

**C A N A D A
PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL**

NO : 500-06-000016-960

**SUPERIOR COURT
Class action**

DOMINIQUE HONHON

Plaintiff

-vs-

**THE ATTORNEY GENERAL OF CANADA
THE ATTORNEY GENERAL OF QUÉBEC
THE CANADIAN RED CROSS SOCIETY**

Defendants

-and-

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

Petitioner

-and-

**FONDS D'AIDE AUX RECOURS
COLLECTIFS**

-and-

LE CURATEUR PUBLIC DU QUÉBEC

Mis-en-cause

**C A N A D A
PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL**

NO : 500-06-000068-987

**SUPERIOR COURT
Class action**

DAVID PAGE

Plaintiff

-vs-

**THE ATTORNEY GENERAL OF CANADA
THE ATTORNEY GENERAL OF QUÉBEC
THE CANADIAN RED CROSS SOCIETY**

Defendants

-and-

**FONDS D'AIDE AUX RECOURS
COLLECTIFS**

-and-

LE CURATEUR PUBLIC DU QUÉBEC

Mis-en-cause

**APPLICATION FROM THE JOINT COMMITTEE FOR THE IMPLEMENTATION OF
THE 2016 ALLOCATION ORDERS**

(Section 10.01(1) of the Settlement Agreement as modified by Schedule F approved by this Court on November 19, 1999 , allocation judgment rendered in this case on August 15, 2016 and subsequent judgment rendered in this case on February 15, 2017 to reconcile the allocation orders)

TO THE HONOURABLE JUSTICE CHANTAL CORRIVEAU DESIGNATED TO HEAR MOTIONS IN THESE CASES, THE PETITIONER RESPECTFULLY SUBMITS:

A- CONTEXT

1. In their Orders/Judgments dated August 15, 2016, August 16, 2016 and February 15, 2017 (the "**2016 Allocation Orders**"), the supervising Courts restated the actuarially unallocated assets of the 1986-1990 Hepatitis C Settlement Agreement Trust Fund to be \$206,920,000 as at December 31, 2013 (the "**2013 Excess Capital**");
2. The 2016 Allocation Orders approved the establishment of a discrete HCV Late Claims Benefit Plan and the payment of prescribed Special Distribution Benefits. Specific amounts of Excess Capital were allocated for these purposes, together with administrative costs and required capital in amounts to be agreed upon by the Joint Committee and the Attorney General of Canada or directed by the Courts;
3. In the 2016 Allocation Orders, the Courts also declared that the Joint Committee may apply to the Courts for consideration of special distribution benefits which address the circumstances of Class Members such as Class Members 2213 and 7438;
4. The Joint Committee has served concurrently this the present application, a distinct application to approve a proposed HCV Late Claims Benefit Plan, a related notice campaign, a related administration budget and to appoint Late Claims Referees;

B- REQUIRED CAPITAL

5. Pursuant to a request received from the Joint Committee, Eckler have calculated the required capital for the HCV Late Claims Benefit Plan to be \$7,411,000 and the required capital for Special Distribution Benefits to be \$12,199,000, as more fully detailed in Eckler's report dated October 12, 2017 which is appended as Exhibit A to the affidavit of Richard Borden sworn on October 12, 2017 alleged in support thereof as **Exhibit R-1**;

C- SECTION 4.08(2) RE-ELECTION

6. Claimant 2213 is a hemophiliac who is an Approved HCV Infected Person co-infected with HIV. As this Court noted at paragraph 148 of its decision, Claimant 2213 believed he was not going to live very long. He therefore elected under Section 4.08(2) of the Hemophiliac HCV Plan to receive the all-inclusive sum of \$50,000 (1999 dollars);
7. As noted at paragraph 150 of Justice Perell's decision rendered on August 15, 2016, Claimant 2213 is part of small group of Class Members who made this all-inclusive \$50,000 election;

