

Were you placed in Administrative Segregation in an Ontario Correctional Institution between January 1, 2009 and August 18, 2021?

If YES, A Class Action May Affect Your Rights.

A Court authorized this Notice. You are not being sued.

The Ontario Superior Court of Justice decided that two class actions, brought on behalf two groups of people called “classes”,¹ can go forward.

You may be a member of the Pre-2018 Class if:		
You were placed in Administrative Segregation in an Ontario Correctional Institution AND You did not already opt out of the <i>Francis v Ontario</i> class action AND Your placement was any time between January 1, 2009 and September 18, 2018 AND		
Your placement was for 15 or more consecutive days (“Prolonged Class Member”)	OR	Your placement was for any length of time AND You were diagnosed by a medical doctor before or during your incarceration with at least one of the listed ² mental disorders AND You suffered from your mental disorder in the manner described in Appendix A ³ AND you reported your diagnosis and suffering to Ontario before or during your administrative segregation (“SMI Class Member”)
You may be a member of the Post-2018 Class if:		
You were placed in Administrative Segregation in an Ontario Correctional Institution AND Your placement was sometime between September 19, 2018 and August 18, 2021 AND		
Your placement was for 15 or more consecutive days (“Prolonged Class Member”)	OR	Your placement was for any length of time AND You were diagnosed by a medical doctor before or during your incarceration with at least one of the listed ⁴ mental disorders AND You suffered from your mental disorder in the manner described in Appendix A ⁵ AND you reported your diagnosis and suffering to Ontario before or during your administrative segregation. (“SMI Class Member”)

¹Please note that the complete class definitions are described later in this Notice, and are found in the proposed Settlement and Protocol. Note also that you can be both a Prolonged Class Member and an SMI Class Member.

² The complete list of medical disorders is found on Pages 6-7 below.

³ Appendix A is set out on Page 8 below.

⁴ The complete list of medical disorders is found on Page 6-7 below.

⁵ Appendix A is set out on Page 8 below.

If you have questions concerning this Notice you can call 1-833-290-4730 for assistance.

YOUR RIGHTS AND OPTIONS WILL DEPEND ON WHICH CLASS YOU BELONG TO AND THE DATES YOU WERE PLACED IN ADMINISTRATIVE SEGREGATION.

If you are a member of the Pre-2018 Class or Post-2018 Class:

On **August 11, 2022**, the Court will determine whether to approve a plan for distributing money owed to eligible class members, and describing how certain class members can make claims for more money (the "Protocol").

Your rights to support or to object to this Protocol are described in this Notice.

If you are a member of the Pre-2018 Class, and you were placed in Administrative Segregation between April 20, 2015 and September 18, 2018:

You are already a class member in a class action lawsuit called *Francis v Ontario* that was certified by the Court on September 18, 2018. In that lawsuit, the Court has already awarded **\$30 million** (less certain fees and levies) in aggregate damages to Pre-2018 Class members with Administrative Segregation placement dates between April 20, 2015 and September 18, 2018.

If you did not opt out of this action, and if the Protocol is approved, you may be able to submit a claim for a share of aggregate damages and/or additional money under the Protocol at a later date.

Your rights to support or to object to this Protocol are described in this Notice.

If you are a member of the Pre-2018 Class, and you were placed in Administrative Segregation between January 1, 2009 and April 20, 2015:

The Court has decided that anyone placed in administrative segregation between January 1, 2009 and April 20, 2015 is barred from pursuing a claim from this time period, unless they can rebut the presumed limitation period. You may still object to the Protocol, and you may deliver a Track 3 claim at a later date if the Protocol is approved.

Your rights to support or to object to this Protocol are described in this Notice.

If you are a member of the Post-2018 Class, and you were placed in Administrative Segregation between September 18, 2018 and August 18, 2021:

On March 11, 2022, the Court certified a second lawsuit, called *Chandra v Ontario*, as a class action for the Post-2018 Class.

Ontario has agreed to settle aggregate damages claims in this second lawsuit for **\$13 million**, and has agreed to have claims for a share of aggregate damages and/or additional money be determined under the Protocol. If the Settlement and Protocol is approved by the Court, the **\$13 million** from the Settlement of this second lawsuit will be combined with the **\$30 million** (less certain fees and levies) awarded by the Court in the first lawsuit, and be shared among eligible Prolonged Class Members under the Protocol. Both Prolonged and SMI Class Members will also be able to make claims for money under the Protocol. Your rights to opt out of the Post-2018 Class, and to support or to object to the Settlement and Protocol, are described in this Notice.

