

CANADA  
PROVINCE OF QUEBEC  
DISTRICT OF MONTREAL  
No.: 500-06-000076-980

**SUPERIOR COURT**  
(Class Action)

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**CONSEIL QUÉBÉCOIS SUR LE TABAC  
ET LA SANTÉ**

-and-

**JEAN-YVES BLAIS**

Plaintiffs

-and-

**JTI-MACDONALD CORP.**

-and-

**IMPERIAL TOBACCO CANADA  
LIMITED**

-and-

**ROTHMANS, BENSON & HEDGES INC.**

Defendants

-and-

**FTI CONSULTING CANADA INC.**, in its  
capacity as Monitor and CCAA Plan  
Administrator of Imperial Tobacco Canada  
Limited and Imperial Tobacco Company  
Limited

-and-

**ERNST & YOUNG INC.**, in its capacity as  
Monitor and CCAA Plan Administrator of  
Rothmans, Benson & Hedges Inc.

-and-

**DELOITTE RESTRUCTURING INC.**, in its  
capacity as Monitor and CCAA Plan  
Administrator of JTI-Macdonald Corp.

Interveners

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**APPLICATION TO COME IN AID OF THE SANCTION ORDERS AND  
TO ADOPT THE QUEBEC CLASS ACTION ADMINISTRATION PLAN**  
(Articles 49, 599 and 600 C.C.P.)  
(Section 11, *Companies Creditors Arrangement Act* ("CCAA"))

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**TO THE HONOURABLE JUSTICE CATHERINE PICHÉ, J.S.C., SITTING IN THE CLASS ACTION DIVISION, IN THE DISTRICT OF MONTREAL, THE PLAINTIFFS AND THE INTERVENERS SUBMIT AS FOLLOWS:**

**I OVERVIEW<sup>1</sup>**

1. In March 2019, shortly after the release of the Court of Appeal decision in these proceedings (the “**Blais Class Action**”) and the related proceedings in court file 500-06-000070-983 (the “**Létourneau Class Action**”), Imperial Tobacco Canada Ltd. (“**ITCAN**”) and Imperial Tobacco Company Limited (together with ITCAN, “**Imperial**”), Rothmans, Benson & Hedges Inc. (“**RBH**”) and JTI-Macdonald Corp. (“**JTIM**”) (collectively, the “**Tobacco Companies**”) sought and were granted protection under the CCAA before the Ontario Superior Court of Justice (Commercial List) (the “**CCAA Court**”). These class action proceedings have been stayed ever since.
2. On March 6, 2025, the CCAA Court issued the Sanction Orders (defined below) approving, among other things, the CCAA Plans (defined below), including the Quebec Class Action Administration Plan (a schedule to each of the CCAA Plans).
3. The Quebec Class Action Administration Plan (the “**Quebec Administration Plan**”), which is filed as **Exhibit R-1**, among other things, sets out the process by which the class members in the *Blais* Class Action (the “**Blais Class Members**”) may submit claims for compensation and establishes the process for administering such claims, and provides for the joint oversight and supervision of the CCAA Court and this Court.
4. The Quebec Administration Plan requires that an application be brought before this Court in the *Blais* Class Action to request that this Court come in aid, recognize, assist and give full force and effect to the extent necessary to the orders issued by the CCAA Court.
5. Accordingly, this Application requests this Court to come in aid of the Sanction Orders and requests that this Court formally adopt the Quebec Administration Plan as if it were an Order of this Court to exercise oversight and supervision, jointly with the CCAA Court, over the claims process pertaining to the *Blais* Class Action.
6. This Application is brought by: (i) the Plaintiffs in the *Blais* Class Action and the *Létourneau* Class Action (the Quebec Class Action Plaintiffs or “**QCAP**”); (ii) FTI Consulting Canada Inc. (“**FTI**”), in its capacity as Monitor and CCAA Plan Administrator of Imperial (including the Defendant ITCAN); (iii) Ernst & Young Inc. (“**EY**”), in its capacity as Monitor and CCAA Plan Administrator of the Defendant

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<sup>1</sup> All capitalized terms used but not defined herein have the meanings given to them in the CCAA Plans (Exhibit R-2).

