

CANADA

PROVINCE OF QUEBEC
DISTRICT OF **LONGUEUIL**

NO.: 505-06-000024-203

SUPERIOR COURT
(Class Action)

JOHN CORMIER

Petitioner

-vs-

CITY OF LONGUEUIL

-and-

**THE ESTATE OF THE LATE
FRANÇOIS LAMARRE**

Respondents, *solidarily*

-and-

**L'AGENCE DE REVENU DU QUÉBEC
(REVENU QUEBEC)**, in the capacity of
provisional liquidator of the estate of the
late François Lamarre

Mise-en-cause

**NOTICE TO THE ALLEGED VICTIMS OF FORMER HOCKEY COACH FRANÇOIS
LAMARRE WITH RESPECT TO THE AUTHORIZATION OF A CLASS ACTION AGAINST
THE CITY OF LONGUEUIL AND THE ESTATE OF FRANÇOIS LAMARRE**

As of June 22, 2021

**IF YOU WERE SEXUALLY ABUSED BY FORMER HOCKEY COACH FRANÇOIS
LAMARRE, THIS NOTICE MAY AFFECT YOUR RIGHTS.**

1. The Superior Court of Quebec has authorized a class action against the City of Longueuil and the Estate of François Lamarre on behalf of : all persons sexually abused by the late François Lamarre while he acted as a coach of the municipal hockey program in the City of Greenfield Park, as well as the estate of such persons if deceased since September 1, 2017 (the "**Class Members**").
2. This class action seeks (i) compensation for the injuries suffered by the victims of sexual abuse committed by the late François Lamarre while he acted as a coach

of the municipal hockey program in the City of Greenfield Park and (ii) punitive damages.

3. The class action will be brought in the judicial district of Longueuil, in the file bearing the court number 505-06-000024-203.
4. In this class action, the principal issues of fact or law to be dealt with collectively are as follows:
 - a. Did Mr. Lamarre sexually assault members of the Class while a hockey coach ?
 - b. Is the City of Longueuil solidarily liable towards the members of the Class for the damages caused to them by Mr. Lamarre's sexual assaults ?
 - c. Is the Estate of the late François Lamarre solidarily liable towards the members of the Class for the damages caused to them by Mr. Lamarre's sexual assaults ?
 - d. What kinds of damages are commonly suffered by victims of sexual assault perpetrated by adults in positions of authority, such as a hockey coach ?
 - e. May the Court commonly determine a minimum quantum for damages that the members of the Class suffered and/or set parameters for the damages suffered by the members of the Class based on the gravity of Mr. Lamarre's sexual assaults, and the consequences thereof ?
 - f. Did the Defendant unlawfully and intentionally interfere with the rights of the members of the Class that were protected by *Quebec's Charter of Human Rights and Freedoms* ?
 - g. If so, what is an appropriate amount of punitive damages to which the Defendants should be condemned in order to sanction and deter the conduct in question ?
 - h. Is it appropriate for punitive damages to be recovered collectively ""?
5. The conclusions sought in the class action are as follows:

MAINTAIN the Class Action;

CONDEMN the Defendants, solidarily, to pay to John Cormier the amount of \$350,000 in non-pecuniary damages, plus interest at the legal rate as of the date of the *Application for Authorization*, as well as the additional indemnity provided for by law in virtue of Article 1619 C.C.Q.;

CONDEMN the Defendants, solidarily, to pay to John Cormier the amount of \$425,000 in pecuniary damages, plus interest at the legal rate as of the date of the *Application for Authorization*, as well as the additional indemnity provided for by law in virtue of Article 1619 C.C.Q.;

CONDEMN the Defendants, solidarily, to pay to the class as a whole punitive damages of \$10,000,000, plus interest at the legal rate as of the date of the *Application for Authorization*, as well as the additional indemnity provided for by law in virtue of Article 1619 C.C.Q.;

ORDER the Mise-en-cause L'Agence de Revenu du Québec, in its capacity of provisional liquidator of the Estate of the late François Lamarre, to pay to Plaintiff, from said estate and according to law, the amount of the condemnations pronounced against the Estate of the late François Lamarre, the whole pursuant to modalities to be determined by the Court;

DECLARE :

(a) that all Class members are entitled to be compensated for all of their pecuniary damages resulting from the faults of the Defendants, including, but without limitation, their loss of income, their loss of earning capacity as well as their expenses and disbursements pertaining to their therapy treatments;

(b) that all Class members are entitled to be compensated for their non-pecuniary damages resulting from the faults of the Defendants, in accordance with parameters to be set by the Court as a result of the trial pertaining to the common issues;

ORDER collective recovery of the punitive damages, and the liquidation of the Class members' claims pursuant to Articles 595 to 598 C.C.P.;

CONDEMN the Defendants to any further relief as may be just and proper;

THE WHOLE with legal costs, including the costs of all exhibits, expertise and publication of notices;

6. Class Members will be bound by any judgment to be rendered in the class action, unless they opt out of the class action.
7. If Class Members wish to opt out from the class action, they must do so within ninety (90) days of this notice (i.e., no later than September 22, 2021), as follows:
 - a. A Class Member who has not already commenced an individual lawsuit against the City of Longueuil and/or the Estate of François Lamarre for damages related to sexual abuse committed by François Lamarre may opt out by notifying the Clerk of the Superior Court of the District of Longueuil at the following address : 1111, Jacques-Cartier East Blvd, Longueuil, Quebec, J4M 2J6, the whole in accordance with Article 580 of the Code of Civil Procedure.
 - b. A Class Member who has already commenced an individual lawsuit against the City of Longueuil and/or the estate of François Lamarre for damages related to sexual abuse committed by François Lamarre that would be disposed of in the class action shall be deemed to have opted out if he or

she does not discontinue his or her individual lawsuit before the expiration of the opt-out period.

8. A Class Member may have his or her intervention received by the Court if it is helpful to the Class.
9. A Class Member, other than the representative or an intervenor, can not be ordered to pay court costs.
10. Class Members are encouraged to contact counsel for Plaintiff/Representative John Cormier for information about the class action and to find out more information about their rights. Communications are **completely free, confidential and protected by attorney-client privilege**. The contact information for said lawyers is as follows :

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Me Robert Kugler / rkugler@kklex.com
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11. The various pleadings relating to this class action can be consulted by visiting the website of the Registry of Class Actions:

www.registredesactionscollectives.quebec
12. **The Court has authorized the use of pseudonyms for the identification of Class members in the proceedings, exhibits, and all other documents filed into the court record, in order to protect their identities.**
13. **The Court has further prohibited the parties, their counsel and every person being informed of the authorization judgment (including members of the public and of the media), to disclose, publish or otherwise communicate the identity of any member of the class or any other personal or nominal information that may disclose the identity of such member.**

THIS NOTICE HAS BEEN AUTHORIZED BY THE SUPERIOR COURT