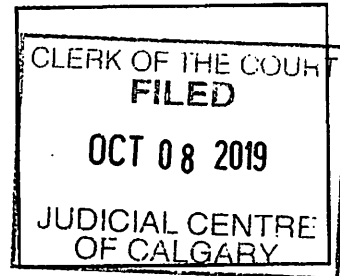


Clerk's stamp



COURT FILE NUMBER 1701-04755 JDR

COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL CENTRE CALGARY

PLAINTIFF N.B.

DEFENDANTS PHILIP HEEREMA, CALGARY EXHIBITION AND
STAMPEDE LIMITED, and CALGARY STAMPEDE
FOUNDATION

DOCUMENT CONSENT ORDER

ADDRESS FOR SERVICE AND CONTACT
INFORMATION OF PARTY FILING THIS
DOCUMENT

JENSEN SHAWA SOLOMON DUGUID HAWKES LLP
Barristers
800, 304 - 8 Avenue SW
Calgary, Alberta T2P 1C2

Carsten Jensen, Q.C., FCI Arb
Kajal Ervin
Cassandra Sutter

Phone: 403 571 1520
Fax: 403 571 1528
File: 13652.001

DATE ON WHICH ORDER WAS PRONOUNCED: October 3, 2019

LOCATION OF HEARING OR TRIAL: Calgary

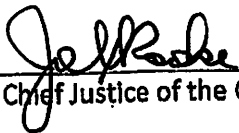
NAME OF JUDGE WHO MADE THIS ORDER: The Honourable Associate Chief
Justice J.D. Rooke

UPON THE APPLICATION of the Plaintiff, N.B., for an Order amending the Class definition; AND
UPON noting paragraph 4 of the Certification Order, filed June 24, 2019 ("Certification Order");
AND UPON noting the consent of counsel for the Defendants, Calgary Exhibition and Stampede
Limited and Calgary Stampede Foundation;

IT IS HEREBY ORDERED THAT:

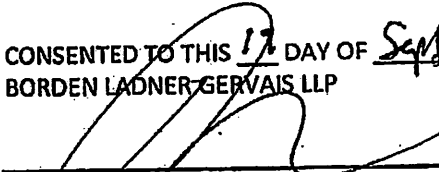
1. The "Class" as defined in paragraph 3 of the Certification Order is amended as follows:

All male students, employees, contractors or volunteers of the Young Canadians between [^]August 1, 1990 to January 31, 2014.
2. The Notice of Certification appended at pages 10 - 12 of the Certification Order is hereby replaced with Schedule "A" attached (the "Revised Notice of Certification").
3. The method of delivery of the Revised Notice of Certification is as follows:
 - (a) Class Counsel will send a copy of the Revised Notice of Certification to all Class Members who have provided them with their contact information.
 - (b) Class Counsel will arrange for the Revised Notice of Certification to be published via social media ~~once, as many times as required by the Court,~~ in the following locations: Instagram, Facebook and Twitter.
 - (c) Calgary Stampede will arrange for the Revised Notice of Certification to be published once on each Facebook alumni page for the Young Canadians by the administrator(s) for those Facebook pages. The Notice of Certification shall be removed following the expiry of the revised opt-out period.
 - (d) Class Counsel will send the Revised Notice of Certification by mail or email to any person who requests it after publication.
 - (e) Class Counsel will issue a Press Release with respect to the Revised Notice of Certification.
 - (f) Class Counsel will publish the Revised Notice of Certification on the JSS website at <https://www.jssbarristers.ca/pages/class-actions/class-actions.cfm>
 - (g) Class Counsel will publish the Revised Notice of Certification on the Canadian Bar Association Class Action Database at <http://www.cba.org/Publications-Resources/Class-Action-Database>
4. There shall be no costs in relation to this Order.
5. This Order may be consented to in counterpart and via electronic means.



Associate Chief Justice of the Court of Queen's Bench of Alberta

CONSENTED TO THIS 17 DAY OF September 2019
BORDEN LADNER GERVAIS LLP



Bruce Churchill-Smith, Q.C.
Counsel for the Defendants, Calgary Exhibition and
Stampede Limited and Calgary Stampede
Foundation

CONSENTED TO THIS 25 DAY OF September 2019
JENSEN SHAW SOLOMON DUGUID HAWKES LLP



Kajal Ervin
Counsel for the Plaintiff, N.B.

Schedule "A"

CLASS ACTION REGARDING PHILIP HEEREMA, THE CALGARY EXHIBITION AND STAMPEDE LIMITED, AND THE CALGARY STAMPEDE FOUNDATION

REVISED NOTICE OF CERTIFICATION

What is the Class Action about?

