

## Schedule “B”

CLASS ACTION REGARDING ANNUAL ADJUSTMENT OF BENEFITS ADMINISTERED BY VETERANS AFFAIRS CANADA	
<p><i>White et al. v His Majesty the King</i> Court No. T-512-24</p> <p>The Federal Court has certified a class proceeding involving alleged underpayments of certain benefits administered by Veterans Affairs Canada (“VAC”) and payable to members or former members of the Canadian Armed Forces (“CAF”) or Royal Canadian Mounted Police (“RCMP”) and their spouses, common-law partners, survivors, and other persons. If you received, at any time between January 1, 2024 and [insert date of the Certification Order], any of the awards and benefits listed below, you may be a member of the Class. Eligible estates of persons who received, at any time between January 1, 2024 [insert date of the Certification Order], any of the awards and benefits listed below may also be class members. If the class proceeding succeeds at trial, or is settled, class members may be entitled to a payment.</p> <p><b>WHAT IS THE CLASS ACTION ABOUT?</b></p> <p>VAC administers certain benefits, which must be annually adjusted.</p> <p>The Plaintiffs and the Class claim the Defendant miscalculated annual adjustment rates from January 1, 2024 to [insert date of the Certification Order], resulting in underpayments to Class members. The class proceeding seeks damages for underpayments that occurred because of the calculation errors.</p> <p><b>WHO ARE THE CLASS MEMBERS?</b></p> <p>The Federal Court has defined the Class as:</p> <p>All members and former members of the Canadian Armed Forces and Royal Canadian Mounted Police, and their spouses, common-law partners, dependents, survivors, and orphans, and any other individuals, including eligible estates of all such persons, who received, at any time between January 1, 2024 and [insert date of the Certification Order] – disability pensions and other benefits from Veterans Affairs Canada that were affected by the annual adjustment of the basic pension under section 75 of the <i>Pension Act</i> including, but not limited to, the awards and benefits listed below:</p> <ul style="list-style-type: none"> <li>• <i>Pension Act</i> pension for disability;</li> <li>• <i>Pension Act</i> pension for death;</li> <li>• <i>Pension Act</i> attendance allowance;</li> <li>• <i>Pension Act</i> allowance for wear and tear of clothing or for specially made apparel;</li> <li>• <i>Pension Act</i> exceptional incapacity allowance;</li> <li>• <i>Veterans Well-being Act</i> clothing allowance;</li> </ul>	<p>fishers, overseas headquarters staff, air raid precautions workers, and injury for remedial treatment of various persons and voluntary aid detachment (World War II);</p> <ul style="list-style-type: none"> <li>• <i>Flying Accidents Compensation Regulations</i> relating to compensation for flying accidents; and</li> <li>• RCMP Disability Benefits awarded in accordance with the <i>Pension Act</i>.</li> </ul> <p>The CAF and RCMP veterans who commenced the class proceeding and who act as representative plaintiffs on behalf of the Class are David White, Raymond Toth, Betty Brousse, Brenton MacDonald and Jean-François Pelletier.</p> <p><b>WHAT DO I NEED TO DO TO TAKE PART?</b></p> <p>All Class Members have the right to participate in the class proceeding. You are automatically included in the proceeding and bound by the results <i>unless</i> you opt-out. If you do <i>not</i> opt-out, you will be eligible to receive a payment from a settlement or judgment in favour of the class. You do not need to do anything if you wish to participate. <i>If you wish to opt-out</i>, you must sign and deliver an Opt-Out Coupon available from any of the lawyers listed below or posted on the case website. If you wish to opt-out, you must send a signed Opt-Out Coupon to any of the lawyers listed below by no later than [date]. If you opt-out, you will <i>not</i> be eligible to receive any payment from a settlement or judgment in favour of the class.</p> <p><b>WHO ARE THE LAWYERS FOR THE CLASS?</b></p> <p>The lawyers for the class (“Class Counsel”) are:</p> <p>Gowling WLG (Canada) LLP (Toronto); Michel Drapeau Law Office (Ottawa); Murphy Battista LLP (Kelowna); Koskie Minsky LLP (Toronto); McInnes Cooper (Halifax).</p> <p>You can obtain more information about the class proceedings and the website created by Class Counsel: <a href="http://www.vetspensionerror.ca">www.vetspensionerror.ca</a></p> <p><b>DO I NEED TO PAY ANYTHING?</b></p> <p>You do not need to pay any legal fees. If the case is unsuccessful, there will be no legal fees. If the case succeeds, Class Counsel may receive a scaled fee of up to 30% plus HST of any amounts recovered. The Federal Court must approve Class Counsel’s fees and any settlement of the class proceeding.</p>

<ul style="list-style-type: none"><li>• <i>Civilian War-related Benefits Act</i> war pensions and allowances for salt water</li></ul>	
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