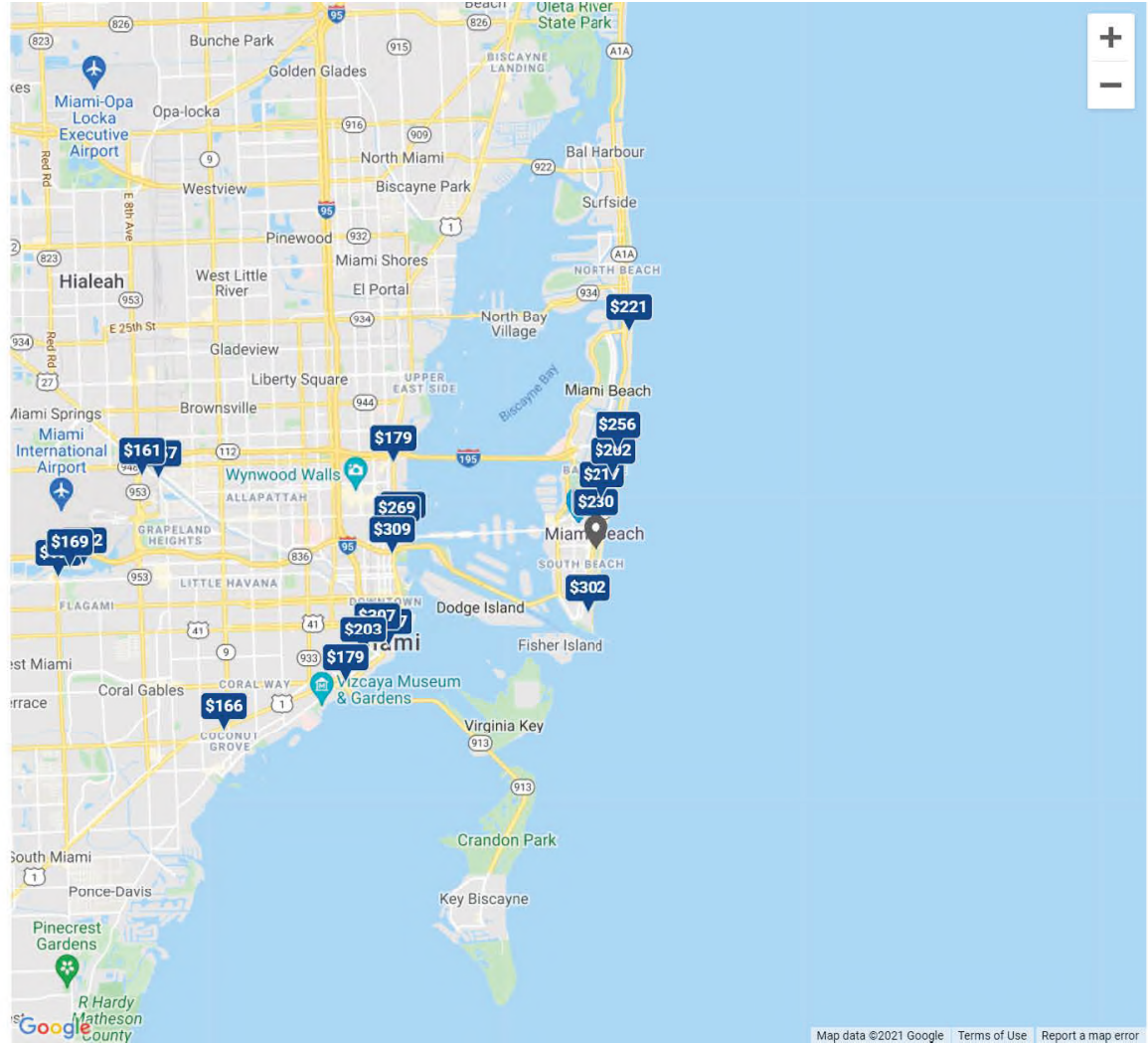
[View Rates](#)



Embassy Suites by Hilton Miami International Airport

7.73 miles
[Hotel Details >](#)

\$157*
HONORS DISCOUNT ADVANCE PURCHASE





Embassy Suites by Hilton Miami International Airport

7.73 miles
[Hotel Details >](#)

\$157*
HONORS DISCOUNT ADVANCE PURCHASE

[View Rates](#)



Hampton Inn Miami Airport East

8.04 miles
[Hotel Details >](#)

\$161*
HONORS TRAVEL/SAVE

[View Rates](#)