RBH; and (iv) Deloitte Restructuring Inc. (“**Deloitte**”), in its capacity as Monitor and CCAA Plan Administrator of the Defendant JTIM (with FTI, EY and Deloitte, in their capacities as Monitors and CCAA Plan Administrators, collectively, the “**Monitors**”).

## **II PROCEDURAL HISTORY**

7. By judgment dated May 27, 2015, rectified on June 9, 2015 (the “**Riordan Judgment**”), Justice Brian Riordan, J.S.C. of the Superior Court of Quebec decided in favour of the QCAP and ordered the Tobacco Companies to pay damages, with interest and additional indemnity, amounting to more than \$15 billion.
8. More precisely: (i) with respect to the *Blais* Class Action, the Court ordered the collective recovery of \$6,858,864,000 in compensatory damages and \$90,000 in punitive damages, with interest and additional indemnity; and (ii) with respect to the *Létourneau* Class Action, the Court ordered the collective recovery of \$131,000,000 in punitive damages, with interest and additional indemnity.
9. On June 26, 2015, the Tobacco Companies appealed the Riordan Judgment.
10. On March 1, 2019, the Court of Appeal substantially upheld the Riordan Judgment (the “**Appeal Judgment**”).
11. As noted above, shortly after the release of the Appeal Judgment, in March 2019, the Tobacco Companies sought and were granted protection under the CCAA before the CCAA Court and have each benefitted from a stay of proceedings ever since.

## **III THE CCAA PROCEEDINGS AND CCAA PLANS**

12. On October 17, 2024, in the context of the Tobacco Companies’ CCAA proceedings (in CCAA Court files CV-19-615862-00CL (JTIM), CV-19-616077-00CL (Imperial) and CV-19-616779-00CL (RBH)), three essentially identical plans of arrangement were filed by the Monitors and the Court-Appointed Mediator in respect of each of the Tobacco Companies, which were thereafter amended and restated, including by way of the Third Amended and Restated Court-Appointed Mediator’s and Monitor’s CCAA Plan of Compromise and Arrangement dated February 27, 2025 (the “**CCAA Plans**”). The CCAA Plans (without schedules) are filed *en liasse* as **Exhibit R-2**.
13. The CCAA Plans provide that the Tobacco Companies must pay an aggregate Global Settlement Amount of \$32.5 billion over multiple years, by way of Upfront Contributions at plan implementation and Annual Contributions over time, which will be used to satisfy the Claimants in the manner provided for therein.

14. The CCAA Plans provide that an amount of \$4.25 billion will be paid from the Global Settlement Amount to settle the claims of the QCAP. Specifically, \$4.119 billion is allocated to satisfy the claims of the *Blais* Class Members and \$131 million is to be contributed to a Cy-près Foundation to indirectly satisfy the claims of the class members in the *Létourneau* Class Action.
15. The CCAA Plans were unanimously approved by the creditors voting thereon at meetings held on December 12, 2024.
16. On March 6, 2025, the CCAA Court issued a Sanction Order in each CCAA proceeding, among other things:
  - (a) sanctioning the CCAA Plans in respect of each Tobacco Company, which were most recently amended and restated on February 27, 2025;
  - (b) authorizing and directing the Monitor to “take all steps and actions, and to do all things, necessary or appropriate to implement the CCAA Plan” (para. 15(a));
  - (c) authorizing and empowering the Monitor “to apply to any court ... for the assistance in carrying out the terms” of the Sanction Order (para. 64); and
  - (d) extending the Stay Period in each CCAA Proceeding until the Effective Time.
17. The Sanction Orders (without schedules) are filed *en liasse* as **Exhibit R-3**.
18. The CCAA Plans also provide for an ongoing role for the Monitors: (i) FTI (in respect of Imperial), (ii) EY (in respect of RBH) and (iii) Deloitte (in respect of JTIM) in the administration of the CCAA Plans as “**CCAA Plan Administrators**”, including the Quebec Administration Plan thereunder. In that regard, concurrently with the issuance of the Sanction Orders, the CCAA Court issued the CCAA Plan Administrator Appointment Orders, which formally appointed each Monitor as CCAA Plan Administrator in respect of the CCAA Plan of their respective Tobacco Company. The CCAA Plan Administrator Appointment Orders are filed *en liasse* as **Exhibit R-4**.

