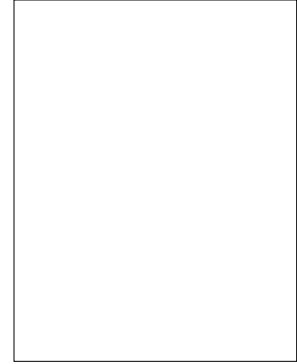


COURT FILE NUMBER 816 of 2005  
COURT OF QUEEN'S BENCH OF SASKATCHEWAN  
JUDICIAL CENTRE REGINA  
PLAINTIFF(S) FONTAINE, ET AL  
DEFENDANT(S) A.G. OF CANADA, ET AL



**GENERAL FINAL RELEASE**

WHEREAS the Indian Residential Schools Settlement Agreement ("IRSSA") was entered into on May 8, 2006, and was approved by nine Courts of Superior Jurisdiction across Canada, including the Saskatchewan Court of Queen's Bench, on December 15, 2006;

AND WHEREAS attached to the IRSSA is Schedule "O-3" being a Settlement Agreement between Her Majesty the Queen in Right of Canada as represented by the Minister Responsible for the Office of Indian Residential Schools Resolution of Canada ("Canada") and the Catholic Entities named in Schedule A to the Settlement Agreement and attached to this General Final Release (the "Catholic Entities") and the Corporation of Catholic Entities Party to the Indian Residential Schools Settlement ("CCEPIRSS");

AND WHEREAS Schedule "O-3" of the Settlement Agreement required the Catholic Entities and CCEPIRSS to meet three specific financial obligations, namely to:

1. make a \$29 million cash contribution;
2. contribute \$25 million In-Kind Services to support healing and reconciliation programs; and
3. pursue a \$25 million Canada-wide best-efforts fundraising campaign (later identified as Moving Forward Together) to support healing and reconciliation programs;

(collectively referred to as "Specific Financial Obligations");

AND WHEREAS, in a ruling on the Request for Directions of the Catholic Entities and CCEPIRSS, dated November 18, 2014, the Honourable Mr. Justice Gabrielson of the Saskatchewan Court of Queen's Bench, on July 16, 2015, found in favour of the Catholic Entities and CCEPIRSS (the "Judicial Ruling");

AND WHEREAS Canada and the Catholic Entities and CCEPIRSS have agreed that the only issue before Justice Gabrielson, in the November 18, 2014 Request for Directions, was whether or not there had been a settlement of the Specific Financial Obligations;

AND WHEREAS Canada and the Catholic Entities and CCEPIRSS have agreed that paragraphs 5 and 45 of the Judicial Ruling are understood to be limited to the matters before Justice Gabrielson, namely the Specific Financial Obligations;

AND WHEREAS, Canada has filed a Notice of Appeal in the Saskatchewan Court of Appeal in relation to the Judicial Ruling, and the appeal is scheduled to be heard in due course as per the schedule and direction of the Court;

AND WHEREAS, in advance of the appeal of the Judicial Ruling, Canada and the Catholic Entities and CCEPIRSS have agreed to settle all of the Specific Financial Obligations, as specified and defined above, on the basis that CCEPIRSS will pay at Canada's direction the sum of \$1.2 million to the Legacy of Hope Foundation;

AND WHEREAS the Catholic Entities and CCEPIRSS are entitled to the benefits of sections 4.5 and 4.6 of the Settlement Agreement as those sections are currently worded in the Settlement Agreement;

NOW THEREFORE, Canada, for good and valuable consideration, the sufficiency of which is hereby irrevocably acknowledged, does hereby remise, release and forever discharge the Catholic Entities (and Missionaires du Christ roi and Les Soeurs Missionaires du Christ (B.C.)) and CCEPIRSS, its directors, officers, shareholders, agents, lawyers and employees (hereinafter jointly and severally called the "Releasees"), of and from all manner of actions, causes of action, suits, debts, dues, accounts, bonds, whatsoever against the Releasees which Canada ever had, now has or hereafter can, shall or may have, or by reason of any cause, matter or thing whatsoever existing up to date hereof arising out of, or relating to, the Specific Financial Obligations;

AND CANADA further covenants and agrees not directly or indirectly, to join, assist, aid or act in concert in any manner whatsoever with any person or entity in making any financial claim or demand whatsoever against the Releasees arising out of or in relation to the aforesaid Specific Financial Obligations hereinbefore remised, released and forever discharged;

AND IN LIGHT OF THE SETTLEMENT of the Specific Financial Obligations, Canada agrees to pay the taxable costs of the Catholic Entities and CCEPIRSS' RFD application of November 18, 2014 and to abandon its appeal of the Judicial Ruling and

the Catholic Entities and CCEPIRSS agree to waive any costs in relation to the appeal to which they might otherwise be entitled;

IN WITNESS WHEREOF Canada has executed this Release as of the \_\_\_\_\_ day of \_\_\_\_\_, 2015 under the hand of its duly authorized officer in that behalf.

\_\_\_\_\_  
(Name)

\_\_\_\_\_  
(Position)

DRAFT