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8. At paragraph 165 of Eckler's October 14, 2015 actuarial report filed on the 2013 Excess Capital Allocations Applications, Eckler estimated that the total liability of permitting the 29 individuals who made this election to re-elect is \$6.6 million. After the compensation they received is indexed and deducted from the compensation payable as a result of the re-election, the net liability is expected to be \$4.6 million as at December 31, 2013;
 9. At paragraph 172 of their report R-1, Eckler estimates that the required capital for this \$4.6 million liability is \$500,000;
 10. Treating similarly situated Class Members similarly is a fundamental aspect of this settlement. At paragraph 21 of his submissions, Claimant 2213 requested that all co-infected hemophiliacs who made this election be permitted to re-elect and that excess capital be allocated for this purpose, as appears from the Factum/Submissions/Written Argument of Class Member 2213 filed at the June Allocation hearing, copy of which is alleged in support thereof as **Exhibit R-2**;
 11. It is just and appropriate that the Courts exercise their unfettered discretion to allocate excess capital to permit other hemophiliacs who made this election to re-elect in the same manner;

D- LOSS OF SERVICES PAYMENTS TO PERMANENTLY DISABLED APPROVED DEPENDENTS (SECTIONS 3.05 AND 4.03 OF THE TRANSFUSED HCV PLAN AND OF THE HEMOPHILIAC HCV PLAN)

12. Claimant 7438 is a permanently disabled dependent of his late mother, an HCV Infected Person. The termination of the loss of services payments he received up to the date she was expected to reach her life expectancy caused him hardship, as more fully described in his Factum/Submissions/Written Argument filed at the June Allocation hearing, copy of which is alleged in support thereof as **Exhibit R-3**;
13. At the request of the Joint Committee, Eckler has estimated that the liability to extend loss of services benefit payments to all alive permanently disabled Approved Dependents for their lifetime, rather than ceasing at the actuarially calculated normal life expectancy of the deceased HCV Infected Person, is \$3,900,000 as at December 31, 2013 and that the associated required capital is \$400,000, as more fully detailed in the memorandum dated October 12, 2017 appended as Exhibit B to the affidavit of Richard Border (R-1);
14. It is just and appropriate that the Courts exercise their unfettered discretion to allocate excess capital to treat other alive permanently disabled Approved Dependents similarly by extending loss of services payments for their lifetimes as well;

E- THREE SEPARATE ACCOUNTS OF THE TRUST

15. Based on trust and accounting advice received by the Joint Committee, the following three separate accounts of the Trust Fund should be established as at December 31, 2013, to be held, invested and administered by the Trustee: the HCV Late Claims Account, the HCV Special Distribution Benefits Account and the HCV Regular Benefits Account, as appears from paragraph of the affidavit #18 of Heather Rumble Peterson alleged in support thereof as **Exhibit R-4** ;

F- THE VALUES OF THE THREE ACCOUNTS

16. All actuarial analysis in respect of the 2013 Excess Capital and the allocations made in the 2016 Allocation Orders have been based on assets, liabilities and required capital as at December 31, 2013. In order to manage the three accounts of the Trust going forward, it is necessary to adjust the figures to current dollars, as explained in paragraph 27 of the affidavit of Richard Border (R-1);
17. Special Distribution Benefit payments and payments under the HCV Late Claims Benefit Plan did not occur prior to 2017. Eckler has opined that it is therefore reasonable to roll the value of the HCV Late Claims Account and the HCV Special Distribution Account as at December 31, 2013 to December 31, 2016, by using the annual rate of return for the invested assets of the Trust Fund net of investment expenses. Use of the total rate of return for the invested assets is consistent with a pro-rata allocation of invested assets to the three accounts, as explained in paragraphs 30-31 of the affidavit of Richard Border (R-1);
18. The balance in the Regular Benefits Account as at December 31, 2016 would be equal to the total amount of the Trust Fund minus the December 31, 2016 account values for the Special Distribution Benefits Account and the Late Claims Benefit Plan Account i.e. the Regular Fund Account is the balance of the fund after setting aside these two calculated amounts, as appears from paragraph 32 of the affidavit of Richard Border (R-1);
19. From December 31, 2016 onwards, Eckler has proposed that the three accounts be updated monthly as follows. The monthly rate of investment return on the total invested assets, net of investment fees, will be calculated. Each account balance will then be reduced by the payments (benefits and expenses) out of the account and interest added at the monthly investment return rate. In any one month, the investment return could be negative, as described in paragraph 33 of the affidavit of Richard Border (R-1);

