

## SCHEDULE B

SEATS.COM AND TICKETS-CENTER.COM

### QUEBEC CLASS ACTION SETTLEMENT

#### NOTICE OF SETTLEMENT APPROVAL

*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.**

**A SETTLEMENT IN THIS CLASS ACTION HAS BEEN APPROVED BY THE COURT.**

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#### 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 Class Members for tickets they purchased before March 11, 2020, for events that were scheduled to take place after March 11, 2020, which events were 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 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.*

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

## **COURT APPROVED SETTLEMENT OF THE CLASS ACTION**

The parties to this class action have reached a settlement (the “**Settlement Agreement**”), which was approved by the Superior Court of Québec on July 26, 2022. The Settlement Agreement 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 Superior Court has ruled that this process of individual recovery of claims entitles the Fonds d'aide aux actions collectives to a percentage of the amount refunded under the laws of Québec.

## **CLAIMS PROCESS**

The refund process is being 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.

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

## **EVENTS SCHEDULED TO TAKE PLACE BETWEEN NOW AND APPROXIMATELY OCTOBER 21, 2022:**

Did you purchase event tickets from Internet Referral Services LLC 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 October 21, 2022?

If so, this section may apply to you as a member of the “**Transition Refund Class**”.

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), you may be able to receive it immediately. Certain conditions and strict deadlines apply so you must contact us immediately as follows:

[retailholdings@vividseats.com](mailto:retailholdings@vividseats.com) or tel: 925-206-3066

Please do not contact Internet Referral Services LLC if your event is scheduled to take place after approximately October 21, 2022 (after the Claims Period). Your claim for a refund will be dealt with during the claims process in this case.

If you wish to receive a refund of your Order, please visit the Settlement Websites **seatssettlement.ca** or **tickets-centersettlement.ca**. The deadline to submit a claim on the Settlement Websites is October 21, 2022.

If you wish to obtain a refund, you must follow the Claims Process and ensure that your electronic tickets are transferred electronically and physical tickets are to be returned by prepaid mail (envelop and courier service (such as UPS, Purolator, DHL, Canada Post) to be provided by and paid by IRS). In all cases, any ticket (whether electronic or physical) must be returned, at least forty-eight (48) hours prior to the event date to the following address:

retailholdings@vividseats.com or tel. : 925-206-3066

## **INTERPRETATION**

If there is a conflict between the provisions of this Notice and the Settlement Agreement, the terms of the Settlement Agreement will prevail.

## **MORE INFORMATION**

For further information or details about the Settlement Agreement, you may contact the Claims Administrator at:

**Velvet Payments**  
5900, avenue Andover, suite 1  
Montréal (Québec) H4T 1H5  
[seatssettlement@velvetpayments.com](mailto:seatssettlement@velvetpayments.com)

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