

SCHEDULE E (b)

C A N A D A

(Class Action)
SUPERIOR COURT

PROVINCE OF QUEBEC
DISTRICT OF MONTREAL

NO : 500-06-000310-058

MG, former student of SELWYN HOUSE,
currently residing in Toronto, Ontario,
herein electing domicile for purposes of
these proceedings c/o the Prothonotary 1,
Notre-Dame East, Montreal, Quebec
H2Y 1B6

-and-

GM, wife of MG, residing in Toronto,
Ontario, herein electing domicile for
purposes of these proceedings c/o the
Prothonotary 1, Notre-Dame East,
Montreal, Quebec, H2Y 1B6

Petitioners

-vs-

L'ASSOCIATION SELWYN HOUSE,
carrying on business as Selwyn House
School, legal entity at 95 Chemin Cote St.
Antoine in the City of Westmount,
Province of Quebec, H3Y 2H8

Respondent

* * *

CANADA

PROVINCE OF QUEBEC
DISTRICT OF MONTREAL

NO : 500-06-000336-061

(Class Action)
SUPERIOR COURT

T.Y. resident of the City of Montreal,
herein electing domicile for purposes of
these proceedings c/o the Prothonotary 1,
Notre-Dame East, Montreal, Quebec, H2Y
1B6

-and-

M.Y., mother of T.Y. resident, of the City of
Montreal, herein electing domicile for
purposes of these proceedings c/o the
Prothonotary 1, Notre-Dame East,
Montreal, Quebec, H2Y 1B6

Petitioners

-vs-

L'ASSOCIATION SELWYN HOUSE, legal
entity, carrying on business as "Selwyn
House School", at 95, Chemin Cote St.
Antoine, in the City of Westmount,
Province of Quebec, H3Y 2H8

Respondent

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CANADA

(Class Action)
SUPERIOR COURT

PROVINCE OF QUEBEC
DISTRICT OF MONTREAL

NO : 500-06-000335-063

D.J., former student of SELWYN HOUSE,
currently residing in Port Washington,
New York, U.S.A.

-and-

C.C., wife of D.J., residing in Port
Washington, New York, U.S.A.

Petitioners

-vs-

L'ASSOCIATION SELWYN HOUSE,
carrying on business as Selwyn House
School, legal entity at 95 Chemin Cote St.
Antoine in the City of Westmount,
Province of Quebec, H3Y 2H8

-and-

John Aimers, resident of the City of
Toronto, in the Province of Ontario; 49 St.
Clair Avenue, Toronto, Ontario, M4V 1K6

Respondents

INDIVIDUAL RECEIPT, RELEASE, DISCHARGE AND TRANSACTION

The undersigned Successful Family Claimant acknowledges, by the present, having received from L'Association Selwyn House (hereinafter "Selwyn") the global sum of _____ Dollars (\$) in capital, interest, additional indemnity, costs and all applicable taxes (the "Payment") in full, final and global settlement of all recourses, claims, suits, actions, rights, or rights of action whatsoever that he/she had, has or may have against Selwyn, John Aimers ("Aimers"), James P. Hill ("Hill"), and the Estate or heirs of Leigh Seville ("Seville") and their

insurers, predecessors, successors and all their past, present and future directors, officers, representatives, agents, principals, employers, employees and legal assigns directly or indirectly arising from or relating to any (a) Abuse ("Abuse" means abuse of a sexual nature and any physical, mental or psychological abuse directly or indirectly related thereto) alleged or claimed to have been perpetrated by or with the participation of any of the teachers Hill, Seville and/or Aimers, (b) any act or omission of any nature whatsoever by Selwyn in relation to Hill, Seville and/or Aimers and (c) without restricting the generality of the foregoing the facts and circumstances set out in the Superior Court files bearing numbers 500-06-000310-058, 500-06-000336-061 and 500-06-000335-063, District of Montreal, and the Ontario Proceeding bearing the Ontario Superior Court Number 05-CV-297637-CP or any similar fact or circumstance.

