

LONG FORM NOTICE

Were you subjected to Separate Confinement or Segregation in a British Columbia Correctional Centre after April 18, 2005?

If YES, a class action may affect your rights.

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

- You could be affected by a class action lawsuit involving British Columbia Correctional Centres.
- British Columbia has agreed to settle a lawsuit on behalf of current and former inmates of B.C. Correctional Centres who were involuntarily subjected to **Separate Confinement and/or Segregation**, for either: at least 15 consecutive days, **or** if B.C. Corrections knew or ought to have known the person suffered from a Mental Illness (the "Class").
- The proposed settlement is worth up to **\$60 million**. Class Counsel fees and certain expenses associated with the class action will be deducted from the settlement. Individual Class Members may receive awards of up to **\$91,000**.
- The Court will hold a hearing on October 22, 2025, to decide whether to approve the proposed settlement.
- Read this notice carefully. It provides important information about the class action, the proposed settlement, and Class Members' rights in respect of the settlement. Your rights and options will depend on the date(s) you were placed in Separate Confinement and/or Segregation.
- If you know a current or former inmate who cannot read this notice, please share this information with them.

YOUR OPTIONS RIGHT NOW

Your options depend on whether you were placed in Separate Confinement and/or Segregation before or after December 22, 2020.

Some class members can still **opt out** of this action.

All class members who do not opt out can voice their support for, or objections to, the proposed settlement.

OPTING OUT OF THE ACTION

In 2020, this action was certified for those placed in Separate Confinement and/or Segregation between **April 18, 2005 and December 22, 2020**. Notice of Certification was provided, and the deadline for these Class Members to opt out passed on August 3, 2021. **These Class Members can no longer opt out of the action.**

On May 29, 2025, this action was certified on behalf of those placed in Separate Confinement and/or Segregation **after December 22, 2020**. These Class members **can still opt out of the action.**

If you were placed in Separate Confinement and/or Segregation after December 22, 2020, your options are:

Do nothing	If you support the proposed settlement, you do not need to do anything right now. If the Court approves the settlement, 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 British Columbia in your own lawsuit in relation to your placement(s) in Separate Confinement and/or Segregation.
Opt Out	You can decide to get out of this class action lawsuit and to get no money from it or the benefit of any admissions from the lawsuit. If you opt out, you will keep your right to sue British Columbia in your own lawsuit for your placement(s) in Separate Confinement and/or Segregation, subject to all the defences British Columbia could have raised to this class action. If you opt out, you will not be able to collect any money or benefits from the settlement. To opt out, you must send the Opt-Out Form by mail to Proactio, Class action - BC Segregation, 600 de la Gauchetière West, suite 2000, Montreal (QC), H3B 4L8, or by email to bcsegregation@proactio.ca no later than September 2, 2025.

If you have questions concerning this Notice you can call 877 916-1122 for assistance.

	You can get a copy of the Opt-Out Form at proactio.ca/bcsegregation , by emailing the Administrator at bcsegregation@proactio.ca , or by calling the Administrator at 877 916-1122.
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VOICING YOUR OPINION ON THE SETTLEMENT

All class members who do not opt out can voice their support for, or objections to, the proposed settlement.

If you are a class member, you have **three options**: you can voice your **support** for the proposed settlement, **voice an objection** to the proposed settlement, or **do nothing**.

Do nothing	If you support the proposed settlement, you do not have to do anything right now. If the Court approves the settlement on October 22, 2025, you will be able to make a claim at a later date for any money that you are entitled to. If you do nothing, you will give up any right to object to the settlement.
Support the proposed settlement	If you want to voice your support for the proposed settlement, you can do so by submitting a Support or Objection Form. Your Support or Objection Form must contain certain things, like your name, address, and the reasons why you support the settlement. You can read more on page 6, below. You must send your Support or Objection Form to Class Counsel by mail to Proactio, Class action - BC Segregation, 600 de la Gauchetière West, suite 2000, Montreal (QC), H3B 4L8, or by email to bcsegregation@proactio.ca. Your form must be received or postmarked no later than September 2, 2025.
Object to the proposed settlement	If you want to object to the proposed settlement, you can also do so by submitting a Support or Objection Form. Your Support or Objection Form must contain certain things, like your name, address, and the reasons why you object to the settlement. You can read more on page 6, below. You must send your Support or Objection Form to Class Counsel by mail to Proactio, Class action - BC Segregation, 600 de la Gauchetière West, suite 2000, Montreal (QC), H3B 4L8, or by email to bcsegregation@proactio.ca. Your form must be received or postmarked no later than September 2, 2025.

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BASIC INFORMATION

1. Why is there a notice?

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

The Court previously certified a lawsuit known as *North v. British Columbia*, Court File No. S1812656. The person who sued is called the Plaintiff. British Columbia is the Defendant. Notice about the certification of this lawsuit was previously disseminated, which advised that lawsuit included people subjected to separate confinement and/or segregation between April 18, 2005 and December 22, 2020 (the "**Class Period**").

The parties have now reached a proposed settlement providing for up to **\$60 million**.

The Court has also amended the certification order to extend the Class Period from December 22, 2020, until the date that the proposed settlement is approved.

