

**STEELE AND SMITH v. LEDUC CLASS ACTION**

**NOTICE OF PROPOSED SETTLEMENT**

**Are you a current or former female employee of the City of Leduc?**

**Have you experienced sexual harassment, sexual assault or discrimination in connection with your employment and time at Leduc?**

**If so, this this potential settlement may affect you. Please read this notice carefully.**

The City of Leduc and the Representative Plaintiffs, Mindy Smith and Christa Steele, have agreed to settle a class action involving allegations that women who worked at Leduc from 2002 to present suffered discrimination, sexual harassment, and sexual assault in connection with their employment.

All current or former female employees who suffered discrimination, sexual harassment, or sexual assault may be able to receive compensation under the proposed settlement if the Court approves it.

A hearing to determine if the proposed settlement is fair, reasonable, and in the best interests of the Class Members is scheduled to take place in Edmonton, on July 4, 2023.

If approved, the settlement will provide, among other things:

1. Financial compensation for Class Members who experienced discrimination, sexual harassment, and sexual assault in connection with their employment at Leduc;
2. The option for survivors to share their experiences of discrimination, sexual harassment, and sexual assault in connection with their employment at Leduc; and
3. Review of and potential changes to Leduc's policies and other measures to address discrimination, sexual harassment, and sexual assault at Leduc.

If the proposed settlement is approved by the Court, Class Members can also “Opt Out” if they do not want to be bound by the terms of the settlement. Information about opting out is set out below.

**What kind of compensation could I be eligible for?**

Your payment will depend on the type of discrimination, sexual harassment, or sexual assault that you experienced in connection with your employment at Leduc and an assessment of the harm you suffered.

The range of individual compensation for most Class Members is between \$10,000 and \$95,000. Class Members who experienced exceptional harm may be eligible for amounts up to \$285,000.

Details are explained in the proposed settlement agreement, which is available at <https://leducclassaction.com>.

**What are your legal rights and options?**

Do nothing	If you support the settlement agreement, you do not have to do anything right now. Please note that by doing nothing, you will give up any right to object to the settlement.
Submit a statement of support	If you would like to explain why you support the settlement, you can complete a Participation Form. This form will include your name, address, and the reasons why you support the settlement. The Participation Form can be found at <a href="https://leducclassaction.com">https://leducclassaction.com</a> . You must email this Form to <a href="mailto:rmartz@bdplaw.com">rmartz@bdplaw.com</a> and it must be received or no later than June 30, 2023.
Object to the proposed settlement	If you would like to explain why you object to the settlement, you can complete a Participation Form. This form will include your name, address, and the reasons why you do not support the settlement. The Participation Form can be found at <a href="https://leducclassaction.com">https://leducclassaction.com</a> . You must email this Form to <a href="mailto:rmartz@bdplaw.com">rmartz@bdplaw.com</a> and it must be received or no later than June 30, 2023.
Attend the settlement hearing	You can attend the approval hearing at the Court of King's Bench in Edmonton, Alberta at 1A Sir Winston Churchill Square on July 4, 2023 at 2:00 pm.

**QUESTIONS ABOUT THE PROPOSED SETTLEMENT SHOULD BE DIRECTED TO CLASS COUNSEL, BURNET, DUCKWORTH & PALMER LLP:**

Robert Martz, Sydney Black, Alanna Wiercinski

2400, 525 8<sup>th</sup> Ave SE  
Calgary, AB T2P 1G1  
Calgary, AB T2P 1G1  
Tel: 403-260-0393  
Email: [rmartz@bdplaw.com](mailto:rmartz@bdplaw.com)

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