

SCHEDULE “F” – NOTICE OF APPROVAL OF SETTLEMENT AND CLAIMS PROCESS

[LONG FORM NOTICE]

SETTLEMENT OF THE CAF PENSION BENEFITS CLASS ACTION

Did you experience a delay in receiving a pension benefit under the Reserve Force Pension Plan or the Regular Force Pension Plan?

A settlement may affect you. You may be entitled to compensation of up to \$1,200. Please read this notice carefully.

The Federal Court authorized this notice. This is not a solicitation from a lawyer.

Douglas Jost (the “Representative Plaintiff”) sued the federal government of Canada (“Canada”) alleging that damages should be paid due to the delayed payment of certain pension benefits under the Reserve Force Pension Plan or the Regular Force Pension Plan between 2007 and 2017.

The Federal Court has now approved a settlement between the Representative Plaintiff and Canada that provides compensation to individuals who experienced delays in the payment of certain pension benefits under the pension plans for members of the Canadian Armed Forces (“CAF”).

Your legal rights are affected even if you do nothing. Please read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:

MAKE A CLAIM: You may submit a claim for compensation under the settlement. To do so, you must complete a Claim Form and send it to the Department of National Defence (“DND”) by January 19, 2026. A copy of the Claim Form is available at: <https://www.canada.ca/en/department-national-defence/services/benefits-military/pay-pension-benefits/benefits/canadian-armed-forces-delayed-pension-class-action.html>.

DO NOTHING: If you do not submit a claim for compensation under the settlement before the deadline, you will give up the opportunity to obtain compensation for any harm caused by the delayed payment of certain pension benefits under the Reserve Force Pension Plan or the Regular Force Pension Plan between 2007 and 2017.

WHAT THIS NOTICE CONTAINS

BASIC INFORMATION

1. Why did I get this notice?
2. What is a class action?
3. What is this class action lawsuit about?
4. Has there been a trial?
5. Why is there a settlement?

WHO IS INCLUDED IN THE SETTLEMENT?

6. Who is included in the settlement?
7. What if I am not sure whether I am included in the settlement?

SETTLEMENT

8. What does the settlement provide?
9. What am I giving up in the settlement?
10. May I remove myself from the settlement?

HOW TO RECEIVE A PAYMENT?

11. How will I receive a payment?
12. How will payments be calculated?
13. When will I receive my payment?
14. What if I disagree with the amount of my payment?
15. What if my claim is denied?

THE LAWYERS REPRESENTING YOU

16. Who is Class Counsel?
17. How will Class Counsel be paid?

GETTING MORE INFORMATION

18. How do I get more information?

BASIC INFORMATION

1. Why did I get this notice?

The Federal Court authorized this notice to provide you with information about how a settlement may affect you. This notice explains the underlying lawsuit, the settlement and your legal rights.

2. What is a class action?

In a class action, one or more individuals referred to as the “representative plaintiff(s)” sue on behalf of a group of people who have similar claims. The group of individuals with similar claims are called a “class” or “class members.” The Court resolves the similar claims for all class members, except for those who clearly exclude themselves from the class action lawsuit.

3. What is this class action lawsuit about?

The class action claims that damages are owing due to the delayed payment of certain pension benefits under the Reserve Force Pension Plan and the Regular Force Pension Plan between 2007 and 2017, following the establishment of a pension plan for members of the Reserve Force.

The Representative Plaintiff, represented by Koskie Minsky LLP (“Class Counsel”), commenced the lawsuit in 2017. Canada is named as the Defendant in the case.

4. Has there been a trial?

The Federal Court certified the class action on April 16, 2021, which means that it was permitted to proceed to trial as a class action. The case has not gone to trial and there has been no judicial decision made on the merits of the lawsuit.

