

**This is the 1<sup>st</sup> Affidavit  
Of Patrick Gervais in these actions  
and was made on 11/October/2017**

Court File No. 98-CV-141369

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

**B E T W E E N :**

DIANNA LOUISE PARSONS, deceased by her Estate Administrator, William John Forsyth, MICHAEL HERBERT CRUICKSHANKS, DAVID TULL, MARTIN HENRY GRIFFEN, ANNA KARDISH, ELSIE KOTYK, Executrix of the Estate of Harry Kotyk, deceased and ELSIE KOTYK, personally

Plaintiffs

and

THE CANADIAN RED CROSS SOCIETY, HER MAJESTY THE QUEEN IN RIGHT OF ONTARIO and THE ATTORNEY GENERAL OF CANADA

Defendants

and

HER MAJESTY THE QUEEN IN THE RIGHT OF THE PROVINCE OF ALBERTA, HER MAJESTY THE QUEEN IN THE RIGHT OF THE PROVINCE OF SASKATCHEWAN, HER MAJESTY THE QUEEN IN THE RIGHT OF THE PROVINCE OF MANITOBA, HER MAJESTY THE QUEEN IN THE RIGHT OF THE PROVINCE OF NEW BRUNSWICK, HER MAJESTY THE QUEEN IN THE RIGHT OF THE PROVINCE OF PRINCE EDWARD ISLAND, HER MAJESTY THE QUEEN IN THE RIGHT OF THE PROVINCE OF NOVA SCOTIA HER MAJESTY THE QUEEN IN THE RIGHT OF THE PROVINCE OF NEWFOUNDLAND, THE GOVERNMENT OF THE NORTHWEST TERRITORIES, THE GOVERNMENT OF NUNAVUT and THE GOVERNMENT OF THE YUKON TERRITORY

Intervenors

Proceeding under the *Class Proceedings Act, 1992*

Court File No. 98-CV-146405

**B E T W E E N :**

JAMES KREPPNER, BARRY ISAAC, NORMAN LANDRY, as Executor of the Estate of the late SERGE LANDRY, PETER FELSING, DONALD MILLIGAN, ALLAN GRUHLKE, JIM LOVE and PAULINE FOURNIER as Executrix of the Estate of the late PIERRE FOURNIER

Plaintiffs

and

THE CANADIAN RED CROSS SOCIETY, THE ATTORNEY GENERAL OF CANADA and HER MAJESTY THE QUEEN IN RIGHT OF ONTARIO

Defendants

and

HER MAJESTY THE QUEEN IN THE RIGHT OF THE PROVINCE OF ALBERTA, HER MAJESTY THE QUEEN IN THE RIGHT OF THE PROVINCE OF SASKATCHEWAN, HER MAJESTY THE QUEEN IN THE RIGHT OF THE PROVINCE OF MANITOBA, HER MAJESTY THE QUEEN IN THE RIGHT OF THE PROVINCE OF NEW BRUNSWICK, HER MAJESTY THE QUEEN IN THE RIGHT OF THE PROVINCE OF PRINCE EDWARD ISLAND HER MAJESTY THE QUEEN IN THE RIGHT OF THE PROVINCE OF NOVA SCOTIA HER MAJESTY THE QUEEN IN THE RIGHT OF THE PROVINCE OF NEWFOUNDLAND, THE GOVERNMENT OF THE NORTHWEST TERRITORIES, THE GOVERNMENT OF NUNAVUT AND THE GOVERNMENT OF THE YUKON TERRITORY

Intervenors

Proceeding under the *Class Proceedings Act, 1992*

No. C965349  
Vancouver Registry

**In the Supreme Court of British Columbia**

Between:

**Anita Endean, as representative plaintiff**

Plaintiff

and:

**The Canadian Red Cross Society  
Her Majesty the Queen in Right of the Province of  
British Columbia, and The Attorney General of Canada**

Defendants

and:

**Prince George Regional Hospital, Dr. William Galliford,  
Dr. Robert Hart Dykes, Dr. Peter Houghton, Dr. John Doe,  
Her Majesty the Queen in Right of Canada, and  
Her Majesty the Queen in Right of the Province of British Columbia**

Third Parties

**Proceeding under the *Class Proceedings Act*, R.S.B.C. 1996, C. 50**

CANADA  
PROVINCE OF QUEBEC  
DISTRICT OF MONTRÉAL

NO : 500-06-000016-960

SUPERIOR COURT  
Class action

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DOMINIQUE HONHON

Plaintiff

-vs-

THE ATTORNEY GENERAL OF CANADA  
THE ATTORNEY GENERAL OF QUEBEC  
THE CANADIAN RED CROSS SOCIETY

Defendants

-and-

MICHEL SAVONITTO, in the capacity of the Joint  
Committee member for the province of Quebec

PETITIONER

-and-

FONDS D'AIDE AUX RECOURS COLLECTIFS

-and-

LE CURATEUR PUBLIC DU QUÉBEC

Mis-en-cause

CANADA  
PROVINCE DE QUÉBEC  
DISTRICT DE MONTRÉAL

NO : 500-06-000068-987

SUPERIOR COURT  
Class action

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DAVID PAGE

Plaintiff

-vs-

THE ATTORNEY GENERAL OF CANADA  
THE ATTORNEY GENERAL OF QUEBEC  
THE CANADIAN RED CROSS SOCIETY

Defendants

-and-

FONDS D'AIDE AUX RECOURS COLLECTIFS

-and-

LE CURATEUR PUBLIC DU QUÉBEC

Mis-en-cause

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## AFFIDAVIT

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I, **PATRICK GERVAIS**, residing at 790, du Chardonnay Street, Laval, province of Quebec, H7A 0C2, solemnly affirm that :

1. I am the Vice-President, Business Development and Partnerships, and a Shareholder of BRAD, a fully integrated agency offering services in media (including web and social media), creativity & strategy, design, promotion, marketing, content creation and e-commerce.
2. Attached hereto and marked as **Exhibit "A"** is my curriculum vitae.

*BRAD's Experience in Legal Notice Campaigns*

3. In 2015, BRAD was retained to design and develop an advertising notice campaign to promote claims takeup in the Dynamic Random Access Memory (DRAM) class action settlement. I led BRAD's development of a nationwide campaign entitled "C'est mon argent/The Money is Mine", which was ranked in the top 10 media campaigns in 2015 according to Infopresse and resulted in excess of 880,000 successful consumer claims in addition to manufacturer and distributor claims. The campaign involved an initial television launch followed by a strong social media campaign and supported by public relation efforts with trained spokespersons to interact with the press and other media.
4. In 2016, I participated in the development of a similar advertising campaign for the Province of Québec, in *Marcotte vs American Express*, a class action where plaintiffs alleged illegal fees were charged by the defendant for foreign currencies transactions using American Express credit card in the years 2000-2003. This campaign proposal was presented before the court but was no longer required for the settlement that was subsequently reached by the parties.
5. More recently, I also led the social media campaign designed and developed by BRAD whose objective was to identify potential sexual assault victims in a class action suit against the City of Westmount for acts allegedly perpetrated by a former sports coach.
6. On Monday of this week, a nationwide advertising notice campaign designed by BRAD to promote claims takeup in the Polyurethane Foam price-fixing class action settlement was launched. The "Mousse Payante/Foam for Cash" campaign also involves an initial television campaign supplemented with social media advertising and supported with a public relations campaign and trained spokespersons for press and other media.

*BRAD's Retainer in these Actions*

7. BRAD was retained by the Joint Committee to develop a national Notice campaign to reach persons diagnosed with Hepatitis C who were infected through blood or blood products in Canada between January 1, 1986 and July 1, 1990 who have not made a claim under the settlement. I have been the project lead.

