

SCHEDULE "P"

Final Legal Release

IN CONSIDERATION of my acceptance into the Independent Assessment Process which appears as Schedule D to the Indian Residential Schools Settlement Agreement,

I, _____, fully, finally and forever release and discharge, separately and severally, each of

1. Her Majesty the Queen in Right of Canada, the Attorney General of Canada, their successors and assigns, and their Ministers, officers, employees, servants, and agents; and,
2. the churches and church organizations listed in Schedule "A" to this Release;

("the Releasees") from any and all actions or causes of action, liabilities, claims and demands whatsoever of every nature or kind for damages, contribution, indemnity, costs, expenses and interest which I ever had, now have or may in future have against them (whether I now know about these claims or causes of action or not), arising from or related to

(a) My participation in a program or activity associated with or offered at or through any Indian Residential School, and

(b) The operation of Indian Residential Schools

provided that this Release shall not preclude my participation in the Independent Assessment Process in accordance with its terms.

2. Paragraph 1 of this Release extends to claims that belong to and could be made by me personally, whether asserted directly by me, or by any other person, group or legal entity on my behalf or as my representative, through a class action or otherwise.

3. *[Where Claimant has started an action]* In addition, I fully, finally and forever release and discharge the Releasees from any and all claims which were or could have been asserted against them by me in an action against the Attorney General of Canada and *[insert names of any other parties]*, being *[Court File No.]* issued in the *[judicial district]* of the *[proper name of court]*, for compensation and damages relating to my experiences at Indian Residential School (the "Action"). In consideration of my acceptance into the Independent Assessment Process, I agree to the dismissal of the Action.

4. The claims and causes of action referred to in paragraphs 1, 2 and 3, *[OR "1 and 2" if para. 3 above is deleted because no action had been commenced]*, are referred to in this Release as "the Released Claims".

5. I will not make any further claims of any kind against the Releasees with respect to the Released Claims.

6. I understand that if at any time I, or anyone on my behalf, make any further claim or demand, or threaten to start an action against any of the Releasees in respect of any of the Released Claims, they may rely on this Release as an estoppel and a complete defence to any such claim or action.

7. I represent and warrant that I have not assigned any of the Released Claims to any person or corporation.

8. I agree that I will not make any or continue any claim in relation to the Released Claims against any person or corporation who could claim for any or all

of damages, contribution or indemnity or other relief in respect of my claim from any of the Releasees whether pursuant to the provisions of the *Negligence Act (ON)* or its counterpart in other common law jurisdictions, the common law, or any other statute of any jurisdiction.

9. I further agree to indemnify the Releasees in respect of claims that may be brought against them by any person, legal entity, government or government agency that arise out of or are in any way connected with payments made to me by that person, legal entity, government or government agency in relation to the Released Claims. This indemnity includes, but is not restricted to, claims relating to medical and/or dental services or treatment provided to me, and claims relating to compensation paid to me by any government or governmental authority for any of the Released Claims that are criminal assaults.

10. If I later commence a claim that is not a Released Claim for damages for harm or injuries which are the same as or similar to the harm or injuries resulting from the Released Claims, and the Releasees or any of them are made parties to such action, the fact and amount of this Release, as well as details of the damages or harm which I claimed in the Released Claims, may be disclosed by the Releasees to the court in the context of such later claim.

11. I acknowledge and declare that I fully understand the terms of this Release, and that I have signed the Release voluntarily for the purpose of obtaining the benefit of the Independent Assessment Process. I further acknowledge that I have sought and obtained legal advice in respect of the Released Claims and this Release.

12. I understand that Her Majesty the Queen does not admit any liability to me by acceptance of this Release or by any payment that may be made to me.

I have signed this Release the _____ day of _____, 200_.

**SIGNED, SEALED AND DELIVERED
IN THE PRESENCE OF:**

Witness

[Name of Releasor] (SEAL)

Address:

SCHEDULE "A"

The Anglican Church of Canada Resolution Corporation
The General Synod of the Anglican Church of Canada
The Missionary Society of the Anglican Church of Canada
The Incorporated Synod of the Diocese of Algoma
The Synod of the Diocese of Athabasca
The Anglican Synod of the Diocese of British Columbia
The Synod of the Diocese of Calgary
The Diocese of the Synod of Cariboo
The Incorporated Synod of the Diocese of Huron
The Synod of the Diocese of Keewatin
The Bishop of Moosonee
The Diocese of Moosonee
The Synod of the Diocese of New Westminster
The Synod of the Diocese of Qu'Appelle
The Synod of the Anglican Church of the Diocese of Quebec
The Diocese of Saskatchewan
The Synod of the Diocese of Yukon
The Bishop of the Arctic
The Diocese of the Arctic

