

CLASS ACTION
C. c. English Montréal School Board and Philip (Hart) Baugniet
COURT N^o.: 500-06-001221-239

**NOTICE OF HEARING ON THE MOTION TO APPROVE A SETTLEMENT AGREEMENT IN
THE CLASS ACTION AGAINST THE ENGLISH MONTRÉAL SCHOOL BOARD AND PHILLIP
(HART) BAUGNIET (SEXUAL ASSAULTS)**

A settlement agreement (the “**Agreement**”) has been reached between the Plaintiff and the English Montréal School Board (the “**EMSB**”) to settle the class action brought against the EMSB and the late Phillip (Hart) Baugniet (“**Baugniet**”), on behalf of the following individuals:

« Toutes les personnes agressées sexuellement alors qu’elles étaient mineures par Phillip (Hart) Baugniet, lesquelles agressions sexuelles ont été causées en lien et alors qu’il était directeur de l’école secondaire Lachine (Lachine High School), de l’école Victoria (Victoria School) ou de l’école FACE, à Montréal, ou y occupait une fonction d’enseignement, de direction ou de supervision, de même que la succession de telles personnes si décédées depuis le 21 août 2019 ».

Unofficial English translation:

“All persons who, while minors, were sexually abused by Phillip (Hart) Baugniet, which sexual assaults were caused in connection with and while he was the principal of Lachine High School, Victoria School, or FACE School, in Montréal, or held a teaching, management or supervisory position at such schools, as well as the succession of such persons if deceased since August 21, 2019” (hereinafter the “Class”)

Summary of the Agreement

Under the Agreement, the EMSB will pay a lump-sum amount ranging from **\$3,400,000** to **\$8,725,000** (the “**Global Settlement Fund**”) to settle the class action brought against it and for the resolution of the individual members’ claims. The Global Settlement Fund will increase based on the number of claims deemed eligible by the Adjudicator according to various tiers set forth in the Agreement, up to a maximum of 46 members.

In addition to the Global Settlement Fund, the EMSB will pay judicial costs and judicial disbursements, including the Plaintiff’s expert fees, pre- and post-approval notices regarding the Agreement, as well as the Adjudicator’s costs and fees incurred in connection with the Adjudication Process.

A retired judge will serve as the Adjudicator and determine the eligibility of members’ claims as well as their compensation category. The EMSB and the Baugniet Estate will have no involvement in the claims process. The Settlement Agreement, as well as the claims process and the Claim Form that each member must submit, are accessible on Class Counsel website at: www.kklex.com.

If there are more than 46 claims deemed eligible, the Plaintiff shall have the option to retain the Global Settlement Fund and distribute it among the total number of members whose claims have been deemed eligible, or to renegotiate the Agreement in good faith, subject to the Tribunal’s

subsequent approval. Failing to reach a new negotiated agreement, the Plaintiff shall have the option to rescind the Agreement; in such a case, the Parties shall be restored to the status they were in prior to the conclusion of the Agreement, and the class action proceedings shall be reactivated accordingly.

Agreement Approval Hearing

Before the claims process begins, the Agreement must be approved by the Superior Court. During the approval hearing, Class Counsel will also ask the Court to approve the payment of their legal fees as well as judicial and extrajudicial disbursements incurred in pursuing the class action, payable from the Global Settlement Fund. The approval hearing will take place before the Superior Court of Montréal **in Room 15.02 of the Montréal Courthouse and via Microsoft Teams videoconference on October 28, 2026, at 9:30 a.m.**

Members who have no objections to raise do not need to attend the approval hearing in order to benefit from the Agreement.

If a member wishes to object, the Superior Court will hear the objection provided that the member has submitted **a written statement** to Class Counsel and to the Clerk of the Superior Court of Montreal, for the attention of the Honourable Dominique Poulin, J.S.C., **no later than October 19, 2026 at 4:30 p.m.**, stating the following:

- a) The name, address, phone number, and email address of the person filing the objection;
- b) A statement that the person believes they are a member, specifying the reasons for that belief;
- c) A brief statement of the nature and grounds of the objection;
- d) Whether the member intends to appear at the approval hearing and make representations; and
- e) If the member intends to be represented by counsel, the counsel's name, address, phone number, and email address.

You may attend the approval hearing **in Room 15.02 of the Montréal Courthouse** at the indicated time or by clicking on **the following Microsoft Teams link**:

https://teams.microsoft.com/l/meetup-join/19%3ameeting_MDIINjMxZDAtnjNjNC00ZTE3LWJiOWUtZDk3ZjEwZDg0MmQ4%40thread.v2/0?context=%7b%22Tid%22%3a%223f6dec78-7ded-4395-975c-6edbb7d10b16%22%2c%22Oid%22%3a%22f2de948d-851d-47f4-9953-579062f424eb%22%7d

For additional information

You may contact Class Counsel free of charge and confidentially using the contact information below:

Me Alexandre Paquette-Dénommé, adenomme@kklex.com

Me David Stelow, dstelow@kklex.com

Me Pierre Boivin, pboivin@kklex.com

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**THIS NOTICE HAS BEEN APPROVED BY THE HONOURABLE DOMINIQUE POULIN,
J.C.S.**