#### **IV THE QUEBEC ADMINISTRATION PLAN**

19. The Quebec Administration Plan is a schedule to each of the CCAA Plans (Schedule “K” to Imperial’s CCAA Plan and Schedule “N” to RBH’s and JTIM’s CCAA Plans).
20. As appears from the CCAA Plans (ss. 14.9(g) and (h)), the administration costs associated with the Quebec Administration Plan are being assumed by either Quebec Class Counsel or from the amounts allocated to the QCAP under the CCAA Plans.

21. As appears from the Sanction Orders (para. 35), at the Effective Time (on the Plan Implementation Date), *“the Blais Judgment and the Létourneau Judgment and Quebec Class Actions are fully and finally satisfied, resolved, compromised and settled.”*
22. As appears from s. 18.3.2 of the CCAA Plans, *“[a]fter the QCAP Claims Process has ended and the Eligible Blais Class Members have been paid their Compensation Payments”, the Tobacco Companies and QCAP “shall consent to motions seeking the Closing Judgment to be brought in the Quebec Superior Court by the Quebec Class Counsel in the Blais Class Action and the Létourneau Class Action.”*
23. The Quebec Administration Plan sets out the process by which the *Blais* Class Members may submit claims for compensation and establishes the process for administering such claims. It also provides for this Court, in conjunction with the CCAA Court, to have oversight and supervision of the Quebec Administration Plan.
24. The Quebec Administration Plan assigns certain matters to: (i) the CCAA Court, (ii) this Court; and (iii) the CCAA Court and this Court jointly.
25. *First*, the Quebec Administration Plan provides that the CCAA Court shall hear and determine proceedings addressing, among other things, the appointment of the Claims Administrator (who will manage the overall administration of the individual claims process and all other duties and responsibilities assigned to it under the Quebec Administration Plan), the appointment of the Administrative Coordinator (who will coordinate and serve as a liaison and conduit to facilitate the flow of information between the Claims Administrator and the CCAA Plan Administrators) and the Quebec Class Counsel Fee. The relevant paragraphs of the Quebec Administration Plan are reproduced below:

*11.2.2.1 A motion by the Court-Appointed Mediator and the Monitors for orders approving and sanctioning the CCAA Plans, which shall include the approval of both the Quebec Administration Plan [...];*

*11.2.2.2 The approval and appointment of the Claims Administrator;*

*11.2.2.3 The approval and appointment of the Administrative Coordinator;*

*11.2.2.4 The approval of the Blais Notice Plan;*

*11.2.2.5 The approval of the retainer agreement respecting fees and disbursements between the Quebec Class Counsel and the representative plaintiffs, and the approval of the Quebec Class Counsel Fee; and*

*11.2.2.6 Any matters which are referred for joint determination by the CCAA Court and the Quebec Superior Court.*

26. *Second*, the Quebec Administration Plan provides that this Court shall hear and determine proceedings addressing, among other things, a motion to come in aid of the Sanction Orders and a motion for orders directing the MSSS and RAMQ to provide certain official confirmations to the Claims Administrator. The relevant paragraphs of the Quebec Administration Plan are reproduced below:

*11.2.3.1 A motion to be brought in the Blais Class Action by the Quebec Class Counsel: (a) requesting that the Quebec Superior Court come in aid, recognize, assist and give full force and effect to the extent necessary to the orders issued by the CCAA Court in the CCAA Proceedings, including in respect of the sanction of the CCAA Plans and the approval of the Quebec Administration Plan; (b) seeking orders authorizing and directing the MSSS and RAMQ to provide to the Claims Administrator Official Confirmations (i) from the Quebec Cancer Registry of Tobacco-Victims' diagnoses of Lung Cancer or Throat Cancer, and (ii) from MED-ÉCHO of Tobacco-Victims' diagnoses of Emphysema/COPD (GOLD Grade III or IV); and (c) if deemed feasible by Quebec Class Counsel, seeking an order directing the MSSS to effect direct notification of the Quebec Administration Plan to potential Blais Class Members on the Quebec Cancer Registry;*

