

NOTICE OF CLASS ACTION CERTIFICATION AND HEARING FOR SETTLEMENT APPROVAL

Regarding class action for recovery of Children's Special Allowances

**If you were a child in the care of a Child and Family Services Agency in
Manitoba between 2005 and 2019, your legal rights may be affected. Please
read this Notice carefully.**

What is this Notice about?

This Notice is being provided in relation to a class proceeding commenced against the Government of Manitoba ("**Manitoba**") in respect of Manitoba's actions and policies relating to the administration of Children's Special Allowance Benefits ("**CSA Benefits**") from children in the care of Métis Child, Family and Community Services Agency Inc. and Michif Child & Family Services Inc. (the "**Métis Agencies**") between January 1, 2005 and March 31, 2019 (the "**Lafontaine Class Action**"). There are separate but related class proceedings dealing with Manitoba's actions and policies relating to the administration of CSA Benefits paid for children in the care of Child and Family Services Agencies in Manitoba other than the Métis Agencies over that same period of time (the "**Flette/Lavallee Class Actions**").

This Notice was approved by the Court of King's Bench of Manitoba (the "**Court**") to provide Class Members with notice that:

- 1) On December 13, 2023, the Court certified the Lafontaine Class Action as a class proceeding; and
- 2) The Plaintiffs in the Lafontaine Class Action have reached a settlement with the Government of Manitoba in the amount of eighty-four-million eight-hundred-thousand (\$84,800,000) to be paid to class members with a portion of those funds to be used to pay legal fees, the costs of administering the settlement and for programs and services to be delivered in connection with the distribution of settlement funds (the "**Settlement**"). The Court will need to approve the Settlement. The Settlement Approval Hearing is scheduled for **September 5-6, 2024**.

Am I a member of this class?

If you were a child in the care of either of the Métis Agencies at any time between January 1, 2005, and March 31, 2019, you are likely a member of the Class and likely entitled to compensation.

If you are a parent or guardian to a minor child who may be a part of the Class, you are responsible for making decisions on behalf of the Class member with respect to the class action, including opting out or making an objection.

Two other related class actions have also been certified with different class definitions:

- The Flette/Lavallee Class Actions: All children in the care of a Child and Family Services Agency **other than** the Métis Agencies between January 1, 2005 and March 31, 2019.

It is possible a person may be a member of more than one class and entitled to compensation from more than one class action. For example, if a person was in the care of one of the Métis Agencies for a certain period of time, and in the care of a different child and family service agency for another period of time, and both periods of time were between 2005 and 2019, that person may be a member of more than one class and is likely entitled to compensation from more than one class action.

GET MORE INFORMATION:

Call Toll Free: 1-877-835-4546 or visit <http://metisclassaction.ca>

Authorized by the Court of King's Bench of Manitoba

If you believe you may be a member of more than one class action, please inquire with the Métis Child and Family Services Authority and/or Epiq Class Action Services Inc. (contact information below) who can assist you, including by providing the contact information to class counsel for the Flette/Lavallee Class Actions and/or for the entity responsible for administering the settlement of the Flette/Lavallee Class Actions.

What happens if I don't agree with the Settlement?

If you disagree with the proposed Settlement Agreement offering compensation to Class Members, or the legal fees sought by Class Counsel, you can voice your objection to the Court by completing and submitting the Objection Form found at <http://metisclassaction.ca> **no later than August 26, 2024.**

Members of the Class who do not want to participate in the class action must formally "opt out". To opt out you must complete and submit the opt-out form, which can be found online at <http://metisclassaction.ca>. No Class Member will be permitted to opt out of the class action unless the election to opt out is received by **5:00 p.m. CST on August 26, 2024.**

A member of the Class who opts out will not be entitled to participate in the class action, will not be bound by the Settlement, and will not be eligible for any recovery in the class action. A Class Member who opts out may be eligible to pursue a claim in a separate proceeding. If you wish to pursue your own claim in a separate proceeding, you should consult with a lawyer immediately.

Who can I contact for more information?

The Court has appointed the Métis Child and Family Services Authority and Epiq Class Action Services Inc. to administer the Settlement. You may contact either for more information about the Settlement:

Métis Child and Family Services Authority

Email: csaclassaction@metisauthority.com

Epiq Class Action Services Inc.

Email: info@metisclassaction.ca

Phone: 1-877-835-4546

Who will represent me?

The Court has appointed Lax O'Sullivan Lisus Gottlieb LLP and MN Trachtenberg Law Corporation to represent you and all other Class Members as "Class Counsel". You will not be charged for contacting these lawyers with questions:

Email: metisclassaction@lolg.ca

Phone: 1-416-645-5079

Important Dates

Deadline to Oppose the Proposed Settlement and/or Fees: August 26, 2024

Deadline to Opt-Out of Class Proceeding: August 26, 2024

Settlement Approval Hearing: September 5-6, 2024

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