

500-06-000453-080

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Annexe 4

CANADA
PROVINCE OF QUEBEC
DISTRICT OF MONTREAL
No: **500-06-000453-080**

(Class action)
SUPERIOR COURT

ANDRÉE MÉNARD

Petitioner

v.

LINO P. MATTEO

-and-

PAUL D'ANDREA

-and-

DELOITTE & TOUCHE S.R.L.

-and-

BDO DUNWOODY S.R.L.

-and-

SCHWARTZ LEVITSKY FELDMAN S.R.L.

-and-

B2B TRUST

-and-

SERVICES FINANCIERS PENSON CANADA INC.

Respondents

NOTICE TO MEMBERS

1. **TAKE NOTICE** that on August 25, 2011, the Superior Court authorized the bringing of a class action against the Respondents on behalf of : « **All persons who on November 9, 2005 were the owners of promissory notes issued by Corporation Mount Real, Gestion MRACS Ltée, Investissements Real Vest Ltée and Corporation Real Assurance Acceptation.**»

2. The principal questions of fact or law to be dealt with collectively are the following: i) Did the Respondents cause damages to members of the group, and if so, what damages? ii) Did Respondents jointly take part in a wrongful act? iii) Did this wrongful act cause damages to members of the group? iv) Are the Respondents jointly liable?

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3. A member who wishes to do so may exclude himself or herself (in particular to present their own claim) from the group by notifying the Clerk of the Superior Court of the judicial district of Montreal by registered mail within 30 days of the publication of the present notice;
4. A member may intervene if the Court considers said intervention to be useful for the group;
5. Members of the group, other than the group representative or an intervener, cannot be called upon to pay the costs of the class action;
6. The full text of the notice to members is available at the Office of the Superior Court, district of Montreal and on the websites of the attorneys for the Petitioner : www.trudeljohnston.com, www.lblavocats.ca and www.recourscollectif.info.

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