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20. For the purposes of implementing, administering, monitoring and supervising the payments to be made pursuant to the 2016 Allocation Orders and this orders, as well as the three Accounts, the Administrator, Trustee, Fund Counsel, Auditors, Joint Committee, Investment Advisors, Referees, Arbitrators, Monitor, Referees and Courts shall perform the role and have the duties and responsibilities provided for in the Settlement Agreement (as amended by Schedule F) and the 1999 Settlement Approval Orders, with all the necessary adaptations, modifications and powers as may be required to do so and as provided for in this order, the order implementing the HCV Late Claims Benefit Plan and the court approved protocols; .
21. The Joint Committee therefore recommends:
- a) That a sum of \$7,411,000 of Excess Capital be allocated for required capital for the HCV Late Claims Benefit Plan referenced in paragraph 5 of the 2016 Allocations Orders;
 - b) That a sum of \$12,199,000 of Excess Capital be allocated for required capital for HCV Special Distribution Benefits, referenced in paragraph 6 of the 2016 Allocation Orders;
 - c) That Claimant 2213 and all other alive Primarily-Infected Hemophiliacs who are Approved HCV Infected Persons co-infected with HIV and who made an election under Section 4.08(2) of the Hemophiliac HCV Plan be permitted to re-elect and receive all compensation and benefits to which they would be entitled under the Settlement Agreement as amended by the 1999 Approval Orders, the 2016 Excess Capital Allocation Orders and any future orders, as if that election had not made, provided that the amount they received under the election or related Special Distribution Benefit is indexed to the date of their re-election in accordance with Section 7.02 and deducted from the compensation to which they are entitled as a result of their re-election;
 - d) That an amount of \$4,600,000 of Excess Capital, plus required capital of \$500,000, as at December 31, 2013, be allocated to fund these Section 4.08(2) re-elections;
 - e) That the Administrator be ordered to pay Claimant 7438 and all other alive permanently disabled Approved Dependants of a deceased HCV Infected Person, who receive or received compensation for loss of services in the home, compensation for loss of services for the dependant's lifetime, rather than it ceasing at the actuarially calculated normal life expectancy of the deceased HCV Infected Person;
 - f) That an amount of \$3,900,000 of Excess Capital, plus required capital of \$400,000, as at December 31, 2013, be allocated to fund the continuation of loss of services payments to all alive permanently disabled dependants of an HCV Infected Person, who receive or will receive said compensation for their lifetime;

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- g) That the following three separate accounts of the Trust Fund be established, as at December 31, 2013, to be held, invested and Administered by the Trustee:
- i) the HCV Late Claims Account, for the payment of compensation under the HCV Late Claims Benefit Plan, the administrative costs thereof, and the HCV Late Claims Notice Campaign;
 - ii) the HCV Special Distribution Benefits Account, for the payment of Special Distribution Benefits ordered in paragraph 6 of the Allocation Orders and for the Section 4.08(2) re-elections and the continuation of loss of services payments to all alive permanently disabled dependants of an HCV Infected Person, who receive or will receive said compensation for their lifetime;
 - iii) the HCV Regular Benefits Account, for the payment of compensation under the Transfused HCV Plan and the Hemophiliac HCV Plan and the administrative costs thereof;
- h) That the value of the HCV Late Claims Benefit Account as at 31 December, 2016 shall be comprised of Excess Capital in the amount of:
- i) \$32,450,000 plus administrative costs of \$51,000, as ordered in paragraph 5 of the 2016 Allocation Orders;
 - ii) the \$7,411,000 allocated for required capital mentioned in paragraph 5 of the 2016 Allocation Orders;
 - iii) the amount of interest earned on the sum of 8(a) and 8(b), from January 1, 2014 to December 31, 2016, by applying the annual rate of return for the invested assets of the Trust Fund, net of investment expenses;
- i) That the value of the HCV Special Distribution Benefits Account as at December 31, 2016, shall be comprised of Excess Capital in the amount of:
- i) \$130,970,000 plus related administrative costs of \$61,000, as ordered in paragraph 6 of the 2016 Allocation Orders;
 - ii) the \$12,199,000 allocated for the required capital mentioned in paragraph 6 of the 2016 allocation Orders;
 - iii) the \$4,600,000 of Excess Capital, plus required capital of \$500,000, as at December 31, 2013, be allocated to fund these Section 4.08(2) re-elections;
 - iv) the \$3,900,000 of Excess Capital, plus required capital of \$400,000, as at December 31, 2013, be allocated to fund the continuation of loss of services