YOUR OPTIONS RIGHT NOW

If you are a member of either the Pre-2018 Class or the Post-2018 Class	
Do nothing	If you support the proposed Protocol for distributing money owed to class members and/or allowing class members to make a claim for additional money, you do not have to do anything right now. If the Court approves the Protocol on August 11, 2022, you will be able to make a claim at a later date for the money that you are entitled to. If you do nothing, you will give up any right to object to the Protocol.
Object to proposed Protocol	If you do not support the proposed Protocol for distributing money owed to class members and/or allowing class members to make a claim for additional money, you can voice your objection by submitting an Objection Form. Your Objection Form must contain certain things, like your name, address, and the reasons why you object to the Protocol. You can read more about objections on Page 10 below. If you want to object, you must send your Objection Form to Class Counsel by mail to Koskie Minsky LLP , 20 Queen St. West, Suite 900, Box 52, Toronto, ON M5H 3R3, or by email to ontarioadminsegclassaction@kmlaw.ca . Your objection must be received or postmarked no later than July 25, 2022 .
If you are a member of the Post-2018 Class	
Do nothing	If you support the proposed Settlement and the Protocol , you do not need to do anything right now. If the Court approves the Settlement and the Protocol, you will be able to make a claim at a later date for money that you may be entitled to. If you do nothing and stay in the class, you give up the right to sue Ontario or others in your own lawsuit in relation to your placement(s) in Administrative Segregation during this period.
Opt Out	<p>You can decide to get out of this class action lawsuit and to get no money from it. If you opt out, you will keep your right to sue Ontario in your own lawsuit for your placement(s) in administrative segregation during this time period. If you opt out, you will not be able to collect any money or benefits from the Settlement or under the Protocol⁶. To opt out, you must send the Opt Out Form by mail to Ontario Segregation Class Action, c/o Epiq Class Action Services Canada Inc., P.O. Box 507 STN B, Ottawa ON K1P 5P6 or by email to info@ontarioadministrativesegregation.ca no later than July 25, 2022.</p> <p>You can get a copy of the Opt Out Form at www.ontarioadministrativesegregation.ca, by emailing the Administrator at the email above, or by calling the Administrator at 1-833-290-4730.</p>
Object to proposed Settlement and/or Protocol	If you do <i>not</i> support the proposed Settlement or Protocol , you can voice your concerns by submitting an Objection Form. Your Objection Form must contain certain things, like your name, address, and the reasons why you object to the Settlement or Protocol. You can read more about objections on Page 10 below. If you want to object, you must send your Objection Form to Class Counsel by mail to Koskie Minsky LLP , 20 Queen St. West, Suite 900, Box 52, Toronto, ON M5H 3R3, or by email to ontarioadminsegclassaction@kmlaw.ca . Your objection must be received or postmarked no later than July 25, 2022 .

⁶ Unless you are also a member of the Pre-2018 Class and have claims for placements in Administrative Segregation occurring before September 18, 2018.

If you have questions concerning this Notice you can call 1-833-290-4730 for assistance.

BASIC INFORMATION

Why is there a notice?

The Court has approved this notice to let you know your rights.

There are two lawsuits that have been authorized by the Court to proceed as class actions:

- **Pre-2018:** The Court has previously certified a lawsuit known as *Francis v. Ontario*, Court File No. CV-18-591719-00CP. Notice about the certification of this lawsuit has previously been disseminated to the Pre-2018 Class.

This notice lets you know about the **August 11, 2022** hearing to approve the Protocol, and lets you know about your rights to object to the Protocol by July 25, 2022.

- **Post-2018:** More recently, on March 11, 2022, a judge of the Ontario Superior Court of Justice certified the case known as *Chandra v. Ontario*, Court File No. CV-18-591719-00CP, which covers the **Post-2018** Class. The person who sued is called the Plaintiff. Ontario is the Defendant.

This notice lets you know about the **August 11, 2022** hearing to approve the Settlement and the Protocol, and lets you know about your rights to object to the Settlement or to the Protocol by July 25, 2022. It also lets you know about your rights to exclude yourself from the class action by opting out by **July 25, 2022**.

