

To: **Proactio**
Class action – MB Segregation
140, Grande Allée Est Bureau 200
Quebec, QC,
G1R 5P7

Admin email: manitobasegregation@proactio.ca

This is **NOT** a claim form. If you complete this **OPT OUT FORM** you will not be eligible to make a claim for compensation from the Settlement of the class proceeding named below:

FILE NO.: CI21-01-31242

THE COURT OF KING'S BENCH
Winnipeg Centre

BETWEEN

VIRGIL CHARLES GAMBLIN and ADEM MOHAMUD

Plaintiffs

- and -

THE GOVERNMENT OF MANITOBA

Defendant

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

IMPORTANT: You can only opt out in relation to a placement in Segregation that occurred between February 28, 2026 and June 4, 2026.

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

I understand that I must email or mail this opt-out form to the address indicated above before October 8, 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 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: _____