*11.2.3.2 Motions seeking the Closing Judgment to be brought in the Blais Class Action and the Létourneau Class Action by the Quebec Class Counsel after the Claims Process has ended and all Eligible Blais Class Members have been paid their Compensation Payments; and*

*11.2.3.3 Any matters which are referred for joint determination by the CCAA Court and the Quebec Superior Court.*

27. *Third*, the Quebec Administration Plan provides that certain matters are to be addressed jointly by the CCAA Court and this Court.
28. In that regard, the Quebec Administration Plan requires that the CCAA Plan Administrators report to the CCAA Court and this Court regarding the progress of the Quebec Administration Plan, including with respect to the publication of notices and the status of the claims process, as appears from paragraph 51.1 of the Quebec Administration Plan:

*51.1 On an annual basis, and as circumstances warrant at any other times in the CCAA Plan Administrators' discretion or as the CCAA Court and the Quebec Superior Court jointly direct, the CCAA Plan*

*Administrators shall report to the CCAA Court and the Quebec Superior Court regarding the progress of the administration of the Quebec Administration Plan including the publication of notices, the Blais Claims Application Deadline to file Tobacco-Victim Claims and Succession Claims, the Tobacco-Victim Claims and Succession Claims approved, the Tobacco-Victim Claims and Succession Claims rejected, any delays in the Claims Process, amounts distributed, fees charged and disbursements made and any other matter which the CCAA Plan Administrators in their discretion deem to be appropriate.*

29. As part of their oversight and supervision mandate, the CCAA Court and this Court may also resolve or provide directions on matters referred to them by the CCAA Plan Administrators or Quebec Class Counsel, may direct an accounting of fees, and are required to approve the budget for the claims administration. The relevant paragraphs of the Quebec Administration Plan are reproduced below:

*17.5 While no appeals, requests for review, or requests for directions to the CCAA Court or the Quebec Superior Court shall be permitted to be brought in respect of individual QCAP Claims under the Quebec Administration Plan, in the event an issue arises that is of significant general application to the Claims Process for Blais Class Members as a whole, Quebec Class Counsel shall in the first instance attempt to resolve the issue informally with the Administrative Co-ordinator and Claims Administrator. If the issue cannot be resolved informally, then, subject to section 7.1, Quebec Class Counsel may bring a request for directions jointly to the CCAA Court and the Quebec Superior Court for determination.*

*57.1 The Claims Administrator shall bring to the attention of and work with the Administrative Coordinator to address and resolve issues that may arise from time to time in the interpretation, implementation and ongoing administration of the Quebec Administration Plan. If the Administrative Coordinator and the Claims Administrator are unable to resolve an issue relating to the Quebec Administration Plan, then the Administrative Coordinator shall refer the matter to the CCAA Plan Administrators who, in their discretion, may bring the matter jointly before the CCAA Court and the Quebec Superior Court for resolution or directions.*

*57.2 The Claims Administrator shall keep accurate and complete records to allow for verification, audit or review as required by the CCAA Plan Administrators and, as circumstances may warrant, by the CCAA Court and the Quebec Superior Court which shall jointly hear and determine matters relating to the ongoing supervision of the Quebec Administration Plan.*

*57.3 Annually, the Claims Administrator shall prepare and submit the budget for the claims administration to the Administrative Coordinator who shall forward the budget to the CCAA Plan Administrators for approval by the CCAA Plan Administrators, who shall submit the budget for final joint approval by the CCAA Court and the Quebec Superior Court.*

*57.5 Annually and as circumstances warrant at any other times as requested by the CCAA Plan Administrators in their discretion or as the CCAA Court and the Quebec Superior Court acting jointly direct, the Claims Administrator shall report through the Administrative Coordinator to the CCAA Plan Administrators regarding the progress of the administration of the Quebec Administration Plan including the publication of notices, the Blais Claims Application Deadline to file Claims, the Tobacco-Victim Claims and Succession Claims approved, the Tobacco-Victim Claims and Succession Claims rejected, any delays in the Claims Process, amounts distributed, fees charged and disbursements made.*