What are the lawsuits about?

Both lawsuits say that Ontario improperly subjected inmates to administrative segregation. The lawsuits claimed that such administrative segregation constituted systemic negligence and a breach of inmates' rights under the *Canadian Charter of Rights and Freedoms*. Ontario denies these claims.

These lawsuits are class actions because they represent a group of people who meet the class definition. These lawsuits may include you. In a class action, a person called the "Representative Plaintiff" (in the Pre-2018 case, Conrey Francis, and in the Post-2018 case, Adrian Chandra) sues on behalf of the group of people who have similar claims. All of these people are a "Class" or "Class Members." The Court resolves the issues for all class members in the same case, except for those who remove themselves from their class by opting out.

What happened with the Pre-2018 lawsuit?

On April 20, 2020, the Court awarded a judgment of \$30 million in aggregate damages to the Pre-2018 Class.

Ontario has agreed to the proposed Protocol which explains i) how eligible class members can make claims for a share of the aggregate damages, and ii) how all class members can claim additional individual damages in their own case. The hearing to determine if the proposed Protocol should be approved by the Court will take place via videoconference on **August 11, 2022**.

What is happening with the Post-2018 lawsuit?

On March 11, 2022, the Court certified the second lawsuit on behalf of the Post-2018 Class for settlement purposes.

Ontario has agreed to a proposed Settlement to resolve this lawsuit. Under the Settlement, if it is approved by the Court, Ontario will pay additional aggregate damages of **\$13 million** on behalf of the Post-2018 Class. Under the Settlement, this amount will be added to the \$30 million (less fees and deductions) from the Pre-2018 lawsuit, and will be shared among all eligible class members who submit claims under the Protocol. The **\$13 million** will not be reduced by Class Counsel fees, levies, or disbursements. In addition to a potential share of the aggregate damages, eligible Post-2018 Class members may also be able to make individual claims for additional money under the Protocol.

Members of the Post-2018 Class, who wish to do so, have until **July 25, 2022** to opt out of the class action, or to object to the Protocol or to the Settlement.

To receive a complete copy of the proposed Settlement, please contact the Administrator at 1-833-290-4730, by email at info@ontarioadministrativesegregation.ca or visit www.ontarioadministrativesegregation.ca.

A hearing to determine if the proposed Settlement is fair, reasonable and in the best interests of the Class Members, and to approve the proposed Protocol, will take place via videoconference on **August 11, 2022**.

What happens if I do nothing about the Post-2018 Lawsuit?

If you are a member of the Post-2018 Class, and you do nothing, you will stay in the Post-2018 Class. You will be bound by the Court's orders, and will give up your right to sue Ontario on your own for the administrative segregation placement(s) that you experienced between September 18, 2018 and August 18, 2021. However, if the Court approves the proposed Settlement and the proposed Protocol, you will be able to make your own claim for money under the Protocol at a later date.

What if I do not like the proposed Settlement in the Post-2018 Lawsuit?

If you are a member of the Post-2018 Class and you do NOT support the proposed Settlement, you can voice your objection to the Court by submitting an Objection Form.

Your Objection Form must include:

- (a) Your full name, address, and telephone number;
- (b) Whether you are a member of the Post-2018 Class, the Pre-2018 Class, or both;
- (c) To the best of your recollection, your list of placements in Administrative Segregation, with dates, locations and lengths of time;
- (d) the reasons for your objection accompanied by any legal support for such objection;
- (e) copies of any documents upon which you are basing your objection;
- (f) a statement of whether you intend to appear at the August 11, 2022 approval hearing; and
- (g) if you intend to appear at the hearing with a lawyer, and if so, identifying the lawyer representing you.

Your Objection Form must be signed by you, and sent to Class Counsel on time. You can send it to Class Counsel by mail to **Koskie Minsky LLP**, 20 Queen St. West, Suite 900, Box 52, Toronto, ON M5H 3R3, or by email to ontarioadminsegclassaction@kmlaw.ca. Your objection statement must be sent to Class Counsel or postmarked no later than **July 25, 2022**.

If you have questions concerning this Notice you can call 1-833-290-4730 for assistance.

What if I do not want to be in the Post-2018 Lawsuit?

