

NOTICE OF A CLASS ACTION
AUTHORIZED BY THE QUÉBEC SUPERIOR COURT

You bought a Top-Load Samsung or Kenmore washer before November 2016?

You may be a member of a class action.

- On April 26, 2018, the Superior Court authorized Option consommateurs to undertake a class action against Samsung Electronics Co., Ltd. and Samsung Electronics Canada Inc. ("**Samsung**") regarding Samsung and Kenmore Top-Load washers. Option consommateurs believes that Samsung has produced, marketed, and sold washers that might explode.
- **The judgment authorizing this class action may affect your rights, whether you take action or not. Please read this notice carefully.**

YOUR RIGHTS REGARDING THIS CLASS ACTION:	
OPT OUT	If you opt out, you will not receive any payment if a settlement is reached between the parties or if the Court grants a final decision in favour of Option consommateurs. This option allows you to pursue your own lawsuit against Samsung regarding the Samsung and Kenmore Top-Load washers identified in this notice.
Do NOTHING	If you are a class member and you agree with the purpose of this class action against Samsung, you have nothing to do to participate in this class action.

- These rights – **and the deadline for exercising them** – are explained in this notice.

QUESTIONS?

CONTACT OPTION CONSOMMATEURS
AT 1 888 412-1313 OR
VISIT
www.option-consommateurs.org

CONTACT THE LAW FIRM BELLEAU LAPOINTE
AT 1 888 987-6701 OR
VISIT
www.recourscollectif.info

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THE CLASS ACTION

1. WHY ARE YOU RECEIVING THIS NOTICE?

On April 26, 2018, the Superior Court authorized Option consommateurs to undertake a class action against Samsung. This notice explains how the class action works, who the class members are, and what their rights are.

2. WHAT IS A CLASS ACTION?

It is a legal procedure instituted by an individual called the "class representative" on behalf of everyone who faces a similar problem, called the "class." A class action allows the Court to rule on the dispute regarding all class members, except for those who choose to opt out. In this class action, Option consommateurs acts as the class representative.

3. WHAT IS THIS CLASS ACTION ABOUT?

Option consommateurs (the class representative) instituted a class action against Samsung regarding Samsung and Kenmore top-load washers. Option consommateurs argues that Samsung has produced, marketed, and sold washers that might explode and that to prevent the risk, the class members are forced to restrict the use of their washer. Option consommateurs alleges, notably, that the washers are not suitable for their intended use and that Samsung has failed to inform the members of the risk of explosion. The class representative also asserts that the recall process put in place by Samsung does not solve the problem, nor does it adequately compensate the consumers.

This class action seeks to obtain a judgment ordering the refund of the purchase price of the washers to the class members. The action is also intended to obtain a refund of \$200 per member as damages, and the payment of 5 million dollars in punitive damages.

THE CLASS MEMBERS

4. WHO IS A CLASS MEMBER?

You are a class member if you purchased in Québec one of the top-load washer models listed below

The following Samsung top-load washer models manufactured between March 2011 and April 2016:

WA5471ABP/XAA, WA5451ANW/XAA, WA5451ANP/XAA, WA422PRHDWR/AA,
WA456DRHDSU/AA, WA456DRHDWR/AA, WA50F9A8DSP/A2, WA45H7200AP/A2,
WA45H7200AW/A2, WA45H7000AW/A2, WA48J7770AW/A2, WA52J8700AP/A2.

The following Samsung top-load washer models manufactured between March 2011 and June 2016:

WA40J3000AW/A2, WA56H9000AP/A2.

The following Samsung top-load washer models manufactured between March 2011 and October 2016:

WA50K8600AV/A2, WA45K7600AW/A2.

The following Kenmore top-load washer models manufactured between March 2011 and April 2016:

592-29212, 592-29222, 592-29227, 592-29336.

Note: Having benefited from the recall campaign set up by Samsung does not prevent you from being a class member.