8. In order to understand the mandate and develop this notice campaign, BRAD received information from and had discussion with members of the Joint Committee and Kevin O'Connell, employed by the Administrator of the settlement. We also received from the Joint Committee a summary of non-identifying information about the age, sex, and provincial location of class members as well the most commonly reported reasons for requiring the transfusion that led to a class members' infection if such information was available. I understand that this summary was prepared by the actuaries retained by the Joint Committee. BRAD also conducted its own research about Hepatitis C generally and more specifically in Canada.
9. Attached hereto and marked as **Exhibit "B"** is BRAD's proposal for this Notice campaign, which provides three notice options, all of which are costed.
10. In making this affidavit, I certify that I am aware that my duty is to:
  - a) provide opinion evidence that is fair, objective and non-partisan and related only to matters within the area of my expertise; and
  - b) assist the court and provide such additional assistance as the court may reasonable require to determine a matter in issue.
11. I am aware that the foregoing duties prevail over any obligation I may owe to any party on whose behalf I am engaged and I am aware that I am not to be an advocate for any party. I confirm this affidavit conforms with the above-noted duties. I further confirm that if called upon to give oral or written testimony, I will give such testimony in conformity with this duty.

**AND I HAVE SIGNED**

  
**PATRICK GERVAIS**

SWORN BEFORE ME  
11/October/2017



**Line Gagnon # 141094**

A Commissioner of Oaths in the Province  
Of Quebec

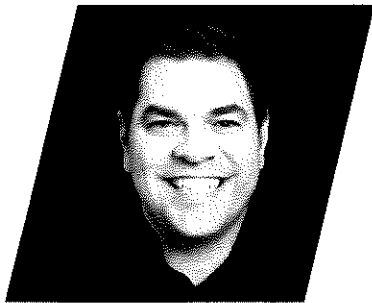


This is Exhibit « **A** » referred to in the  
Affidavit of **PATRICK GERVAIS**  
sworn before me at Montreal,  
this 11<sup>th</sup> day of October 2017

*Line Gagnon*

Line Gagnon #141094  
A Commissioner for taking Affidavits  
for the Province of Quebec





## ***PATRICK GERVAIS***

### ***Associate Vice-President***

An entrepreneur at heart, Patrick is first and foremost an expert in 360° communication strategies. With every mandate, he provides his clients with a proactive approach and a passion for innovation. He is results-oriented, and has an exceptional ability of identifying promising opportunities for his clients. Over the years, he has developed a profound knowledge of the effective use of media. As a result, he has worked for such renowned brands as BMR, Benny&Co., Chocolats Favoris, Bell Canada, GM Canada, and Sobey's. Patrick has collaborated on the marketing, branding, planning, and promotion of many products and brands on a national level, including for Isuzu Canada, Lego, Wines of France, Bell Canada, Wines of Chile, and more.

With respect class action cases, Patrick served as an expert witness in multiple cases. The first was in 2015, for Dynamic Random Access Memory (DRAM). The second, in 2016, was at the request of Réal Marcotte, for a case against American Express; the case alleged that the company was charging illegal fees for foreign currency transactions made using American Express credit cards. American Express did not want to settle for a specific amount of money in this class action suit, so the lawyers at Trudel Johnston & Lespérance asked Brad to develop a campaign for the Province of Quebec (which was fully developed by Patrick Gervais) to recruit as many eligible American Express card holders as possible. Once the case was presented before the courts, American Express decided to settle.

Patrick also led a social media campaign whose objective was to identify potential sexual assault victims in a class action suit against the City of Westmount for the actions of a former sports coach. More recently, a new campaign was launched across Canada, to inform all citizens who purchased polyurethane foam products in Canada between January 1, 1999, and January 10, 2012, that they could be compensated for a certain amount of their purchases. Patrick developed the entire strategy—from media selections, to digital implementation, to the PR campaign. All strategies were developed to ensure that the campaign's message was effectively communicated to the public.

## ***EXPERIENCE***

Brad since October 2013  
*Vice-President*

Cap Communications 2012-2013  
*President*

GPI Communications 1997-2012  
*President*

### **DISTINCTIONS**

Elsie Awards 2007 – Winner, Best Niche Marketing – Sopexa Canada

Gaïa 2009 – Grand Prize: Bakery and Pastry Products – Galettine Moment

SIAL 2009 – Grand Prize: Trends and Innovation – Galettine Moment

Elsie Awards 2011 – Winner, Best Integrated Marketing Program: Wines – Wines of Chile

Gaïa 2012 – Finalist: Meat, poultry, seafood, and deli meats (fresh, frozen) – Le Chef et Moi – Industrie gastronomique Cascajares – Beef Fondant

CTAC 2012 – Winner, Innovation Award: New or Improved Products, Snacks – Nutrifrance Ltd. – OMAX Nutrition Bars

CTAC 2012 – Winner, Innovation Award: Prepared foods (dry, chilled, frozen) – Le Chef et Moi – Industrie gastronomique Cascajares – Beef Fondant

### **OTHER EXPERIENCE**

Advertisements for La Tablée des Chefs, since 2014 (volunteer)

Fundraising Campaign for Procure, 2010 to 2012 (volunteer)

Fundraising Campaign for Dr. Clown/Fondation Jovia, 2007 to 2009 (volunteer)



This is Exhibit « **B** » referred to in the  
Affidavit of **PATRICK GERVAIS**  
sworn before me at Montreal,  
this 11<sup>th</sup> day of October 2017

*Line Gagnon*

Line Gagnon #141094  
A Commissioner for taking Affidavits  
for the Province of Quebec



AUGUST 11, 2017

# ***COMMUNICATION PLAN - CLASS ACTION - HEPATITIS C 86-90***

Proposed to the Joint Committee

***BRAD***

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01

# *SUMMARY*

*BRAD*

# Summary

## KEY CHALLENGES

- Detachment on behalf of the target: Revisiting a potential date of infection of 27 years ago or more
- A settlement was reached 18 years ago
- Questioning eligibility for late claims versus regular claims
- Possible confusions with other Hepatitis C class action settlement
- Few people are eligible
- Increase credibility, so people don't think it's a scam
- Motivate them to act so they can receive what they're entitled to
- Complexity of making a claim

## Summary

### ACTION PLAN

We will concentrate our media investments to target of those aged 27 and over.

The campaign will kick off in January 2018 and will deploy in two phases.

We will use media that require more than 3 seconds of attention, to ensure a clearer understanding of our message.

We will use media that are seen as credible in the eyes of the public, and that allows for the delivery of a complex message.

#### Phase 1: Ignite Awareness

#### Phase 2: Drive Conversion

- Use mass media (television) for efficient reach and to pique curiosity, to encourage people to research the possibility of making a claim
- SEM (Search Engine Marketing) strategy on the resulting internet searches
- New website for a higher rate of conversion and to get people's email address in order to start a conversation. Will also allow updates to email addresses if they are not new to the settlement
- Develop a simple and highly memorable call-to-action message for all media platforms
- Use spokesperson to generate claims
- Use social media to properly profile which people have the potential to make a claim

*02*



# *OUR RECOMMENDATIONS*

*BRAD*

## Our understanding of the mandate

- Create a **national campaign** that serves to notify a broad range of people - including those who may not know that this settlement even exists - that a class action was settled, and that anyone who contracted Hepatitis C through a blood transfusion or blood product in the class period has the possibility of filing a late claim and being compensated under.
- Encourage class members consumers to register without conveying in detail the components of the settlement new late claims compensation plan.
- Suggest how the campaign might stay active for the next 2 years with a smaller budget; social media would be a good strategy.



## Targets for media buy purposes

It is important to understand that the target market used in this presentation determines the selection of appropriate media to reach the maximum amount of potential class members between 27 and 75 years old.

Should our communications focus on a specific age group, we will make sure all possible people who have been infected and who qualify will be reached, and we will raise awareness among them about how to make a claim.

There will be a form to screen people on the website (done in collaboration with the administrator) to make sure we funnel only potentially eligible claims to the right people.

## Targets for media buy purposes

Canada-wide (English and French); approximately 10,000 people were infected

- Target the largest population clusters, such as Quebec, Ontario, and BC (larger cities)
- Particular attention should be paid to people outside the larger cities (they have probably been less exposed to specialists and teaching hospitals, where awareness of the settlement is higher)
- People aged 27 and over, with a focus on those aged 50-70
- Friends, families, and children of those infected with Hepatitis C
- Doctors

Many people do not know they had a transfusion at that time because previously, a signed consent was often not required to receive a transfusion.

