C A N A D A

PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL

NO.:

SUPERIOR COURT
CIVIL DIVISION

MARC BOUDREAU, having elected his domicile at the office of attorney Alan M. Stein, 1010 Sherbrooke West, bureau 1505, Montreal, Québec, H3A 2R7

PETITIONER

-vs-

THE ATTORNEY GENERAL OF CANADA, Department of Justice, having an office at Complex Guy Favreau, 200 René-Lévesque Blvd. West, East Tower, 5th Floor, Montréal, Québec, H2Z 1X4

THE ATTORNEY GENERAL OF QUEBEC having an office at Complex Guy Favreau, 200 René-Lévesque Blvd. West, East Tower, 9th Floor, Montréal, Québec, H2Z 1X4

and

THE SISTERS OFPROVIDENCE, having an office at 12055 rue Grenet, Montréal, Québec, H4J 2J5

and

LES SOEURS DE MISERICORDE DE MONTREAL, having an office at 12435 av. De la Misericorde, Montréal, Québec, H4J 2G3

and

THE GREY NUNS OF MONTREAL, having an office at 138 rue Saint-Pierre, Montréal, Québec, H2Y 2L7

and

LES PETITES FRANCISCAINES DE MARIE, having an office at 201-115 rue Alfred-Morin , Baie-St-Paul, Québec, G3Z 0K6

and

LES SŒURS DU BON-PASTEUR DE QUEBEC, having an office at 2550 rue Marie- Fitzbach, Quebec Québec, G1V 2J2

and

CONGREGATION DES SŒURS DE NOTRE-DAME AUXILIATRICE, having an office at 895 rue Perreault E, Rouyn- Noranda, Québec, J9X 5H5

and

CLERCS DE SAINT-VIATEUR DU CANADA, having an office at 450 Avenue Querbes, Montréal, Québec, H2V 3W5

RESPONDENTS

MOTION FOR AUTHORIZATION TO INSTITUTE A CLASS ACTION AND TO OBTAIN THE STATUS OF REPRESENTATIVE
(Articles 574 et seq. C.C.P.)

TO ONE OF THE HONOURABLE JUDGES OF THE SUPERIOR COURT, SITTING IN PRACTICE DIVISION, IN AND FOR THE DISTRICT OF MONTREAL, PETITIONER RESPECTFULLY SUBMITS THE FOLLOWING:

1. THE PETITIONER WISHES TO INSTITUTE A CLASS ACTION ON BEHALF OF THE CLASS OF PERSONS HEREINAFTER DESCRIBED, NAMELY:

1.1. All persons and estates of deceased persons who were victims of psychological, physical and sexual abuse, as well as being the subjects of persecution and human experimentation;

1.2. Within the group of the abovementioned victims, there are approximately 150 individuals who were subject to this cause and experimentation;

Background Information

1.3. The children and individuals who were subject to the above abuse and experimentation were warehoused in psychiatric institutions, parishes , reform schools and other institutions as part of a financial scheme to enrich the government of Quebec and the Catholic Order and/or Church;

1.4. The Quebec government under Maurice Duplessis (Premier of Quebec from 1944-1959) received a large volume of funding from the federal government, one of the Respondents, for the so-called care of the children. The abovementioned period of history in Quebec has been referred to as “La Grande Noirceur" ("The Great Darkness") due to the rampant corruption primarily in the treatment of the individuals and children who became known as the Duplessis Orphans;

1.5. While institutionalized under the care and protection of the Canadian federal government due to the actions of the government of the province of Quebec, psychiatrists, medical doctors and the mainly Roman Catholic institutions themselves, many Duplessis Orphans were improperly subjected to brain-damaging electroshock, forcible injections with powerful drugs, human experimentation, torture, sexual abuse, beatings, forced labor and other forms of physical abuse. The abuse resulted in many deaths and estimates ranging into the thousands;

