

SAINT JOHN ESTABROOKS ABUSE CLASS ACTION

NOTICE OF SETTLEMENT APPROVAL

Please read this notice carefully. Your rights may be affected even if you do not take any action. Une version française de cet avis est disponible sur le site web www.saintjohnrecourscollectif.kpmg.ca ou par courriel (saintjohnclassaction@kpmg.ca).

Reading this notice may be triggering. You may prefer to wait until you are in a safe space before reading further or have someone else read it for you, as it may bring back difficult memories and emotions. The Sexual Violence New Brunswick support line is available 24/7 at 506-454-0437. Additional emotional and mental health supports can be accessed at saintjohnclassaction.kpmg.ca.

This notice is for all Class Members in the Saint John Estabrooks Abuse class action. You may be able to claim money in a Settlement that was approved in a class action lawsuit against the City of Saint John on behalf of survivors of sexual abuse committed by Kenneth Estabrooks. The Settlement was approved on March 12, 2026.

Eligible Class Members can now make a claim for compensation from the Settlement by submitting a Claim Form to the Administrator by email at saintjohnclassaction@kpmg.ca or by regular mail:

KPMG INC.
600 de Maisonneuve Blvd. West
Suite 1500, KPMG Tower
Montréal QC H3A 0A3
Attention: Administrator of Saint John Estabrooks Abuse Class Action

The deadline to make a Claim is April 13, 2027.

IMPORTANT INFORMATION

- You may be eligible for compensation if you suffered harm as a result of being sexually abused by Kenneth Estabrooks in the City of Saint John between January 1, 1953 and November 1, 1975, while he was employed as a police officer.
- There is a settlement fund of \$16.5 million available to pay eligible Class Members as well as certain fees and expenses, including an honorarium for the representative plaintiff and Class Counsel's legal fees in the amounts approved by the Court.
- The amount of money paid for each approved Claim will depend on the nature of the harm each class member suffered, and the number of Claims that are approved.
- For more information, including resources to access emotional and mental health supports, visit the settlement website at saintjohnclassaction.kpmg.ca.

GETTING HELP WITH YOUR CLAIM

If you have questions or need help you can contact the Administrator at 1-855-609-2759 or by email at saintjohnclassaction@kpmg.ca. You can also get legal advice and help from one of the law firms for the Class Members at the contact information below:

Koskie Minsky LLP	McKiggan Hebert
Email: estabrooksabuseclassaction@kmlaw.ca Phone: 1-866-777-6323 20 Queen Street West, Suite 900, Box 52 Toronto, Ontario M5H 3R3	Email: info@mckigganhebert.com Phone: 902-423-2050 1959 Upper Water St. #502 Purdy's Wharf Tower 1 Halifax, NS B3J 3N2

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The Class Action

1. What is this lawsuit about?

The Court found the City of Saint John is vicariously liable for the harm suffered by all persons who were sexually abused by Kenneth Estabrooks while he was a Saint John police officer.

2. Who is a Class Member?

The "Class" or "Class Members" includes all persons who allege they suffered injury, loss or damage as a result of being sexually abused by Kenneth Estabrooks in the City of Saint John between January 1, 1953 and November 1, 1975.

The Notice

3. What is the purpose of this notice?

The purpose of this notice is to inform you that the New Brunswick Court of King's Bench has approved the Settlement reached in the class action lawsuit against the City of Saint John on behalf of survivors of sexual abuse committed by Kenneth Estabrooks.

You might have already received notice of certification of this lawsuit, or notice about the March 12, 2026 Settlement Approval Hearing. However, this notice is to update you that the Settlement has now been approved and to let you know how to make a Claim and the deadline for doing so.

The Settlement

4. What does the Settlement provide?

Under the Settlement, the City of Saint John will pay up to \$16.5 million. This amount includes payments to compensate successful Claimants, as well as certain fees and expenses associated with the Settlement, including Class Counsel's fees in the amount approved by the Court, the third-party litigation funder's fees, administration costs, and the honorarium for the representative plaintiff approved by the Court.

The Claims Process is intended to provide restorative and expeditious justice to Class Members while mitigating to the greatest extent possible, any further trauma.

The Court has appointed a third-party, called the Administrator (KPMG), that will decide all Claims according to a Claims Process set out in the Settlement. The Administrator will offer its services in English and French, and keep all information provided by Class Members through the Claims Process strictly confidential.

5. How much money can I claim under the Settlement?

The amount of money paid for each approved Claim will depend on the nature of the harm each class member suffered, and the number of Claims that are approved.

The Settlement provides for compensation for the following types of sexual abuse and certain Eligible Psychological Harms.

6. What is an Eligible Psychological Harm?

Under the Claims Process, an **Eligible Psychological Harm** is defined as any of the following: post-traumatic stress disorder, anxiety disorder, depression, eating disorder, sleep disorder, substance use disorder, anger issues, self-harming, sexual dysfunction, intimacy problems, and/or other personality and/or psychotic disorders.

Making a Claim for Psychological Harm is **optional**. Class Members who choose to make a Claim for Psychological Harm must provide a diagnosis and/or documentation of an Eligible Psychological Harm occurring after they were abused by Kenneth Estabrooks.

Participating in the Settlement

Class Members can participate in the Settlement by making a Claim.

The period for making a Claim runs until April 13, 2027. During that period, you may make a Claim by filling out the Claim Form and submitting it (and supporting documents, if applicable) to the Administrator by mail or email on or before April 13, 2027.

7. Am I eligible for compensation?

If you are a Class member, you must submit a Claim Form before April 13, 2027 to be eligible for compensation. The Administrator will determine if you are eligible to receive compensation according to the Claims Process.

