

DID YOU ATTEND GRENVILLE CHRISTIAN COLLEGE BETWEEN SEPTEMBER 1973 AND JULY 1997?

A Class Action Lawsuit May Affect Your Rights.

A court authorized this notice. You are not being sued.

- i You could be affected by a class action lawsuit involving Grenville Christian College (“Grenville”), Charles Farnsworth, and Judy Hay the executrix for the estate of J. Alastair Haig (the “Defendants”).
- i A Court has approved the lawsuit as a class action that includes former students of Grenville. **If you know a former student of Grenville, please share this information with them.**
- i The Court has not decided whether the Defendants did anything wrong, and the case is currently scheduled to go to trial. There is no money available now and no guarantee there will be. However, your rights are affected, and you have a choice to make now.

YOUR LEGAL RIGHTS AND OPTIONS AT THIS STAGE	
DO NOTHING	<p>Stay in this lawsuit. Await the outcome. Share in possible benefits. Give up certain rights.</p> <p>By doing nothing, you keep the possibility of getting money or other benefits that may come from a trial or settlement, including the benefit of any order or judgments in favour of the class. But, you give up any rights to sue the Defendants on your own about the same legal claims in this lawsuit.</p>
REMOVE YOURSELF (OPT OUT)	<p>Get out of this lawsuit. Get no benefits from it. Keep rights.</p> <p>If you ask to be removed (opt out) and money or benefits are later awarded, you won’t share in those. You will also lose the right to the benefit of any order or judgement in favour of the class. But, you keep any rights to sue the Defendants on your own about the same legal claims in this lawsuit.</p>

- i Absent any settlement, lawyers must prove the claims against the defendants at a trial. The claims of Class Members as a whole will be addressed at a trial of the issues common to all Class Members including such issues as “Did the defendants breach their duty of care to the Class Members?”

- i Upon resolution of the common issues by the Court, you may be called upon to prove the damages you claim to have sustained and the cause of those damages in your own individual trial. Your options are explained in this notice. To ask to be removed, you must act by **December 28, 2014**.

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BASIC INFORMATION

1. Why is there a notice?

This lawsuit has been “certified” as a Class Action. This means that the lawsuit meets the requirements for class actions and may proceed to trial. If you are included, you may have legal rights and options before the Court decides whether the claims being made against Grenville, Charles Farnsworth, and Judy Hay the executrix for the estate of J. Alastair Haig (the “Defendants”) on your behalf are correct. This notice explains all of these things.

The case is known as *Cavanaugh v. Grenville Christian College*, Court File No. 08-CV-347100CP. The people who sued are called the Plaintiffs.

2. What is this lawsuit about?

The lawsuit says the Plaintiffs were subjected to systemic and pervasive physical and psychological abuse at the hands of Grenville staff, including Mr. Farnsworth and Mr. Haig. The Defendants deny these claims. The Court has not decided whether the Plaintiffs or the Defendants are right. The lawyers for the Plaintiffs will have to prove their claims in Court.

3. Why is this a class action?

In a class action one or more people called “representative plaintiffs” (in this case, Lisa Cavanaugh, Andrew Hale-Byrne, Richard Van Dusen, Margaret Granger and Tim Backlock) sue on behalf of people who have similar claims. All of these people are a “class” or “class members.” The court resolves the issues for all class members, except for those who remove themselves from the class.

4. Who is a member of the Class?

The Class includes students who attended and resided at Grenville Christian College between September 1973 and July 1997, excepting the children and grandchildren of the individual Defendants.

5. What are the Plaintiffs asking for?

Plaintiffs are asking for money or other benefits for the Class. They are also asking for lawyers' fees and costs, plus interest.

6. Is there any money available now?

No money or benefits are available now because the Court has not yet decided whether the Defendants did anything wrong, and the two sides have not settled the case. There is no guarantee that money or benefits will ever be obtained. If they are, you will be notified about how to make a claim, including the possibility that you may have to individually prove part of your claim.

YOUR RIGHTS AND OPTIONS

You have to decide whether to stay in the Class or whether to remove yourself before a possible trial, and you have to decide this **December 28, 2014**.

7. What happens if I do nothing at all?

If you do nothing you will automatically remain in the Class. You will be bound by all Court orders, good or bad. If any benefit is awarded, you may need to take action in order to receive any benefits.

8. What if I don't want to be in the Class?

If you decide not to participate in the lawsuit or if you claim not to have sustained any damages at Grenville, you must remove yourself – this is sometimes referred to as “opting out”. If you remove yourself, you will not receive any benefit that may be obtained as a result of this lawsuit. You will not be bound by any Court orders and you keep your right to sue the Defendants regarding the issues in this case.

To remove yourself, you must send in the Opt Out Form and return it to the Grenville Class Action Administrator. You must mail your Opt Out Form postmarked by **December 28, 2014**, to: Grenville Class Action Administrator, c/o Koskie Minsky LLP, 900-20 Queen Street West, Toronto Ontario, M5H 3R3 or by email at: grenvilleclassaction@kmlaw.ca.

THE LAWYERS REPRESENTING YOU

9. Do I have a lawyer in the case?

Yes. The Court has appointed Koskie Minsky LLP, Torkin Manes LLP, McKenzie Lake Lawyers LLP, and Haber & Associates to represent you and other Class Members as “Class Counsel.” You will not be charged for these lawyers. If you want to be represented by another lawyer, you may hire one to appear in Court for you at your own expense.

10. How will the lawyers be paid?

The lawyers’ fees and expenses would be deducted from any money obtained for the Class, or paid separately by the Defendants. Class members will not be liable for any fees and expenses of class counsel over and above that.

A TRIAL

11. How and when will the Court decide who is right?

If the case is not dismissed or settled, the Plaintiffs will have to prove their claims at a trial that will take place in Toronto. During the trial, a court will hear all of the evidence, so that a decision can be reached about whether the Plaintiffs or the Defendants are right about the claims in the lawsuit. There is no guarantee that the Plaintiffs will win any money or benefits for the Class. The trial may decide all or part of your claim. You may need to prove part of your claim individually. These things are not known right now.

12. Will I get money after the trial?

If the Plaintiffs obtain money or benefits as a result of a trial or settlement, you will be notified about how to make a claim, including the possibility that you may have to individually prove part of your claim. These things are not known right now. Important information about the case will be posted on the website, <http://kmlaw.ca/Case-Central/Overview/?rid=155>, as it becomes available.

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