5. Why is there a settlement?

On July 4, 2025, the Court approved a settlement between the Representative Plaintiff and Canada. By agreeing to the settlement, the parties avoid the costs and uncertainty of a trial and potential delays in obtaining judgment, and Class Members receive the compensation described in the settlement agreement. The Court found that the settlement is fair and reasonable, and in the best interests of all Class Members.

WHO IS INCLUDED IN THE SETTLEMENT?

6. Who is included in the proposed settlement?

The settlement applies to all individuals, referred to as “Class Members”, who did not “opt out” of the class action and who meet the following criteria:

- (a) served in the Canadian Armed Forces – Reserve Force;
- (b) released from the Canadian Armed Forces between March 1, 2007 and October 31, 2017;
- (c) were entitled to receive an Immediate Annuity, Transfer Value, Annual Allowance and/or Bridge Benefit under the Regular Force Pension Plan or the Reserve Force Pension Plan; and
- (d) did not receive payment of the Immediate Annuity, Transfer Value, Annual Allowance and/or Bridge Benefit for more than 60 days from the date of release.

In the decision certifying the lawsuit as a class proceeding, the Federal Court set a deadline to “opt out” of the class action. The “opt out” period expired on August 14, 2021. There will be no further opt-out period.

Estates of Class Members may also be eligible to receive a payment under the proposed settlement. A claim must be filed by the estate executor or, if the estate has been wound up, by an immediate family member.

All Class Members except those who validly opted out are bound by the settlement and will be deemed to have “released” Canada in relation to the subject-matter of the lawsuit. This means that Class Members will not have the right to start another lawsuit against Canada for alleged harm caused by the delayed payment of pension benefits under the Reserve Force Pension Plan or the Regular Force Pension Plan during the class period from March 1, 2007 to October 31, 2017.

7. What if I am not sure whether I am included in the settlement?

If you are not sure whether you are included in the settlement, you may call toll-free at 1 (800) 513-6344 or visit <https://kmlaw.ca/cases/canada-forces-delayed-pension-class-action/>. Additional information is available at <https://www.canada.ca/en/departement-national-defence/services/benefits-military/pay-pension-benefits/benefits/canadian-armed-forces-delayed-pension-class-action.html>.

SETTLEMENT

8. What does the settlement provide?

The settlement provides compensation for delays in the payment of certain pension benefits under the Reserve Force Pension Plan and the Regular Force Pension Plan during the class period from March 1, 2007 to October 31, 2017. The payments under the Settlement Agreement are intended to compensate Class Members for the experience of delay rather than any economic loss.

The amount of the compensation to be paid to any individual Class Member depends on the type of pension benefit paid to the Class Member and the length of the delay in payment (*i.e.*, the number of days between the Class Member's date of release and the date of payment). Class Members who received a Monthly Benefit (Immediate Annuity, Annual Allowance and/or Bridge Benefit) may be eligible to receive a payment in accordance with the following payment schedule:

1 to 90 Days	91 to 150 Days	151 to 365 Days	366 to 730 Days	Over 730 Days
\$0	\$400.00	\$600.00	\$800.00	\$1,200.00

Class Members who received a Transfer Value may be eligible to receive a payment in accordance with the following payment schedule:

1 to 180 Days	Over 181 Days
\$0	\$600.00

Under the settlement, Transfer Values are treated differently from Monthly Benefits due to their distinct eligibility criteria and terms of payment under the applicable legislation, the *Canadian Forces Superannuation Act*, RSC 1985, c C-17, and its associated regulations.

Further details may be found in the Settlement Agreement. A copy of the Settlement Agreement is available online at: <https://kmlaw.ca/cases/canada-forces-delayed-pension-class-action/>.

9. What am I giving up in the settlement?

In exchange for being entitled to access the compensation scheme under the settlement, Class Members give up their rights to continue this class action and to start another lawsuit against Canada for the claims being resolved by the settlement.