Compensation will only be awarded to Eligible Claimants, meaning Class Members who submit a complete Claim Form to the Administrator by April 13, 2027 and who meet the following criteria:

- a) suffered injury, loss or damage as a result of being sexually abused by Kenneth Estabrooks;
- b) the sexual abuse occurred in the City of Saint John between January 1, 1953 and November 1, 1975; and
- c) the sexual abuse occurred while Kenneth Estabrooks was a City of Saint John police officer.

You may **not** be eligible for compensation from the Settlement if you previously and validly opted yourself out of this lawsuit, or previously settled a lawsuit against the City of Saint John relating to the same abuse.

8. How do I make a Claim?

To be eligible to receive money from the Settlement, you must make a Claim by submitting a fully completed Claim Form (and supporting documents, if applicable) to the Administrator on or before April 13, 2027 by email at saintjohnclassaction@kpmg.ca or by mail at

KPMG INC.
600 de Maisonneuve Blvd. West
Suite 1500, KPMG Tower
Montréal QC H3A 0A3
Attention: Administrator of Saint John Estabrooks Abuse Class Action

To get a copy of the Claim Form: download a PDF copy from saintjohnclassaction.kpmg.ca or request a paper copy from the Administrator at 1-855-609-2759 or saintjohnclassaction@kpmg.ca.

Keep a copy of your Claim Form and all supporting documents for your records. If you submit your Claim Form by mail via Canada Post, request your post office to apply a postmark (the date stamped by Canada Post) on the envelope. This will be considered as the day the Claim Form was submitted to the Administrator.

9. When do I have to submit a Claim by?

You must submit your Claim Form on or before April 13, 2027.

If you fail to submit your Claim Form on or before April 13, 2027, you may not receive any money from the Settlement.

The Administrator will have limited ability to consider late Claims received within three (3) months after April 13, 2027, where the Class Member provides a reasonable explanation in writing as to why their Claim was submitted late. As of July 13, 2027 it will be too late for your Claim to be considered.

10. Can I submit a Claim on behalf of a Class Member who has passed away?

Yes, if you have legal authority to do so and the person was **alive on or after May 16, 2024**. If you are submitting a Claim on behalf of a deceased Class Member, you must explain on the Claim Form why you have the authority to act on their behalf, and attach one of the following documents as proof: (a) Letters of Administration; (b) Letters of Administration with Will Annexed; (c) Letters Probate; or (d) a copy of the deceased Class Member's will appointing you as executor of their estate.

11. Do I need a lawyer to make a Claim?

You do **not** need to hire a lawyer in order to make a Claim for compensation under the Settlement, but you may find it helpful to have one.

The Administrator and Class Counsel can answer any questions you may have about the Claims Process at no charge. Their contact information is available on the first page of this notice.

12. What supporting documents do I need to prove my Claim?

The supporting documents that you need to include with your Claim Form will depend on what you are claiming, and whether you are claiming on behalf of someone else.

- **If you are claiming for Sexual Abuse only**, you do not need to provide any supporting documents with your Claim Form.
- **If you are claiming for Psychological Harm in addition to Sexual Abuse**, you need to provide a diagnosis and/or documentation of an Eligible Psychological Harm occurring after you were abused by Kenneth Estabrooks. See question 6 for a list of Eligible Psychological Harms.
- **If you are claiming on behalf of a Class Member who passed away on or after May 16, 2024**, you need to provide proof that you have the legal authority to act on their behalf (see question 10) and documentary, testimonial, and/or medical evidence in support of your claim that the deceased Class Member was sexually abused by Kenneth Estabrooks while he was a City of Saint John police officer between January 1, 1953 and November 1, 1975.

The Lawyers Representing the Class

13. Do I have a lawyer in this case?

The law firms representing the Class Member are listed below:

Koskie Minsky LLP	McKiggan Hebert
Email: estabrooksabuseclassaction@kmlaw.ca Phone: 1-866-777-6323 20 Queen Street West, Suite 900, Box 52 Toronto, Ontario M5H 3R3	Email: info@mckigganhebert.com Phone: 902-423-2050 1959 Upper Water St. #502 Purdy's Wharf Tower 1 Halifax, NS B3J 3N2

You will not be charged for contacting these lawyers with questions about the Settlement. If you want to be represented by your own lawyer, you may hire one at your own expense.

14. How will the lawyers representing the Class be paid?

Class Counsel worked on a contingency fee basis, meaning that no fees were charged at any stage of the lawsuit. Class Counsel's fees and expenses will be deducted from the Settlement Fund in an amount to be approved by the Court.

Getting More Information

This notice summarizes the Settlement and how to make a Claim and the deadline for doing so. More details are in the Settlement Agreement and Claims Process, which you can view at saintjohnclassaction.kpmg.ca.

Neither the parties nor their lawyers make any representations regarding the tax effects, if any, of receiving any benefits under the Settlement. Consult your tax advisor for any tax questions you may have.

The court offices will be unable to answer any questions about the matters in this notice. If you have any questions regarding the Settlement, more information is available at saintjohnclassaction.kpmg.ca or by reaching out to the Administrator at the contact information below. Please do not contact the court offices.

Email: saintjohnclassaction@kpmg.ca

Phone: 1-855-609-2759

Mail or Courier:

KPMG INC.
600 de Maisonneuve Blvd. West
Suite 1500, KPMG Tower
Montréal QC H3A 0A3
Attention: Administrator of Saint John Estabrooks Abuse Class Action

In Person:

KPMG INC.
City Hall Building 15 Market Square, Suite 501
Saint John, NB E2L 3V6