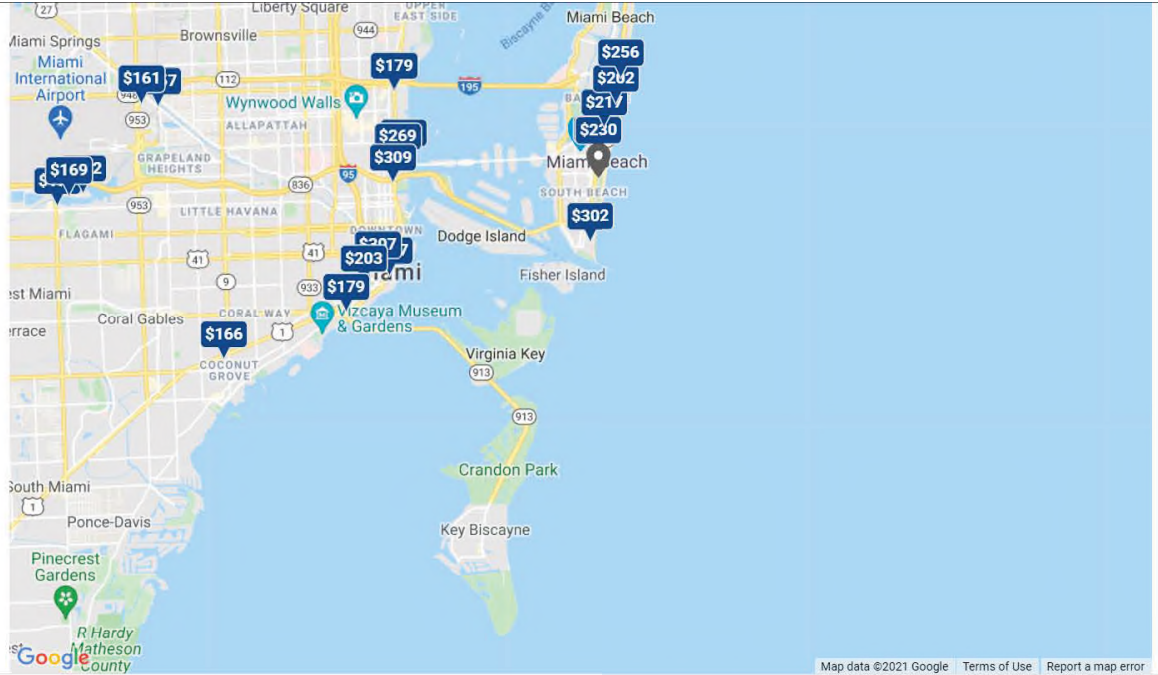
Hilton Miami Airport Blue Lagoon

9.09 miles
[Hotel Details >](#)

\$152*
HONORS DISCOUNT ADVANCE PURCHASE

[View Rates](#)

< Page 1 of 2 >



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How can we help?

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Call us, it's toll-free.

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[Modern Slavery and Human Trafficking](#)

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[Hilton Honors Discount Terms & Conditions](#)

[Cookies Statement](#)

[Tourism Mediator](#)

[AdChoices](#)

Plans Change

 Look for our flexible booking options with free changes and cancellations available at every hotel.

Amenities & Services Availability [Learn More](#)

Step 1 of 3

Select a Room

 **Earn up to 180,000 Points for future travel.**
Terms Apply. [Learn More](#)

Your stay includes ✓ Free WiFi ✓ Non-smoking rooms ✓ On-site restaurant ✓ Outdoor pool ✓ Fitness center

- Special Rates** **Accessible Rooms** **Use Points & Money**

Daily Resort Charge includes: Guest internet access; beach club access with 2 chairs & towels; transportation within a 3 mile area via an electric cart; beach cruiser bikes; 2 bottled waters daily; 2 cups of American Coffee daily; local & toll-free calls.

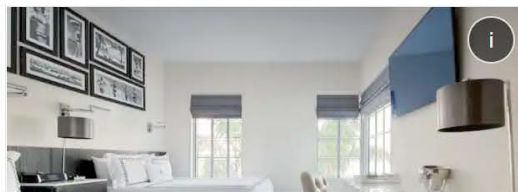


Gale South Beach, Curio Collection by Hilton ▾

11 Oct – 14 Oct 2021 (3 nights)
1 room for 3 adults
[Edit Stay](#)

We found 1 room for you.