Even though a high proportion of Canadians (90%) correctly indicate that "someone can have Hepatitis C and not know it", only one in four (23%) say they have been tested for Hepatitis C at some point in their life

Source (Ipsos) <http://www.ipsos-na.com/news-polls/pressrelease.aspx?id=5977>

The most frequently cited sources of infection reported to the administrator of the settlement are:  
Heart Surgery, Anemia, Hysterectomy, Leukemia, M.V.A, Hip Replacement, surgery (not specified as to type),  
GI Bleed, Bleeding Ulcer, Childbirth, Bypass

## **Targets for media buy purposes**

### **Family members**

Family members can apply for compensation if Hepatitis C was the cause of death of someone in their family. Family members are also eligible if their infected family members were already approved for the settlement but could not claim their compensation because they died before they were able to do so.

### **People potentially qualified to claim that are living with Hepatitis C**

### **Secondary infections**

A spouse or child of an infected person, who contracted the disease from them.

Those with secondary infections are also eligible, but the person with the primary infection must be approved for the settlement. Household exposure to the blood of someone who has Hepatitis C is the most common form of secondary infection.

## Objectives

1. Target those who did not file a claim on time or within 1 year of reaching age of majority (before the June 30, 2010 deadline or within 3 years after they were diagnosed)
2. Gather as many names as possible to make first contact
3. Initiate discussion with these individuals to verify whether they are eligible for compensation
4. Reach as many eligible class members and their family members as possible
5. Inform and motivate the general public and the media
6. Raise awareness among health professionals
7. Generate valid claims

## Current challenges

- Complex problem: It's a public health issue; care must be taken when communicating with people who have been cured
- Target detachment: Requesting action when the issue took place over 30 years ago and the settlement was reached 18 years ago
- Potential questioning from the target concerning their eligibility
- Trust and credibility is an important factor of success

## Strategic pillars

Based on our understanding of the mandate and its key issues, here are the strategic pillars for the deployment of the campaign:

- A. Use a spokesperson to assert the legitimacy of the compensation
- B. Develop a message that prompts action; that generates internet research
- C. Ensure we have a web presence, and take the time needed to explain what claimants may be entitled to
- D. All communications should converge on the new website so that people communicate with the administrator, and so that we can start a conversation and ensure all eligible people claim compensation.

## Positioning

- Do you have Hepatitis C?
- Did you receive a transfusion or blood products between 1986 and 1990?
- If so, make a claim
- You could be compensated!

## Proposed deployment

### Media Targets – Establish contact with potential class members who should receive compensation

- A small percentage of Canadians has been affected by the Hepatitis C case. The campaign will speak mainly to adults aged 27+, with a focus on the segment that is most predisposed to knowing about the case and who is infected with Hepatitis C. The proposed emphasis will be men and women aged 50 to 70 years with Hepatitis C.



## Proposed deployment

### STRATEGY: A TWO-PHASE APPROACH

#### Phase 1

- The campaign is designed with two distinct phases. The initial phase, **IGNITE AWARENESS**, will focus on getting the news out loud and clear to a broad Canadian audience aged 27+ (the audience with the highest risk)
- 75% of Canadians who are most at risk for Hepatitis C have not been tested or don't know if they have been tested – Ipsos research 2014
- Approximately 280,000 Canadians nationwide are currently infected with Hepatitis C
- Testing “Baby Boomers” would locate approximately 67% - 75% of all those with Hepatitis C.  
Source: Canadian Health Measures Survey – CHMS: Health Reports 2013; 24 11: 3-13

As shown in research done by Ipsos and the Canadian Health Measures Survey, we certainly need to raise awareness of this disease, as it may potentially affect this segment of the population, some of whom are unaware they have contracted it. We need to generate a reaction and more importantly we need people to act and to follow up on our message (visit the website, call a doctor, search online for more details)

The end results of this phase are:

- Maximizing general awareness for a broad population of Canadians (adults aged 27+)
- Providing detailed information about the steps to follow in order to file a claim
- Credibly persuading the target, while knowing this is a unique case that may generate less interest in the public.

## Proposed deployment

### STRATEGY: A TWO-PHASE APPROACH

#### Phase 2

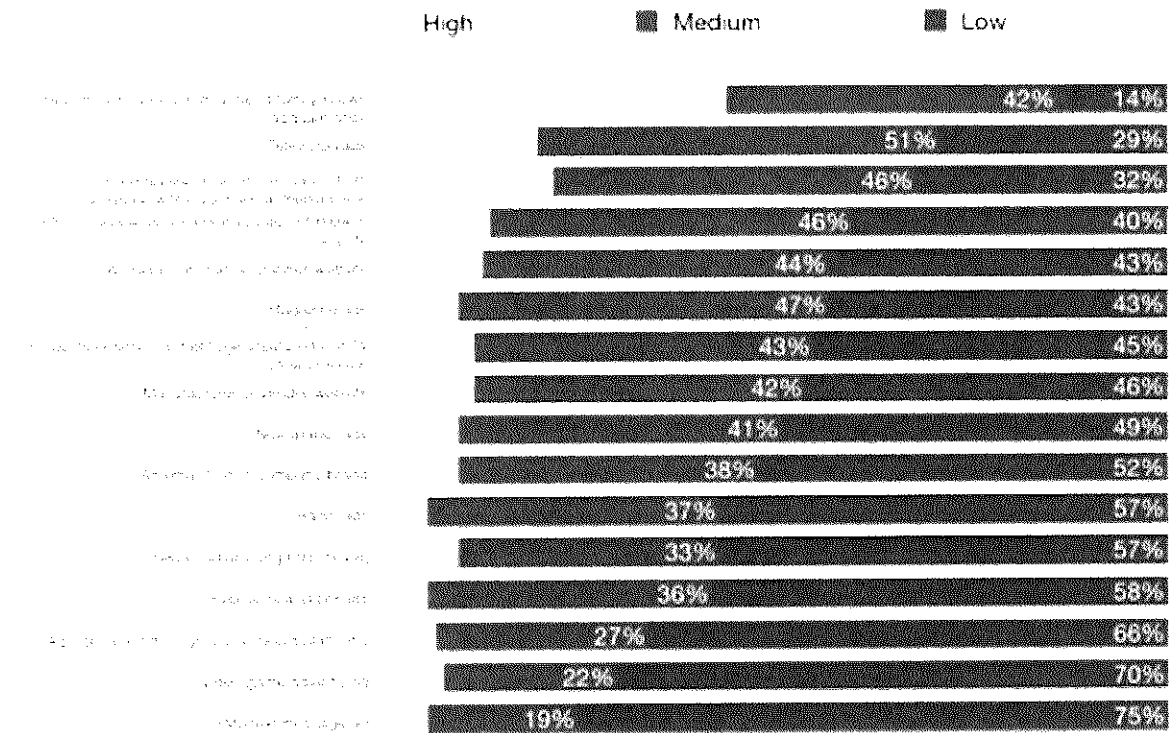
The second phase, **DRIVE CONVERSIONS**, will primarily be designed to accelerate the claim rate for a high-potential segment: adults aged 50-70. The different tactics put forward will:

- Create pressure on the target with a higher-frequency approach, as opposed to broad reach in the first phase
  - Allow for geo-targeting by province, by city
- Leverage digital elements from social and search marketing (SEM) to emphasize the call-to-action, with the understanding that message was established in the first phase
  - Allow for specific targeting and incremental reach on Facebook
  - Address all existing and new requests for information with searches on Google and Bing. These consumers are predisposed to engage and to claim (if they qualify)
- Accommodate deployment with a flexibility factor, to react with a regional adjustment
- Exploit social channels and use influencers/bloggers to help expand the discussion, heighten credibility, and first and foremost have people react and connect with the new website in one click. According to the latest consumer research, considering the high penetration of social media in Canada combined with people's established ability to connect with friends, we need to tap into the most important factor that influences decision-making: recommendations made by friends or family.

