

NOTICE OF NS DEAF SCHOOLS CLASS ACTION SETTLEMENT

Please visit the settlement website at www.NSDeafSchoolsClassAction.com to view an ASL Video that signs the information contained in this notice.

WHAT IS THIS NOTICE ABOUT?

This notice is directed to all former students who attended and/or resided at the School for the Deaf in Halifax, Nova Scotia or the Interprovincial School for the Education of the Deaf in Amherst, Nova Scotia (the “Schools”) between 1913 and 1995, and who have not already opted out of the class proceeding.

This notice concerns the proposed settlement of a class action against the Attorney General of Nova Scotia and the Atlantic Provinces Special Education Authority (together the “Defendants”). On **November 28, 2025**, the Nova Scotia Supreme Court will consider whether to approve the settlement. **Interpreters will be at the hearing.** On that same date, the Court will also consider whether to approve the payment of the legal fee and reimbursement of expenses to Class Counsel. The law firm of Wagners is Class Counsel.

KEY TERMS OF THE PROPOSED SETTLEMENT

The Defendants have agreed to pay up to a total of \$36,235,702 to directly compensate eligible Class Members, plus designated other amounts to pay for collective indirect benefits (\$3,000,000), the costs of administering the settlement (\$2,500,000), and payments of honoraria of \$15,000 each to the two Representative Plaintiffs. The Defendants will also pay Class Counsel’s legal fee and expenses. Class Counsel is seeking the Court’s approval of a legal fee of \$12,529,710.60 plus tax. These legal costs do not impact the amount of money Class Members will get under the settlement. If the settlement is approved, eligible Class Members can apply for two types of payment:

Systemic Harms Payment: This will compensate for harmful experiences commonly suffered by Class Members. If the settlement is approved, Class Members who were **alive on or after January 31, 2019**, may apply for this compensation. If a Class Member died before January 31, 2019, their estate is not eligible.

Independent Assessment Process Payment: This will compensate living Eligible Class Members for physical and sexual abuse suffered at the School(s). There are two payment levels (level 1 is \$90,000 to \$100,000, and level 2 is \$140,000 to \$150,000). The amount awarded will depend on the severity of the abuse and harm.

Further details about eligibility are available on the settlement website.

WHAT DO I NEED TO DO NOW?

If the proposed settlement is approved, the Administrator will send out a notice to Class Members they have contact information for. Class Members will also be indirectly notified through digital ads and newspapers.

If you do not agree with the proposed settlement or the legal fee for Class Counsel, you can send a written or signed video objection to the Administrator, Verita Global, by **November 18, 2025**. More information about the objection process is available on the settlement website.

HOW DO I GET MORE INFORMATION?

Please visit the settlement website to view informational videos: www.NSDeafSchoolsClassAction.com. If you have questions, you may contact Verita, the Administrator, or Class Counsel:

NS Deaf Schools Class Action Administrator
c/o Verita Global
P.O. Box 3355
London, ON N6A 4K3
Phone: 1-888-999-9616
Email: info@NSDeafSchoolsClassAction.com
Website URL: www.NSDeafSchoolsClassAction.com

Or you can contact Class Counsel at:

Wagners
1869 Upper Water Street
Suite PH 301, Pontac House
Historic Properties
Halifax, NS B3J 1S9
Telephone: 902-425-7331 / 1-866-455-1355
Email: classaction@wagners.co

Verita and Wagners are available to take calls through Video Relay Service (VRS) and Teletypewriter (TTY).

Informational videos with sign language interpreters are on the settlement website: www.NSDeafSchoolsClassAction.com. More information about the processes and deadlines will be available through videos on the website if the settlement is approved.