5. HOW DO I PARTICIPATE IN THIS CLASS ACTION?

If you are a class member and agree with the purpose of this class action against Samsung, you have nothing to do to participate in this class action.

6. CAN I INTERVENE IN THIS CLASS ACTION?

Yes. If you are a class member and you request it, the Court may allow you to intervene in the court proceedings, if your intervention is deemed useful to the class. If you intervene, you may be subject to an examination at Samsung's request or you may have to pay judicial fees.

OPTING OUT

This is your only chance to opt out from the class action.

7. WHAT HAPPENS IF I OPT OUT?

- 1) You retain your rights to institute your own lawsuit against Samsung regarding the affected top-load washers, for the described issue;
- 2) You will not be bound by the judgments rendered by the Court in this class action; but
- 3) You will not be entitled to receive a payment if a settlement is reached between the parties, or if the Court grants a final decision in favor of Option consommateurs

8. WHAT HAPPENS IF I DO NOT OPT OUT?

- 1) You give up your rights to institute your own lawsuit against Samsung regarding the affected top-load washers, for the described issue;
- 2) You will be bound by the judgments rendered by the Court in this class action;
- 3) You will be entitled to receive a payment if the Court grants a final decision in favour of Option consommateurs, or if a settlement is reached.

9. HOW DO I OPT OUT?

If you do not wish to be bound by this class action, you can opt out by sending to the clerk of the Superior Court of Québec a signed letter containing the following information:

- The class action file number: 500-06-000816-161.
- Your name, current address and telephone number.
- Your statement: "I am a class member and I wish to opt out of the class action."
- Your signature.

You must send your letter by registered or certified mail before November 28 2018 at the following address:

Clerk of the Superior Court of Québec
File: 500-06-000816-161
Montreal Courthouse
1, Notre-Dame East Street, Suite 1.120

Montréal (Québec) H2Y 1B6

THE CLASS COUNSEL

10. WHO ARE THE LAWYERS WORKING ON THIS CLASS ACTION?

The law firm Belleau Lapointe, LLP represents Option consommateurs, and therefore, the class members.

Belleau Lapointe

306, Place d'Youville Office B-10
Montréal (Québec)
H2Y 2B6

Toll-free: 1 888 987-6701

Telephone: 514 987-6700

Email: info@belleaulapointe.com

11. ARE THERE FEES FOR THE CLASS MEMBERS?

You do not have to personally pay the class counsel working on this class action.

The class counsel will be paid from the damages that may be awarded through the class action, if applicable. The Court will be asked to decide the reasonableness of Option consommateurs' class counsel legal fees, which may not exceed 30% of the amounts recovered from the judgment or the out-of-court settlement. In case of success, Option consommateurs also asks the Court to condemn Samsung to pay their class counsel's legal fees and expenses, in addition to the amount claimed for the class members. The Court may however also decide that such fees and costs will be deducted from the amounts owed to the class, if any.

FOR MORE INFORMATION

You can consult the judgment authorizing the class action at the following addresses:

- Option consommateurs' website:
<https://option-consommateurs.org/recours/action-collective-laveuses-samsung-kenmore/>
- Belleau Lapointe, Option consommateurs' lawyers' website:
<http://www.recourscollectif.info/fr/dossiers/laveusesamsung/>

If you have questions, you can contact Option consommateurs or their lawyer, the law firm Belleau Lapointe, by mail, email or phone:

Option consommateurs

Maison du développement durable
50, Sainte-Catherine West Street
Office 440
Montreal (Québec)
H2X 3V4

Toll-free: 1 888 412-1313
Telephone: 514 598-7288
Email: info@option-consommateurs.org

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306, Place d'Youville, Office B-10
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Toll-free: 1 888 987-6701
Telephone: 514 987-6700
Email: info@belleaulapointe.com

The reference for this class action file is:

Option consommateurs et Chantal Gagnon c. Samsung Electronics Canada inc et al., No 500-06-000816-161, Superior Court of Québec, District of Montreal.