

EXPLORICA (WORLDSTRIDES) and OLD REPUBLIC INSURANCE COMPANY OF CANADA CLASS ACTION – NOTICE OF CERTIFICATION and SETTLEMENT

Molot et al. v. WorldStrides Canada, Inc., et al., Court File No. CV-20-00649798-00CP

THIS NOTICE AFFECTS YOUR RIGHTS – PLEASE READ IT CAREFULLY

TO: All persons in Canada who entered into a contract with Explorica for Trip(s) which were to occur any time during the period from January 1, 2020 to June 29, 2022, who entered into a contract of insurance with Old Republic Insurance Company of Canada related to such Trip(s).

(collectively, the “Class” or “Class Members”, as appropriate)

This Notice is published and/or being sent to you by order of the Superior Court

The Superior Court has approved a [Settlement Agreement](#) between the Plaintiffs and the Defendants Old Republic Insurance Company of Canada and WorldStrides Canada, Inc. (collectively, the “**Settling Defendants**”). In light of the voluntary payments made by the Settling Defendants to the Class Members, the case against the Settling Defendants with respect to any Old Republic Insured Trip(s) that did not occur because of covered reason “O” in the Old Republic policy will be dismissed.

All Class Members, as defined above, should by now have received their full compensation from the Settling Defendants. The dismissal of the case as against the Settling Defendants will not have any impact on the compensation that you have already received. The Settlement Agreement does not entitle any Class Members to additional compensation. Any Class Member that has not received their compensation can utilize the dispute resolution mechanism outlined in the Settlement Agreement.

The Settlement Agreement also provides that the settling defendant will pay for your legal costs, and those legal costs were not deducted from the amount of money you have received.

You are being provided with this notice because your rights are affected by the outcome of this lawsuit, and to provide you with an opportunity to “opt out” of the Settlement Agreement, if you so wish. The Settlement Agreement does not have any effect on your right to compensation, as the Settling Defendants have already provided the Class Members with compensation.

Tandia Molot, a minor by her litigation guardian Dawn Molot, Dawn Molot, Owen Mungy and Lucinda Mungy have been appointed the Representative Plaintiffs by the Court, and the law firms of Sotos LLP, Curtis Dawe, Adair Goldblatt Bieber LLP, and Samfiru Tumarkin LLP have been approved by the Court to act for the Class Members, as “Class Counsel”.

Please contact Curtis Dawe Lawyers with any questions about this class action at 709-722-5181 or at the address below. More information, including a full copy of the Settlement Agreement, is available at <https://www.sotosclassactions.com/cases/school-trip-cancellation/>.

Your right to choose whether or not to be part of the lawsuit

DO NOTHING IF YOU WISH TO PARTICIPATE IN THE SETTLEMENT AGREEMENT. If you are a person falling within the Class definition described above, you will automatically be included in the Class unless you opt out of this proceeding. **This means that you will be bound by the Settlement Agreement.**

All persons falling within the Class definition described above have already received reimbursement from the Settling Defendants directly. The decision to opt in or opt out of the proceeding will have no impact on the reimbursement that you have already received. The decision to opt in or opt out of the proceeding will not entitle any Class Members to any additional compensation, or any reduction in the compensation already received.

IF YOU DO NOT WANT TO BE BOUND BY THE SETTLEMENT AGREEMENT, you must fill out the “opt-out” form below (or a letter setting out the same information) and send it to Curtis Dawe. The deadline for opting out is August 3, 2022. If your written request to opt out is not post-marked by that date you will remain a member of the Class.

By opting out of this Class, you are confirming that you do not wish to participate in the Settlement Agreement. Please note that the Settling Defendants have already reimbursed Class Members in full; opting out will not impact the compensation that you have already received.

Once you opt-out, you will receive no further communications regarding this action from Class Counsel.

Financial consequences for you

All members of the Class who do not opt out of the class action will be bound by the Settlement Agreement. The payments have already been made by the Settling Defendants. If you wish to dispute the amount that you have received, the process to do so is described in Schedule “A” to the Settlement Agreement. The Settlement Agreement, including the schedules, can be found here <https://www.sotosclassactions.com/cases/school-trip-cancellation/>.

If you choose to opt out, you may start your own law suit against the defendants in relation to your trip(s) booked through Explorica, and insured by Old Republic, which were to occur between January 1, 2020 and June 29, 2022, but did not occur. However, the Settling Defendants have already reimbursed the amounts related to such claims in full.

Fees/Funding

The Representative Plaintiffs have retained Class Counsel to represent them and the Class in the lawsuit, and the Court has approved this appointment.

Pursuant to the Settlement Agreement, which has been approved by the Court, legal costs in the amount of \$300,000 (including HST and disbursements) are being paid by the defendant directly to Class Counsel, over and above the Settlement Amounts that have been paid to the Class. Therefore, Class Counsel’s fees did not affect the amount or extent of your recovery, and you will not have to pay Class Counsel fees.

OPT OUT NOTICE

To: Curtis Dawe Lawyers
tpayne@curtisdawe.com
Attn: Travis Payne

I confirm that I **do not** wish to be a Class Member in the class action *Molot et al. v. WorldStrides Canada, Inc., et al.*, Court File No. CV-20-00649798-00CP. I confirm that having chosen to opt-out of this class, I will receive no further communications from Class Counsel regarding this class action.

Signature

Print Name: _____

Address: _____

Postal Code: _____

Telephone: _____

Email: _____

Note: To opt out this notice must be received before August 3, 2022.