

NOTICE OF CERTIFICATION AND PROPOSED SETTLEMENT IN RILEY SAUNDERS CLASS ACTION

If you were a child in care of the British Columbia Ministry of Children and Family Development (“MCFD”) and after April 1, 2001 your care was assigned to Robert Riley Saunders for a period of 90 consecutive days or more, you should read this notice carefully.

A class has been certified and a proposed settlement has been reached, subject to Court approval.

This class action deals with harms caused to children in care by a social worker, Robert Riley Saunders, who was employed by MCFD.

You are affected by this class action if you were subject to a continuing custody order, a temporary custody order, an agreement with a youth, a voluntary care agreement or a special needs agreement under the *Child, Family and Community Service Act* (“CFCSA”) and, on or after April 1, 2001, were assigned to the caseload of Robert Riley Saunders for at least 90 consecutive days while under the age of 19.

Under the proposed settlement agreement, Class Members will be eligible without proof of harm for the following Basic Payments:

- \$25,000 for all Class Members; and
- An additional \$44,000 for all Class Members who were Indigenous Children (for a total payment of \$69,000).

In addition to the Basic Payments, Class Members may apply for Elevated Damages for increased harms caused or contributed by Saunders using a simplified adjudication procedure. Elevated Damages are payable for homelessness (\$25,000), psychological harm (\$45,000), sexual exploitation (\$75,000), educational delay (\$20,000-\$50,000) and bodily harm (\$15,000). The maximum amount in total for Elevated Damages for an individual is \$181,000.

The maximum combined total award for Basic Payments and Elevated Damages for an individual is \$250,000.

Class Counsel propose to charge legal fees in the amount of 12.5% plus GST and PST, which are to be deducted from Basic Payments and Elevated Damages before payment to Class Members.

For more information or to make submissions to the Court regarding the amount or terms of the proposed settlement agreement or legal fees, go online to www.gratlandcompany.com, email saundersclassaction@gratlandcompany.com or call 604-694-1919/1-866-230-2752 (from Monday to Friday, 9:00 a.m. to 5:00 p.m.) to speak to legal counsel or an administrator.

A hearing to seek Court approval for the settlement agreement and legal fees has been set for October 23, 2020, in Vancouver.