## Proposed deployment

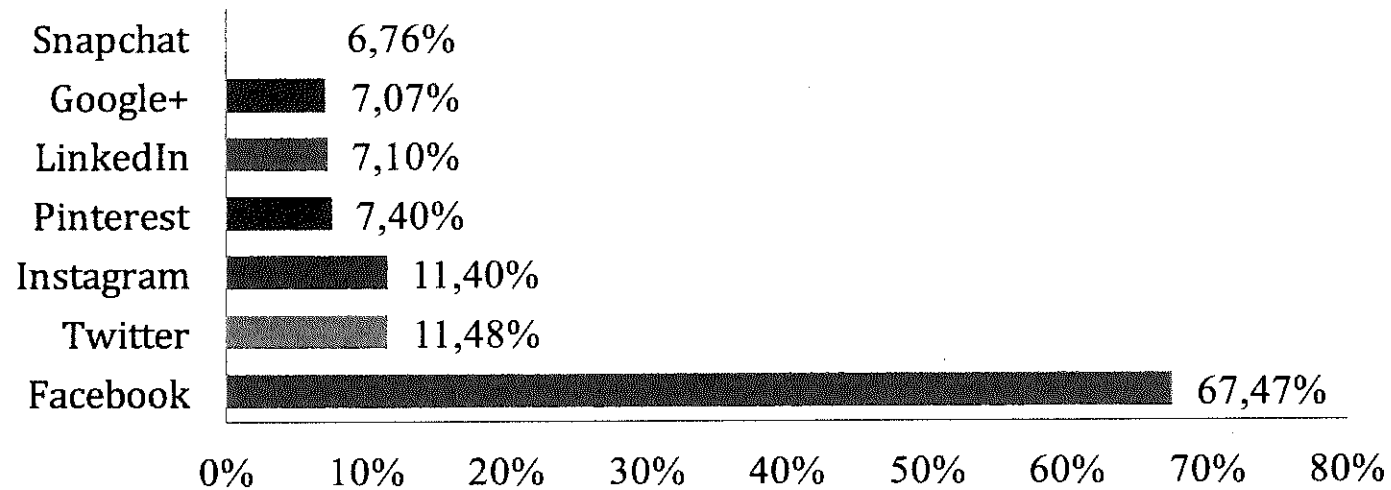
### US Consumers' Biggest Purchase Influencers

% US consumers aged 14 and above, asked to what degree the following influence their buying decisions



## Proposed deployment

### Daily Access to social platform in Canada, Age 16+



Source: *Touchpoints Canada 2016, Base:*

## Media selection & execution

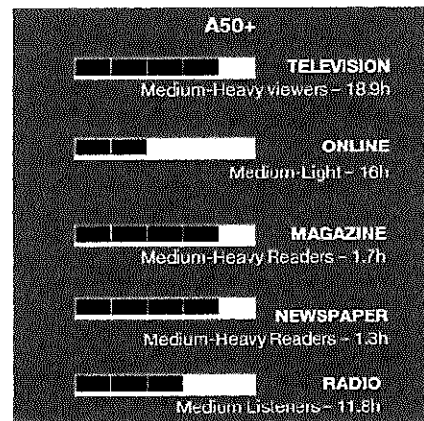
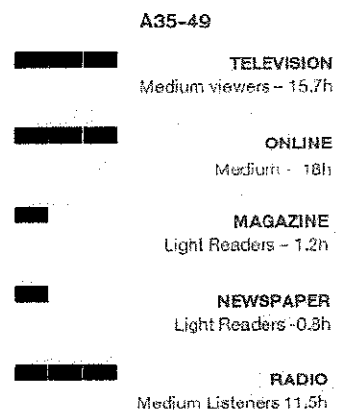
### Television

The campaign is scheduled to start in January 2018 after the holidays, which is ideal timing to leverage a television strategy; our target is more predisposed to watch this medium (19h/week) and their favourite shows are back on air at this time of the year. Television always brings the highest recall level of all media, and as such will help present the message to all Canadians (estimated reach more than three quarters of adults aged 27+). Television will be an ice-breaker for the campaign.

Television will be supported by several other touch points, which are necessary to tell the complete story, from establishing the campaign to facilitating its activation. When we consider the media exposure of our potential segments, we definitely need to complete the mix with digital elements, which will allow for niche targets of more qualified consumers.

## Media selection & execution

Weekly Media Consumption



TV consumption : ROC vs Quebec

Weekly hours and Daily potential reach

	A35-49	A50+
ROC	15.4h / 82%	18.1h / 86%
Quebec	16.8h / 83%	21.3h / 92%

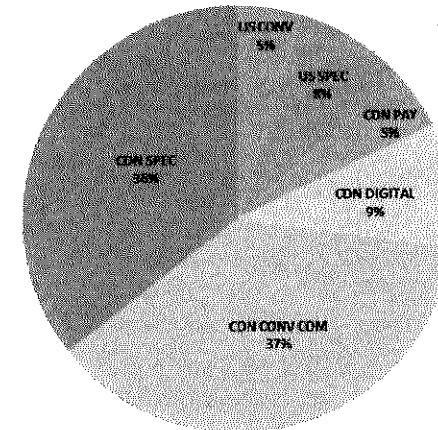
Used as an insight, news environments will be strongly considered in television, in order to ensure credibility and to help arouse interest.

TV remains a major reference as a source of information for the majority of our target (35-60), although the entire 27+ years old spectrum is reached with this media selection.

## Media selection & execution

TV schedules will be purchased in a balanced split between conventional and specialty networks, to align with viewership habits (50/50). The weight allocated to the specialty network portion will allow for much better pricing, resulting in a more efficient strategy and an overall increased return on investment (ROI). The right selection of specialty networks will also create an emphasis on the core target adults aged 50-70: CBC News Network, History, CTV News Channel, TSN, RDI.

Fall 2016 – Share of market



- 45% of buyable hours tuned is spent with Conventional
- 55% of buyable hours tuned is spent with Specialty

\*Source: Infosys PPM Sept-Dec 2016

### News environment is appointment TV for most of the 50+ consumers

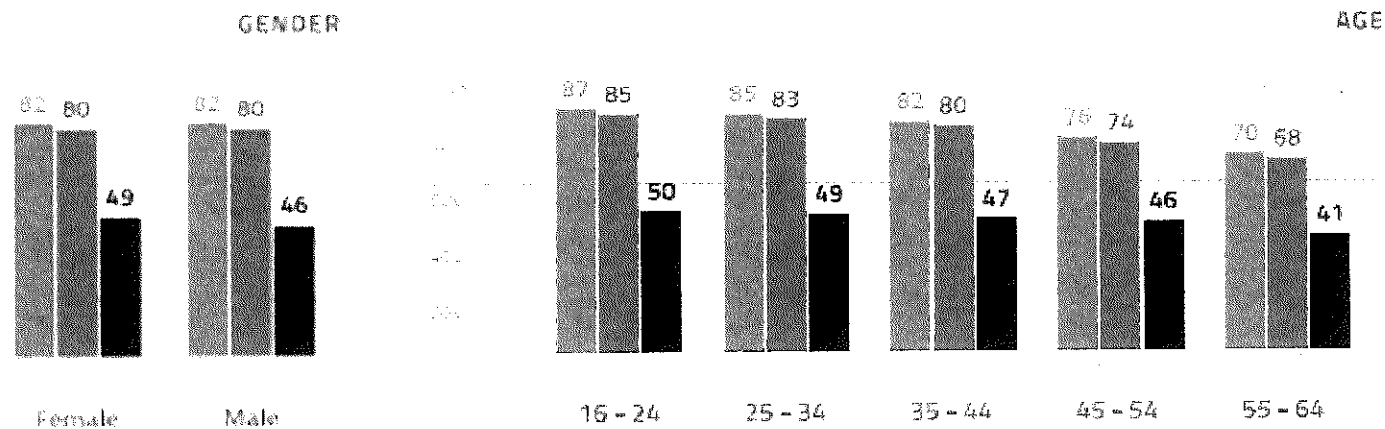
Watched news on television yesterday	2006 %	2012 %	Change
Total	57	55	-2
18-29	49	34	-15
30-49	53	52	-1
50-64	63	65	+2
65+	69	73	+4

\*Source: Infosys PPM Sept-Dec 2016

## Facebook & Instagram



Facebook and Instagram will be leveraged for their ability to effectively reach various segments through very "niche" targeting elements. Not only can we reach our target on their personal devices (mobile, tablet, and desktop) to present our main message, but we also want to engage with them to encourage them to act and file a claim, and to share the information with their family and friends.



Facebook and Instagram audience, Facebook 2016



## Facebook & Instagram



In order to succeed, we will leverage the page [www.Hepc8690.ca](http://www.Hepc8690.ca) to facilitate the push and the link to our ads. This will allow us to broadcast our messages in video format onto the newsfeeds of all Facebook users, and will also allow us to use the Carousel format, which is more likely to generate a higher engagement rate (conversions). Overall, these formats perform better than the usual right-hand column format, and more importantly, they provide access to the mobile inventory which represents more than 50% of all impressions available on Facebook and Instagram.