This notice lets you know about:

1. The October 22, 2025 hearing to approve the settlement.
2. Your rights to voice your objection to or support for the settlement by September 2, 2025.
3. Your right to exclude yourself from the class action by opting out by September 2, 2025, if you were subjected to Separate Confinement and/or Segregation **after December 22, 2020.**

2. What is this lawsuit about?

The lawsuit says that British Columbia improperly subjected inmates to separate confinement and/or segregation. The lawsuit says that such separate confinement and/or segregation constitutes breach of fiduciary duty, systemic negligence and breaches of inmates' rights under the *Canadian Charter of Rights and Freedoms*. British Columbia denies these claims.

3. Why is this a class action?

In a class action, a person called the “Representative Plaintiff” (in this case, Naveah North) sued on behalf 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 one case, except for those who remove themselves from the class.

4. Who is a member of the Class?

The Class includes those persons who, between April 18, 2005 and the date that the proposed settlement is approved, were involuntarily subjected to either:

1. Separate Confinement and/or Segregation for at least fifteen (15) consecutive days; or
2. Separate Confinement and/or Segregation when B.C. Corrections knew or ought to have known the person suffered from Mental Illness;

in a B.C. correctional centre as defined in s. 1 of the *Correction Act*. S.B.C. 2004, c. 46.

“Separate Confinement and/or Segregation” means any placement apart from the general population pursuant to ss. 17, 18, 24 or 27(1)(d) of the *Correction Act Regulation*, B.C. Reg. 58/2005;

“Mental Illness” means a diagnosed condition comprising 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,

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- 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.

WHAT HAPPENS TO THE SETTLEMENT MONEY

5. What money is available?

Under the proposed settlement, British Columbia will pay up to **\$60,000,000**. If the settlement is approved, this money, plus any interest and less court-approved legal fees, disbursements, honorarium, administration expenses and applicable taxes will be available for compensation to all eligible Class Members who file a claim.

6. How much money could I get if the Court approves the settlement?

The settlement that the Court must approve will allow Class Members to claim up to **\$91,000**. You can read more about the proposed settlement and request a copy at proactio.ca/bcsegregation.

YOUR RIGHTS AND OPTIONS

7. What happens if I do nothing?

If you support the proposed settlement, you do not have to do anything right now. If the Court approves the settlement, 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 settlement.

You have the right to voice your support for or objection to the proposed settlement. You can do so by submitting a Support or Objection Form. You can find a copy of the Support or Objection Form at proactio.ca/bcsegregation.

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Your Support or Objection Form must include:

- (a) Your full name, address, and telephone number;
- (b) the reasons for your support of the proposed settlement or the reasons for your objection accompanied by any legal support for such objection;
- (c) copies of any documents upon which you are basing your support or objection; and
- (d) a statement of whether you intend to appear at the October 22, 2025 settlement approval hearing.

Your Support or Objection Form must be signed by you and sent to the Administrator on time. You can submit it to the Administrator by mail at Proactio, Class action - BC Segregation, 600 de la Gauchetière West, suite 2000, Montreal (QC), H3B 4L8, or by email at bcsegregation@proactio.ca. Your Support or Objection Form must be sent to the Administrator or postmarked no later than September 2, 2025.

8. What if I don't want to be in the lawsuit?

If you do not want to be in the lawsuit, you must remove yourself. This is called “opting out.”

If you were subjected to Separate Confinement and/or Segregation between April 18, 2005 and December 22, 2020, you cannot opt out unless you receive the Court's permission. The deadline for you to opt out of this class action expired on August 3, 2021.

If you were subjected to Separate Confinement and/or Segregation after December 22, 2020, you have until September 2, 2025 to opt out by submitting an Opt-Out Form.

If you opt out, you will not receive any benefits that may be obtained if the proposed settlement is approved, including financial compensation. Neither you nor British Columbia will be bound by any Court findings or orders in this action. Subject to the defences British Columbia may raise, you keep your right to independently sue British Columbia as an individual regarding the issues in this case, but cannot rely on the settlement terms to support your claim.

If you have questions concerning this Notice you can call 877 916-1122 for assistance.

To remove yourself, submit an Opt-Out Form available at proactio.ca/bcsegregation to the Administrator by mail at Proactio, Class action - BC Segregation, 600 de la Gauchetière West, suite 2000, Montreal (QC) H3B 4L8, or by email to bcsegregation@proactio.ca. The Opt-Out Form must be sent by September 2, 2025.

THE LAWYERS REPRESENTING YOU

9. Do I have a lawyer in the case?

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

You can contact Koskie Minsky LLP at bcadminsegclassaction@kmlaw.ca or by phone 1-877-398-0497 (toll free).

10. How will the lawyers be paid?

You will not have to pay any of Class Counsel’s fees or expenses. Class Counsel’s fees and expenses will be deducted from the settlement. The Court will be asked to approve the lawyers’ fees pursuant to a contingency fee retainer agreement that they entered into with the Plaintiff. The contingency fee retainer agreement provides that Class Counsel can seek up to 33.3% of any settlement as payment for the work they performed for the class.

Additional information can be found in the settlement Agreement and by contacting Class Counsel.

GETTING MORE INFORMATION

11. How do I get more information?

You can get more information at proactio.ca/bcsegregation, by calling toll free at **877 916-1122**, or writing to: Proactio, Class action - BC Segregation, 600 de la Gauchetière West, suite 2000, Montreal (QC), H3B 4L8, or by email at: bcsegregation@proactio.ca

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