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- payments to all alive permanently disabled Approved Dependants of an HCV Infected Person, who receive or will receive said compensation for their lifetime;
- v) the amount of interest earned on the sum of 9(a), 9(b),9(c) and 9(d), from January 1, 2014 to December 31, 2016, by applying the annual rate of return for the invested assets of the Trust Fund, net of investment expenses;
- j) That the value of the HCV Regular Benefits Account as at December 31, 2016 shall be comprised of the total amount of the Trust Fund, minus:
- i) the value of the HCV Late Claims Account as at December 31, 2016 calculated in the manner described above, and
 - ii) the value of the HCV Special Distribution Benefits Account as at December 31, 2016 calculated in the manner described above;
- k) That from December 31, 2016 onward, the HCV Late Claims Benefit Account, the HCV Special Distribution Benefits Account and the HCV Regular Benefits Account shall be updated monthly as follows:
- i) the monthly rate of investment return on the total invested assets, net of investments fees, will be calculated, and
 - ii) each account balance will then be reduced by the payments (benefits and expenses) out of the account and interests added at the monthly investment return rate;
- l) That each of the HCV Late Claims Account, the HCV Special Distribution Benefits Account and HCV Regular Benefits Account include:
- i) any investments in which such assets may from time to time be invested;
 - ii) any proceeds of disposition of any investments, and
 - iii) all income, interest, profit, gains and accretions and additional assets, rights and benefits of any kind or nature whatsoever arising, directly or indirectly, from or in connection with or accruing to any of the foregoing, but excluding any amounts which have been paid or disbursed therefrom;
- m) That for the purposes of implementing, administering, monitoring and supervising:
- i) the payments to be made pursuant to the 2016 Allocation Orders and those requested in this application, and
 - ii) the HCV Late Claims Account, the HCV Special Distribution Benefits Account and the HCV Regular Account, the Administrator, Trustee, Fund Counsel,

Auditors, Joint Committee, Investment Advisors, Referees, Arbitrators, Monitor, Late Claims Referees and Courts shall perform the role and have the duties and responsibilities provided for in the Settlement Agreement, with all the necessary adaptations, modifications and powers as may be required to do so, and as provided for in the order to be rendered on this application, the order implementing the HCV Late Claims Benefit Plan, the HCV Late Claim Benefit Plan and the court approved protocols;

22. Similar Joint Committee applications will be filed before the Superior court of Ontario and the Supreme court of British-Columbia.
23. The present application is well founded in facts and in law.

FOR THESE REASONS, MAY IT PLEASE THE COURT:

GRANT Petitioner's present application;

ORDER THAT an amount of \$7,411,000 of Excess Capital be allocated for the required capital for the HCV Late Claims Benefit Plan, referenced in paragraph 5 of the 2016 Allocation Orders;

ORDER THAT an amount of \$12,199,000 of Excess Capital be allocated for required capital for HCV Special Distribution Benefits, referenced in paragraph 6 the 2016 Allocation Orders;

ORDER THAT Claimant 2213 and all other alive Primarily-Infected Hemophiliacs who are Approved HCV Infected Persons co-infected with HIV and who made an election under Section 4.08(2) of the Hemophiliac HCV Plan be permitted to re-elect and receive all compensation and benefits to which they would be entitled under the Settlement Agreement as amended by the 1999 Approval Orders, the 2016 Excess Capital Allocation Orders and any future orders, as if that election had not made, provided that the amount they received under the election or related Special Distribution Benefit is indexed to the date of their re-election in accordance with Section 7.02 and deducted from the compensation to which they are entitled as a result of their re-election;