1.6. Léo-Paul Lauzon, an Accounting Sciences professor at Université du Québec à Montréal, wrote an article on October 14, 1998, stating that the government of Quebec and many Orphanages were financially incentivized to warehouse these children in any manner they could possibly do so. An excerpt of his article reads as follows:

“*La principale raison qui a pu conduire à l'internement de milliers d'enfants est la différence entre la subvention reçue par les orphelinats et celle reçue par les asiles. Ainsi, l'orphelinat de l'Immaculée de Chicoutimi recevait un per diem de 0,70 $ en 1956 pour les enfants de plus de cinq ans alors que le per diem de Saint-Jean-de-Dieu était, pour la même année, de 2,25 $ (soit trois fois plus élevé). De plus, les congrégations religieuses n'étaient plus tenues d'éduquer ces enfants et les faisaient travailler sans rémunération.*

Le gouvernement du Québec avait également comme politique de favoriser largement la construction et l'exploitation d'hôpitaux à l'aide de subventions que le gouvernement fédéral octroient à compter de 1948. De 1948 à 1953, le gouvernement fédéral a déboursé

94 millions de dollars dans la santé, dont 31 % ont été alloués au Québec. À titre de comparaison, l'Ontario n'a reçu que 26 % de cette somme au cours de la même période.

Le gouvernement québécois préférait donc construire de nouveaux hôpitaux pour « entreposer » les malades mentaux, profitant des importantes subventions du gouvernement fédéral, plutôt que d'investir dans le mieux-être des malades. Le réseau psychiatrique se retrouvait donc face à un sous-financement chronique et à une pression à la baisse continuelle de ses taux d'occupation qu'il fallait compenser par de nouvelles admissions.

Dans au moins un cas, soit celui du Mont-Providence, le gouvernement du Québec a directement contribué à l'internement d'enfants normaux en institut psychiatrique pour pouvoir profiter des subventions du gouvernement fédéral.

Les congrégations religieuses on eu un net avantage financier à transférer des enfants normaux « illégitimes » dans des hôpitaux psychiatriques, notamment pour profiter d'un per diem plus important. Les communautés religieuses ont réussi à obtenir, en dollars constants de 1999, environ 70 millions de dollars en sommes additionnelles pour les années de 1940 à 1960. Ce montant constitue selon nous un minimum puisqu'il ne tient pas compte du travail non rémunéré des enfants ni des revenus additionnels que les communautés religieuses ont obtenus en évacuant des orphelinats les « illégitimes » pour faire place à une clientèle plus payante."

1.7. In brief, the religious institutions gained an additional profit of $70M from the years between 1940 and 1960, due to their illegal operation of placing children in psychiatric institutions and other institutions. This sum of money does not even include the non-remunerated work the children did, as well as the profits made once the Duplessis Orphans were evacuated for a better-paying clientele;

2. THE PETITIONER'S PERSONAL CLAIM AGAINST THE RESPONDENT IS BASED ON THE FOLLOWING FACTS:

Background Information

2.1. That Petitioner, Marc Boudreau (née Jean-Marc Girard) was born on February 14, 1956, at the Crèche de la Miséricorde de Montréal. He had a twin brother who died three days after birth. Up to the age of 9 months old, Petitioner was placed in different foster homes of which he does not remember. At the age of 9 months old, he was placed at the foster home of Ms. Rollande Boudreau (née Rollande Bessette). The Adoption Bureau paid her a pension for this. When he was approximately 5 or 6 years old, Ms. Boudreau **met** a romantic interest and decided that it was best for Petitioner to be placed somewhere else and that such a decision was to be taken by the Youth Division of the Court of Quebec;

2.2. That over the next several years at various different foyers, boarding schools, orphanages, monasteries, mental institutions, and hospitals, Petitioner experienced terrible and horrific

acts assisted, funded, and conducted by the Defendants, the events of which are detailed hereinafter;