A lawsuit has been certified as a Class Action against Philip Heerema, Calgary Exhibition and Stampede Limited, and the Calgary Stampede Foundation.

The lawsuit alleges that the Class Members who were male students, employees, contractors, or volunteers with the Young Canadians organization of the Calgary Stampede Foundation and/or the Calgary Exhibition and Stampede Limited were sexually exploited, sexually lured, and / or sexually assaulted by Philip Heerema, or at risk. The lawsuit also alleges that the Calgary Stampede Foundation and the Calgary Exhibition and Stampede Limited failed to provide a safe and secure environment free of sexual exploitation and sexual abuse. Further, the lawsuit alleges that the Calgary Stampede Foundation and the Calgary Exhibition and Stampede Limited failed to adequately supervise Philip Heerema and failed to establish, implement, or enforce adequate policies, practices, or procedures to protect Class Members against sexual abuse or exploitation from staff and faculty of the Calgary Stampede Foundation and the Calgary Exhibition and Stampede Limited. The lawsuit alleges that the Calgary Stampede Foundation and the Calgary Exhibition and Stampede Limited are vicarious liable for Philip Heerema's actions.

The Representative Plaintiff, who can only be identified by his initials in accordance with a Court Order, is N.B. In this lawsuit the Representative Plaintiff is seeking damages on his own behalf and on behalf of everyone who was a male student, employee, contractor, or volunteer with the Young Canadians organization of the Calgary Stampede Foundation and the Calgary Exhibition and Stampede Limited and who was sexually exploited, sexually lured, and / or sexually assaulted by Philip Heerema, or at risk.

How do I know if I am a member of the Class?

The Class has been defined by the Court as follows:

All male students, employees, contractors or volunteers of the Young Canadians between August 1, 1990 to January 31, 2014.

If you were a male student, employee, contractor, or volunteer with the Young Canadians organization, during the time that Philip Heerema was employed there, then you are likely a Class Member.

If you are not sure whether you are a member of the Class or not, or if you would be entitled to damages should the Defendants be found responsible and required to pay damages, then you should speak to Class Counsel, whose address is set out below.

How do I participate in this Class Action?

Class Members who wish to participate in the Class Action do not need to do anything at this time. They are automatically included in the Class Action.

Class Members who wish to participate are also encouraged to contact Jensen Shawa Solomon Duguid Hawkes LLP ("Class Counsel") at:

Kajal Ervin / Cassandra Sutter
Jensen Shawa Solomon Duguid Hawkes LLP
#800, 304 – 8 Avenue SW
Calgary, Alberta T2P 1C2
(403) 571-1520
classactions@jssbarristers.ca

What if I do not want to participate in the Class Action?

Any Class Member who wishes to opt out of the Class Action must do so by sending a written opt out form, signed by the Class Member, stating that he opts out of the Class Action. The written opt out form can be obtained from Class Counsel, and must be sent by pre-paid mail, courier, or e-mail to Class Counsel at the address above.

The written opt-out form must be received by Class Counsel no later than December 30, 2019.

Class Members may be permitted to opt out of the Class Action after December 30, 2019 and prior to approval of settlement, if applicable, upon further order of the Court. If you opt-out of the Class Action, you will take full responsibility for initiating your own lawsuit against the Defendants and for taking all legal steps necessary to protect your claim, if you wish to proceed with a claim.

What are the costs to me?

Class Members will not be personally liable to pay any legal fees or disbursements to Class Counsel.

If Class Counsel is successful in establishing that the Defendants are liable to pay money to the Class Members, the Court will then proceed to determine which Class Members may be entitled to that money, and how such amounts should be distributed to those Class Members.

The Representative Plaintiff has retained Class Counsel to represent him and the Class in this lawsuit. Class Counsel will only be paid legal fees if the lawsuit is successful. If the lawsuit is successful, Class Counsel will request that legal fees be set by the Court.

If the Class Action is successful, legal costs will be deducted from the amounts recovered for the Class Members, but only after such costs are approved by the Court.

How do I find out more about this Class Action?

Questions about the matters in this Notice must not be directed to the Court. The Certification Order and other information with respect to this Class Action can be obtained at the following website: www.jssbarristers.ca/pages/class-actions/class-actions.cfm

In addition, questions for Class Counsel should be directed by mail, e-mail, or telephone to:

Kajal Ervin / Cassandra Sutter
Jensen Shawa Solomon Duguid Hawkes LLP
#800, 304 – 8 Avenue SW
Calgary, Alberta T2P 1C2
(403) 571-1520
classactions@jssbarristers.ca