

CANADA

PROVINCE OF QUÉBEC
DISTRICT OF MONTREAL

No.: 500-06-001177-225

SUPERIOR COURT
(Class Action Division)

A.B.
-and-
TANYA JONES

Plaintiffs

v.

ATTORNEY GENERAL OF QUÉBEC
-and-
ATTORNEY GENERAL OF CANADA

Defendants

NOTICE CONCERNING THE AUTHORIZATION OF A CLASS ACTION IN QUÉBEC ON BEHALF OF INUIT, MÉTIS AND FIRST NATIONS PEOPLE LIVING OFF-RESERVE, INVOLVED WITH YOUTH PROTECTION SERVICES

If you are a First Nation person living off-reserve, Inuk living in Nunavik or originally from Nunavik, or Métis, and you were **removed from your home when you were under 18 years of age** or were **involved with the Director of Youth Protection (“DYP”)**, or if you are a parent or grandparent of such a person:

You should read this notice

On April 30, 2024, the Superior Court of Québec authorized a class action against the Attorney General of Canada (“**AGC**”) and the Attorney General of Québec (“**AGQ**”), alleging the breach of fiduciary duties, the commission of faults, as well as discrimination and/or the violation of the rights guaranteed by the Canadian Charter and the Québec Charter in the development, implementation, funding and delivery of child and family services to Inuit, Métis and First Nation youth living off-reserve.

YOU ARE A MEMBER OF THIS CLASS ACTION IF YOU MEET ANY OF THE FOLLOWING DEFINITIONS:

Nunavik Child Class

You are Inuk, live in Nunavik and are registered or have the right to be registered as a beneficiary of the James Bay and Northern Québec Agreement or are registered with an Inuit land claim organization and:

- at any time between **November 11, 1975 and April 30, 2024**, you were the subject of a report to the DYP, or otherwise brought to its attention, when you were under 18 years of age (the “Nunavik Child Class”); or
- you were placed, during the period of **November 11, 1975 to December 31, 1991**, with one or more non-Indigenous foster homes or adoptive families (the “Nunavik Child Subclass”).

Essential Services Class

You are Inuk, live in Nunavik and, between **November 11, 1975 and April 30, 2024**, you required an essential service when you were under 18 years of age, but did not receive it or you received it late because of one of the defendants, their departments or their agents. For the purposes of this class action, essential services are limited to psychological support, therapy and accompaniment in connection with a report (“signalement”) to child and family services and its effects.

Nunavik Family Class

You are a parent or a grandparent who was providing care to a member of the above groups.

Québec Child Class

You are not a member of the Nunavik Child Class and you are an Indigenous person (First Nations, Métis or Inuk) ordinarily residing in Québec, and **at any time between January 1, 1992 and April 30, 2024:**

- you were under 18 years of age and did not reside on a reserve, and
- you were placed outside of your home by the federal or provincial Crown, or one of their agents.

Québec Family Class

You are a parent or a grandparent and you were providing care to a member of the above sub-group when that person was placed outside the home.

If you meet any of the above definitions, you are automatically a member of the class, and you do not need to take any steps to register in order to benefit from the class action.

The class action seeks monetary compensation between \$40,000 and \$300,000 per Member of the Class, depending on the gravity and extent of the physical and psychological injuries and harms caused to them as a result of the alleged faults

committed by the AGC and/or the AGQ. The class action also seeks payment of punitive damages and damages pursuant to s. 24(1) of the Canadian Charter, in an amount to be determined by the Court.

If you **do not wish** to be included in this class action and obtain payment if the class action is granted or settled, you may **exclude** yourself from the group by sending a notice to the Civil Court Office of the Superior Court of Québec for the judicial district of Montreal preferably by registered or certified mail, at the following address:

**Civil Court Office of the Superior Court
Montreal Courthouse**
1 Notre-Dame Street East
Montreal, Québec H2Y 1B6

The **notice of exclusion** must be sent by **June 2, 2025**, and contain your full name, address and indicate that you wish to exclude yourself from class action 500-06-001177-225.

If you choose to exclude yourself, you will not be able to benefit from the class action, in the event of a favorable judgment or a settlement.

If you have any questions about the class action and/or your rights, you are encouraged to contact any of the lawyers representing the class:

SOTOS LLP 55 University Ave, Suite 600 Toronto (ON) M5J 2H7 Toll-free: 1-888-977-9806 Tel.: (416) 977-5229 www.sotosclassactions.com classactions@sotos.ca	ALEXEEV LLP 2000 McGill College Ave, Suite 600 Montreal (QC) H3A 3H3 Tel.: (514) 545-7080 Fax.: (514) 648-7700 www.alexeevco.com wcolish@alexeevco.com
KUGLER KANDESTIN LLP 1 Place Ville-Marie, Suite 1170 Montreal (QC) H3B 2A7 Toll Free: 1-844-999-2861 Tel.: (514) 878-2861 ext. 144 Fax: (514) 875-8424 www.kklex.com info@kklex.com	COUPAL CHAUVELOT S.A. 460 rue Saint-Gabriel, Suite 500 Montreal (QC) H2Y 2Z9 Tel.: (514) 903-3390 Fax (514) 600-4220 www.coupalchauvelot.com

All communications are free of charge for you, confidential, and protected by solicitor-client privilege.

Please be advised that this notice to Members is an abbreviated version authorized by the Court. We encourage Members to read the full notice, which contains additional information, available on the dedicated website for this class action: <https://millenniumscoopcan.ca/cases/indigenous-youth-in-quebec/>

This notice is available in English, French and Inuktitut.

Notice date: May 2, 2025

The publication of this notice has been authorized by the Honourable Marie-Christine Hivon, J.S.C.