

SEATS.COM AND TICKETS-CENTER.COM

QUEBEC CLASS ACTION SETTLEMENT

NOTICE OF HEARING FOR SETTLEMENT APPROVAL AND OPT-OUT

Internet Referral Services LLC
QUEBEC CLASS ACTION
N° 500-06-001066-204

This notice is to all persons in Quebec, who purchased before March 11, 2020, one or more ticket(s) as a result of using one of Internet Referral Services LLC's Websites (seats.com or tickets-center.com) for an event scheduled to take place after March 11, 2020, which event was subsequently postponed or rescheduled, without a full refund being provided by Internet Referral Services LLC.

PLEASE READ THIS NOTICE CAREFULLY. IT MAY AFFECT YOUR RIGHTS.

THIS CLASS ACTION HAS BEEN SETTLED, SUBJECT TO COURT APPROVAL.

AUTHORIZATION OF THE CLASS ACTION

On July 10, 2020, a class action was commenced in Quebec against Internet Referral Services LLC ("IRS"), as well as other online ticket marketplaces, alleging that they did not provide a timely refund to putative Class Members for tickets they purchased before March 11, 2020, for events that were scheduled to take place after March 11, 2020, which event was subsequently postponed, rescheduled or cancelled. The Representative Plaintiff was asking the Court to determine whether Class members were entitled to full reimbursement of the purchase price of the tickets and other related services purchases, plus interest, as well as punitive damages.

IRS operates seats.com and tickets-center.com.

On April 13, 2022, the Honourable Justice Pierre-C. Gagnon of the Superior Court of Québec authorized the bringing of this class action, for settlement purposes only, against the Defendant on behalf of the following amended class:

All persons in Quebec, who purchased before March 11, 2020 one or more ticket(s) as a result of using Internet Referral Services LLC Websites for an event scheduled to take place after March 11, 2020, which event was subsequently postponed or rescheduled, without a full refund being provided by Internet Referral Services LLC.

(the "**Settlement Class**" or "**Settlement Class Members**").

PROPOSED SETTLEMENT OF THE CLASS ACTION

The parties to this class action have reached a proposed settlement (the “**Settlement Agreement**”), subject to obtaining the approval of the Superior Court of Quebec. The Settlement Agreement, if approved by the Court, provides that the Defendant will offer to its Quebec customers (i) who purchased one or more ticket(s) before March 11, 2020 for an event scheduled to take place after March 11, 2020, which event was subsequently postponed or rescheduled and has not occurred by the end of the Claims Period and (ii) who have not received a full refund, not successfully pursued a chargeback or do not have an active chargeback in process (the “**Refund Class**”), the option to:

- Receive a full refund of their Order, which could include event tickets including any add-on items purchased such as parking passes (including base price, service fees, delivery fees and taxes), less any previous refunds received, in exchange for the return of their valid ticket(s); OR
- Maintain their order (keep their ticket(s)).

The refund process will be done through a Claims Process on the website of the Claims Administrator. The refund will only be provided if the valid ticket(s) is returned to the Defendant by the end of the Claims Period, and at least 48 hours prior the event date. The refund will be credited to the method of payment used to purchase the tickets (in USD). If this method of payment has expired, you will be contacted to obtain a new method of payment to credit. No cheque will be issued.

The Administration Fees and the Class Counsel Fees will be paid separately by the Defendant. Settlement Class Members will therefore **not** be asked to support or pay for any portion of these fees.

In return for providing the reimbursements, the Defendant will receive a release from all Settlement Class Members and a declaration of settlement out of Court of the Class Action.

The settlement is a compromise of disputed claims and is not an admission of liability, wrongdoing or fault on the part of the Defendant.

If you wish to keep your event ticket(s), you have nothing to do.

EVENTS SCHEDULED TO TAKE PLACE BETWEEN NOW AND APPROXIMATELY SEPTEMBER 4TH, 2022:

Did you purchase event tickets from IRS before March 11, 2020, for an event scheduled to take place after March 11, 2020, that was subsequently postponed or rescheduled, and which event is scheduled to take place between NOW and approximately September 4th, 2022?

If so, this section may apply to you as a “**Transition Settlement Class Member**”.

If you wish to hold onto your ticket(s), you have nothing to do.

