

CANADA
PROVINCE OF QUEBEC
DISTRICT OF MONTREAL

(Class Action)
SUPERIOR COURT

N^o: 500-06-000886-172

LISA BLAIS

Representative Plaintiff

v.

WATCH TOWER BIBLE AND TRACT SOCIETY
OF CANADA

– and –

WATCH TOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA

Defendants

NOTICE TO MEMBERS

1. **TAKE NOTICE** that the Honourable Chantal Corriveau, a judge of the Superior Court sitting in the district of Montreal, authorized the plaintiff, Lisa Blais, to bring a class action against the defendants, Watch Tower Bible and Tract Society of Canada and Watch Tower Bible and Tract Society of Pennsylvania, pursuant to a judgment rendered on February 27, 2019 (rectified on March 11, 2019), and confirmed by the Court of Appeal on December 11, 2020, on behalf of the persons belonging to the subclasses described below, namely:

“All persons who are or were a Jehovah’s Witness and who allege having been sexually abused as a minor by a Jehovah’s Witness Elder in the province of Québec (the ‘Elder Abuse Subclass’).”

and

“All persons who are or were a Jehovah’s Witness and who allege having been sexually abused as a minor by a Jehovah’s Witness in the province of Québec (the ‘Witness Abuse Subclass’).”

Collectively the “**Class**”

2. The status of representative for the exercise of the class action on behalf of the Class has been granted to Lisa Blais. The contact details of her attorneys are as follows:

Mtre. Sarah Woods (swoods@woods.qc.ca)

Mtre. Laurence Ste-Marie (lstemarie@woods.qc.ca)

Mtre. Laurence Rousseau-Dumont (lrdumont@woods.qc.ca)

WOODS LLP

2000 McGill College Avenue

Suite 1700
Montreal, Quebec H3A 3H3
Telephone: 514-982-4545
Fax : 514-284-2046

3. The Class members are invited to communicate with the plaintiff's attorneys or Mtre. Maripier Ainey, paralegal, at 514-982-4545, for more information on this class action and on their rights. These communications are free, confidential and protected by professional secrecy.
4. The main factual or legal questions to be addressed collectively are the following:
 - a) Did Elders and other Witnesses sexually abuse minor Witnesses, including the plaintiff?
 - b) Were the defendants negligent in failing to take measures to prevent the perpetration of sexual abuse on minors by Elders and Witnesses, constituting a fault under the *Civil Code of Québec*?
 - c) Did the defendants' systemic practices and policies facilitate the perpetration of sexual abuse on minors, including the plaintiff, constituting a fault under the *Civil Code of Québec*?
 - d) Did the defendants' systemic practices and policies lead to the failure to report said sexual abuse on Jehovah's Witnesses minors, including the plaintiff, to the provincial authorities, constituting a fault under the *Civil Code of Québec*?
 - e) Were the defendants' systemic practices and policies relating to sexual abuse on Jehovah's Witness minors inherently harmful, constituting a fault under the *Civil Code of Québec*?
 - f) Are the defendants liable as principals for the sexual abuse committed by the Elders on minors?
 - g) Are the defendants liable as principals for Elders' failure to report the sexual abuse on minors?
 - h) Did the defendants' fault cause damages to the Class members?
 - i) Are the defendants solidarily liable for pecuniary and non-pecuniary damages caused to the Class members?
 - j) Did the defendants unlawfully and willfully interfere with the Class members' fundamental rights and freedoms protected by the *Quebec Charter of Rights and Freedoms*?
 - k) Are the Class members entitled to claim punitive damages?
5. The conclusions sought in relation to these questions are as follows:

- a) GRANT the plaintiff's application;
 - b) **ORDER** the defendants, solidarily, to pay the plaintiff a sum of \$150,000, as moral damages, plus interest at the legal rate and an additional indemnity pursuant to Article 1619 of the *Civil Code of Québec*, calculated as of the date of service of the application for certification of a class action;
 - c) **ORDER** the defendants, solidarily, to pay the plaintiff a sum of pecuniary damages, to be determined during the trial, plus interest at the legal rate and an additional indemnity pursuant to Article 1619 of the *Civil Code of Québec*, calculated as of the date of service of the application for certification of a class action;
 - d) **ORDER** the defendants to pay the plaintiff a sum of \$100,000 in punitive damages, plus interest at the legal rate and an additional indemnity envisaged in Article 1619 of the *Civil Code of Québec*, calculated as of the date of service of the application for certification of a class action;
 - e) **GRANT** the class action of the plaintiff for all Members of the class;
 - f) **ORDER** the Defendants, solidarily, to pay each Member of the class a sum of \$150,000 as moral damages, plus interest at the legal rate and an additional indemnity pursuant to Article 1619 of the *Civil Code of Québec*, calculated as of the date of service of the application for certification of a class action;
 - g) **ORDER** the Defendants, solidarily, to pay each Member of the class a sum of pecuniary damages, to be determined during the trial, plus interest at the legal rate and an additional indemnity pursuant to Article 1619 of the *Civil Code of Québec*, calculated as of the date of service of the application for certification of a class action;
 - h) **ORDER** the defendants to pay every Member of the class a sum of \$100,000 as punitive damages, plus interest at the legal rate and an additional indemnity pursuant to Article 1619 of the *Civil Code of Québec*, calculated as of the date of service of the application for certification of a class action;
 - i) **ORDER** the collective recovery of claims for moral and punitive damages for all Members of the class and the individual liquidation of claims of Members of the class in accordance with articles 595 to 598 of the *Code of Civil Procedure*;
 - j) **ORDER** the collective recovery of claims for pecuniary damages for all Members of the class and the individual liquidation of claims of Members of the class in accordance with articles 595 to 598 of the *Code of Civil Procedure*;
 - k) **ORDER** individual recovery of claims for pecuniary damages for all Members of the class in accordance with articles 599 to 601 of the *Code of Civil Procedure*;
6. The class action by the plaintiff Lisa Blais' must be exercised in the judicial district of Montreal.
 7. A member who has already instituted an originating application with the same subject matter as the class action shall be deemed to be excluded from the Class if this member does not discontinue his or her application before the expiry of the exclusion period.

8. A member who has not already instituted an originating application with the same subject matter as the class action may exclude himself or herself from the Class by notifying the clerk of the Superior Court of the district of Montreal before the expiry of the exclusion period.
9. A member wishing to be excluded must do so no later than thirty (30) days after the publication of this notice to Members, by November 22, 2021.
10. All Class members who have not excluded themselves shall be bound by any judgment rendered in this class action.
11. A Class member may make an intervention which will be received by the Court if it is considered useful to the Class. An intervening member is required to submit to an examination at the defendants' request. A member who does not intervene in the class action may only be subjected to an examination on discovery if the Court considers it necessary.
12. A Class member other than a representative or an intervenor cannot be called upon to pay the legal costs of a class action.
13. Proceedings and other important documents relating to this class action are available on the following websites:
 - The Register of Class Actions' website: <https://www.registredesactionscollectives.quebec>
 - Plaintiff's attorney's website concerning class actions currently underway: <https://www.classactions.ca>

THE PUBLICATION OF THIS NOTICE HAS BEEN ORDERED BY THE COURT