ORDER THAT an amount of \$4,600,000 of Excess Capital, plus required capital of \$500,000, as at December 31, 2013, be allocated to fund these Section 4.08(2) re-elections;

ORDER the Administrator to pay Claimant 7438 and all other alive permanently disabled Approved Dependents of a deceased HCV Infected Person, who receive or received compensation for loss of services in the home, compensation for loss of services for the

dependant's lifetime, rather than it ceasing at the actuarially calculated normal life expectancy of the deceased HCV Infected Person;

ORDER THAT an amount of \$3,900,000 of Excess Capital, plus required capital of \$400,000, as at December 31, 2013, be allocated to fund the continuation of loss of services payments to all alive permanently disabled dependants of an HCV Infected Person, who receive or will receive said compensation for their lifetime;

ORDER the establishment of the following three separate accounts of the Trust Fund, as at December 31, 2013, to be held, invested and administered by the Trustee:

- a) the HCV Late Claims Account, for the payment of compensation under the HCV Late Claims Benefit Plan, the administrative costs thereof, and the HCV Late Claims Notice Campaign;
- b) the HCV Special Distribution Benefits Account, for the payment of Special Distribution Benefits ordered in paragraph 6 of the Allocation Orders and for the Section 4.08(2) re-elections and the continuation of loss of services payments to all alive permanently disabled dependants of an HCV Infected Person, who receive or will receive said compensation for their lifetime;
- c) the HCV Regular Benefits Account, for the payment of compensation under the Transfused HCV Plan and the Hemophiliac HCV Plan and the administrative costs thereof;

DECLARE that the value of the HCV Late Claims Account as at December 31, 2016 shall be comprised of Excess Capital in the amount of:

- a) \$32,450,000 plus administrative costs of \$51,000, as ordered in paragraph 5 of the 2016 Allocation Orders;
- b) the \$7,411,000 allocated for required capital mentioned in paragraph 5 of the 2016 Allocation Orders;
- c) the amount of interest earned on the sum of 8(a) and 8(b), from January 1, 2014 to December 31, 2016, by applying the annual rate of return for the invested assets of the Trust Fund, net of investment expenses;

DECLARE that the value of the HCV Special Distribution Benefits Account as at December 31, 2016, shall be comprised of Excess Capital in the amount of:

- a) \$130,970,000 plus related administrative costs of \$61,000, as ordered in paragraph 6 of the 2016 Allocation Orders;

-
- b) the \$12,199,000 allocated for the required capital mentioned in paragraph of the 2016 allocation Orders;
 - c) the \$4,600,000 of Excess Capital, plus required capital of \$500,000, as at December 31, 2013, be allocated to fund these Section 4.08(2) re-elections;
 - d) the \$3,900,000 of Excess Capital, plus required capital of \$400,000, as at December 31, 2013, be allocated to fund the continuation of loss of services payments to all alive permanently disabled Approved Dependants of an HCV Infected Person, who receive or will receive said compensation for their lifetime;
 - e) the amount of interest earned on the sum of 9(a), 9(b),9(c) and 9(d), from January 1, 2014 to December 31, 2016, by applying the annual rate of return for the invested assets of the Trust Fund, net of investment expenses;

DECLARE that the value of the HCV Regular Benefits Account as at December 31, 2016 shall be comprised of the total amount of the Trust Fund, minus:

- a) the value of the HCV Late Claims Account as at December 31, 2016 calculated in the manner described above, and
- b) the value of the HCV Special Distribution Benefits Account as at December 31, 2016 calculated in the manner described above;

ORDER from December 31, 2016 onward, the HCV Late Claims Benefit Account, the HCV Special Distribution Benefits Account and the HCV Regular Benefits Account shall be updated monthly as follows:

- a) the monthly rate of investment return on the total invested assets, net of investment fees, will be calculated; and
- b) each account balance will then be reduced by the payments (benefits and expenses) out of the account and interest added at the monthly investment return rate;

ORDER that each of the HCV Late Claims Account, the HCV Special Distribution Benefits Account and the Regular Benefits Account include:

