

NOTICE OF HEARING TO APPROVE A SETTLEMENT AGREEMENT

The present Notice may affect your legal rights. Please read carefully.

THE FOLLOWING PERSONS ARE AFFECTED BY THIS NOTICE: ALL VICTIMS OF SEXUAL ABUSE PERPETRATED BY FR. JEAN-PAUL THIBAUT, MEMBER OF THE RELIGIOUS CONGREGATION L'INSTITUT DES FRÈRES DE NOTRE-DAME DE MISÉRICORDE, WHILE HE WAS AFFILIATED WITH COLLÈGE ST-HILAIRE INC. (HEREINAFTER THE "**GROUP**")

PURPOSE OF THE PRESENT NOTICE

On March 20, 2015, a Motion for Authorization to Institute a Class Action was filed against Fr. Jean-Paul Thibault, L'Institut des Frères de Notre-Dame de Miséricorde and Collège Saint-Hilaire inc. (hereinafter the "**Respondents**").

The parties have finalized an agreement of settlement, release and transaction (hereinafter the "Settlement Agreement"), without admission of responsibility, with a view to completely and definitively settle the class action and the claims of all members of the Group.

On February 1, 2016, a Hearing of the Motion to Approve the Settlement Agreement will take place at the **Montreal Courthouse** situated at **1 Notre-Dame Street East, Montreal, H2Y 1B6, in room 15.07 at 10:00 a.m.**

Be advised that the present Notice contains only a summary of the terms of the Settlement Agreement and that the complete terms of the agreement may be obtained on the website of the attorneys for the Group, www.kklex.com. In case of conflict, the conditions of the Settlement Agreement will prevail.

HEARING OF THE MOTION TO APPROVE

Members of the Group who do not oppose the Settlement Agreement do not need to be present at the Hearing in order to benefit therefrom.

If a member wishes to oppose the Settlement Agreement during the Hearing of February 1, 2016, he must provide the grounds of his opposition in writing to the attorneys for the parties no later than January 27, 2016 and include the following information:

- 1) His name, address, telephone number and e-mail address;
- 2) A statement confirming that he is a member of the Group;
- 3) A brief statement describing the nature of his opposition;

THE TERMS OF THE SETTLEMENT AGREEMENT

Pursuant to the Settlement Agreement, the members will be compensated based on the nature of the sexual abuse suffered and the gravity of the damages sustained, according to the following guidelines:

- a) Base compensation: **\$55,000**
- b) Level 1 extraordinary compensation: **\$75,000**
- c) Level 2 extraordinary compensation: **\$110,000**

A retired judge will act as Adjudicator and will determine the validity of the claims and the compensation category to which each accepted claimant is entitled. The meetings between the claimants and the Adjudicator will be confidential, and the Respondents shall have no right of contestation. In addition, no claim may be dismissed by the Adjudicator on the grounds of prescription.

In the event that the Settlement Agreement is approved by the Court, all members of the Group who do not opt out of the class action will be bound, and will give a complete release, in capital, interest and costs, to the Respondents, for any civil claim arising directly or indirectly from the facts alleged and exhibits produced in support of the Motion for Authorization in the Court matter bearing no. 750-06-000005-154, in respect of the sexual abuse perpetrated by Fr. Jean-Paul Thibault only.

PROCEDURE FOLLOWING APPROVAL OF THE SETTLEMENT AGREEMENT

In the event that the Court approves the Settlement Agreement following the Hearing taking place on February 1, 2016, the members of the Group may submit a claim by following the procedure set forth in Annex 2 of the Settlement Agreement and by completing the claim form set forth in Annex 3 of the Settlement Agreement. All of the documents are available on the website www.kklex.com.

ADDITIONAL INFORMATION/QUESTIONS

The members of the Group may communicate confidentially and for free with the attorneys for the Group in order to discuss their rights pursuant to the Settlement Agreement:

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THIS NOTICE WAS AUTHORIZED BY THE HONOURABLE MICHEL A. PINSONNAULT, J.S.C.