If you do not want to be in the lawsuit, you must remove yourself from it. This is sometimes referred to as “opting out.” If you opt out, you will not receive any benefit that may be obtained from the lawsuit, including under the Settlement, and you will not be able to submit claims for damages under the Protocol. You will not be bound by any Court orders, and you keep your right to sue Ontario on your own regarding the issues in this case.

To opt out, you must submit an Opt Out Form by **July 25, 2022**. You can get an Opt Out Form at www.ontarioadministrativesegregation.ca. You must mail your Opt Out Form by **July 25, 2022** to: Ontario Segregation Class Action, c/o Epiq Class Action Services Canada Inc., P.O. Box 507 STN B, Ottawa ON K1P 5P6, or email it to info@ontarioadministrativesegregation.ca by **July 25, 2022**.

Who is a member of these class actions?

The **Pre-2018 Class** includes:

All current and former Inmates, who were alive as of April 20, 2015:

I. Inmates with a Serious Mental Illness

a) who were subjected to Administrative Segregation for any length of time at one of the Correctional Institutions between January 1, 2009 and September 18, 2018;

b) who were diagnosed by a medical doctor before or during their incarceration with at least one of the following disorders, as defined in the relevant Diagnostic and Statistics Manual of Mental Disorders (“DSM”):

- (A) Schizophrenia (all sub-types),
- (B) Delusional disorder,
- (C) Schizophreniform disorder,
- (D) Schizoaffective disorder,
- (E) Brief psychotic disorder,
- (F) Substance-induced psychotic disorder (excluding intoxications and withdrawal),
- (G) Psychotic disorder not otherwise specified,
- (H) Major depressive disorders,
- (I) Bipolar disorder I,
- (J) Bipolar disorder II,
- (K) Neurocognitive disorders and/or Delirium, Dementia and Amnestic and Other Cognitive Disorders,
- (L) Post-Traumatic Stress Disorder;
- (M) Obsessive Compulsive Disorder; or
- (N) Borderline Personality Disorder;

and who suffered from their disorder, in a manner described in Appendix “A”, and,

c) who reported such diagnosis and suffering to the Defendant's agents before or during their Administrative Segregation);

or,

If you have questions concerning this Notice you can call 1-833-290-4730 for assistance.

II. Inmates in Prolonged Administrative Segregation

a) who were subjected to Administrative Segregation for 15 or more consecutive days at one of the Correctional Institutions between January 1, 2009 and the date of certification.

The **Post-2018 Class** includes:

All current and former Inmates, who were alive as of May 14, 2018:

I. Inmates with a Serious Mental Illness

(a) who were subjected to Administrative Segregation for any length of time at one of the Correctional Institutions between September 18, 2018 and August 18, 2021,

(b) who were diagnosed by a medical doctor before or during their incarceration with at least one of the following disorders, as defined in the relevant Diagnostic and Statistics Manual of Mental Disorders ("DSM"):

- (A) Schizophrenia (all sub-types),
- (B) Delusional disorder,
- (C) Schizophreniform disorder,
- (D) Schizoaffective disorder,
- (E) Brief psychotic disorder,
- (F) Substance-induced psychotic disorder (excluding intoxications and withdrawal),
- (G) Psychotic disorder not otherwise specified,
- (H) Major depressive disorders,
- (I) Bipolar disorder I,
- (J) Bipolar disorder II,
- (K) Neurocognitive disorders and/or Delirium, Dementia and Amnestic and Other Cognitive Disorders,
- (L) Post-Traumatic Stress Disorder;
- (M) Obsessive Compulsive Disorder; or
- (N) Borderline Personality Disorder;

and who suffered from their disorder, in a manner described in Appendix "A", and,

(c) who reported such diagnosis and suffering to the Defendant's agents before or during their Administrative Segregation;

and/or,

II. Inmates in Prolonged Administrative Segregation

a) who were subjected to Administrative Segregation for 15 or more consecutive days at one of the Correctional Institutions between September 18, 2018 and August 18, 2021.

Certain terms are defined as follows:

"Correctional Institutions" are correctional institutions as defined in the *Ministry of Correctional Services Act*, R.S.O. 1990, c. M.22, excluding the St. Lawrence Valley Correctional and Treatment Centre.

"Inmates" are inmates as defined in the *Ministry of Correctional Services Act*, R.S.O. 1990, c. M.22.

If you have questions concerning this Notice you can call 1-833-290-4730 for assistance.