Avg/night in \$USD ▾



Daily Resort Charge includes: Guest internet access; beach club access with 2 chairs & towels; transportation within a 3 mile area via an electric cart; beach cruiser bikes; 2 bottled waters daily; 2 cups of American Coffee daily; local & toll-free calls.

We found 1 room for you.

Avg/night in \$USD ▼



2 Queens Signature

Quick Book
Honors Discount

\$260

More Rates From \$230

Plus \$32.00 USD resort charge per night, plus tax

How can we help?

+1-888-225-9664

Call us, it's toll-free.

Customer Support

Online reservation assistance.

[Hilton Honors Discount Terms & Conditions](#)

[Site Usage Agreement](#)

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[Modern Slavery and Human Trafficking](#)

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Plans Change

Look for our flexible booking options with free changes and cancellations available at every hotel.

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Step 2 of 3

Select a Rate

 **Earn up to 180,000 Points for future travel.**
Terms Apply. [Learn More](#)

Daily Resort Charge includes: Guest internet access; beach club access with 2 chairs & towels; transportation within a 3 mile area via an electric cart; beach cruiser bikes; 2 bottled waters daily; 2 cups of American Coffee daily; local & toll-free calls.

Special Rates Use Points & Money

Avg/night in \$USD ▼

Flexible Rate

Change or cancel up to 1 day before arrival. Pay when you stay.

\$269 ⓘ

[Book](#)

Plus \$32.00 USD resort charge per night, plus tax

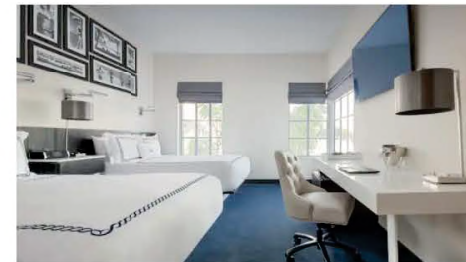
Honors Discount

~~\$269~~

\$260 ⓘ

[Book](#)

Honors Discount



Gale South Beach, Curio Collection by Hilton ▼

11 Oct – 14 Oct: 2021 (3 nights)

1 room for 3 adults

[Edit Stay](#)

- 2 Queens Signature
Change Room
- Select a Rate**
- Payment and Guest Details

Prepay and Save

Change or cancel up to 3 days before arrival. Requires a 1-night deposit, refundable up to 3 days in advance.

\$242



Book

Honors Discount

~~\$242~~

\$230



Book

Plus \$32.00 USD resort charge per night, plus tax

Make it a package deal

Breakfast Included

Change or cancel up to 1 day before arrival. Breakfast included for each registered adult and children, age 5 or under, when accompanied by adult diner.

\$314



Book

Plus \$32.00 USD resort charge per night, plus tax

Honors Breakfast Inc

Honors breakfast inc.

\$307



Book

Plus \$32.00 USD resort charge per night, plus tax

2X Points

Change or cancel up to 1 day before arrival. Earn Double Hilton Honors Points. Pay when you stay.

\$277



Book

Plus \$32.00 USD resort charge per night, plus tax

Family Fun Package

Family fun package. Enjoy breakfast for 4 plus wi-fi. Breakfast for up to 2 adults and 2 kids under 12.

\$319



Book

you stay.

[Book](#)

Plus \$32.00 USD resort charge per night, plus tax

Family Fun Package

Family fun package. Enjoy breakfast for 4 plus wi-fi. Breakfast for up to 2 adults and 2 kids under 12.

\$319



[Book](#)

Plus \$32.00 USD resort charge per night, plus tax

Romance Package

Romance package. Enjoy sparkling wine breakfast for 2 and late checkout at 2pm when available

\$334



[Book](#)

Plus \$32.00 USD resort charge per night, plus tax

Americano Package-

Americano package-. Includes 3 meals plus 1 cocktail per person breakfast-lunch-dinner offer by dolce italian

\$569



[Book](#)

Plus \$32.00 USD resort charge per night, plus tax

How can we help?

+1-888-225-9664

Call us, it's toll-free.

Customer Support

Online reservation assistance.

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Sign In | Join

Flexible Rate ✕

Change or cancel up to 1 day before arrival. Pay when you stay.

2 Queens Signature
3 adults

Avg \$269.00/night in \$USD

11 Oct 2021	\$269.00
12 Oct 2021	\$269.00
13 Oct 2021	\$269.00
Total room charge	\$807.00

Resort Charge: \$32.00 per room, per night

Total fees **\$96.00**

- 7.00 % per room, per night
- 4.00 % per room, per night
- 3.00 % per room, per night

Total taxes **\$126.42**

Book

Total for stay: \$1,029.42

Guarantee Policy

This reservation requires a credit card deposit of \$343.14 USD which will be charged to your card.

