

Schedule “D”

DISSEMINATION PLAN

PHASE 1: NOTICE OF CERTIFICATION

The Notice of Certification shall be distributed in the following manner:

Notice by Institutional Defendants

1. The defendant Vancouver College Limited shall deliver the Long Form Notice of Certification in substantially the same form as it appears at Appendix 1, to all students enrolled at Vancouver College at any time between 1976 and 2013, by the following methods:
 - (a) via any and all alumni portals, websites, or newsletters;
 - (b) directly to individual former students using any physical address or email address contact information in Vancouver College Limited’s possession, power or control; and
 - (c) via Vancouver College’s social media accounts.
2. The defendant St. Thomas More Collegiate Ltd. shall deliver the Long Form Notice of Certification in substantially the same form as it appears at Appendix 1 to all students enrolled at St. Thomas More Collegiate Ltd. at any time 1976 and 1989, by the following methods:
 - (a) via any and all alumni portals, websites, or newsletters;
 - (b) directly to individual former students using any physical address or email address contact information in St. Thomas More Collegiate’s possession, power or control; and
 - (c) via St. Thomas More Collegiate’s social media accounts.
3. The Archbishop of Vancouver shall publish a copy of the Long Form Notice of Certification in substantially the same form as it appears at Appendix 1 in the BC Catholic newspaper, digital edition, on at least 3 occasions between the certification of this proceeding and a date which is 30 days prior to the Opt-Out Deadline with the first publication occurring within 30 days of the approval of this Notice Plan and the second prior to December 31, 2023.

Notice by Class Counsel

4. In addition, the plaintiff proposes that the notices of certification (in substantially the same form as they appear at Appendix 1 and 2) be delivered to class members pursuant to a notice program involving:
 - (a) direct notice to class members who have contacted CFM Lawyers;
 - (b) press releases;
 - (c) advertising online, by means such as Google Ads and Meta Ads (i.e., Facebook and Instagram), as well as in national and/or provincial newspapers, such as the *Globe and Mail*, *Vancouver Sun*, *Province*, and *Times Colonist*; and
 - (d) posting online via class counsel's websites or social media accounts.
5. The costs shall be paid by the plaintiff in first instance with the right to seek recovery of those costs from the defendants by order of the judge presiding at the common issues trial.

Timing

6. If not otherwise stated above, notice of certification by the institutional defendants and by class counsel, in the form and manner described above, shall be given by not later than September 1, 2023.