“Administrative Segregation” refers to segregation as outlined in section 34 of Regulation 778, R.R.O. 1990 under *Ministry of Correctional Services Act*, R.S.O. 1990, c. M.22.

Appendix “A”

- Significant impairment in judgment (including all of the following: the inability to make decisions, confusion, and disorientation);
- Significant impairment in thinking (including both paranoia and delusions that make the offender a danger to self or others);
- Significant impairment in mood (including constant depressed mood plus helplessness and hopelessness; agitation; manic mood that interferes with ability to effectively interact with other offenders or staff);
- Significant impairment in communications that interferes with ability to effectively interact with other offenders or staff;
- Hallucinations; delusions; or, severe obsessional rituals that interferes with ability to effectively interact with other offenders or staff;
- Chronic and severe suicidal ideation resulting in increased risk for suicide attempts; or
- Chronic and severe self-injury.

Please note: the glossary of the relevant DSM is to be used to interpret the foregoing terms where appropriate.

What money is available?

The Court awarded \$30 million in aggregate damages to the Pre-2018 Class. After the payment of all Court-approved deductions for class counsel fees, the Class Proceedings Fund's levy, an honorarium to the representative plaintiff, and disbursements owed, approximately \$19,779,961 will be available for distribution.

If the Court approves the proposed Settlement for the Post-2018 Class, an additional \$13 million, without deductions, will be available for distribution.

If the Court approves the proposed Protocol, both awards will be combined into a single fund of approximately **\$32,779,961**, which will be divided equally amongst all eligible class members of either action who file a claim. Additional damages may be available to certain class members if they choose to bring Track 2 or Track 3 claims.

No money or benefits are being distributed yet because the Court has not yet approved the Settlement or the Protocol.

How much money could I get if the Court approved the Protocol?

The Protocol that the Court must approve will allow you to choose one of three ways of claiming money:

	TRACK 1	TRACK 2	TRACK 3
Amount	ONLY EQUAL SHARE of the \$32.7 million lump sum divided among all eligible Prolonged Class Member claimants.	UP TO \$100,000 limit to your claim (All eligible Prolonged Class Member claimants will receive at least an equal share of the \$32.7 million lump sum. SMI Class Member claimants can also receive damages).	COURT AWARD With no limit to your claim (All eligible Prolonged Class Member claimants will receive at least an equal share of the \$32.7 million lump sum. SMI Class Member claimants can also receive damages).

If you have questions concerning this Notice you can call 1-833-290-4730 for assistance.

	TRACK 1	TRACK 2	TRACK 3
Documents	Claim Form + Track Selection Form	Claim Form + Track Selection Form + Your affidavit, plus brief written arguments on the harm caused by administrative segregation	Claim Form + Track Selection Form + Affidavits and other evidence, cross-examinations, plus legal documents demonstrating harm caused by your administrative segregation
Process	NO Court hearing. NO assessment of harm by a Referee. Fastest Process.	A legal Referee will review your evidence about the harms you claim, and determine your award on a grid up to a maximum of \$100,000. The award must then be approved by the Court.	A court hearing, called “a motion for summary judgment,” at which the Judge will review your evidence, any evidence that Ontario presents, and hear legal arguments. The Judge will then determine the amount of your award, if any.
Fees	NO additional legal fee	UP TO 15% on the additional money obtained, plus disbursements and a levy to any funder (But NO legal fee on the amount equivalent to the equal share of the \$32.7 million)	ANY legal fee agreed to between you and your lawyer on the additional money obtained, plus any disbursements, plus a levy to any funder (But NO legal fee on the amount equivalent to the equal share of the \$32.7 million)

The Pre-2018 Class Action has received financial support from the Class Proceedings Fund. There will be a levy that reduces the amount of any award or settlement funds that members of the Pre-2018 Class may receive. This levy is the sum of the amount of any financial support paid from the Fund plus 10 per cent of the amount of the award or settlement funds payable to Class Members, if any.

Within **Track 2**, a legal Referee will review your file, and determine an award on the basis of the following grid, up to a maximum of \$100,000:

CRITERIA FOR TRACK 2 AWARD	AWARD
15-29 consecutive days in administrative segregation	Up to \$10,000
30-44 consecutive days in administrative segregation	Up to \$15,000
45-80 consecutive days in administrative segregation	Up to \$20,000
81-100 consecutive days in administrative segregation	Up to \$30,000
More than 100 consecutive days in administrative segregation	Up to \$40,000

If you have questions concerning this Notice you can call 1-833-290-4730 for assistance.