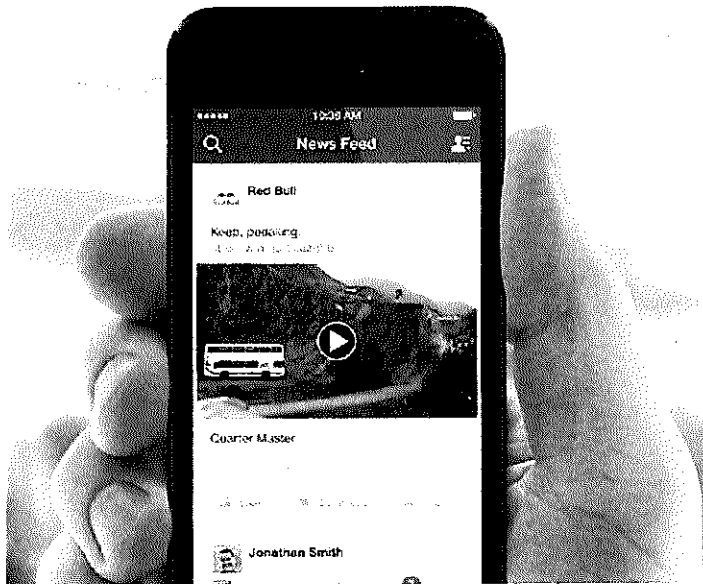
- Formats to be deployed:
  1. **Video ad** mainly to increase **awareness**
  2. **Click-to-website ad** (mobile specific) to accelerate conversions: drive to claim site
- Target by demographic:
  - 50+ with emphasis on desktops
  - 27-50 on all devices
  - Geo-target as per ongoing results/responses
- Build look-alike segments based on results (drive to site)
- A retargeting strategy can be deployed with the implementation of a Facebook pixel on our website. People visiting the Hep C site could be retargeted while going through their Facebook/Instagram newsfeed.

## Facebook & Instagram



### Facebook video ad

- awareness



### Facebook click-to-website ad

- conversion



## SEM AdWords

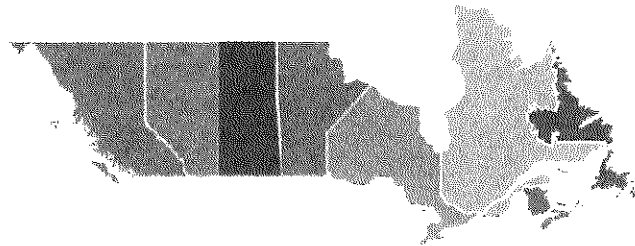
Our target will be in information-seeking mode. Following the mass media campaign, they'll be doing searches based on the following:

- What is Hepatitis C and what are its symptoms?
- Do I have Hepatitis C?
- What happened with blood transfusions between 1986 and 1990?
- Names and list of drug treatments

A list of key words will be generated to cover these questions and to direct the target to the claim site. These key words will be closely monitored and will be optimized to ensure that the clicks we are paying for are actually converting into claims, as opposed to generating a high bounce rate.

## SEM AdWords

The SEM campaign will be executed nationally, but we can expect more activity in the 5 provinces that rank highest for searches related to Hepatitis C.

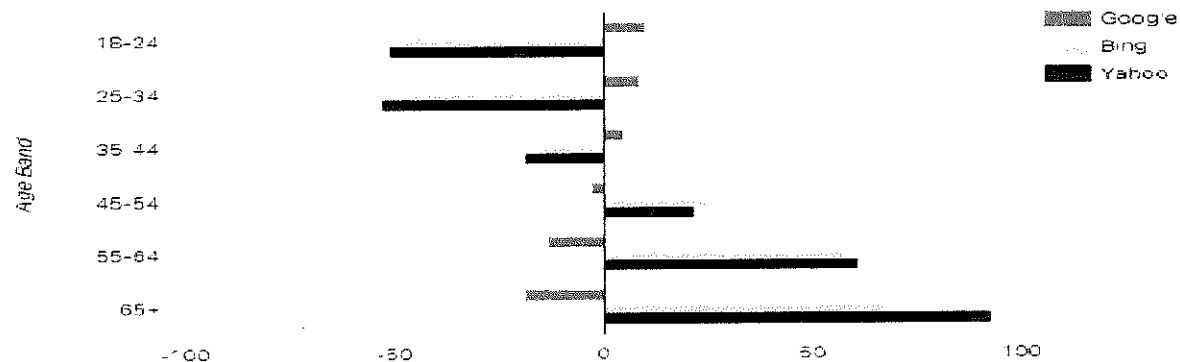


1	Prince Edward Island	
2	Saskatchewan	
3	Newfoundland and Labrador	
4	New Brunswick	
5	Nova Scotia	

## SEM AdWords

Because a segment of our target is aged over 50, it will be important to keep a portion of the investments on Yahoo and Bing, as these have a much higher penetration with that demographic. We recommend investing a maximum of 20% of the search budget in those engines, with the remaining 80% going to Google.

### *Index of Age:*



There is a clear line at middle age that split Google users to Bing and Yahoo users. Google are more likely to be younger whereas Bing and Yahoo have a more mature audience.

## Contribution of each touchpoint

### Phase 1: IGNITE AWARENESS

#### Television

- Rapidly build a strong awareness level among all Canadians (74%+) – less than 2 weeks should be required
- Establish a theme and tone for all subsequent communications
- Present the steps to follow to receive compensation

### Phase 2: DRIVE CONVERSIONS

#### Facebook & Instagram

- Platforms allow for precise geographic and demographic targeting of advertising. Text and low-production-cost ads will be presented to these users in an efficient cost-per-click buying strategy.
- Their intrinsic function is sharing pertinent content. The Hep C settlement is not only newsworthy; it's a win-only situation for the Canadian consumer. This means that content pertaining to it will be shared with family members and/or friends.

#### SEM – Search Marketing

- All activities on these engines will drive directly to the registration website; a pay-per-performance approach will be deployed. We will ensure a maximum ROI factor by paying only for users who engage with our message (visit the claim site). Optimization will be required throughout the campaign.

## Social media

### LEGITIMIZING THE CAMPAIGN

One of the problems that is often identified in class action suits that involve payments is the credibility of the information, especially when this information circulates online. Many internet users are reluctant to share their personal information over the internet for fear they could be dealing with a scam.

To address this, Brad's social media management team will ensure they interact with internet users via Facebook, answering any and all questions. We have a lot of experience in this field.

Our objective in managing social media is to make sure people get the right information and make a claim if they are eligible. We have experience engaging and moderating discussions and will liaise with the Administrator and Joint Committee to ensure accurate messaging. Questions about HCV, treatment options, and other medical related inquiries will be referred to a more qualified person or resource.

## Public relations

We suggest a media relations campaign with a PR drive that will support the advertising campaign for the Hepatitis C late claim class action.

Although press conferences no longer easily attract reporters, this kind of campaign will need a starting point to launch interview bookings during the media relations campaign. We will need a series of interviews to kick off the campaign.

These events and the subsequent interviews will feature a spokesperson (yet to be named) who will explain the basics of the class action suit, the targeted consumers, and the procedure to follow in order to register.

The media relations campaign will remind consumers about the class action and the importance of registering in order to start the claiming process.

Before deploying this campaign, we must identify and train a spokesperson in order to maximize the interviews' impact. It may be relevant to train two spokespeople: one for the English interviews, and another for the French interviews.

Spokesperson training materials will include documents (key messages, Q&As) as well as a fact sheet that can be used by media who wish to discuss the class action without conducting an interview.

The media relations campaign will benefit from TACT Intelligence-conseil (public relations firm) wide range of contacts in the media industry. We plan to target mainstream media, considering the large number of Canadians, as well as medical and consumer reporters.



## Budget A

### **Agency fees: \$85,000**

Includes strategy, account executives, coordination, electronic production design (website) and the production of promotional material.

