

CLASS ACTION

NOTICE TO:

- i) EVERYONE IN QUEBEC WHO PURCHASED/OWNS; AND
- ii) EVERYONE WHO PURCHASED IN QUEBEC

A 15" OR 17" 2011 MACBOOK PRO LAPTOP WHICH HAS SUFFERED OR SUFFERS FROM A GRAPHICS DEFECT

TAKE NOTICE that, by Judgment rendered on November 24, 2016 and rectified on December 22, 2016, the Superior Court of Québec authorized Mr. René Charbonneau to begin a class action against Apple Canada Inc. and Apple Inc. ("**Apple**") on behalf of:

1. *All persons in Quebec, who purchased and/or own a 2011 MacBook Pro Laptop with a 15 inch or 17 inch screen which has suffered or suffers from a Graphic Defect, or any other Group(s) or Sub-Group(s) to be determined by the Court; and*
2. *All persons, who purchased in Quebec a 2011 MacBook Pro Laptop with a 15 inch or 17 inch screen which has suffered or suffers from a Graphic Defect, ... manufactured, distributed, sold or otherwise put onto the marketplace by the Respondents or any other Group(s) or Sub-Group(s) to be determined by the Court;*

A "**Graphics Defect**" is a graphical anomaly or defect which could be but does not have to be: severe screen distortion, pixilation, graphical artifact or ghosting.

The attorney for the class is:

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Mr. Charbonneau is asking the Court to determine whether 2011 MacBook Pro laptops suffered from a Graphics Defect and whether Apple knew of and failed to warn consumers of such a Graphics Defect. The Court will also have to determine whether Apple is liable to pay damages to class members (the reimbursement of the initial purchase price, the reimbursement of repair costs disbursed and/or punitive damages) and, if so, in what amounts. The Court will also have to determine if Apple was legally obliged to recall the 2011 MacBook Pro Laptops.

Please consult the Lex Group Inc. website for the full text of this Notice, including the full text of the principal questions that the Court will be asked to deal with collectively and the

list of orders that Mr. Charbonneau is asking the Court to issue once it has decided these questions: <http://www.lexgroup.ca>.

If you wish to exclude yourself from the class action and avoid being bound by the judgment which will be rendered, you must send a notice no later than December 29, 2017, by registered or certified mail to the following address (with a copy to info@lexgroup.ca):

Superior Court of Québec, 1 Notre-Dame street East, Montréal, Québec, Canada,
H2Y 1B6

You must state that you wish to exclude yourself from the class action *Charbonneau v. Apple Canada Inc. et al.* (case number 500-06-000722-146).

If you wish to be included in the class action, you have nothing to do.

As a class member, you have the right to intervene in the present class action, in the manner provided for by law but you cannot be called upon to pay the costs of the class action.

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