If you use a debit/credit card to check in, a hold may be placed on your card account for the full anticipated amount to be owed to the hotel, including estimated incidentals, through your date of check-out and such hold may not be released for 72 hours from the date of check-out or longer at the discretion of your card issuer.

Cancellation Policy

If you wish to cancel, please do so 1 day prior to arrival to avoid cancellation penalties.

At check in, the front desk will verify your check-out date. Rates quoted are based on check-in date and length of stay. Should you choose to depart early, price is subject to change.

We reserve the right to cancel or modify reservations where it appears that a customer has engaged in fraudulent or inappropriate activity or under other circumstances where it appears that the reservations contain or resulted from a mistake or error.

Totals listed here are estimated based on current taxes and exchange rates (if applicable) and do not include additional fees/charges that may be incurred during your stay.

Optional services for an additional charge

Plans Change

 Look for our flexible booking options with free changes and cancellations available at every hotel.

Step 3 of 3

Payment and Guest Details

Total for stay

\$1,029.42

[Show price details](#)

Total room charge	\$807.00
Total fees	\$96.00
Total taxes	\$126.42

All fields are required unless marked optional.

Payment

Card number	
Month	Year

Guest information

First Name
Last Name



Gale South Beach, Curio Collection by Hilton

11 Oct – 14 Oct 2021 (3 nights)

1 room for 3 adults

[Edit Stay](#)

- 2 Queens Signature
Change Room
- Flexible Rate
Change Rate
- Payment and Guest Details


Email
Phone
Country/Region USA ▼
Address
Address 2 <small>Optional</small>
Zip
City
State ▼

 Add guest names

SKIP THE FRONT DESK AND GO STRAIGHT TO YOUR ROOM WITH DIGITAL CHECK-IN & DIGITAL KEY

Instantly join Hilton Honors, subject to the [Hilton Honors program terms and conditions](#), & don't forget to download the app before your stay.

Yes, I want to join Hilton Honors now.

 Special requests

☰ **Special requests**

Traveling with a pet, service animal, etc.

[+](#) Add special requests

View optional services ▼

Guarantee and Cancellation Policy

This reservation requires a credit card deposit of \$343.14 USD which will be charged to your card. If you wish to cancel, please do so 1 day prior to arrival to avoid cancellation penalties.

By clicking "Book Reservation," I agree to the [Rules and Restrictions](#), [Site Usage Agreement](#), and acknowledge that Hilton will collect, use, share and transfer my information as set out in [Hilton's Global Privacy Statement](#).

Book Reservation

*In-Room WiFi Internet access may not be complimentary at properties with a resort charge.

How can we help?

+1-888-225-9664

Call us, it's toll-free.

Customer Support

Online reservation assistance.

[Hilton Honors Discount Terms & Conditions](#)

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Plans Change

Look for our flexible booking options with free changes and cancellations available at every hotel.

Step 3 of 3

Payment and Guest Details

Total for stay

\$1,029.42

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Avg \$269.00/night in \$USD

Flexible Rate

11 Oct 2021

\$269.00

12 Oct 2021

\$269.00

13 Oct 2021

\$269.00

Total room charge

\$807.00

Resort Charge: \$32.00 per room, per night

Total fees

\$96.00

7.00 % per room, per night

4.00 % per room, per night

3.00 % per room, per night

Total taxes

\$126.42

Total for stay: \$1,029.42



Gale South Beach, Curio Collection by Hilton

11 Oct – 14 Oct 2021 (3 nights)

1 room for 3 adults

[Edit Stay](#)



2 Queens Signature

Change Room



Flexible Rate

Change Rate



Payment and Guest Details

All fields are required unless marked optional.




Payment

Card number

 **Payment**

Card number	
Month ▼	Year ▼

 **Guest information**

First Name
Last Name
Email
 Please enter a valid email address.
Phone
Country/Region USA ▼
Address
Address 2 <small>Optional</small>
Zip
City

☰ **Special requests**

Traveling with a pet, service animal, etc.

⊕ Add special requests

View optional services ▼

Guarantee and Cancellation Policy

This reservation requires a credit card deposit of \$343.14 USD which will be charged to your card. If you wish to cancel, please do so 1 day prior to arrival to avoid cancellation penalties.