### **Production: \$75,000**

Includes production of TV/internet messages, and design of all material

### **Media buys: \$620,000**

Includes all the media in the base plan

### **Community management: \$25,000**

Includes management and distribution of content on social networks

### **Public Relations: \$50,000**

### **Grand total: \$855,000**

Considering the fact that there are 28,500,000 adults aged 18+ in Canada

Considering the fact that there are 24,886,707 adults aged 27+ in Canada

Considering the fact that there are 11,079,300 adults aged between 50 and 75 in Canada

Considering the fact that the proposed plan is forecast to reach over 70% of Canadian adults aged 27+ when combining all efforts (TV and digital)

**We can estimate we will reach over 70% of Canadians aged 27+ at least 4 times.**

According to our experience, when developing an encirclement strategy, the target must be reached a minimum of three times to gain the desired attention.

According to our experience, we know that more than 70% of our targets will be reached by our message.

# Media plan

## MEDIABRANDS

### Hepatitis C Class Action - 2017

				<div><div>January</div><div>February</div><div>March</div><div>April</div></div>																Impressions	Client Cost			
Markets	Stations/Publications/Sites			Format	8	15	22	29	5	12	19	26	5	12	19	26	2	9	16	23	30			
IGNITE AWARENESS																								
Television					GRPs A27+																Reach / Frequency			
	National	English	Conventional & Specialty	30-sec			160	160														73,9% / 4.3x	\$407 000	
	National	French	Conventional & Specialty	30-sec			175	175														82,4% / 4.2x	\$138 000	
DRIVE CONVERSIONS																								
Digital					<div>Optimization Window - 2 weeks</div>																			
	National	English	Facebook/Instagram - Carousel	Photos/video	<div></div>																4 000 000		\$40 000	
	National	French	Facebook/Instagram - Carousel	Photos/video	<div></div>																1 000 000		\$10 000	
	National	English	SEM	AdWords	<div></div>																		\$15 000	
National	French	SEM	AdWords	<div></div>																		\$10 000		
																						Client media cost		\$620 000
																						Total client cost		\$620 000

## Budget B

### **Agency fees: \$85,000**

Includes strategy, account executives, coordination, electronic production design (website) and the production of promotional material.

### **Production: \$75,000**

Includes production of TV/internet messages, and design of all material

### **Media buys: \$650,000**

Includes all the media in the base plan

### **Community management: \$25,000**

Includes management and distribution of content on social networks

### **Public Relations: \$60,000**

### **Grand total: \$895,000**

Considering the fact that there are 28,500,000 adults aged 18+ in Canada

Considering the fact that there are 24,886,707 adults aged 27+ in Canada

Considering the fact that there are 11,079,300 adults aged between 50 and 75 in Canada

Considering the fact that the proposed plan is forecast to reach over 75% of Canadian adults aged 27+ when combining all efforts (TV and digital)

**We can estimate we will reach over 75% of Canadians aged 27+ at least 6 times.**

According to our experience, when developing an encirclement strategy, the target must be reached a minimum of three times to gain the desired attention.

According to our experience, we know that more than 80% of our targets will be reached by our message.

## Media plan

**MEDIABRANDS**

**Hepatitis C Class Action - 2017**

				January					February					March				April				Impressions	Client Cost						
Markets	Stations/Publications/Sites		Format	8	15	22	29	5	12	19	26	5	12	19	26	2	9	16	23	30									
IGNITE AWARENESS																													
				GRPs A27+																	Reach / Frequency								
Television	National	English	Conventional & Specialty	30-sec	160		160																	73.9% / 4.3x		/ 4.3x		\$407 000	
	National	French	Conventional & Specialty	30-sec	175		175																	82.4% / 4.2x		/ 4.2x		\$138 000	
DRIVE CONVERSIONS																													
				Optimization Window - 5 weeks																									
Digital	National	English	Facebook/Instagram - Carousel	Photos/video																		5 000 000		\$50 000					
	National	French	Facebook/Instagram - Carousel	Photos/video																		1 500 000		\$15 000					
	National	English	SEM	AdWords																				\$25 000					
	National	French	SEM	AdWords																				\$15 000					
																					Client media cost		\$650 000						
																					Total client cost		\$650 000						

## Budget C

### **Agency fees: \$95,000**

Includes strategy, account executives, coordination, electronic production design (website) and the production of promotional material.

### **Production: \$95,000**

Includes production of TV/internet messages, and design of all material

### **Media buys: \$702,400**

Includes all the media in the base plan

### **Community management: \$25,000**

Includes management and distribution of content on social networks

### **Public Relations: \$70,000**

### **Grand total: \$987,400**

Considering the fact that there are 28,500,000 adults aged 18+ in Canada

Considering the fact that there are 24,886,707 adults aged 27+ in Canada

Considering the fact that there are 11,079,300 adults aged between 50 and 75 in Canada

Considering the fact that the proposed plan is forecast to reach over 80% of Canadian adults aged 27+ when combining all efforts (TV and digital)

**We can estimate we will reach over 80% of Canadians aged 27+ at least 8 times.**

According to our experience, when developing an encirclement strategy, the target must be reached a minimum of three times to gain the desired attention.

According to our experience, we know that more than 90% of our targets will be reached by our message.

# Media plan

MEDIABRANDS					Hepatitis C Class Action - 2017																				
Markets		Stations/Publications/Sites		Format	January				February				March				April				Impressions	Client Cost			
					8	15	22	29	5	12	19	26	5	12	19	26	2	9	16	23	30				
IGNITE AWARENESS																						Reach / Frequency			
Television					GRPs A27+																				
National	English	Conventional & Specialty		30-sec	160 160																	73,9% / 4.3x		\$407 000	
National	French	Conventional & Specialty		30-sec	175 175																	82,4% / 4.2x		\$138 000	
	English	Specialty		30-sec	20 20				GRPs A27+															\$30 400	
	French	Specialty		30-sec	20 20																			\$12 000	
DRIVE CONVERSIONS																									
Digital					Optimization Window - 6 weeks																				
National	English	Facebook/Instagram - Carousel		Photos/video																		5 500 000		\$55 000	
National	French	Facebook/Instagram - Carousel		Photos/video																		2 000 000		\$20 000	
National	English	SEM		AdWords																				\$25 000	
National	French	SEM		AdWords																				\$15 000	
Client media cost																						\$702 400			
Total client cost																						\$702 400			

## Budget for post-campaign activity

Considering the fact that there will potentially still be late claims after the campaign, we recommend staying active for the next year or two.

Our recommendation is to use the data from the campaign, identify the most efficient profiles, and communicate with similar profiles through social media and on a regular basis, adjusting our communication as claims are made.

**We suggest a community management budget of \$25,000 for 12 months**

**and**

**A media placement budget of \$12,000 for 12 months**

**Grand total: \$37,000 annually**

## Budget rationale

We were asked to develop a strategy with a \$500,000 budget

We do not recommend this option, the reason being that we have to cover the whole country: with a budget of \$500,000, we would not be able to use television, which is the most effective media to reach our target, so we would have to deploy 100% on the web.

Our message is complex and we need time to explain it to our different targets: images will help to create awareness and ease understanding.

The web is not as effective as television: we are surrounded by other advertising when browsing the internet, plus 80% of videos on the internet are watched without sound, so it would require considerably more frequency for an individual to be aware of our message and to understand it. The internet and social media are the best means of supporting and converting, but not for creating awareness.

We also want to pay particular attention to people living outside the larger cities, as they have probably have less awareness. For these people, television is certainly the best media choice!



