

NOTICE TO MEMBERS – AUTHORIZATION FOR CLASS ACTION – *Adriana Quattrociocchi c. Groupe Champlain inc. (CHSLD Marie-Victorin)*, - N° 500-06-001259-239

On September 30, 2025, the Superior Court of Quebec, District of Montreal, authorized a Class Action (the “Class Action”) for damages against Groupe Champlain Inc., in connection with the CHSLD Champlain Marie-Victorin, located at 7150 Marie-Victorin Street in Montreal, for the benefit of the following group (translation):

“Any person who resided at the CHSLD Champlain (Marie-Victorin) at any time between April 3, 2020, and June 20, 2020, as well as their spouse, natural caregiver(s), children, and grandchildren, and the heirs and beneficiaries of deceased residents.”

The class representative is Adriana Quattrociocchi, personally and in her capacity as heir to her father, the late Giovanni Quattrociocchi.

This Class Action seeks compensation for damages allegedly suffered by the representative, Adriana Quattrociocchi, and the class member as a result of the Defendant’s management of the COVID-19 pandemic in the Champlain CHSLD Marie-Victorin only.

Class members are automatically included in the Class Action without having to take any steps to register. Members may also contact the group representative’s attorneys by completing the form available on the website menardmartinavocats.com

The Class Action will proceed in the district of Montreal.

EXCLUSION OF THIS CLASS ACTION:

Any class member has the right to exclude himself from the Class Action by filing a written notice to the clerk of the Superior Court of Quebec for the district of Montreal, in accordance with article 580 of the Code of Civil Procedure, on **December 6 2025**, at the latest:

Quebec Superior Court Registry (C.S. 500-06-001259-239) 1, Notre-Dame Street East, Montreal, Québec, H2Y 1B6

The deadline to opting out the Class Action without court authorization is **December 6 2025**, at the latest.

Any class member who is not excluded from the Class Action will be bound by any judgment rendered in this Class Action. In addition, any member who has filed an individual action against the Defendant which has, in whole or in part, the same subject matter as the Class Action and who has not discontinued his action on **December 6 2025**, at the latest, shall be deemed to have excluded himself or herself from the Class Action.

MAIN QUESTIONS

Following the authorization judgement, the main questions of fact or law which will be dealt with collectively are the following:

1. Did the Defendant, Groupe Champlain Inc. (“Champlain”), negligently and wrongfully fail to comply with ministerial guidelines regarding the adaptation of service offerings and infection prevention and control at the Champlain CHSLD Marie-Victorin between April 3rd and June 20,

2020?

2. Did Champlain negligently and wrongfully fail to train a team in infection prevention and control at the Champlain CHSLD Marie-Victorin between April 3rd and June 20, 2020?

3. Did Champlain negligently and wrongfully fail to train its employees in infection prevention and control and the use of personal protective equipment at the Champlain CHSLD Marie-Victorin?

4. Did Champlain negligently and wrongfully fail to obtain and distribute to its employees the personal protective equipment required for infection prevention and control at the Champlain CHSLD Marie-Victorin between April 3rd and June 20, 2020?

5. Did Champlain negligently and wrongfully fail to implement separate hot, warm, and cold zones to separate positive patients, suspected positive patients awaiting results, and negative patients at the Champlain CHSLD Marie-Victorin between April 3rd and June 20, 2020?

6. Did Champlain negligently and recklessly fail to test employees, residents with symptoms, residents who had been in close contact with residents with symptoms, and residents who had been in close contact with residents or employees who tested positive at the Champlain CHSLD Marie-Victorin between April 3rd and June 20, 2020?

7. Did Champlain wrongfully and negligently fail to take the necessary action to compensate for employee shortages due to COVID-19-related work stoppages, resulting in significant employee shortages that had a major impact on the quality of care and services provided to residents at the Champlain CHSLD Marie-Victorin between April 3rd and June 20, 2020?

8. Did Champlain wrongfully and negligently fail to take any measures to protect the lives and integrity of the residents under its responsibility at the Champlain CHSLD Marie-Victorin between April 3rd and June 20, 2020?

9. Did Champlain wrongfully and negligently use at the Champlain CHSLD Marie-Victorin between April 3rd and June 20, 2020, employees who had worked in its other CHSLDs as well as employees who had worked in other facilities experiencing outbreaks, in violation of infection prevention and control norms and ministerial directives to that effect?

10. Did Champlain wrongfully and negligently fail to place symptomatic employees in isolation in accordance with ministerial guidelines and norms for infection prevention and control at the Champlain CHSLD Marie-Victorin between April 3rd and June 20, 2020?

11. Do the Defendant's faults are the cause of the damages suffered by the class member, and what are those damages, if any?