2.3. That the exact dates that Petitioner was transferred cannot be determined due to the destruction and/or removal of all records, and the horrifying abuse that Petitioner underwent as a child;

2.4. That the decision by the Court of Quebec was to place Petitioner in the religious school of Saint-André Avellin. There he experienced physical and mental abuse due to the strict rules and regulations implemented by the school, but nothing in comparison with what was to come in the other foyers/boarding schools where he would be sent to next;

2.5. That the second foyer/boarding school that Petitioner was institutionalized at was the Monastery of Huberdeau in Argenteuil, Quebec. At this monastery, Petitioner experienced terrible atrocities. Similar to his first foyer/boarding school, Petitioner was punched many times. He remembers that the institution would place all the kids in the gymnasium and a big man would hit them hard if they made any noise or did anything at all. He noted that he was punched many times in the neck. In one instance, Petitioner was beaten so badly that he feared losing his left eye. Frequently, Petitioner was forced into a strait jacket and then put in isolation (a room with nothing other than 4 white walls surrounding him). There, he would have awful human experimentation conducted upon himself by the authorities. These experiments included forced intake of drugs, sleep-deprivation therapy, and sleep-deprivation and electro-shock therapy. On top of all of this, certain priests at the Monastery would sexual abuse him. He was sodomized by these priests, and then given drugs to facilitate more sexual abuse against him.

2.6. That Petitioner was instructed at the time that he should not tell his adoptive parents about anything that happened at Huberdeau and that if he were to tell them, he would be physically abused for doing so;

2.7. That Petitioner noted that many of the boys were crippled , either walking with a cane or crutches or again in a wheelchair and some having lost their eyesight due to beatings and even murder and subsequently buried at the backyard of Huberdeau;

2.8. That it is obvious to understand the reason for which Petitioner has a foggy memory of what transpired at Huberdeau. The physical pounding his body and brain withstood, as well as the extreme mental anguish definitely caused, has led the Petitioner to only having a vague grasp on what transpired while he was institutionalized there. In his opinion, Huberdeau, out of all the terrible places he stayed during his childhood, was the worst;

2.9. That Petitioner was then sent to a monastery named Roberval in Lac St. Jean. At Roberval, there were monitors who looked after the children who were dressed in civilian clothes. Petitioner was in a pavilion, where he was instructed to make cement statues in the form of flowerpots, lions and other things. Petitioner suffered from both physical exhaustion and mental anguish. In general, any child would receive blows and were sent into solitary

confinement into a small room (4ft x 7ft) with only one tiny window (6″ by 6″) if they did not obey the rules. Other times, children were dressed only in their underwear for a period determined by the monitors, in order to humiliate the specific child. The children were only given 15 minutes to eat each meal and then were forced back into their cells. When Petitioner wanted to use the bathroom, he would often be sexually abused by one of the monitors who was at his guard post;

2.10. That after Roberval, Petitioner was sent to Berthollet, in the northern part of Montreal, when he was approximately seven years old. Berthollet was essentially a prison for children. It was very strict and severe with punishments which including hard beatings and punches. Children were kept in small cells with a small window and the door was always locked. The mealtimes were very short, children were forced to wash themselves naked with all the other children. If a child was acting out of line, they would be placed in isolation for a long time. Needless to say, this caused extreme mental suffering upon all the children at Berthollet, including Petitioner;

2.11. Petitioner was then sent to the Mont Providence Psychiatric Hospital in Rivières des Prairies in Montreal, where more abuse and torture occurred. This included the same types of drug experimentation done unto Petitioner, as well as isolation. During class time at this institution, if a child acted out, they were to be put in a strait jacket, given drugs and put in isolation. Petitioner still remembers being brutally assaulted by his Professor Béliveau in the gymnasium, who thrust him violently against the cement wall and then gave Petitioner a punch in the throat. A few days after this incident, Professor Béliveau and his colleague Professor Valois, arranged for Petitioner to be beaten by five pupils who were boxers and they beat him with their boxing gloves on. Due to this event, he was put in the Mont Providence Psychiatric Hospital's infirmary for three or four days where there were other children with both Down syndrome and mental retardation. He was in a state of shock to have been placed there;