03

# WHO WE ARE

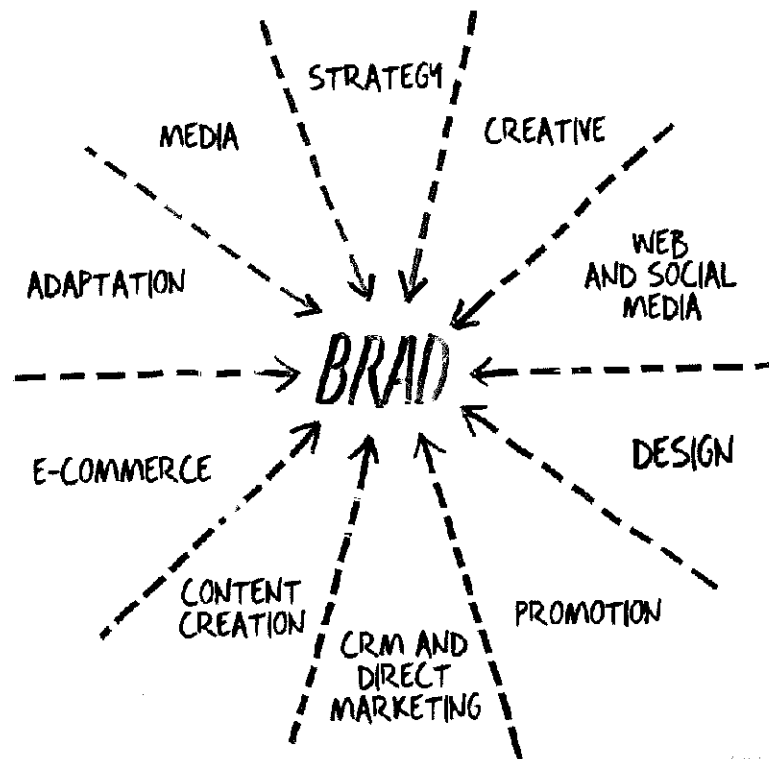
BRAD

## Who we are

Founded in 1994, Brad has earned an excellent reputation based on the quality of its strategic thinking and creativity. A fully integrated agency, Brad has offices in Montreal and Quebec City, with more than 60 employees collectively participating in the development of the firm.

### OUR OFFER

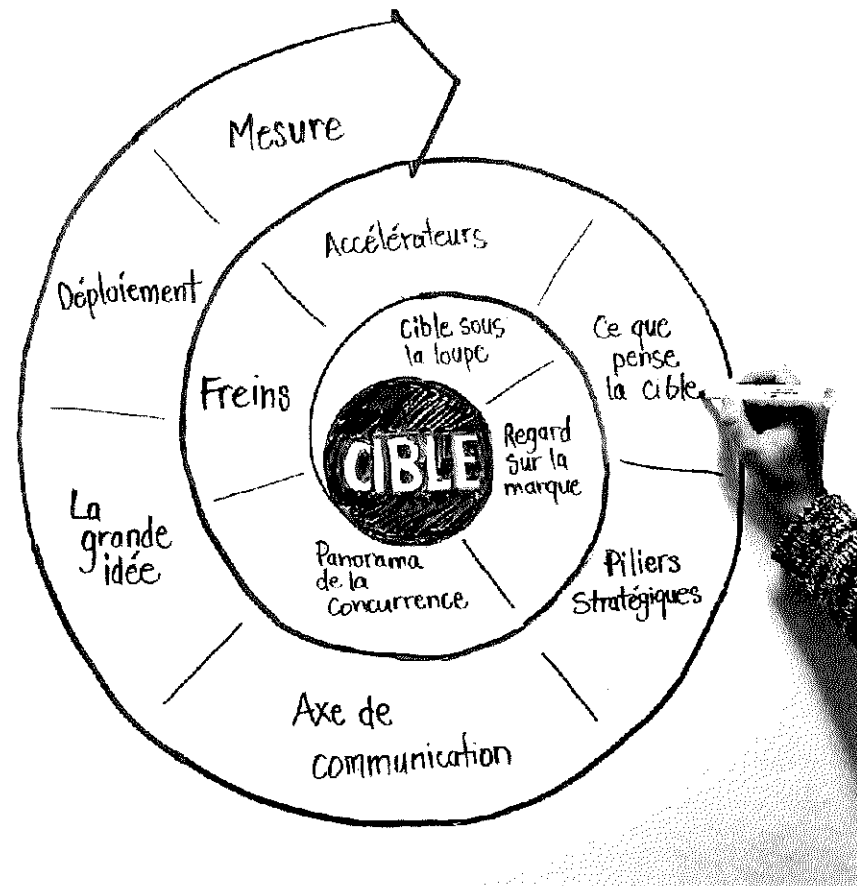
Brad offers the following services:



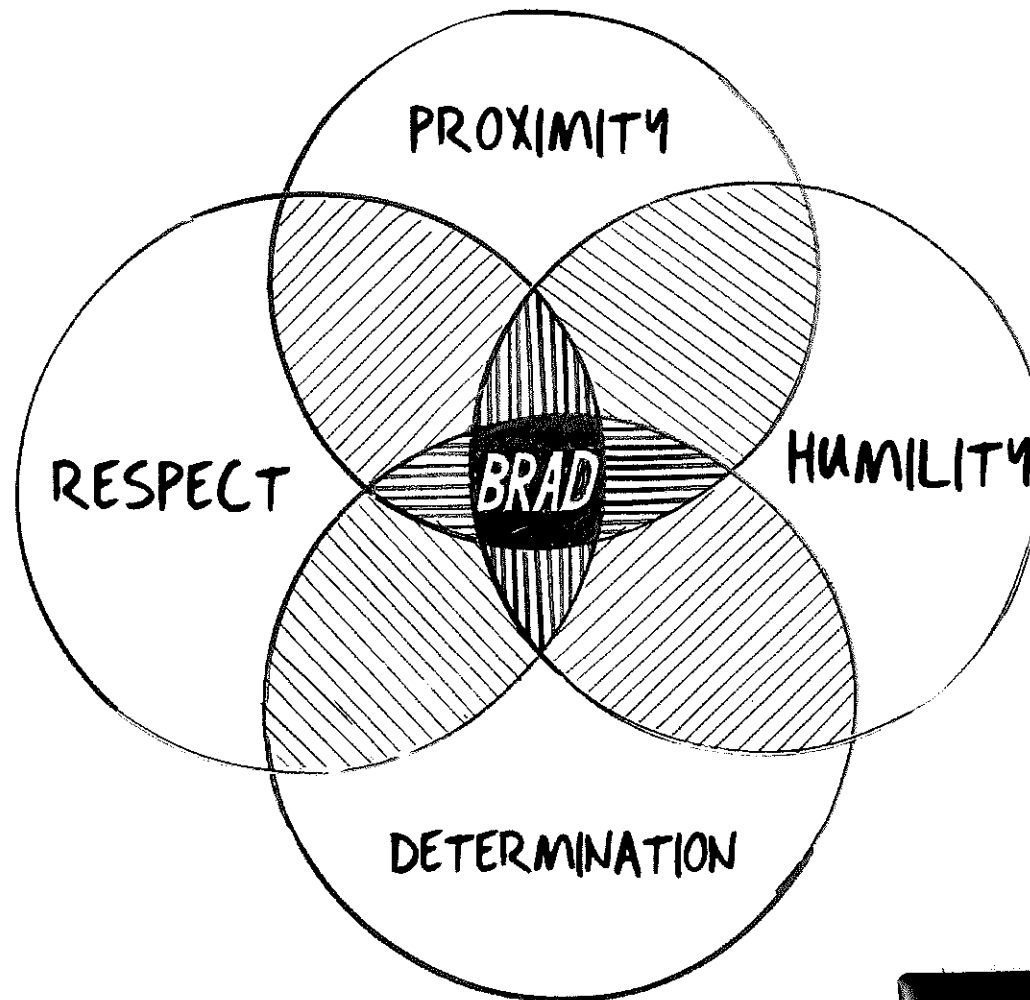
**BRAD**

## Our process

1. Target
2. Target market at the glance
3. Brand Analysis
4. Competitive Landscape
5. Warnings
6. Accelerators
7. What does the target thinks?
8. Strategic Pillars
9. Communication Axis
10. The Great Idea
11. Deployment
12. Measures



## Our values



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et d

## Our clients



CNESST

IRVING



BMR

Disney



BORALEX

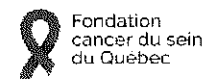


can-am

SPYDER

XPS

Épargne  
Placements  
Québec



DOOLY'S  
S. JAMES / BOIRE / MANGER

sobeys

ALLIANCE DE L'INDUSTRIE  
TOURISTIQUE DU QUÉBEC

AVELEDA  
L'ART DE LA CUISINE

J.P. CHENET



a+traction  
RADIO

Produits Neptune

Québec

Canada

VILLE DE  
QUÉBEC

Québec  
ENFORME

BOR  
DÉE

L'URIE  
RAPHAËL

OPÉRA  
DE MONTREAL



Lunetterie Sears

MARCHAND GIGUÈRE  
Les Bonnes Lunettes

LEPAGE  
PIRELLA

Pharmapar

fleur de lys

eddyfi

SIX PINTS

UBISOFT  
QUÉBEC

NOVABUS PREVOST

Belleau Lapointe  
L'ART DE LA CUISINE

Fairmont  
LE REINE ELIZABETH

PENDOPHARM  
DESALBIENS / THÉRIAC / VIK

TELEFILM  
CANADA

TOURISME  
CHARLEVOIX

BRAD

## IPG Mediabrands

To ensure our presence at the national level, we appeal to our loyal partner, IPG Mediabrands, a media agency service that has offices in four cities across Canada. They have more than 300 specialists who share our passion for media expertise.