SOUGHT CONCLUSIONS:

The sought conclusions by the Class Action are the following:

GRANT the Class Action of the plaintiff and class members against the defendant Groupe Champlain Inc.;

DECLARE the defendant Groupe Champlain Inc. liable for the damages suffered by class members;

ORDER the defendant Groupe Champlain Inc. to pay each class member all damages suffered by them;

For each resident of the Champlain CHSLD Marie-Victorin, regardless of whether they have contracted COVID-19:

A sum of \$40,000 to the class members in compensation for:

- Psychological distress;
- Damage to their integrity, safety, and dignity;
- The deterioration of their physical, psychological, and cognitive health;
- The feelings of abandonment, suffering, anger, sadness, stress, and inconvenience resulting from the Defendant's faulty and negligent management of the pandemic;

A sum of \$2,500 to his or her children in compensation for the pain, stress, and inconvenience associated with the Defendant's wrongful and negligent management of the pandemic and their possible contamination with COVID-19 by the Defendant.

A sum of \$500 to his or her grandchildren in compensation for the pain, stress, and inconvenience associated with the anxiety caused by their grandparents' situation and their possible contamination with COVID-19;

An additional sum of \$1,000 to his or her caregiver, in addition to the amounts provided above, if the caregiver is a child or grandchild of the resident;

For class members who were residents of the Champlain CHSLD Marie-Victorin infected by COVID-19 who survived the infection:

An additional sum of \$30,000 to the class member in compensation:

- For pain, stress, and inconvenience associated with COVID-19 contamination;
- For the deterioration of their physical, psychological, and cognitive health associated with COVID-19 contamination;

Full reimbursement of expenses incurred or to be incurred as a result of the Defendant's wrongful conduct;

An additional amount to be paid to the class member, subject to the right of each class member to present, on an individual basis when assessing the quantum, proof of more significant prejudice to which the member will be entitled to if any of the following element is proven:

- The member underwent a hospital stay in intensive care;
- The member has been hospitalized;
- The member was wrongfully not sent to a hospital when his condition or level of care required it, whether for hospital care or comfort care that the Champlain CHSLD Marie-Victorin was unable to provide between April 3rd and June 20, 2020;
- The member suffered financial losses;

A sum of \$10,000 to his or her children in compensation for the pain, stress, and inconvenience associated with their parent's COVID-19 contamination;

A sum of \$2,500 to his or her grandchildren in compensation for the pain, stress, and inconvenience associated with their grandparents' COVID-19 contamination;

An additional sum of \$5,000 to his or her caregiver, in addition to the amounts provided above, if the caregiver is a child or grandchild of the resident;

For spouses, children, grandchildren, heirs and assigns of residents of the Champlain CHSLD Marie-Victorin who died as a result of COVID-19 or institutional abuse caused by the outbreak between April 3rd and June 20, 2020:

A sum of \$100,000 to the surviving spouse, in his or her personal capacity, in compensation for the pain, stress, and inconvenience suffered, as well as for grief caused by the loss of a loved one (solatium doloris) due to the Defendant's wrongful conduct;

A sum of \$30,000 to each of the deceased's heirs and beneficiaries, subject to proof of their status as heirs or beneficiaries, as the case may be, in compensation for the pain, stress, and inconvenience suffered, as well as compensation for the grief caused by the loss of a loved one (solatium doloris) due to the Defendant's wrongful conduct;

A sum of \$100,000 to the surviving spouse, in his or her capacity as heir of the deceased, if any, or to the estate of the deceased, as the case may be, in compensation for the physical and moral suffering endured by the deceased prior to his or her death (pretium doloris) as a result of the Defendant's wrongful conduct;

Full reimbursement of disbursements and funeral expenses incurred and to be incurred as a result of the Defendant's wrongful conduct;

An additional amount to be paid to the class member, subject to the right of each class member to present, on an individual basis when assessing the quantum proof of more considerable particular prejudice, to which the class member will be entitled if it is proven that the class member has suffered pecuniary losses due to COVID-19, all in connection with the alleged faults;

THE WHOLE, with costs, including all expert and opinion fees to be incurred in connection with the present proceedings.

INTERVENTION AND LEGAL COSTS

A class member may ask the Court to intervene in this Class Action. The petition to intervene can be granted if it is deemed useful to the group. An intervening class member may be required to undergo a pre-trial examination submit to discovery at the request of the Defendant's request to intervene.

A member who does not intervene in the Class Action may only be subject to pre-trial examination with the authorization of the Court.

A class member other than the representative or an intervenor cannot be called upon to pay the legal costs of the Class Action.

FOR FURTHER INFORMATION:

For more information, you can consult the Class Actions Register, where you will find the main legal documents filed with the Court, at the following address:

<https://www.registredesactionscollectives.quebec/>

Members who wish to be kept informed of developments in this case can visit the group's attorneys' website:

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This notice has been authorized and approved by the Honourable Donald Bisson, j.c.s.