If you are a Class Member then you are "releasing" Canada, which means you cannot sue Canada for anything related to the delayed payment of certain pension benefits under the Reserve Force Pension Plan or the Regular Force Pension Plan during the Class Period from March 1, 2007 to October 31, 2017.

The Settlement Agreement describes the released claims with specific descriptions, so please read it carefully. If you have any questions about what this means, you may contact Class Counsel or your own lawyer. You are responsible for paying your own lawyer's fees.

10. May I remove myself from the settlement?

In the decision certifying the lawsuit as a class proceeding, the Federal Court set a deadline of August 14, 2021 to “opt out” of the class action. A separate notice campaign was approved by the Federal Court to notify potential Class Members of the opt-out deadline. There will be no further opt-out period.

Therefore, Class Members who did not validly opt out of the class action by August 14, 2021 are bound by the settlement.

HOW TO RECEIVE A PAYMENT

11. How will I receive a payment?

To request compensation under the Settlement Agreement, all Class Members must complete and submit a Claim Form. Claims will be reviewed and verified by the Department of National Defence acting as the Administrator of the Settlement Agreement. Class Members will not need to testify in Court. Once the Claim is reviewed and verified, eligible Class Members will receive compensation as soon as reasonably possible.

The Claims Period will commence on August 18, 2025 and the deadline to submit Claims is January 19, 2026. The start and end dates of the Claims Period may change if there is an appeal of the Court’s decision approving the Settlement Agreement. Updated information will be available at: <https://www.canada.ca/en/department-national-defence/services/benefits-military/pay-pension-benefits/benefits/canadian-armed-forces-delayed-pension-class-action.html>.

The Claim Form will be available online at <https://www.canada.ca/en/department-national-defence/services/benefits-military/pay-pension-benefits/benefits/canadian-armed-forces-delayed-pension-class-action.html>.

You may also call (Toll Free): 1-833-467-2514 / (Local): 613-901-8372. If you need help filling out your Claim Form, you should contact the Administrator.

12. How will payments be calculated?

The Administrator will review your Claim Form and determine if you qualify for a payment. If you do, the Administrator will determine the amount of your payment based on the criteria described in the Settlement Agreement.

13. What if I disagree with the decision?

If you wish to dispute the decision, you may request that the decision be reconsidered.

14. What if my claim is denied?

If your claim is denied, you will receive a notice of the decision. You may request that the denial decision be reconsidered.

THE LAWYERS REPRESENTING YOU

15. Who is Class Counsel?

The lawyers representing the Representative Plaintiff and Class Members are Koskie Minsky LLP. If you wish to be represented by or receive advice from another lawyer, you may hire a lawyer at your own expense.

16. How will Class Counsel be paid?

Class Counsel will be paid fees and disbursements in the amount of \$2,362,721.27, including fees, disbursements and taxes. This amount will be paid directly by Canada and separately from the compensation paid to Class Members.

You will not need to pay any legal fees out of your own pocket. If you retain another lawyer or representative then you must pay the fees, disbursements and taxes for their services.

GETTING MORE INFORMATION

17. How do I get more information?

This notice summarizes the settlement. For full details, a copy of the Settlement Agreement is available online at: <https://kmlaw.ca/cases/canada-forces-delayed-pension-class-action/> or [Canadian Armed Forces Delayed Pension Class Action - Canada.ca](#).

To obtain more information, you may visit, call or email:

Class Counsel

Website: <https://kmlaw.ca/cases/canada-forces-delayed-pension-class-action/>

Email: cafpensions@kmlaw.ca

Telephone: 1 (800) 513-6344

DND as Administrator of the CAF Pension Benefits Class Action

Website: <https://www.canada.ca/en/department-national-defence/services/benefits-military/pay-pension-benefits/benefits/canadian-armed-forces-delayed-pension-class-action.html>.

Email: dpsp.claims-reclamations.dpps@forces.gc.ca

Telephone: (Toll Free): 1-833-467-2514 / (Local): 613-901-8372