### **Complete cutting-edge media solutions**

The services offered at Mediabrands meet all communication needs, including strategic planning, identification of potential markets, budget allocation, planning, and media-buying channels, as well as financial control and measuring ROI in post-campaign analysis. With evolving technologies and digital channels changing every day, their specialized boutique agencies provide niche expertise that allows for maximized results with the most accurate business solutions.



*04*

# *OUR TEAM*

*BRAD*

## Our team



### ***PATRICK GERVAIS***

*Vice-President - Associate*

An entrepreneur at heart, Patrick is primarily a promotional communications strategy expert. For each mandate, he provides clients with a proactive approach and a passion for innovation. He is results-oriented, and has the exceptional ability to identify promising opportunities for his clients.

Patrick developed the nationwide "C'est mon argent / The Money is Mine" campaign, a class action lawsuit against RAM manufacturers, which was one of the top 10 campaigns in 2015 according to Infopresse.

Over the years, he has developed a strong understanding of the retail industry; he has worked for well-known chains including BMR, Benny&Co., Chocolats Favoris, Bell Canada, GM Canada, and Sobey's. Of particular relevance to your mandate, Patrick is an expert in brand strategy and planning. He has accompanied clients like Chocolats Favoris and Benny&Co. along the path to achieving their business objectives.

Patrick has also collaborated in the marketing of many products and brands on a national level, including Isuzu Canada, Lego, Wines of France, Bell Canada, Wines of Chile, and more.

Patrick will be responsible for overseeing and directing your account strategy. He will provide you with his strategic and planning expertise, as well as his ability to develop high-added-value partnerships. His ongoing commitment to accompanying clients through the evolution and achievement of their objectives will undoubtedly lead him to suggest the perfect strategy for your needs.



## Our team



### ***SANDRA KLEIN***

#### ***Account Director***

Energetic, in tune with new trends, and keen on social media, Sandra is a versatile and efficient Project Manager. After her BA in Communications, she completed an internship in public relations and event services at Cirque du Soleil, and then pursued a career in advertising.

Last year, Sandra led the Canada-wide "C'est mon argent / The Money is Mine" campaign, the class action lawsuit against RAM manufacturers.

Over the past few years, she has put her expertise to work for large-scale clients like Labatt, the Régie du Bâtiment du Québec, Spotify, and Gallimard, for whom she managed the Folio campaign, which won a Grand Prix Créa in 2014.

In addition to excellent interpersonal skills and a determined team spirit, she pays close attention to her clients' needs and requirements, thus combining responsiveness and pro-activity, two key qualities for an account manager.

Sandra ensures that all timelines and budgets are respected, while overseeing projects' entire lifespan. She brings considerable rigour and attention to detail in support of her clients' brands. Her sense of organization and her experience will be tremendous assets for your account.

## Our team



### ***BENOIT BOUCHER***

*Account Director*

An energetic team-player, Benoit's campaigns benefit from his strong capacity for observation and attention to detail. He ensures that the strategy is respected in all communications, regardless of the media used.

His ability to analyse and strategize, respect budgets and timelines, and maintain regular and effective communication with clients, all combine to ensure he delivers on time and successfully.

Over the past decade, Benoit has worked on numerous major mandates that had North American, Canadian, regional, and local scopes. He always ensures he understands the needs of all partners, in order to create successful stories that are measurable and profitable to the core target market.

He is entrepreneur and full of initiative, and is sure to be a very effective resource for your mandate.

## Our team



### **FABIEN LOSZACH**

*Interactive Strategy Director*

With a Ph.D. in Sociology that focused on creativity, Fabien Loszach has long worked as a digital and media consultant, having worked with different agencies over the course of his career. As a result, he has developed an expertise in digital strategy, with a speciality in social media networks. He also hosts a digital segment on the radio show La Sphère, which airs on ICI Radio-Canada Première, and he acts as a consultant and journalist for various media that specialize in digital culture, including Branchez-vous, the Canada Media Fund, and Infopresse.

As Director of Interactive Strategy at Brad, Fabien places his skills at the service of clients including LEGO, Disney, J.P. Chenet, Tourisme Québec, the CNESST, the Régie de l'assurance maladie du Québec (RAMQ), the Curateur public, Irving Oil, Group Marchand, Québecor - Sports and Entertainment Group, and Can-Am Spyder - BRP, where he oversees all web and social media strategies.

Fabien orchestrated the digital part of the pan-Canadian "C'est mon argent / The Money is Mine" campaign with brio, and the campaign attained its objectives in only five days.

He also leads the digital, content, and social media team at Brad, and oversees the development of interactive strategies at the agency. His strategic mind and keen understanding of the multiple possibilities presented by the internet are major assets.

## Our team



### **SÉBASTIEN HOULE**

*Vice-President, Group Account Director, IPG Mediabrands Montreal*

An established media strategist, Sébastien has 20 years of experience in media and in the development of convergent campaigns. His expertise was acquired mainly at Cossette Media (11 years) where he rose through the ranks to become group media director. He has extensive experience on major accounts, including Bell, Telus, Molson, Metro, Ford, Tourism Montreal, and Aeroplan.

He has detailed knowledge of different communication channels (traditional and digital) and his ability to analyze issues and business opportunities in the local markets of both Quebec and Canada make him a key partner in reaching qualified targets and meeting marketing objectives.

Beyond his media experience, Sébastien spent 18 months at Ig2 in Montreal, to add skills in agency account services to his impressive resume. The key knowledge he acquired, including planning with a strategic approach, creative development, and production management, now allows him to better understand how the consumer is positioned at the heart of marketing plans, and to develop the best environments to interact with them by combining the best media touch points with the appropriate messages.

Through his experience in media and account services, he seeks to contribute to the development of strong campaigns. Working in collaboration with clients and partners using innovation and a rigorous approach to customer benefits are priority elements of his approach.

*05*

*EXAMPLE*

*BRAD*

**THE MONEY IS MINE.CA**

**themoneyismine.ca**

### **CONTEXT**

An \$80M settlement was reached in Canada following a class action lawsuit against several dynamic random access memory (DRAM) manufacturers.

### **MANDATE**

Develop a Canadian campaign to inform citizens of their right to make a claim and how to go about it.


### **RESULTS**

We reached the objective of **350,000 claims only 5 days** after the campaign launched.

In all, nearly **one million claims** were made in Canada.

By comparison, 376,000 claims were made for the same class-action lawsuit in the United States, where the population is 10 times larger.

Did you purchase an electronic device with a memory chip (DRAM) between 1999 and 2002?



**YOU PAID TOO MUCH.**  
Some memory chip (DRAM) manufacturers reportedly agreed to price fix.

**-VISIT-**  
**THEMONEYISMINE.CA**  
TO GET YOUR MONEY BACK.

No receipt required.



**-VISIT-**  
**THEMONEYISMINE.CA**  
TO GET YOUR MONEY BACK.

Belcan Lapointe  
CFM

HP  
SAMSUNG



Click here to watch the video

**YOU PAID TOO MUCH.**

**-VISIT-**  
**THEMONEYISMINE.CA**  
TO GET YOUR MONEY BACK.

Some memory chip (DRAM) manufacturers reportedly agreed to price fix, and a settlement was reached.

If you purchased an electronic device containing a memory chip (DRAM) between April 1, 1999 and June 30, 2002, you paid too much.

All Canadians who bought an electronic device that contains a memory chip (DRAM) between these dates have the right to claim compensation. No receipt required.

Belcan Lapointe CFM HP SAMSUNG





***THANK YOU!***

***BRAD***

## Contact Information

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Vice-President

Business Development and Partnerships

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***patrick.gervais@brad.ca***