

Notice of Settlement Approval Hearing

The Class Action Proceeding

On December 4, 2019, a class action lawsuit was filed by a Québec consumer (“the “Plaintiff”) against the Defendant Turo Inc. (“Turo”). The Plaintiff claims that since November 4, 2016, Turo charged a higher price than the one it advertised or displayed at the first step of a vehicle booking (excluding the applicable taxes and optional costs or services) on both its website (www.turo.com) and mobile application, contrary to section 224 c) of the *Consumer Protection Act*, C.Q.L.R., c. P-40.1 and section 54 of the *Competition Act*, R.S.C., 1985, c. C-34. These allegations were never proven in Court and were contested by Turo.

The class action lawsuit is more fully described in the *Application to Authorize the Bringing of a Class Action and to Appoint the Status of Representative* that is available on Class Counsel’s website: www.lpclex.com/turo.

On November 5, 2021, the Superior Court of Québec authorized the Class Action against Turo for settlement purposes only.

The Turo Settlement Approval Hearing

The purpose of this notice is to inform you that the parties have reached a Settlement Agreement, without any admission of liability on the part of Turo.

The Settlement Agreement is subject to Court approval. The Superior Court of Québec will hold a hearing to determine whether the Court will approve the Settlement Agreement on **April 12, 2022 at 9:30 a.m., in room 15.10** of the Montréal Courthouse located at 1 Notre-Dame Street East in Montréal and via TEAMS, the link for same will be posted before that date on the website of Class Counsel, www.lpclex.com/turo. The date and time of the settlement approval hearing may be subject to adjournment by the Court without further publication notice to the Class Members, other than such notice which will be posted on Class Counsel’s website www.lpclex.com/turo.

You may attend the hearing if you wish but you have no obligation to do so. If you agree with the proposed settlement and wish to be bound by it, you have nothing at all to do.

Summary of the Turo Settlement Agreement

Turo has agreed to provide Settlement Class Members (as detailed in the Settlement Agreement) with one (1) Settlement Credit in the amount of **\$16.50 CAD** to be used toward a future vehicle booking on its website or mobile application. The Settlement Credit must be used within thirty-six (36) months of the date of deposit in an Eligible Account and must be applied in full in one single vehicle booking. The Settlement Credit is transferable by way of a one-time transfer to another Registered Guest and is no further transferable thereafter. The Settlement Credit cannot be used to purchase gift cards, gift certificates, or any product redeemable for cash. The Settlement Credit cannot be combined with any other offer, discount or coupon.

Additionally, Turo has implemented a business practice change for the users accessing its website or mobile application from Québec pursuant to which the price displayed for the first step

of a vehicle booking on its website and mobile application is inclusive of the applicable Trip Fees, resulting in pricing that is “all-inclusive”, except for taxes and optional costs or services.

As part of the Settlement Agreement, Turo will receive from the Plaintiff and the other class members who have not validly opted out from the Class Action in accordance with this Settlement, a full release of any and all claims made in the *Application to Authorize the Bringing of a Class Action and to Appoint the Status of Representative* against Turo.

Turo also agrees to pay Class Counsel Fees of \$172,800.00 plus GST & QST and \$2,500.00 in disbursements, subject to Court approval.

Right of Exclusion (Opt Out)

If you do not wish to be bound by the Class Action against Turo and the Settlement Agreement, you must send, by no later than **March 18, 2022** to the clerk of the Superior Court of Québec a signed request of exclusion containing all of the following information:

1. The name and Court docket number of this case, which is: *Abicidan vs. Turo Inc.* (500-06-001026-190);
2. Your name, address, phone number(s) and email address associated with your Turo account; and
3. Specific confirmation that you wish to exclude yourself (opt out) of the Class Action against Turo and the *Turo Settlement Agreement*.

The request for exclusion (opt out) must be sent by mail to the Court with copy to Class Counsel at the following addresses:

To: Grefe de la Cour supérieure du Québec PALAIS DE JUSTICE DE MONTRÉAL 1 Notre-Dame Street East Montréal (Québec) H2Y 1B5	With Copy to : Me Joey Zukran LPC Avocat inc. Email: jzukran@lpclex.com
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If you opt-out from the Class Action against Turo and the Settlement Agreement, you will not be eligible to receive the Settlement Credit in the amount of sixteen dollars and fifty cents (\$16.50) and you will be solely responsible for ensuring and prosecuting your own rights and recourses against Turo at your own costs and within any applicable legal time periods.

Right to Object, to comment on the settlement or to Intervene

The parties' attorneys will make representations to the Court in support of the Settlement Agreement during the above-mentioned settlement approval hearing. If you wish, you can also come to Court to present your comments or objections with regards to the Settlement Agreement. You have no obligation to do so.

To exercise your Right to Object, you must submit a signed objection letter that briefly states your name, contact information (including the email address associated with your Turo account), the reasons why you object, whether your intent is to be present in Court during the settlement approval hearing and if you intend to be represented by independent counsel (providing the name and contact information of said counsel, if known).

The objection notice must be sent by no later than **March 18, 2022** to class counsel by email to : jzukran@lpclex.com.

As a Class Member, you have the right to intervene in the present Class Action in the manner provided by law. No Class Member other than the Plaintiff or an intervenor may be required to pay legal cost arising from the Class Action.

For More Information

For more information and to access a copy of the complete terms of the Settlement Agreement and the Court judgment(s), you can access the following website: www.lpclex.com/TURO. If you have questions, you can contact the Representative's lawyers, the law firm LPC Avocat Inc., by mail, email or phone. Your name and any information provided will be kept confidential. Please do not contact TURO or their lawyers, nor any of the judges of the Superior Court.

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This notice has been approved by the Superior Court of Québec.