

IMPORTANT NOTICE ABOUT THE CLASS ACTION LAWSUIT AGAINST GRENVILLE CHRISTIAN COLLEGE (“GCC”)

If you attended and boarded at GCC between September 1973 and July 1997 (and you are NOT a child or grandchild of Charles Farnsworth and/or Alastair Haig and you have NOT previously validly opted-out) you are a Class Member and this Notice is for you.

www.GCCSettlement.ca

Please read this notice carefully as it may affect your legal rights.

A Settlement has been reached between the parties in the GCC lawsuit. The Settlement must be Court approved before it is implemented and before Class Members can participate in it.

The Court hearing to decide if the Settlement should be approved is scheduled to be heard virtually on **November 16, 2023, at 10:00 am EST**.

A copy of the Settlement Agreement is available at www.GCCSettlement.ca. You can also request a paper or electronic copy from Settlement Class Counsel (see contact information below).

BACKGROUND

This Action was commenced in about 2008 alleging that GCC was negligent and its staff failed to fulfill and/or were grossly negligent in fulfilling their fundamental obligations to Class Members during the entirety of the Class Period (being September 1973 to July 1997) and that this could cause harm, and that the Defendants are liable for the harms suffered by the Class Members.

The Action was allowed to proceed by way of class action (“Certified”) in February 2014 and Class Members were provided an opportunity to opt-out of the lawsuit by December 28, 2014.

In 2019 the Action proceeded to a common issues trial, which was successful, and the Court’s determinations at the common issues trial (issued in February 2020) were upheld by the Ontario Court of Appeal in 2021.

WHAT DO YOU HAVE TO DO NOW?

If the Settlement is approved, then all Class Members can submit a claim for payment. If you want to submit a claim for payment, **you do NOT need to take any steps at this time**. Another Notice will be issued if the Settlement is approved, and it will include all of the details on how to submit a claim in the Settlement. Updates and details will also be available on the website www.GCCSettlement.ca.

If you do not think the Settlement is fair, reasonable, or in the best interests of the Class Members, or you object to the amount of legal fees that are being sought, you can submit an objection to the Court in one (1) of two (2) ways:

Option 1: You can send in a statement, which **must** include your full name, complete contact information, confirmation that you are a Class Member, and an explanation of why you object to the Settlement or counsel fees. Class Counsel will file these with the Court. Statements can be sent by email or mail and must be received **by no later than October 31, 2023, by 11:59 pm EST**, by way of:

Email:	gcc@mckenzielake.com
Fax:	519-672-2674
Mail:	McKenzie Lake Lawyers LLP Attention: Sabrina Lombardi 1800-140 Fullarton Street London ON N6A 5P2

Option 2: You can submit submissions to the court in person at the Settlement Approval Hearing. If you want to address the court, you **must** email gcc@mckenzielake.com **by no later than October 31, 2023, by 11:59 pm EST**, to advise of same. Details of how to participate in the virtual hearing will be sent to everyone who wishes to speak.

WHAT IS THE PROPOSED SETTLEMENT?

The Insurers, on behalf of the Defendants, will pay **\$10,875,000 CAD** to settle the lawsuit. The Settlement Amount will be allocated to pay Eligible Claims (the "Settlement Fund"), as well as the costs of administering the Settlement, the litigation funding levy and if approved by the Court, honoraria to the representative Plaintiffs for their extraordinary efforts pursuing the litigation and representing the class, as well as Class Counsel's legal fees.

The Settlement Fund will be distributed to Eligible Class Members claimants as follows:

1) Group A - Common Experience Claim

- i. All Class Members share a Common Experience in having attended and boarded at GCC during the Class Period (September 1973 and July 1997) and having been subjected to controlling, demeaning, intimidating, and humiliating acts, as well as excessive physical and/or psychological punishment.
- ii. Payments to Eligible Class Members under this category ("CEP") will be determined based upon the amount of time they attended and boarded at GCC during the Class Period.

Less than 1 School Year ¹	\$ 1,500 CAD
1 School Year	\$ 3,000 CAD
1-2 School Years	\$ 6,000 CAD
3-4 School Years	\$ 12,000 CAD
4+ School Years	\$ 24,000 CAD

¹ A school year is 10 months, between September and June

2) Group B – Severe Psychological and/or Physical Harm and/or Sexual Abuse

- i. Class Members may seek additional compensation to the CEP, if they can provide objective evidence of severe psychological injury (i.e. mental-health illness/disorder diagnosis and treatment), or physical injury (i.e. surgery and/or ongoing physiotherapy) linked to their experiences at GCC.
- ii. Class Members subjected to incidences of sexual abuse may also submit claims for additional compensation.
- iii. To qualify for additional compensation related to severe psychological injury or physical injury, claimants **must** provide a sworn/solemnly affirmed Impact Statement and medical records, in addition to the completion and execution of the Claim Form.
- iv. To qualify for additional compensation related to sexual abuse, claimants **must** provide a sworn/solemnly affirmed Impact Statement setting out the nature of the incident(s) alleged to have been experienced by the claimant while at GCC during the Class Period (being September 1973 to July 1997), along with the details relating to the time period, specific date(s) of the incident(s), location, individuals involved, witnesses, if any, and reports made, if any (and to whom those reports were made).

- v. Payments in this category will be awarded based on a points-system. While claimants may qualify for compensation in this category for one (1) or more reasons, *in no event will an award in this category exceed \$50,000 CAD.*

Payment in any one (1) of the categories is not guaranteed. Class Members **must** meet all eligibility requirements, including documentary/evidentiary requirements and filing deadlines. If a claimant is denied compensation in this category, their CEP is unaffected. In no event shall a claimant be awarded more than \$74,000 CAD in total compensation ("CEP" and Group B award combined).

Class Counsel will be requesting that \$3,122,187.50 CAD of the Settlement Amount be allocated towards their legal fees, taxes, and disbursements. A 10% levy of the Net Settlement Fund, after deduction of legal fees and expenses, (approximately \$740,000 CAD) will also be paid to the Class Proceedings Fund, which provided financial support to enable the prosecution of the class action lawsuit.

WHAT HAPPENS NEXT?

If the Settlement is approved, the class action will be dismissed in its entirety. GCC will receive a release from all Class Members, whether the Class Member receives payment or not. This means that no Class Members will be able to sue GCC in the future for any harm or damage suffered as a result being a boarding student there between September 1973 and July 1997.

ADDITIONAL INFORMATION?

Requests for any additional information or questions about the Class Action and proposed Settlement can be directed to:

Settlement Class Counsel:

McKenzie Lake Lawyers LLP

Attention: Sabrina Lombardi

Email: gcc@mckenzielake.com

Telephone: 1-800-261-4844

Website: <https://www.mckenzielake.com/the-grenville-christian-college-class-proceeding/>

OR

Court appointed Notice Administrator:

Epiq Class Action Services Canada Inc.

Attention: GCC Settlement

Email: info@GCCSettlement.ca

Telephone: 1-877-786-0546

Website: www.GCCSettlement.ca