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Book Reservation

*In-Room WiFi Internet access may not be complimentary at properties with a resort charge.

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EXHIBIT A-2

Rules and Restrictions

At check in, the front desk will verify your check-out date. Rates quoted are based on check-in date and length of stay. Should you choose to depart early, price is subject to change.

We reserve the right to cancel or modify reservations where it appears that a customer has engaged in fraudulent or inappropriate activity or under other circumstances where it appears that the reservations contain or resulted from a mistake or error.

Totals listed here are estimated based on current taxes and exchange rates (if applicable) and do not include additional fees/charges that may be incurred during your stay.

Taxes

7.00 % per room, per night

4.00 % per room, per night

3.00 % per room, per night

Guarantee and Cancellation Policy

This reservation requires a credit card deposit of \$343.14 USD which will be charged to your card. If you wish to cancel, please do so 1 day prior to arrival to avoid cancellation penalties.

If you use a debit/credit card to check in, a hold may be placed on your card account for the full anticipated amount to be owed to the hotel, including estimated incidentals, through your date of check-out and such hold may not be released for 72 hours from the date of check-out or longer at the discretion of your card issuer.

Angers, Nathalie

De: Angers, Nathalie
Envoyé: May 25, 2021 4:58 PM
À: lex@tjl.quebec; mathieu@tjl.quebec; bruce@tjl.quebec;
bgrenier@grenierverbauwhede.ca; cverbauwhede@grenierverbauwhede.ca;
famine@millerthomson.com; Chênevert, Karine; eprefontaine@osler.com;
aauthier@osler.com; mbixi@lavery.ca; notifications-mtl@lavery.ca; tpinos@cassels.com;
simon.seida@blakes.com; anthony.cayer@blakes.com; Lefebvre, Eric; Pousht-Mashhad,
Saam
Cc: De Zordo, Alexander L.; Saint-Onge, Jean; Chênevert, Karine
Objet: NOTIFICATION / Chafik Mihoubi vs. Priceline.com, L.L.C. et als. / S.C.M.:
500-06-001041-207 - Application for Leave to adduce evidence (Defendant Hilton) /
Our file: 299542.1
Pièces jointes: 2021-05-25 - Application for leave to adduce evidence - Defendant
Hilton(122028217.1).pdf

BORDEREAU DE NOTIFICATION PAR COURRIER ÉLECTRONIQUE (ARTICLE 134 C.P.C.)

DATE : Montréal, le 25 mai 2021

EXPÉDITEUR :

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Notre dossier : 299542.000001

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(514) 871-1522
Courriel : mbrixi@lavery.ca / notifications-mtl@lavery.ca
Votre dossier :

NUMÉRO DE DOSSIER DE COUR ET NATURE DU DOCUMENT NOTIFIÉ :

Numéro de dossier : 500-06-001041-207

Parties : Chafik Mihoubi c. Priceline.com, L.L.C., Hotwire, inc., Homeaway.com, inc., Accor, S.A., Bedandbreakfast.com, inc., Canadastays (1760335 Ontario inc.), Hilton Worldwide Holdings, inc., Six Continents Hotels, inc., Orbitz Worldwide, L.L.C., Hyatt Hotels Corporation, Wyndham Hotel Group, L.L.C., Kayak Europe, G.M.B.H. et Benjamin & Brothers, L.L.C. (Reservations.com)

Nature du document : **Application for Leave to Adduce Evidence and Exhibits – Defendant Hilton** (art. 574 (3) C.p.c.)

Nombre de pages : 32
(pièces jointes seulement)



Nathalie Angers

Adjointe à la pratique pour / Practice Assistant for Karine Chênevert,

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COUR SUPÉRIEURE
(Action collective)

DISTRICT DE MONTRÉAL
N° : 500-06-001041-207

CHAFIK MIHOUBI

Demandeur

c.

PRICELINE.COM, L.L.C.

et

HOTWIRE, INC.

et

HOMEAWAY.COM, INC.

et

ACCOR, S.A. & als.

Défenderesses

**APPLICATION FOR LEAVE TO ADDUCE
RELEVANT EVIDENCE OF HILTON
WORLDWIDE HOLDINGS, INC**
(Art. 574 (3) CCP)

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B.M. 2545

Me Jean Saint-Onge, *Ad. E.*
Me Alexander L. De Zordo, *Ad. E.*
Me Karine Chênevert
Dossier : 299542.000001