In consideration of the Payment, the **Successful Family Claimant** and his or her heirs, successors and legal assigns have fully, finally and forever released, relinquished and discharged **Selwyn and Aimers, Hill and the Estate or heirs of Seville**, their insurers, their predecessors, and successors and all their past, present and future directors, officers, representatives, agents, principals, employers, employees and legal assigns from and against any and all recourses, claims, suits, actions, demands, rights or rights of action of any nature or kind whatsoever (including any claims for the subrogated interests of any Canadian Public Health Insurer) now existing or which may arise in the future directly or indirectly from (a) Abuse alleged or claimed to have been perpetrated by or with the participation of any of the teachers Hill, Seville and/or Aimers, (b) any act or omission of any nature whatsoever by Selwyn in relation to Hill, Seville and/or Aimers and (c) without restricting the generality of the foregoing the facts and circumstances set out in the Superior Court files bearing numbers 500-06-000310-058, 500-06-000336-061 and 500-06-000335-063, District of Montreal, and the Ontario Proceeding bearing the Ontario Superior Court Number 05-CV-297637-CP or any similar fact or circumstance.

Further, in consideration of the Payment, without limiting the generality of the foregoing, the **Successful Family Claimant** and his or her heirs, successors and legal assigns, consent to a bar order that bars the **Successful Family Claimant** from commencing or continuing any suit or proceeding, including but not limited to initiating a proceeding as a class representative or participating as a class member against Selwyn, Aimers, Hill or the Estate or heirs of Seville, their insurers or any other parties who could claim contribution or indemnification from any one of Selwyn, Aimers, Hill or the Estate or heirs of Seville directly or indirectly arising from or relating to (a) any Abuse alleged or claimed to have been perpetrated by or with the participation of any of the teachers Hill, Seville and/or Aimers and (b) any act or omission of any nature whatsoever by Selwyn in relation to Hill, Seville and/or Aimers; and (c) without restricting the generality of the foregoing the facts and circumstances set out in the Superior Court files bearing the numbers 500-06-000310-058; 500-06-000336-061 and 500-06-000335-063, District of Montreal, and the Ontario Proceeding bearing the Ontario Superior Court Number 05-CV-297637-CP or any similar fact or circumstance.

In consideration of the Payment, the **Successful Family Claimant** hereby renounces to later demand rescission of the Individual Receipt, Release, Discharge and Transaction for any possible cause including an error of fact or law known or unknown at the present date and recognizes that the Individual Receipt, Release, Discharge and Transaction covers all possible types of claims known or unknown at the present date.

The settlement formalized by the Individual Receipt, Release, Discharge and Transaction intervenes without any admission of liability whatsoever by **Selwyn** and/or **Aimers** or any other person obtaining a release herefrom.

The **Successful Family Claimant** hereby undertakes not to publicize or disclose the Individual Receipt, Release, Discharge and Transaction, its conditions and the conditions of the settlement it is formalizing to any person, corporation, or any other entity not a party to this Individual Receipt, Release, Discharge and Transaction, whether orally or in writing, directly or indirectly and to maintain at all times the strict confidentiality of same. The **Successful Family Claimant** recognizes that the obligations, terms and conditions of the Confidentiality Agreement provided at Schedule G c) are incorporated by reference into the present agreement.

The **Successful Family Claimant** hereby recognizes that the transaction recognized and completed hereby in the actions bearing Superior Court numbers 500-06-000310-058, 500-06-000336-061 and 500-06-000335-063, and the Ontario Proceeding bearing the Ontario Superior Court Number 05-CV-297637-CP constitutes a transaction according to the terms of Articles 2631 and following of the *Civil Code of Quebec*.

I hereby acknowledge that I have requested that this Agreement be drawn up in English. *Je reconnais avoir exigé que la présente transaction soit rédigée en anglais.*

Signed at _____, 2008 Signed at _____, 2008

Class Counsel, Agent of Class Counsel or
Legal Counsel of Successful Family
Claimant

Successful Family Claimant