

To: **Proactio** Class Action – Manitoba Segregation  
140, Grande Allée Est Bureau 200  
Québec, QC G1R 5P7

Administrator email: manitobasegregation@proactio.ca

This is **NOT** a claim form. Completing this **OPT OUT FORM** will exclude you from receiving any compensation arising out of any settlement or judgment in the class proceeding named below:

FILE NO. CI21-01-31242

THE COURT OF KING'S BENCH  
Winnipeg Centre

BETWEEN:

VIRGIL CHARLES GAMBLIN and HAWA YUSSUF AS LITIGATION GUARDIAN OF A.M.  
Plaintiffs

- and -

THE GOVERNMENT OF MANITOBA  
Defendant

Proceeding under  
*The Class Proceedings Act, C.C.S.M. c. C130*

**IMPORTANT: You cannot opt out if your placements in Segregation occurred on or before May 4, 2022.**

**I understand that by opting out of this class proceeding I am confirming that I do NOT wish to participate in this class proceeding. I do NOT wish to receive any benefit that may be obtained from the lawsuit.**

I understand that I must email or mail this opt-out form to the address indicated above before **April 13, 2026**, or else it will *not* be valid.

I understand that any individual claim I may have must be commenced within a specified limitation period or else it will be legally barred. I understand that the filing of this class proceeding and related class proceedings suspended the running of the limitation period from the time the class proceeding was filed. The limitation period will **resume running against me** if I opt out of this class proceeding.

I understand that by opting out, I take full responsibility for the resumption of the running of any relevant limitation period and for taking all necessary legal steps to protect any claim I may have.

\_\_\_\_\_  
Name of Class Member  
Telephone: \_\_\_\_\_

\_\_\_\_\_  
Signature of Class Member Opting Out  
or of Guardian of Property (if applicable)  
Date: \_\_\_\_\_

\_\_\_\_\_  
Name of Witness  
Telephone: \_\_\_\_\_

\_\_\_\_\_  
Signature of Witness  
Date: \_\_\_\_\_