

**NOTICE OF AUTHORIZATION AND SETTLEMENT APPROVAL HEARING WITH  
HYDROSOLUTION**

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**The Class Action**

On or around September 16, 2024, a class action lawsuit was filed by a Quebec consumer against HydroSolution S.E.C., Enercare Recharge Limited Partnership, and HydroSolution Ltée (together, “**HydroSolution**”). The lawsuit alleges that HydroSolution failed to honour their legal and contractual obligations and representations regarding leased water heaters in connection with a storm in Quebec on or around August 9, 2024, and the subsequent issuance by HydroSolution of invoices for the buyback of water heaters until July 1, 2025.

These allegations were never proven in Court and are contested by HydroSolution.

You are a class member if you are a consumer who had an active lease with HydroSolution on or around August 9, 2024, and received an invoice from HydroSolution requesting an amount for the buyback of the leased water heater in connection with the storm until July 1, 2025.

**The Settlement Approval Hearing**

The purpose of this notice is to inform you that the parties have reached a settlement, without any admission of liability on the part of HydroSolution. As such, on August 15, 2025, the Superior Court of Quebec authorized the class action for settlement purposes only.

The settlement is subject to Court approval. The Superior Court of Quebec will hold a hearing to determine if the settlement should be approved on **September 18, 2025 at 9:00 a.m., in room 15.06** of the Montreal Courthouse located at 1 Notre-Dame Street East, H2Y 1B6, and via Teams on a link that will be posted by then on the Class Counsel’s website [www.lpclex.com/hydrosolution](http://www.lpclex.com/hydrosolution).

The date and time of the settlement approval hearing may be subject to adjournment by the Court without further notice, other than such notice which will be posted on Class Counsel’s website.

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, **no further action is required**.

**The Settlement with HydroSolution**

Pursuant to the terms of settlement, each class member will be entitled to receive one of the following compensation in accordance with their respective situation, namely:

- a cheque or credit in the amount of \$200 for the class members who paid the buyback;
- a cheque or credit in the amount of \$100 for the class members who paid the buyback but received a retention offer from HydroSolution, or those who paid the buyback in part; or
- an undertaking by HydroSolution not to pursue any amounts in respect of the buyback for the class members who did not pay the buyback.

As part of the settlement, HydroSolution will receive a full release from the Plaintiff and the class members of all claims made against HydroSolution in the class action.

### **Right of Exclusion (Opt-Out)**

If you do not wish to be bound by the settlement with HydroSolution, you must send, by no later than **September 17, 2025**, a signed request containing all of the following information:

- the Court docket number: 500-06-001332-242;
- a confirmation that you are a class member;
- your name and contact information, including your billing and email addresses;
- a confirmation that you wish to opt-out; and
- your signature.

The request must be sent by mail to the Court and post-marked by September 17, 2025, or to Class Counsel by that date via email ([jzukran@lpclex.com](mailto:jzukran@lpclex.com)) who will then file it in Court on your behalf:

**Grefe de la Cour supérieure du Québec**  
Palais de justice de Montréal  
1 Notre-Dame Street East, Room 1.120  
Montréal (Québec) H2Y 1B5

If you opt-out, you will not be eligible to receive any compensation. You will be solely responsible for taking any steps to pursue your own legal rights against HydroSolution, at your own expense and within any applicable legal time limits.

### **Objection, Comment or Intervention**

The parties' attorneys will make representations to the Court in support of the settlement during the above-mentioned hearing. Class members can object to or make comments on the settlement. To present, object to, or comment on the settlement, you must send, by no later than **September 17, 2025**, a signed letter or email containing all of the following information:

- the Court docket number: 500-06-001332-242;
- a confirmation that you are a class member;
- your name and contact information, including your billing and email addresses;
- the grounds of your objection; and
- your signature.

The request must be sent to Class Counsel by email to [jzukran@lpclex.com](mailto:jzukran@lpclex.com).

### **For More Information**

For more information including a copy of the complete settlement and other relevant documents, please visit the settlement website: [www.lpclex.com/hydrosolution](http://www.lpclex.com/hydrosolution). If you have questions, you can contact class counsel listed below. **Please do not contact HydroSolution or their lawyers, nor any of the judges of the Superior Court.**

LPC Avocats

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Settlement Website: [www.lpclex.com/hydrosolution](http://www.lpclex.com/hydrosolution)

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