Releasor's Initials

Witness Initials

The Anglican Synod of the Diocese of Caledonia

The Diocesan Synod of Central Newfoundland

The Diocesan Synod of Eastern Newfoundland and Labrador

The Synod of the Diocese of Edmonton

The Diocesan Synod of Fredericton

The Synod of the Diocese of Kootenay

The Synod of the Diocese of Montreal

The Synod of the Diocese of Niagara

The Diocesan Synod of Nova Scotia and Prince Edward Island

The Incorporated Synod of the Diocese of Ontario

The Incorporated Synod of the Diocese of Ottawa

The Synod of the Diocese of Rupert's Land

The Diocese of Saskatoon

The Incorporated Synod of the Diocese of Toronto

The Diocesan Synod of Western Newfoundland

The Synod of the Diocese of Brandon

The Canada Impact North Ministries

The Company for the Propagation of the Gospel in New England (also known as The New England Company)

Anglican Parishes of the Central Interior

Releasor's Initials

Witness Initials

The Presbyterian Church in Canada

The Trustee Board of the Presbyterian Church in Canada

The Women's Missionary Society of the Presbyterian Church in Canada

The United Church of Canada

The Foreign Mission of the Presbyterian Church in Canada

Board of Home Missions and Social Services of the Presbyterian Church in Canada

The Board of Home Missions of the United Church of Canada

The Women's Missionary Society of the United Church of Canada

The Baptist Church in Canada

The Methodist Church of Canada

The Missionary Society of the Methodist Church of Canada (also known as the Methodist Missionary Society)

Sisters of Charity, a body corporate also known as Sisters of Charity of St. Vincent de Paul, Halifax also known as Sisters of Charity Halifax

The Roman Catholic Episcopal Corporation of Halifax

Les Soeurs De Notre Dame-Auxiliatrice

Les Soeurs de St. François D'Assise

Institut Des Soeurs Du Bon Conseil

Les Soeurs de Saint-Joseph de Saint-Hyacinthe (The Sisters of St. Joseph of St. Hyacinthe)

Les Soeurs De Jésus-Marie

Releasor's Initials

Witness Initials

Les Soeurs de l'Assomption de La Sainte Vierge

Les Soeurs de l'Assomption de la Sainte Vierge de l'Alberta

Les Soeurs de la Charité de St.-Hyacinthe

Les Oeuvres Oblates de l'Ontario

Les Résidences Oblates du Québec

La Corporation Épiscopale Catholique Romaine de la Baie James (The Roman Catholic Episcopal Corporation of James Bay)

The Catholic Diocese of Moosonee

Soeurs Grises de Montréal/Grey Nuns of Montreal

Sisters of Charity (Grey Nuns) of Alberta

Les Soeurs de La Charité des T.N.O.

Hôtel-Dieu de Nicolet (HDN)

The Grey Nuns of Manitoba Inc. – Les Soeurs Grises du Manitoba Inc.

La Corporation Épiscopale Catholique Romaine de la Baie d'Hudson (The Roman Catholic Episcopal Corporation of Hudson's Bay)

Missionary Oblates – Grandin

Les Oblats de Marie Immaculée du Manitoba

The Archiepiscopal Corporation of Regina

The Sisters of the Presentation

The Sisters of St. Joseph of Sault St. Marie

Les Soeurs de la Charité d'Ottawa – Sisters of Charity of Ottawa

Releasor's Initials

Witness Initials

Sisters of Instruction of the Child Jesus

Oblates of Mary Immaculate – St. Peter’s Province

The Sisters of St. Ann

The Benedictine Sisters of Mt. Angel Oregon

Les Pères Montfortains

The Roman Catholic Bishop of Kamloops Corporation Sole

The Bishop of Victoria, Corporation Sole

The Roman Catholic Bishop of Nelson Corporation Sole

Order of the Oblates of Mary Immaculate in the Province of British Columbia

The Sisters of Charity of Providence of Western Canada

Les Soeurs de Charité de la Providence des Territoires du Nord Ouest
(predecessor)

La Corporation Épiscopale Catholique Romaine de Grouard

Roman Catholic Episcopal Corporation of Keewatin

La Corporation Archiépiscope Catholique Romaine de St. Boniface

Les Missionnaires Oblates de St. Boniface - The Missionary Oblate Sisters of St.
Boniface

Roman Catholic Archiepiscopal Corporation of Winnipeg

La Corporation Épiscopale Catholique Romaine de Prince Albert

The Roman Catholic Bishop of Thunder Bay

Immaculate Heart Community of Los Angeles CA

Releasor’s Initials

Witness Initials

Archdiocese of Vancouver - The Roman Catholic Archbishop of Vancouver

Roman Catholic Diocese of Whitehorse
The Catholic Episcopal Corporation of Whitehorse

The Catholic Episcopal Corporation of MacKenzie

The Roman Catholic Episcopal Corporation of Prince Rupert

Episcopal Corporation of Saskatoon

OMI Lacombe Canada Inc.

Mt. Angel Abbey Inc.

Releasor's Initials

Witness Initials