2.12. Furthermore, at the Mont Providence Psychiatric Hospital, Petitioner was falsely labelled as mentally deficient and challenged. This was a complete and utter lie and had terrible consequences upon Petitioner's life. Petitioner was never mentally ill and should never have been labelled as such;

2.13. Upon his release from the aforesaid Rivière des Prairies Hospital, Petitioner was transferred to the Centre des Marronniers, in order for him to subsequently be sent to the Pavillon des Marronniers, which was located in south-west Montreal. The regulations at this pavilion were also very severe, and it was the last place at which he was institutionalized at. Afterwards, he finally found freedom, but had to face society for the first time in his life;

2.14. Up until the age of 18, Petitioner's life was a living hell. He lost 10 years of his childhood due to all the aforesaid places where he suffered abuse and torture. He suffered terrible consequences from his time under the supervision of the authorities. The extreme beatings led to many problems in his left eye. He also experiences presently pain in his neck from the excessive beatings and punches.

2.15. That furthermore, Petitioner has a severe case of Atherosclerosis, a disease in which plaque builds up inside the arteries, as well as Progressive Multifocal Leukoencephalopathy which was detected in 1997 or 1998 by his neurologist, both of which were likely caused by the physical abuse he withstood during his childhood. The medical records detail all of the physical trauma that Petitioner still has to this day and will have for the rest of his life;

2.16. From an emotional aspect, Petitioner's childhood experience has led him to live a life deficient of love, intimacy and passion for others. He cannot feel any of these emotions, as they were stripped away from him while under the supervision of the Defendants as a child.

2.17. Additionally, Petitioner has trouble trusting any male. He finds himself becoming very distant and cold towards all males, and especially ones with authority. He distrusts society and the administrative powers, including the federal and provincial government, since they are the reason for his trauma. Due to what he experienced, Petitioner feels constantly sad, unhappy and cries very often. He was ashamed of himself. Even to this day, Petitioner finds himself being insecure, unstable, revolted, frustrated, angry, and bitter with rage and hatred towards all those who did this to him. He has been unable to form a stable and normal life;

2.18. The emotional trauma Petitioner endures has had real-life consequences. He has had two marriages in the past that have both ended in divorce. From these two marriages, Petitioner has 5 children and 7 grandchildren. While others are able to feel and express their love freely for their loved-ones, Petitioner finds himself unable to experience love whatsoever. At work, Petitioner feels very sensitive and insecure around any type of authority. Petitioner now has a very supportive girlfriend who is helping him deal with the emotional aftermath and damages;

2.19. Prior to hearing about the Duplessis orphans, Petitioner did not want to think of his past. He pushed the memories of this dark time as far away in his mind as possible. He wanted to restart his life without this black cloud hanging over him, however it has been very difficult to do so;

2.20. That Petitioner kept the secret of his past up until the beginning of 2016, not knowing that he was, in fact, a Duplessis orphan. After meeting and conversing with a friend, he vaguely discussed his life with his friend. His friend told him that there was an indemnification program where the government was giving money to the children who were affected similarly to Petitioner. Upon having this discussion, Petitioner did research about the Duplessis Orphans online and found Rod Vienneau, President of the Comité Les Enfants de la Grande Noirceur. Upon contacting Mr. Vienneau and communicating with him in regard to his childhood, the conspiracy that was perpetrated by the Quebec Government and the Committee that Mr. Vienneau was head of, the Petitioner became interested in partaking in the Committee. He subsequently found out about the small indemnification program of $15,000 that was offered by the Government of Quebec in