If you wish to obtain a refund, which would involve returning your ticket(s) to IRS, you may be able to receive it immediately - without awaiting a further Court Order in this case. Certain conditions and strict deadlines apply so you must contact IRS immediately as follows:

seatssettlement@velvetpayments.com

or

tickets-centersettlement@velvetpayments.com

Please do not contact IRS if your event is scheduled to take place after approximately September 4th, 2022 (after the Claims Period). Your claim for a refund will be dealt with during the claims process in this case.

SETTLEMENT APPROVAL HEARING

A hearing before the Superior Court of Québec will be held on **June 17, 2022 at 9:30 a.m.**, at the Montreal courthouse located at 1, Notre-Dame East Street, Montreal, Quebec, in room 16.02, or via a TEAMS link: <https://url.justice.gouv.qc.ca/oCT0>. This date may be subject to adjournment by the Court without further publication of notice to the Class Members, other than such notice which will be posted on the Settlement Website www.seatssettlement.ca or www.tickets-centersettlement.ca.

If you wish to be included in the Class Action, you have nothing to do and nothing to pay.

If you do not wish to participate in this class action:

If you wish to exclude yourself from the Class Action, you will not be entitled to participate further in the Class Action, or to share in the distribution of funds received as a result of the Settlement Agreement. To exclude yourself, you must send a notice no later than **June 2, 2022**, by email to the Claims Administrator at the following address: seatssettlement@velvetpayments.com or tickets-centersettlement@velvetpayments.com.

You must also send the notice by registered mail to the Court at the following address:

Clerk of the Superior Court of Québec
File: 500-06-001066-204
Montreal Courthouse
1, Notre-Dame East Street, Suite 1.120, Montréal (Québec), H2Y 1B6

You must state that you wish to exclude yourself from the class action *Patterson v. Internet Referral Services LLC et als.* (case number 500-06-001066-204).

If you wish to object to the terms of the proposed Settlement Agreement:

If you disagree with the Settlement Agreement, but you do not wish to opt out of the class action, you can object to the Settlement Agreement by delivering a written submission on or before **June**

2, 2022, filed with the Court or Class Counsel in accordance with the proposed Settlement Agreement and containing the following information:

- A heading referring to this proceeding (*Patterson v. Internet Referral Services LLC et als.*, case no. 500-06-001066-204).
- Your name, current address, email address and telephone number and, if represented by counsel, the name, address, telephone number and email address of your counsel.
- A statement that you purchased before March 11, 2020, one or more tickets from Internet Referral Services LLC for an event scheduled to take place after March 11, 2020, which event was subsequently postponed or rescheduled, without a full refund being provided by Internet Referral Services LLC.
- A statement whether you intend to appear at the settlement approval hearing, either in person or through counsel.
- A statement of the objection and the grounds supporting the objection.
- Copies of any papers, briefs, or other documents upon which the objection is based.
- Your signature.

You must send your objection to Class Counsel, to their address detailed below.

Please note that the Court cannot change the terms of the Settlement Agreement. Any objections will be used by the Court to consider whether to approve the Settlement Agreement or not.

Class Members who do not oppose the proposed Settlement Agreement do not need to appear at any hearing or take any other action to indicate their desire to support the proposed Settlement Agreement (and they will not be charged any fees).

If the Settlement Agreement is approved, another notice to Class Members will be sent advising you of this and explaining the process for obtaining a refund.

As a Settlement Class Member, you also have the right to intervene to support the plaintiff in the present Class Action, in the manner provided for by law. You have no obligation to intervene in the file.

No Settlement Class Member (other than the representative plaintiff or an intervenor) may be required to pay legal costs arising from the class action.

MORE INFORMATION

For further information or details about the proposed Settlement Agreement, you may contact class counsel identified below. Your name and any information provided will be kept confidential. Please do not contact Internet Referral Services LLC, or the Judges of the Superior Court.

Mtre David Assor

Lex Group Inc.

4101 Sherbrooke Street West

Westmount, QC, H3Z 1A7

Fax: 514-940-1605

Email: info@lexgroup.ca

Website : www.lexgroup.ca

You may also contact the Claims Administrator at:

Velvet Payments

seatssettlement@velvetpayments.com
tickets-centersettlement@velvetpayments.com

**THE PUBLICATION OF THIS NOTICE TO CLASS MEMBERS
HAS BEEN APPROVED AND ORDERED BY THE SUPERIOR COURT OF QUEBEC.**