Damages or Additional damages if an Inmate with Serious Mental Illness:	
If the Referee concludes that the level of harm is low	Up to \$10,000
If the Referee concludes that the level of harm is medium	Up to \$15,000
If the Referee concludes that the level of harm is high	Up to \$20,000
Additional damages for any one or more of: Post-traumatic Stress Disorder, Severe Clinical Depression, Self-injurious Behavior, Substantial Degradation in Axis I Disorder (excluding Substance Use Disorders), or Substantial Degradation of Borderline Personality Disorder):	
If the Referee concludes that the level of harm is low	Up to \$20,000
If the Referee concludes that the level of harm is medium	Up to \$30,000
If the Referee concludes that the level of harm is high	Up to \$40,000

There are several other parts of the proposed Protocol that describe, amongst other things: access to records of segregation placements, disclosure of documents, costs, and pre-judgment and post-judgment interest. If you would like to request a complete copy of the Protocol, please contact: info@ontarioadministrativesegregation.ca, call 1-833-290-4730, or visit www.ontarioadministrativesegregation.ca.

What happens if I do nothing at all about the Protocol?

If you support or do not have any comments about the Protocol, you do not need to do anything right now. If the Court approves the Protocol, you will be able to make a claim for money at a later date through the process outlined in the Protocol.

What if I do not like the proposed Protocol?

If you are a member of either the Pre-2018 Class or the Post-2018 Class, and you do NOT support the proposed Protocol for distributing aggregate damages and for making individual claims for more money, you can voice your objection to the Court by submitting an Objection Form.

Your Objection Form must include:

- (a) Your full name, address, and telephone number;
- (b) Whether you are a member of the Post-2018 Class, the Pre-2018 Class, or both;
- (c) To the best of your recollection, your list of placements in Administrative Segregation, with dates, locations and lengths of time;
- (d) the reasons for your objection accompanied by any legal support for such objection;
- (e) copies of any documents upon which you are basing your objection;
- (f) a statement of whether you intend to appear at the August 11, 2022 approval hearing; and
- (g) if you intend to appear at the hearing with a lawyer, and if so, identifying the lawyer representing you.

Your Objection Form must be signed by you, and sent to Class Counsel on time. You can send it to Class Counsel by mail to **Koskie Minsky LLP**, 20 Queen St. West, Suite 900, Box 52, Toronto, ON M5H 3R3, or by email to ontarioadminsegclassaction@kmlaw.ca. Your objection statement must be sent to Class Counsel or postmarked no later than **July 25, 2022**.

THE LAWYERS REPRESENTING YOU

Do I have a lawyer in the case?

Yes. The Court has appointed Koskie Minsky LLP from Toronto to represent you and other Class Members as “Class Counsel.” You will not be personally charged for the services of these lawyers. If you want to be represented by another lawyer, you may hire one at your own expense.

You can contact Koskie Minsky LLP at ontarioadminsegclassaction@kmlaw.ca or by phone 1-844-819-8527 (toll free).

How will the lawyers be paid?

Class Counsel only gets paid if they win a trial or if there is a settlement. Since they won a judgment for the Pre-2018 Class, Class Counsel has already been paid from the aggregate damages amount awarded. Class Counsel is not seeking any additional payment from the amount proposed in the Post-2018 Settlement Agreement.

If the Protocol is approved, Class Counsel will receive additional fees for:

- i) successful Track 2 claims brought by class members that they represent (up to 15% of the claim award, plus costs and disbursements), and
- ii) for successful Track 3 claims brought by class members that they represent (up to an amount agreed upon with each claimant, and approved by the Court).

If you hire a different lawyer to represent you in your individual claim under the Protocol, that lawyer’s fee will also be limited in Track 2 to up to 15% plus disbursements, and will need to be approved by the Court if the claim is brought under Track 3.

How do I get more information?

You can get more information at www.ontarioadministrativesegregation.ca, by calling toll free at **1-833-290-4730**, or writing to: Ontario Segregation Class Action, c/o Epiq Class Action Services Canada Inc., P.O. Box 507 STN B, Ottawa ON K1P 5P6, or by email at: info@ontarioadministrativesegregation.ca.