2010. In his mind, this was a slap in the face and insulting. In contrast to the horrific childhood he had which was directly caused by the Quebec Government and all who assisted them, this was an insultingly low amount to be offered. Petitioner wanted to finally obtain justice and close this chapter in his life, once and for all. However, the amount of $15,000 is definitely not sufficient to do so;

2.21. That Petitioner has done extensive research to find out what transpired during the early years of his life and has only unearthed three documents pertaining to same. All others have evidently been destroyed. The only documents he was able to obtain were those from the Psychiatric Hospital of Mont Providence in Rivière des Prairies in Montreal, a report detailing the events that occurred during his time at Huberdeau from the St-Justine Hospital, and documents from the Social Services Centre of Montreal which describes the name of his adopted parents, a record of his health, and the transfers into the various foster homes throughout his childhood**;**

2.22. Currently, Petitioner feels like he is living in the unknown. Many pieces of his life are missing. He does not know who his family is, since, despite many efforts to find out who and where they are, all documents regarding his history have been destroyed. This present lawsuit will finally put his mind at rest, as he will no longer have to be constantly thinking of what he endured. With this action, Petitioner can finally move on with his life, knowing that justice was served, allowing him to finally attain freedom and regain his dignity;

3. RESPONSIBILITY OF RESPONDENTS:

3.1. While institutionalized the Respondents were funded by the Canadian Federal Government and due to the actions of the Government of the Province of Quebec, the psychiatrists, medical doctors and essentially the Roman Catholic Church itself, many children underwent sexual abuse, human experimentation, torture, beatings, forced labor and other forms of physical abuse;

3.2. It is estimated the abuse resulted in the range of thousands of deaths. In the 1990s, 240 individual testimonies and 320 criminal complaints from Duplessis Orphans were compiled.

3.3. In 1997, the Quebec Government authorized Daniel Jacoby, an ombudsman for the Quebec Government, to investigate the foregoing and to report in detail whether there was such abuse caused to the Duplessis Orphans. The aforesaid ombudsman found evidence of ice baths, torture, beatings and other forms of abuse and more;

3.4. A renowned psychiatrist, Denis Lazure, admitted in his memoirs that the aforesaid Orphans died from psychiatric treatments in the institutions that they were interned at and that these treatments were nothing more than sadistic pseudo-treatments on these children;

3.5. That to date, however, no individual or entity, including the Canadian and Quebec governments, the psychiatrists and doctors who victimized the Duplessis Orphans and

exploited them as human guinea pigs, and the Roman Catholic orders which ran the institutions have been held accountable or apologized for the alleged crimes and human rights abuses, apart from a nominal compensation program that was offered by the Quebec government that was unsatisfactory to almost all of the Duplessis Orphans;

4. THE COMPOSITION OF THE MEMBERS OF THE CLASS MAKES THE APPLICATION OF ARTICLES 87 AND 143 C.C.P. DIFFICULT AND/OR IMPRACTICAL FOR THE FOLLOWING REASONS:

4.1. Based upon the aforesaid allegations, to date there is in approximately 150 members of the class. This number could increase once proceedings are instituted and authorized by a judge of the Superior Court and the proceedings are made public by the media;

4.2. It would be impractical for Petitioner to obtain a mandate from all members of the Class who reside throughout Quebec, Ontario and the United States, many of whom are quite elderly and many of whom are unsophisticated or who have lost their identity;

4.3. Class action will ensure the most efficient use of judicial resources;

5. THE IDENTICAL, SIMILAR OR RELATED QUESTIONS OF LAW OR OF FACT BETWEEN EACH MEMBER OF THE CLASS AND THE RESPONDENT, WHICH PETITIONER WISHES TO HAVE DECIDED BY THIS CLASS ACTION ARE:

5.1. Did Respondents commit a fault by subjecting the Duplessis Orphans to brain damaging electric shock, forcible injections with powerful drugs, human experimentation, torture, forced labor and other forms of physical and sexual abuse?

5.2. If the answer to the above question is yes, are Respondents liable for the damages sustained by the Class collectively?

