

**NOTICE OF SETTLEMENT OF SELWYN HOUSE SCHOOL CLASS ACTIONS
CONCERNING SEXUAL ABUSE**

TO: All former students who attended Selwyn House School who allege that they were the victims of Abuse (means abuse of a sexual nature and any physical, mental, or psychological abuse directly or indirectly related thereto) perpetrated by or with the participation of one of three former teachers, John Aimers, Leigh Seville or James P. Hill, that commenced while these former students attended Selwyn House School (hereinafter “the Student Class”)

AND TO: The living mothers and living fathers, current spouses, including common law spouses, and children of the individuals described in the above defined Student Class (hereinafter “the Family Class”)

PLEASE READ THIS NOTICE CAREFULLY AS IT MAY AFFECT YOUR LEGAL RIGHTS.

TO ALL CLASS MEMBERS:

The Superior Court of Quebec has approved the Settlement Agreement reached in the three Motions to institute Class Proceedings initiated in Quebec against Selwyn House School and, in one of the Motions, against John Aimers, bearing Superior Court file numbers 500-06-000310-058, 500-06-000336-061 and 500-06-000335-063. The Motions have been authorized as class actions for the sole purpose of giving effect to the settlement relative to alleged Abuse by or with the participation of the above noted former teachers. The final dismissal of an Ontario class proceeding almost identical to one of the Quebec Motions (500-06-000310-058), bearing Ontario Superior Court number 05-CV-297637-CP, is also a condition to the Settlement.

On April 25, 2008, an Approval hearing for the Settlement Agreement in the three Motions brought on behalf of Class Members was held. On August 6, 2008, Mr. Justice Pierre-C. Gagnon dismissed the Motion for approval of a settlement on the basis that access to information regarding compensation needed to be clarified. The Agreement was amended to add such clarification and on January 13, 2009 the Agreement was approved by the Superior Court.

To make a Claim pursuant to this Settlement Agreement, Class Members **must file a Claim Form with Selwyn House School’s Counsel within sixty (60) days from the publication of the present notice, i.e. by April 8, 2009**, in the manner described below.

SUMMARY OF THE SETTLEMENT AGREEMENT

The settlement entitles Class Members to private and confidential alternative dispute resolution procedure, administered by an independent Arbitrator.

Selwyn House School, while not admitting any facts, liability or wrongdoing, has agreed to make payments not to exceed the total amount of \$5,000,000 CAD to settle all the Claims of all Class Members in accordance with the terms and conditions of the Settlement Agreement.

Student Class Members will be eligible to receive payments under the Settlement Agreement in accordance with the three defined categories of Abuse set out therein. Family Class Members will also be eligible to receive payments. The Settlement Agreement and its Schedules describe in detail the claims process and amounts that may be claimed. The specific amounts to which Class Members may be entitled are confidential. Thus, Class Members must execute a Confidentiality Agreement in order to obtain access to same.

In order to receive the confidential information relative to the amounts that may be claimed Student Class Members will be required to sign a Confidentiality Agreement to obtain this information from Class Counsel by submitting Schedule G (a) of the Settlement Agreement and upon confirmation of certain details regarding attendance at Selwyn House School during the relevant period of time by Selwyn, Schedule G (b) of the Settlement Agreement. Thereafter, Family Class Members may complete Schedule G (c) of the Settlement Agreement to obtain the confidential information relative to payments for which they are eligible. Schedule G a) and thereafter as applicable Schedules G b) and G c) may be submitted to Class Counsel effective immediately.

Execution and submission of forms G a) and G b) do not affect in any way Student Class Members' rights to opt out of the Settlement.

A copy of the Settlement Agreement and publicly accessible Schedules, excluding information relative to the amounts that may be claimed, but including the Confidentiality Agreement and the Claim Forms, are posted at www.msmb.ca and may be obtained by contacting Class Counsel at the contact information noted below.

