



WAGNERS
A SERIOUS INJURY LAW FIRM

MADELEINE CARTER
902.425.7330

Paralegal:
Dayna MacGillivray
dmacgillivray@wagners.co

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VIA EMAIL

Dear Advocate for the Deaf and Hard of Hearing:

**Re: *Perrier & Martell v. Attorney General of Nova Scotia and APSEA* – Hfx No. 447198
Certification of Class Action for Former Students of Nova Scotia Deaf Schools**

We are class counsel for a certified class action filed on behalf of former students who attended two schools for the deaf and hearing impaired which operated in Nova Scotia between 1913 and 1995: (i) the School for the Deaf, located in Halifax, Nova Scotia, and (ii) the Interprovincial School for the Education of the Deaf, in Amherst, Nova Scotia (subsequently named the Atlantic Provinces Resource Centre for the Hearing Handicapped, and in 1989 renamed the Atlantic Provinces Special Education Authority – Resource Centre for the Hearing Impaired).

The class action is brought against the Province of Nova Scotia and Atlantic Provinces Special Education Authority, alleging systemic physical, sexual and psychological abuse for which the Defendants are liable.

On January 31, 2019, the lawsuit was certified to proceed as a class action by the Nova Scotia Supreme Court. For your reference, I enclose a copy of the Certification Order.

The Court has ordered that court-approved notice of certification of the class action must be sent (by electronic means or otherwise) to the Society of Deaf and Hard of Hearing Nova Scotians, the Deafness Advocacy Association of Nova Scotia, and similar organizations serving the deaf and hard of hearing populations throughout each province and territory in Canada, to be posted on the organizations' websites, bulletin boards, and/or distributed to individuals as determined by the organizations or as requested by Class Members. In addition, a video blog conveying the contents of the written notice, with a sign language interpreter, shall be distributed to said organizations.

With respect to the video blog, it may be viewed on Wagners' YouTube channel at the following link:

<https://www.youtube.com/watch?v=fXIEFieWKL4>

Accordingly, please find enclosed copies of the Notice of Certification and the Opt-Out Form that we kindly ask you to, pursuant to the Court order, immediately post on your website, bulletin boards or any other areas that you determine to be appropriate so that former students of the two schools are aware of the legal proceeding.

You will see that the notice directs questions to our law firm, Wagners.

If you have any questions or concerns arising from this letter, please be in touch with us immediately and we will be happy to speak with you further concerning this matter.

Thank you for your anticipated assistance and cooperation in this important task.

Yours truly,



Maddy Carter

MADC/vcl

Enclosure