5.3. What is the amount of damages sustained by the class collectively as a result of the fault of Respondents?

6. THE QUESTIONS LAW OR OF FACT PARTICULAR TO EACH OF THE MEMBERS OF THE CLASS ARE:

6.1. Out of the damages recovered by the Class, collectively, from the Respondent, what is each member of the Class entitled to?

6.2. Is the three year prescription provided for by the Civil Code of Quebec, as ruled upon in *Kelly* vs. *La Communauté des Sœurs de la Charité de Québec* by the Honourable Justice André Denis, applicable to this case?

6.3. Alternatively, has it been impossible for the Class to file an Action prior to this moment, due to an impossibility to act, allowing for prescription to continue running, which is provided for in Article 2904 of the Civil Code of Quebec?

7. **DUE TO PETITIONER'S IMPOSSIBILITY TO ACT CAUSED BY THE RESPONDENTS, PRESCRIPTION RUNS UNTIL IT IS POSSIBLE FOR PETITIONER TO ACT:**

7.1. According to Article 2925 of the *Civil Code of Quebec*, the victims should, in theory, have only three years to enforce their right of originating an action against the Respondents.

> ***2925.*** *An action to enforce a personal right or movable real right is prescribed by three years, if the prescriptive period is not otherwise determined.*

7.2. However, Article 2904 of the *Civil Code of Quebec* refutes the abovementioned article if it was impossible for a person to act prior to the current Action.

> **2904.** *Prescription does not run against persons if it is impossible in fact for them to act by themselves or to be represented by others.*

7.3. Petitioner, as well as all members of the class, underwent serious infringement of their guaranteed rights, incurred serious stress, fear, and inability to even discuss any aspect of what they went through during this time period at such a young age. The trauma experienced by these Duplessis Orphans had a paralyzing effect as each was gripped by fear. They had been completely incapacitated and incapable of filing an Action before this time;

7.4. After the aforesaid judgement of the Honourable Justice André Denis, over the last two decades, there has been ample jurisprudence that allows for prescription to continue running past the normal three years limit. The trend in the Courts of Quebec is to allow for prescription to extend up until it has become possible to act;

7.5. Petitioner, as well as members of the class, were incapable of acting for the aforementioned reasons. In addition, they have been diligent and persistent in their efforts to find an amicable resolution to this matter. To their dismay, none of their efforts have led to a satisfying conclusion, and therefore they have found no alternative to filing an Action against Respondents. This is a matter that has caused grave damage to each Duplessis Orphan. The memories of such terrible acts caused to them and to the children around them will be etched in their minds forever;

7.6. Respondents have not offered any compensation to date, notwithstanding the letter of Jonathan Levy presented to the United Nations Human Rights Committee, dated November 29, 2010, a copy of which was forwarded to the Government of Canada, and notwithstanding the letter of Petitioner's undersigned attorney forwarded to the Prime Minister of Canada, Justin Trudeau, dated July 24, 2017, copies of these letters are produced en liasse to form part of Petitioner exhibit P-1;

8. IT IS EXPEDIENT THAT THE INSTITUTION OF A CLASS ACTION FOR THE BENEFIT OF THE MEMBERS OF THE CLASS BE AUTHORIZED FOR THE FOLLOWING REASONS:

8.1. The Class action is the best procedural vehicle to members of the Class in order to protect and enforce their rights herein and render justice to the aforesaid victims and orphans;

8.2. While the amount of the damages and loss sustained by each member of the Class will differ, all of the legal and factual issues surrounding the Respondent's conduct and its liability therefore are identical for each member of the Class;

8.3. Members of the Class who have endured terrible physical and emotional damages as a result of Respondents' conduct could, in the absence of a Class Action, be prevented from instituting a separate recourse against the Respondents in view of the costs involved to enforce their rights;

