



Court File No. CV-19-615862-00CL
Court File No. CV-19-616077-00CL
Court File No. CV-19-616779-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

THE HONOURABLE) Tuesday, the 10th day
) of December, 2024
CHIEF JUSTICE MORAWETZ)

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,
R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE
OR ARRANGEMENT OF **JTI-MACDONALD CORP.**

AND IN THE MATTER OF A PLAN OF COMPROMISE
OR ARRANGEMENT OF **IMPERIAL TOBACCO CANADA LIMITED**
AND **IMPERIAL TOBACCO COMPANY LIMITED**

AND IN THE MATTER OF A PLAN OF COMPROMISE
OR ARRANGEMENT OF **ROTHMANS, BENSON & HEDGES INC.**

ORDER GRANTING INTERLOCUTORY INJUNCTIVE RELIEF

THIS MOTION made by Quebec Class Action Plaintiffs pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. c-36, as amended (the "**CCA**") for injunctive relief against Actis Law Group and Ms. Andrea Grass (collectively, "**Actis Law Group**") was made this day in Toronto, Ontario.

ON READING the QCAPs' Notice of Motion, the Affidavit of André Lespérance dated December 8, 2024 (the "**Lespérance Affidavit**"), together with the exhibits thereto, and on hearing the submissions of Quebec Class Counsel and other such counsel requesting to be heard, all other parties having been duly served with the Motion Record as appears from the Affidavit of Service of Tina Silverstein sworn December 8, 2024;

1. **THIS COURT ORDERS** that the time for service of the Notice of Motion and the Motion Record herein is hereby abridged and validated so that this Motion is properly returnable today and hereby dispenses with further service thereof.
2. **THIS COURT ORDERS** that all capitalized terms used herein, unless herein otherwise defined, shall have the meanings ascribed to them in the Lespérance Affidavit and the CCAA Plans.
3. **THIS COURT ORDERS** that the request for interlocutory injunctive relief is granted.
4. **THIS COURT ORDERS** that the interlocutory injunctive relief granted hereunder shall remain in effect until the Sanction Order is rendered or until any such later date if this Order is thereafter extended or made permanent.
5. **THIS COURT ORDERS** that Actis Law Group shall immediately take down and remove:
 - a. the web-pages entitled “Canadian Tobacco Class Action Settlement Representation”, found at the following link: <https://actislaw.org/class-actions/canadian-tobacco-class-action-settlement-representation>; and its French language equivalent, “Représentation au règlement canadien de l’actions collectives sur le tabac”, found at the following link: <https://actislaw.org/actions-collectives/representation-au-reglement-canadien-de-laction-collective-sur-le-tabac>; and
 - b. any other pages or websites in which they have any involvement whatsoever containing communications or other information relating to the Quebec Class Actions and/or the claims and distribution processes under the CCAA Plans, including the Quebec Class Action Administration Plan, for the purpose of soliciting any Tobacco-Victims including class members in the Quebec Class Actions (“**Quebec Class Members**”) for representation

or to provide any other services to them in connection with their Tobacco Claims;

(collectively the “**Actis Website**”)

6. **THIS COURT ORDERS** Actis Law Group to cease and desist from soliciting, communicating with, approaching, entering into retainer agreements with, and/or providing information or advice to any Tobacco-Victims, including Quebec Class Members, in connection with the CCAA Plans, including the Quebec Class Action Administration Plan and/or any compensation due thereunder;

7. **THIS COURT ORDERS** Actis Law Group to provide Quebec Class Counsel with the list of all persons who signed up or provided information through the Actis Website or otherwise, including all contact and other information obtained and/or collected by them (the “**Actis List**”) by December 10, 2024 at 3 pm.

8. **THIS COURT ORDERS** Actis Law Group to destroy all copies of the Actis List in their possession, whether in electronic or paper form, by no later than December 10, 2024 at 5 pm.

9. **THIS COURT ORDERS** that the Quebec Class Action Plaintiffs are relieved from the requirement to provide an undertaking as to damages in respect of the Order granted hereunder.

AID AND RECOGNITION

10. **THIS COURT HEREBY REQUESTS** the aid and recognition of any court, tribunal, regulatory or administrative body or agency having jurisdiction in Canada or in any other foreign jurisdiction, to give effect to this Order. All courts, tribunals, regulatory and administrative bodies and agencies are hereby respectfully requested to make such

Orders and to provide such assistance, as may be necessary or desirable to give effect to this Order.



Chief Justice Geoffrey B. Morawetz

IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT, R.S.C. 1985, c.C-36, AS AMENDED
AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF:

JTI-MACDONALD CORP.

IMPERIAL TOBACCO CANADA LIMITED AND IMPERIAL TOBACCO COMPANY LIMITED

ROTHMANS, BENSON & HEDGES INC.

Court File No. CV-19-615862-00CL

Court File No. CV-19-616077-00CL

Court File No. CV-19-616779-00CL

ONTARIO
**SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**
Proceeding commenced at Toronto

**ORDER
GRANTING INTERLOCUTORY
INJUNCTIVE RELIEF**

FISHMAN FLANZ MELAND PAQUIN LLP

Avram Fishman / Mark E. Meland / Tina Silverstein

Place du Canada

1010 de la Gauchetière St. West, Suite 1600

Montreal, Quebec H3B 2N2

Tel: 514-932-4100

TRUDEL JOHNSTON & LESPÉRANCE

Philippe H. Trudel / Bruce W. Johnston / André Lespérance

750 Côte e la Place d'Armes, Bureau 90

Montréal, Québec H2Y 2X8

Tel: 514-871-8385

Attorneys for Conseil Québécois sur le tabac et la santé, Jean-Yves Blais and Cécilia Létourneau

(Québec Class Action Plaintiffs)