Lapple et al v His Majesty the King in right of the Province of Ontario, Court File No. CV-16-558633-00CP Dadzie et al v His Majesty the King in right of Ontario et al, Court File No. CV-16-558376-00CP

Ontario Corrections Staffing-Related Lockdowns Class Actions Settlement Objection Form

Ontario Corrections Staffing-Related Lockdowns Class Actions Settlement OBJECTION FORM

<u>This is **NOT** a Claim Form</u>. If you want to participate in the proposed Settlement (i.e., make a Claim), you are not required to do anything now. If the Settlement is approved, the Claim Form will be made available at that time.

Read the instructions below carefully. If you need more details regarding the proposed Settlement, or the requested Class Counsel Fees or Honoraria, please read the long-form Notice of Settlement Approval Hearing or visit ONTJailStaffLockdowns.ca.

Complete and submit this Objection Form **ONLY if you want to OBJECT** to the proposed Settlement and/or Class Counsel Fees (i.e., ask the Court to reject the proposed Settlement and/or Class Counsel Fees).

Questions? Visit the Administrator online at ONTJailStaffLockdowns.ca or reach out to the Administrator by toll-free telephone (1-844-742-0825) or by email (info@ONTJailStaffLockdowns.ca).

INSTRUCTIONS:

- 1. Complete this Objection Form **ONLY IF YOU WANT TO OBJECT** to (i.e., ask the Court to reject) the proposed Settlement and/or Class Counsel Fees.
- 2. Complete the "My Information" section with your name, address, telephone number, and email address (if you have one).
- 3. Complete the "My Membership in the Class" section by checking the box that applies to you, to identify whether you are a current or former immigration detainee.
- 4. Under "My Objection," check the box(es) to indicate whether you want to object to the proposed Settlement, and/or to the Class Counsel Fees request and/or to the requested Honoraria.
- 5. In the spaces provided, explain why you are objecting. Use this space to give the reasons why you think the Court should not approve the proposed Settlement, Class Counsel Fees request and/or requested Honoraria. If you need more space, please attach additional pages.
- 6. If you want to include any other documents with your objection, check the box saying, "I am including additional documents with my Objection Form." Make sure that you include those documents with your Objection Form when you submit it.
- 7. If you want to attend the Settlement Approval Hearing where the Court will decide whether to approve the proposed Settlement, Class Counsel Fees request, and the requested Honoraria, check the box to indicate whether you will attend in person or by Zoom. You do not need to attend the hearing unless you want to. A copy of your Objection Form will be provided to the Court whether or not you decide to go to the

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hearing. If you have a lawyer representing you at the hearing, please provide that lawyer's name and contact information.

- 8. Sign and date your Objection Form.
- 9. Send your completed Objection Form to the Administrator, by mail or email, **no later than October 14, 2025**.

	Mail:	Email: info@ONTJailStaffLockdowns.ca	
	Ontario Corrections Staffing-Related Lockdowns Class Actions Administrator c/o Deloitte LLP PO Box 7545 STN Adelaide		
	Toronto, ON M5C 0C4		
MY IN	FORMATION:		
My ful	ll name is:		
My ma	ailing address is:		
My tel	ephone number is:		
My en	nail address (if applicable) is:		
MY M	EMBERSHIP IN THE CLASS: Check th	e box that applies to you.	
	I was an inmate at an Ontario Correctional Institution (other than the Elgin-Middlesex Detention Centre, the Ontario Correctional Institute, or the St Lawrence Valley Correctional and Treatment Centre) between May 30, 2009 and November 27, 2017, and I have not validly opted out of (excluded myself from) the Lapple Class.		
	OR		
	Act at an Ontario Correctional Institution Centre, the Ontario Correctional Institut	ander the <i>Immigration and Refugee Protection</i> on (other than the Elgin-Middlesex Detention e, or the St Lawrence Valley Correctional and 2009 and November 27, 2017, and I have not om) the Dadzie Class.	

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MY OBJECTION:

I want to OBJECT to the proposed Settlement that is offering up to \$59 million in total for the classes in these class action lawsuits about staffing-related lockdowns at Ontario correctional institutions, because:		
(If you need more space to complete your answer, please attach additional pages.)		
I want to OBJECT to the requested Class Counsel Fees (\$17,700,000 plus HST and disbursements) because:		
(If you need more space to complete your answer, please attach additional pages.)		
I want to OBJECT to the requested Honoraria (\$15,000 for each Representative Plaintiff) because:		
(If you need more space to complete your answer, please attach additional pages.)		
I am including additional documents with my Objection Form.		
I will attend the Settlement Approval Hearing on October 22, 2025 <u>in person</u> in Toronto, Ontario.		
I will attend the Settlement Approval Hearing on October 22, 2025 by Zoom.		
I do NOT intend to appear at the Settlement Approval Hearing on October 22, 2025.		
I will have a lawyer representing me at the Settlement Approval Hearing. The lawyer's name and contact information is:		

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SIGNATURE & DATE		
Date (YYYY-MM-DD)	 Signature	

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