8.4. Members of the Class who have suffered relatively minimal damages as a result of the Respondents' conduct could, in the absence of a Class Action, be prevented from instituting a separate recourse against the Respondents in view of the costs involved to enforce their rights;

8.5. In the absence of a class action, there is a real possibility of numerous individual actions against the Respondent that will involve an analysis of the same legal and factual issues, which will entail an inefficient use of the resources of the judicial system, as well as the possibility of contradictory judgments on questions of fact or of law which are identical for each member of the Class;

8.6. It is in the interests of justice that members of the Class be given the opportunity to participate in the institution of a Class Action that would benefit all those who have sustained damages as a result of the Respondents' conduct;

9; **THE DAMAGES**:

9.1 In the light of all the foregoing, the Petitioner has a right to claim from the Defendants the sum of **$350.000** for moral damages solidarly from the Respondents, to compensate for all the anguish , pain and suffering , inconvenience , stress and aggravation;

9.2 Seeing that the Petitioner's physical and emotional integrity has been tainted by the intentional acts of the Respondents, seeing the severity of the sexual abuses performed by the Respondents on the Petitioner, the Petitioner is entitled to claim the sum of **$500.000** solidarly from the Respondents as punitive and exemplary damages, the whole in accordance with the Charter of Human rights;

9.3 That finally the Petitioner has a right to claim from the Respondents the sum of **$25,000** solidary, for the cost of future therapy that he wishes to undergo to deal with the trauma from the sexual aggressions;

10. THE NATURE OF THE RECOURSE WHICH THE PETITIONER WISHES TO EXERCISE ON BEHALF OF THE MEMBERS OF THE CLASS IS:

10.1 An action in compensatory damages against the Respondents to sanction its negligence and willful blindness in facilitating the irregular and unlawful institutionalization of the Duplessis Orphans;

11. THE CONCLUSIONS SOUGHT BY PETITIONER AGAINST THE RESPONDENTS ARE AS FOLLOWS:

AUTHORIZE the present Class Action against the Respondents;

CONDEMN the Respondents to pay the Petitioner solidarly the sum of $350,000 for the agony and additional stress that he has suffered due to the Respondents' actions plus the interest at the legal rate as well as the additional indemnity provided for in Sections 1617 and the following of the Civil Code of Quebec;

CONDEMN the Respondents to pay the Petitioner solidarly the sum of $500,000 as punitive and exemplary damages plus the interest at the legal rate as well as the additional indemnity provided for in Sections 1617 and the following of the Civil Code of Quebec;

CONDEMN the Respondents to pay solidarly to the Petitioner the sum of $25,000 so that the Petitioner can undergo a future therapy caused by all the sexual aggressions and abuses that he has suffered due to the Respondents' actions plus the interest at the legal rate as well as the additional indemnity provided for in Sections 1617 and the following of the Civil Code of Quebec;

CONDEMN the Respondents to compensate the Class for their collective loss, namely the total amount of damages – physical and emotional – caused to them while under the "care" of Respondents;

DECLARE that Respondents are liable for the costs of judicial and extrajudicial fees and disbursements, including fees for expertise incurred in the present matter for and in the name of Petitioner and the members of the Class;

ORDER collective recovery of $875,000.00 per member of the Class;

ORDER that the claims of the members of the Class be the object of individual claims in accordance with Articles 595 to 601 C.C.P. or, if impractical or inefficient, order the Respondents to perform any remedial measures that this Honourable Court deems to be in the interests of the members of the Class;

ORDER the Respondents to advise all members of the Class of the present Class Action lawsuit;

CONDEMN the Respondents to any further relief as may be just and proper;

THE WHOLE with costs, including the costs of all exhibits, reports, expertise and publication of notices.

MONTRÉAL, January 23, 2018

ME ALAN M. STEIN
1010 Sherbrooke West, Suite 1505
Montréal, Québec H3A 2R7
Tel: (514) 289-3000, ext. 202
Fax: (514) 284-0003
Attorney for the Petitioner