HOW TO MAKE A CLAIM

To make a Claim under the Settlement Agreement, Student Class Members shall complete and submit the Student Claim Form set out in Schedule H of the Settlement Agreement by providing all the information requested and duly completing the affidavit required to submit this form. Family Class Members shall complete and submit the Family Claim Form set out in Schedule I by providing all the information requested and duly completing the affidavit required to submit this form. **The deadline to submit a Claim Form is the Opt Out Deadline which is 60 days following the present Notice: April 8, 2009.** Claim Forms must be submitted to: Nicholl Paskell-Mede Re: Selwyn House Class Action Settlement 630 René-Lévesque Blvd. West, suite 1700, Montreal, Quebec H3B 1S6 Attention: Carolena Gordon **on or before the Opt Out Deadline** by mail (postmarked on or before April 8, 2009) or received by fax to (514) 843-6110.

CAUTION: CLAIMANTS SHOULD ACT PROMPTLY, AS DEADLINES MAY INVALIDATE A CLAIM

RIGHT TO OPT OUT

All persons who fall within the class definitions authorized by the Superior Court of Quebec will automatically be included in one of the classes unless they exclude themselves from a class by Opting Out. Student Class Members shall have the right to exclude themselves from the Settlement, and in such event neither the Student Class Member who has opted out nor his related Family Class members shall be eligible for any of the payments set out in the Settlement Agreement. To Opt Out Student Class members will have to complete, sign and return an “**Opt Out Form**” to: Nicholl Paskell-Mede Re: Selwyn House Class Action Settlement 630 René-Lévesque Blvd. West, suite 1700, Montreal, Quebec H3B 1S6 Attention: Carolena Gordon **on or before the Opt Out Deadline (April 8, 2009)**. If a Student Class Member does not timely and properly Opt Out and does not timely and properly make a claim under the Settlement Agreement, he and his related Family Class Member(s) shall be bound by the terms of the Settlement Agreement and all related court orders and shall be forever barred from receiving any payment under the settlement, commencing any suit or proceeding or continuing any action in relation to Abuse perpetrated by or with the participation of John Aimers, James P. Hill or Leigh Seville against Selwyn House School, John Aimers, James P. Hill and/or the Estate or heirs of Leigh Seville or any other third parties. If a Student Class Member elects to Opt Out of the Settlement and the class proceeding, each and every related Family Class Member will be deemed to also have Opted Out of the Settlement.

CLASS COUNSEL FEES

The Quebec Superior Court has awarded to counsel representing the classes “Class Counsel” (McPhadden Samac Merner Barry) (including Quebec Agent for Class Counsel Liebman & Associates) collectively, the amount of \$750,000 plus the Federal Goods and Services Tax. This amount shall be paid by Selwyn House School in addition to the payments to Class Members. The Settlement Agreement also allows Class Counsel additional fees from Class Members if they initiate the arbitration of their claims in conformity with the terms and conditions of the Settlement Agreement.

Claimants may, at their own cost, but are not obliged to, retain their own lawyers to assist them in making their claims under the Settlement.

IMPORTANT DEADLINES

April 8, 2009 is the Deadline to Opt Out of the Settlement and the Deadline to file a Claim [**60 days after the Settlement Order Notice Date**]

FURTHER INFORMATION

A complete copy of the Settlement Agreement and publicly accessible Schedules including the Claim Forms or Opt Out Form are available from Class Counsel’s website at www.msmb.ca.

You may contact Class Counsel McPhadden Samac Merner Barry at 8 King Street East, Suite 300, Toronto, Ontario, M5C 1B5 (416) 363-5195 or at www.msmb.ca or Quebec Agent for Class Counsel Liebman and Associates at 1 Westmount Square, Suite 1500, Montreal, Quebec H3Z 2P9 (514) 846-0666 or at www.liebman.org

This notice is intended as a summary only. If there is any conflict between the provisions of this Notice and the Settlement Agreement and any of its Schedules, the terms of the Settlement Agreement shall prevail.

PUBLICATION OF THIS NOTICE HAS BEEN AUTHORIZED BY THE SUPERIOR COURT OF QUEBEC