

**THIS NOTICE IS TO ALL PERSONS WHO WERE STUDENTS  
ENROLLED IN THE DIAGNOSTIC MEDICAL SONOGRAPHY PROGRAM  
("THE DMS PROGRAM") AT CANADIAN ALL CARE COLLEGE BETWEEN  
NOVEMBER 4, 2019 AND NOVEMBER 9, 2022**

**This Notice may affect your rights. Please read it carefully.**

**1. What is this lawsuit about?**

A Representative Plaintiff, Elias Faiz has commenced a Class Proceeding against CANADIAN ALL CARE INC. operating as CANADIAN ALL CARE COLLEGE seeking damages on behalf of all students enrolled in the Diagnostic Medical Sonography Program ("the DMS program") at Canadian All Care College at any time between November 4, 2019 and November 9, 2022.

The Class Proceeding was certified on November 5, 2024. Flaherty McCarthy LLP represents the class ("Class Counsel"). The purpose of this document is to provide notice to Class Members that the Class Proceeding has been certified and your rights to remain in the action or to opt-out of the action.

**2. Am I a member of the Class?**

You are a member of the Class and entitled to participate in the proceeding if you fall under the definition of a "Class Member", which is defined as:

*All students enrolled in the Diagnostic Medical Sonography Program ("the DMS program") at Canadian All Care College at any time between November 4, 2019 and November 9, 2022 (the "Class" or "Class Members").*

**3. How does this Class Proceeding affect you?**

If you are a Class Member, and you wish to participate in the proceeding, then **you do not need to do anything more at this stage.** You are automatically included in the Class.

There is no cost to you to participate in the class action. You will have no responsibility to pay any legal fees. Class Counsel will only be paid if the action succeeds at trial or there is a settlement. Class Counsel have entered into a contingency fee agreement with the representative plaintiffs. The agreement provides for a contingency fee of 33% of the amount recovered in the Class Proceeding to be paid to Class Counsel, along with reimbursement of all disbursements and taxes. The court must first approve Class Counsel's legal fees before they will be paid.

#### **4. Class Members May Opt Out of the Proceeding**

IF YOU DO NOT WANT TO PARTICIPATE in this Class Proceeding, you must take steps to opt out of the Class. If you opt out of the Class, you will not be eligible to recover any benefits under a settlement or award in this Class Proceeding.

Members of the Class may exercise their right to opt out of the Class by sending an email to [optout@allcareclassaction.com](mailto:optout@allcareclassaction.com) indicating your wish to opt out of the Class Proceeding. Your Opt-Out Email must include:

- (i) The name of this proceeding (*Faiz. v. Canadian All Care College*, or similar identifying words);
- (ii) The Class Member's full name and date of birth;
- (iii) The Class Member's mailing address and telephone number;
- (iv) A brief statement indicating that the Class Member understands they are opting out of the class proceeding and that they will be excluded from any judgment (including an approved settlement), if any.

You cannot exclude yourself by telephone.

No Class Member will be permitted to opt out after **APRIL 8, 2025 at 5:00PM (EST)**.

A Class Member who does not opt out of the Class Proceeding will be bound by the terms of any judgment or any settlement approved by the Court. Each Class Member may be entitled to share in the amount of any judgment awarded or settlement reached in the Class Proceeding.

A judgment (including an approved settlement), whether favourable or not, will bind all Class Members who do not opt out of the Class.

#### **5. Additional Information**

The certification order and other information regarding the Class Proceeding is available at [www.allcareclassaction.com](http://www.allcareclassaction.com)

Requests for further information or questions for Class Counsel should be directed to [info@allcareclassaction.com](mailto:info@allcareclassaction.com)