*57.6 Annually and as circumstances warrant at any other times as requested by the CCAA Plan Administrators in their discretion or as the CCAA Court and the Quebec Superior Court acting jointly direct, the Claims Administrator shall provide through the Administrative Coordinator to the CCAA Plan Administrators who, in turn, shall report to the CCAA Court, an accounting of the fees charged, disbursements made and, after the Blais Claims Application Deadline, the distributions made to Eligible Blais Class Members for approval by the CCAA Court.*

30. The Quebec Administration Plan also grants the CCAA Court and this Court power to jointly extend the *Blais Claims Submissions Period*, as appears from paragraph 22.1 of the Quebec Administration Plan:

*22.1 The Blais Claims Submission Period shall commence at the Effective Time and run for twelve months until the Blais Claims Application Deadline. The Blais Claims Submission Period may be extended jointly by the CCAA Court and the Quebec Superior Court if it is deemed necessary and expedient to do so as the implementation of the Quebec Administration Plan unfolds.*

31. Finally, for the purposes of the joint and coordinated oversight of the Quebec Administration Plan, the CCAA Court and this Court may establish a protocol for communications between one another to discuss matters relating to their joint supervision, as appears from paragraph 11.2.1 of the Quebec Administration Plan:



*11.2.1 The CCAA Court and the Quebec Superior Court may establish a protocol for communications between one another to discuss, on an ongoing basis, matters relating to their co-supervision of the administration of the Quebec Administration Plan, including issues which are specifically referred for resolution to the CCAA Court and the Quebec Superior Court by the CCAA Plan Administrators. In resolving such referred matters, the CCAA Court and the Quebec Superior Court may, in their discretion, issue orders and/or provide such directions as are appropriate to facilitate the fair, efficient and timely administration of the Quebec Administration Plan;*

32. No changes can be made to the Quebec Administration Plan without the joint approval of the CCAA Court and this Court, as appears from paragraph 7.1 of the Quebec Administration Plan:

*7.1 No changes, modifications or revisions shall be made to the Quebec Administration Plan without the joint approval of the CCAA Court and the Quebec Superior Court as set out in an Order issued by the CCAA Court. The CCAA Plan Administrators, Claims Administrator and Quebec Class Counsel are the only persons who are entitled to apply to the CCAA Court to seek a revision to the terms of the Quebec Administration Plan.*

33. Although the Sanction Orders have full force and effect in all Provinces and Territories in Canada by virtue of the CCAA, a federal statute, and by the terms of the Sanction Orders themselves (see Exhibit R-3, para. 62), the CCAA Court has nevertheless requested that this Court come in aid, recognize, assist and give effect to the Sanction Orders and that it formally adopt the Quebec Administration Plan as if it were an Order of this Court to give it full force and effect.
34. Moreover, this Court's formal adoption of the Quebec Administration Plan will ensure that there is no ambiguity as to the role of this Court in the oversight and supervision of the Quebec Administration Plan.
35. QCAP and the Monitors respectfully invite this Court to communicate directly with the CCAA Court, if desired.
36. QCAP and the Monitors remain at the disposal of both Courts to assist it in any manner possible.

**FOR THESE REASONS, MAY IT PLEASE THE COURT TO:**

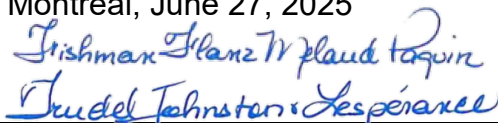
**COME IN AID** of the CCAA Court in order to recognize, assist and give effect to the Sanction Orders and the CCAA Plan Administrator Appointment Orders issued on March 6, 2025 by the Honourable Chief Justice Geoffrey B. Morawetz in court files CV-19-615862-00CL, CV-19-616077-00CL, CV-19-616779-00CL, and to the CCAA Plans;

**DECLARE** that the Sanction Orders, the CCAA Plan Administrator Appointment Orders and the CCAA Plans shall have full force and effect in the Province of Quebec;

