

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

IKEA Settlement

ABICIDAN V. IKEA CANADA LIMITED PARTNERSHIP, 1137446 ONTARIO INC., IKEA LIMITED, IKEA PROPERTIES LIMITED AND INTER IKEA SYSTEMS B.V. (S.C.M. FILE NO. 500-06-000797-163)

PLEASE READ THIS NOTICE CAREFULLY AS IT MAY AFFECT YOUR LEGAL RIGHTS

A Settlement has been reached with IKEA Canada Limited Partnership, 1137446 Ontario Inc., IKEA Limited, IKEA Properties Limited and Inter IKEA Systems B.V. (collectively “**IKEA**”) in a class action related to all persons who between January 1, 2002 and June 28, 2016 purchased in Quebec an IKEA’s children chests of drawers taller than 60 cm (23½ inches), or adult chests of drawers taller than 75 cm (29½ inches), recalled by IKEA Canada, for the following models: Askvoll, Brimnes, Brusali, Busunge, Hemnes, Hurdal, IKEA Ps 2012, Koppang, Kullen, Malm, Nornas, Stockholm, Stuva, Sundvik, Tarva, Trogen, Trysil, Tyssedal, Undredal, Alesund, Alleby, Alvesta, Aneboda, Angus, Ånes, Arup, Askedal, Aspelund, Balstar, Bankeryd, Bergsmo, Bialitt, Birkeland, Blimp, Boj, Brett, Boksta, Bjorn, Borkvalla, Diktad, Edland, Elis, Engan, Eksil, Fjell, Fjord, Flaten, Fridolin, Granås, Gute, Haddal, Hajdeby, Hensvik, Herrestad, Holleby, Hovdal, Hopen, Hosteland, Kabin, Kirkenes, Knot, Kusk, Kurs, Kviby, Leksvik, Lo, Lomen, Mac, Mast, Mammot, Mandal, Meråker, Midsund, Natura, Narvik, Nordli, Nordnes, Nyvoll, Ottenby, Rakke, Ramberg, Ranvik, Rodd, Robin, Rustik, Sala, Skarnes, Sandefjord, Stranda, Sveio, Stavanger, Tassa, Tovik, Trandum, Trondheim, Varde, Vajer, Vallvik, Vestby, Vinstra, Visdalen, Vollen The Plaintiff alleged that the Chests of Drawers did not meet the North American ASTM standard requirements on free-standing stability. Under the Settlement, IKEA agrees to provide the Compensation as described herein below.

WHO IS INCLUDED? You are a Class Member, and are included in the proposed Settlement, if you purchased a Chests of Drawers as defined herein above.

WHAT CAN I RECEIVE? To receive Compensation from the Settlement, you may choose one of the options detailed in the settlement documents available at chestofdrawerssettlement.com, which include the Recall Benefits already available as per the recall dated June 26, 2016, **or you can request a Pickup Service within sixty (60) days following the publication of this Notice.** To benefit from the Pickup Service you must submit a Claim Form with its Sections A, B and C, and return the duly completed Claim Form to the Claims Administrator by email, fax, or online as per the information above within the sixty (60) day delay. If the Claim for the Pickup is valid, the Pickup will be scheduled if and after the Settlement is approved by the Court. You can contact the Claims Administrator to request a Claim Form by consulting the website at chestofdrawerssettlement.com, or emailing codsettlement@ikeaservice.ca or ReglementCommode@ikeaservice.ca.

WHAT ARE MY OPTIONS? If you wish to opt-out from the class action and therefore from the Settlement, you must submit an Opt-Out Form the Superior Court of Quebec, by registered or certified mail, at the Courthouse of Montreal, Superior Court (Class Actions Division), at 1 Notre-Dame Street East, Montreal, Quebec, H2Y 1B6, by **no later than June 28, 2021 at 23h59.** If you submit a Claim Form or do nothing, you will be bound by the Settlement and will give up your right to sue IKEA about the Chests of Drawers. If you do not opt-out, you may object to the Settlement by **no later than June 28, 2021** to Class Counsel by email, or assert your contentions before the Court at the Approval Hearing.

THE COURT APPROVAL HEARING: The Court will hold an online hearing **on June 30, 2021 at 9:30 AM, at the Montreal Courthouse** (room 17.09) in person or **virtually, which Teams link will be posted on the websites WWW.LPCLEX.COM/IKEA and chestofdrawerssettlement.com,** to consider whether to approve the Settlement. The Court will also consider requests by Class Counsel for IKEA to pay their attorneys’ fees of \$197,500 plus taxes and \$2,500 for disbursements and expenses, as well as the payment of \$2,500 to the Class Representative for his individual claim.

ADDITIONAL INFORMATION: [This is a summary. For more information about your rights and options, or to obtain a copy of the Settlement Agreement or Claim Form visit \[www.lpclex.com/ikea\]\(http://www.lpclex.com/ikea\).](#)

If you have questions, you can contact the Class Counsel, by mail, email or phone at Joey Zukran, **LPC AVOCATS INC.**, 276 Saint-Jacques Street, Suite 801, Montreal, Quebec, H2Y 1N3, Tel: 514-379-1572, Fax: 514-221-4441,

Email: JZUKRAN@LPCLEX.COM. Your name and any information provided will be kept confidential. Please do not contact IKEA or their counsels, nor any of the judges of the Superior Court.

The Superior Court of Quebec authorized the publication of this Notice.