- a) any investments in which such assets may from time to time be invested;
- b) any proceeds of disposition of any investments; and
- c) all income, interest, profit, gains and accretions and additional assets, rights and benefits of any kind or nature whatsoever arising, directly or indirectly, from or in

connection with or accruing to any of the foregoing, but excluding any amounts which have been paid or disbursed therefrom;

DECLARE that for the purposes of implementing, administering, monitoring and supervising:

- a) the payments to be made pursuant to the 2016 Allocation Orders and this Order, and
- b) the HCV Late Claims Account, the HCV Special Distribution Benefits Account and the Regular Benefits Account;

DECLARE that the Administrator, Trustee, Fund Counsel, Auditors, Joint Committee, Investment Advisors, Referees, Arbitrators, Monitor, Referees, Late Claims Referee and Courts shall perform the role and have the duties and responsibilities provided for in the Settlement Agreement (as amended by Schedule F), with all the necessary adaptations, modifications and powers as may be required to do so, and as provided for in the order to be rendered on this application, the order implementing the HCV Late Claims Benefit Plan, the HCV Late Claim Benefit Plan and the court approved protocols;

ORDER such further and other relief as counsel may request and this Honourable Court may direct;

ORDER that the judgment to be rendered shall not be effective unless and until corresponding orders are made by the Supreme Court of British Columbia and the Ontario Superior Court of Justice;

THE WHOLE without costs.

Montréal, October 16, 2017



SAVONITTO & ASS. INC.

Attorneys for Petitioner

AFFIDAVIT

I, the undersigned, **MARTINE TRUDEAU**, lawyer, practicing in the law firm of Savonitto & Ass. Inc. located at 468, rue St-Jean Street, Suite 400, in the city and district of Montreal, solemnly affirm the following:


1. I assist the Member of the Joint Committee for Quebec acting as applicant for the purposes of this application;
2. All the facts alleged in this application are true.

AND I HAVE SIGNED



MARTINE TRUDEAU

**Affirmed before me
In Montreal this October 16, 2017**



**Chantal Pleau
Commissioner of oaths for Quebec**

LIST OF EXHIBITS

- EXHIBIT R-1 :** Affidavit of Richard Border, sworn October 12, 2017, including the following exhibits attached thereto;
- A:** Required capital report prepared by Eckler and dated October 12, 2017;
 - B :** Memorandum to the Joint Committee prepared by Eckler regarding the loss of service compensation paid to permanently disabled Dependants dated October 12, 2017;
- EXHIBIT R-2 :** Factum/Submissions/Written Argument of Class Member 2213;
- EXHIBIT R-3:** Factum/Submissions/Written Argument of Class Member 7438.

Montréal, October 16, 2017



SAVONITTO & ASS. INC.
Attorneys for Petitioner

NOTICE FOR PRESENTATION

Me Nathalie Drouin
Me Stéphane Arcelin
**PROCUREUR GÉNÉRAL DU CANADA/
ATTORNEY GENERAL OF CANADA**
Complexe Guy Favreau Tour Est
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Me Serge Ghorayeb
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Me Mason Poplaw
Me Kim Nguyen
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TAKE NOTICE that the present *Application from the Joint Committee for the Implementation of the 2016 Allocation Orders* will be presented for adjudication before the Honourable Chantal Corriveau, J.C.S., at the joint hearing specifically scheduled to take place on November 22 and 23, 2017, in Toronto at a location to be determined.

DO GOVERN YOURSELVES ACCORDINGLY.

Montreal, October 16, 2017


SAVONITTO & ASS. INC.
Attorneys for Petitioner

N° : 500-06-000016-960

SUPERIOR COURT (Class Action
Province of Quebec
District of **MONTREAL**

DOMINIQUE HONHON

Plaintiff

-vs-

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

Defendants

-and-

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

Petitioner

FONDS D'AIDE AUX RECOURS COLLECTIFS

-and-

LE CURATEUR PUBLIC DU QUÉBEC

Mis-en-cause

N° : 500-06-000068-987

SUPERIOR COURT (Class Action
Province of Quebec
District of **MONTREAL**

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

**APPLICATION FROM THE JOINT COMMITTEE FOR
THE IMPLEMENTATION OF THE 2016
ALLOCATION ORDERS**

ORIGINAL

Savonitto

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