**DECLARE** that the Quebec Class Action Administration Plan has been adopted as if it were an Order of the Superior Court of Quebec;

**THE WHOLE** without costs, save in the event of contestation.

Montreal, June 27, 2025



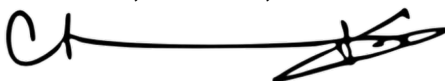
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**FISHMAN FLANZ MELAND PAQUIN LLP**

**TRUDEL JOHNSTON & LESPÉRANCE**

Lawyers for the Plaintiffs Conseil québécois  
sur le tabac et la santé, Jean-Yves Blais and  
Cécilia Létourneau

Montreal, June 27, 2025

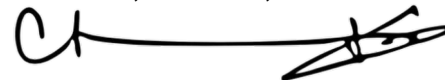


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**DAVIES WARD PHILLIPS & VINEBERG  
LLP**

Lawyers for FTI Consulting Canada Inc., in  
its capacity as Monitor and CCAA Plan  
Administrator of Imperial Tobacco Canada  
Limited and Imperial Tobacco Company  
Limited

Montreal, June 27, 2025



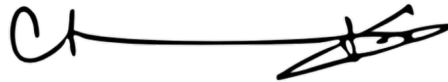
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**LANGLOIS LAWYERS LLP**

Lawyers for Ernst & Young Inc., in its  
capacity as Monitor and CCAA Plan  
Administrator of Rothmans, Benson &  
Hedges Inc.

Montreal, June 27, 2025

A handwritten signature in black ink, consisting of a stylized 'C' followed by a horizontal line and a flourish.

per

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**BLAKE, CASSELS & GRAYDON LLP**

Lawyers for Deloitte Restructuring Inc., in its  
capacity as Monitor and CCAA Plan  
Administrator of JTI-Macdonald Corp.

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## LIST OF EXHIBITS

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<b>EXHIBIT R-1</b>	Quebec Class Action Administration Plan dated December 5, 2024;
<b>EXHIBIT R-2</b>	<i>En liasse</i> , Third Amended and Restated Court-Appointed Mediator's and Monitor's CCAA Plan of Compromise and Arrangement dated February 27, 2025 (without schedules), in court files CV-19-615862-00CL, CV-19-616077-00CL and CV-19-616779-00CL;
<b>EXHIBIT R-3</b>	<i>En liasse</i> , Sanction Orders dated March 6, 2025 (without schedules), in court files CV-19-615862-00CL, CV-19-616077-00CL and CV-19-616779-00CL;
<b>EXHIBIT R-4</b>	<i>En liasse</i> , CCAA Plan Administrator Appointment Orders dated March 6, 2025, in court files CV-19-615862-00CL, CV-19-616077-00CL and CV-19-616779-00CL.

## AFFIDAVIT

I, the undersigned, Philippe H. Trudel, practicing my profession at 750 Côte de la Place d'Armes, Suite 90, Montréal (Québec), certify the following:

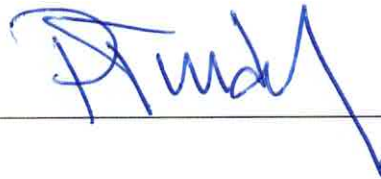
1. I am one of the attorneys representing the Quebec Class Action Plaintiffs.
2. All of the facts alleged in the *Application to Come in Aid of the Sanction Orders and to Adopt the Quebec Class Action Administration Plan* are true.

SWORN before me at the City of Montreal,  
in the Province of Quebec, this 27<sup>th</sup> day of  
June, 2025.



Commissioner of Oaths for Quebec





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## NOTICE OF PRESENTATION

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**To: THORNTON GROUT FINNIGAN LLP**

100 Wellington Street West, Suite  
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Lawyers for Rothmans, Benson &  
Hedges Inc.

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[msassi@cassels.com](mailto:msassi@cassels.com)  
Lawyers for Ernst & Young Inc., in its  
capacity as court-appointed monitor  
of Rothmans, Benson & Hedges, Inc.

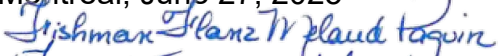

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Lawyers for Imperial Tobacco Canada  
Limited and Imperial Tobacco  
Company Limited

**TAKE NOTE** that the *Application to Come in Aid of the Sanction Orders and to Adopt the Quebec Class Action Administration Plan*, will be presented before the Honourable Catherine Piché, Judge of the Superior Court of Québec, District of Montréal, sitting in the Class Action Division, virtually by Teams, in **Room 16.12** of the Montreal Courthouse at 1 Notre-Dame Street East, Montreal, Quebec, H2Y 1B6 on **July 21, 2025 at 9:30 a.m.**, or as soon thereafter as counsel may be heard. The coordinates to join Room 16.12 by Teams are as follows:

<b>16.12</b>	<a href="#">Rejoindre la réunion Microsoft Teams</a> <a href="tel:+15813192194">+1 581-319-2194</a> Canada, Québec (Numéro payant) <a href="tel:+18334501741">(833) 450-1741</a> Canada (Numéro gratuit) ID de conférence : 559 596 749# <a href="#">Numéros locaux</a>   <a href="#">Réinitialiser le code confidentiel</a>   <a href="#">En savoir plus sur Teams</a>   <a href="#">Options de réunion</a> Rejoindre à l'aide d'un dispositif de vidéoconférence <a href="mailto:teams@teams.justice.gouv.qc.ca">teams@teams.justice.gouv.qc.ca</a> ID de la conférence VTC : 1158898292 <a href="#">Autres instructions relatives à la numérotation VTC</a>
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**PLEASE ACT ACCORDINGLY.**

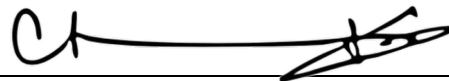
Montreal, June 27, 2025

**FISHMAN FLANZ MELAND PAQUIN LLP**  
**TRUDEL JOHNSTON & LESPÉRANCE**

Lawyers for the Plaintiffs Conseil québécois  
sur le tabac et la santé, Jean-Yves Blais and  
Cécilia Létourneau

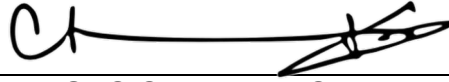
Montreal, June 27, 2025



**DAVIES WARD PHILLIPS & VINEBERG**  
**LLP**

Lawyers for FTI Consulting Canada Inc., in  
its capacity as Monitor and CCAA Plan  
Administrator of Imperial Tobacco Canada  
Limited and Imperial Tobacco Company  
Limited

Montreal, June 27, 2025

A handwritten signature in black ink, consisting of a stylized 'C' followed by a horizontal line and a flourish.

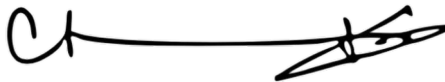
per

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**LANGLOIS LAWYERS LLP**

Lawyers for Ernst & Young Inc., in its capacity as Monitor and CCAA Plan Administrator of Rothmans, Benson & Hedges Inc.

Montreal, June 27, 2025

A handwritten signature in black ink, consisting of a stylized 'C' followed by a horizontal line and a flourish.

per

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**BLAKE, CASSELS & GRAYDON LLP**

Lawyers for Deloitte Restructuring Inc., in its capacity as Monitor and CCAA Plan Administrator of JTI-Macdonald Corp.



500-06-000076-980

**SUPERIOR COURT**  
**(Class Action)**  
**District of Montreal**

**CONSEIL QUÉBÉCOIS SUR LE TABAC ET LA SANTÉ -and- JEAN-YVES BLAIS**

**Plaintiffs**

**-and-**

**JTI-MACDONALD CORP.** et al.

**Defendants**

**-and-**

**FTI CONSULTING CANADA INC.**, in its capacity as Monitor and CCAA Plan Administrator of Imperial Tobacco Canada Limited and Imperial Tobacco Company Limited et al.

**Interveners**

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Macdonald Corp.

**APPLICATION TO COME IN AID OF THE SANCTION ORDERS AND TO ADOPT THE QUEBEC CLASS ACTION  
ADMINISTRATION PLAN**