



Civil Litigation Section
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November 19, 2018

Our File Number: 8987642

BY ELECTRONIC MAIL

Federal Court of Appeal
Thomas D'Arcy McGee Building
90 Sparks Street
Ottawa, ON K1A 0H9

Attention: Registrar

Dear Sir/Madam:

Re: *Frame et al. v. Riddle, et al.*, FCA File No. 18-A-40

I write on behalf of all counsel in this matter including the counsel who withdrew from the application prior to the Court's decision.

Everyone involved, counsel and clients, are anxious to move forward; however, the settlement agreement requires the exhaustion of all appeals prior to implementation. In order to facilitate timely implementation, counsel have agreed that the moving parties will not seek to appeal nor seek leave to appeal the decision rendered by the Federal Court of Appeal in this matter or any other decision made in connection with the Sixties Scoop Settlement Agreement and the responding parties will not to seek costs either against the moving parties or their counsel. A written agreement documenting this arrangement and signed by all concerned is enclosed.

Accordingly, the parties respectfully thank the Court and advise that the Implementation Date of the Sixties Scoop Settlement Agreement will be December 1, 2018.

Yours truly,

Catharine Moore
General Counsel
CM/epa

Encl. Signed Agreement

cc. Jai Singh Sheikhpura, Thomas G. Keast (Watson Goepel LLP)
E.F. Anthony Merchant, Evatt Merchant (Merchant Law)
Kirk M. Baert, Garth Myers, Celeste Poltak (Koskie Minsky)
David Klein, Angela Bepflug, Doug Lennox, Aden Klein (Klein Lawyers)
Brian Meronek, William Klym (DDWest LLP)
Doug Racine (Aboriginal Law Group)
Travis Henderson (Department of Justice Canada)

CLASS PROCEEDING

COURT FILE NO.: 18-A-40

BETWEEN:

**JOAN FRAME, PETER CHRISTOPHER VAN NAME, NOELINE VILLEBRUN, ROSE
SICCAMA, GUNARGIE O'SULLIVAN, COLLEEN RIJOTT, MARK HANDLEY,
SARAH RAIN, VIOLET CHRISTINE DAVID, MELANIE MORRUSSEAU and
JOSAPHINE DENIS**

Applicants

- and -

**JESSICA RIDDLE, WENDY LEE WHITE AND CATRIONA CHARLIE
and HER MAJESTY THE QUEEN**

Respondents

- and -

WATSON GOEPEL LLP, DD WEST LLP and ABORIGINAL LAW GROUP

Applicants' Solicitors

**SIXTIES SCOOP CLASS ACTION FEDERAL COURT OF APPEAL
COSTS SETTLEMENT AGREEMENT**

WHEREAS the Applicants applied for leave to exercise the right of appeal of the Respondents Jessica Riddle, Wendy Lee White and Catriona Charlie in this matter (the "Application");

AND WHEREAS the Application was dismissed by the Reasons for Order of Justice Laskin of the Federal Court of Appeal dated November 8, 2018;

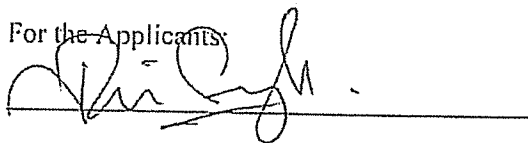
AND WHEREAS the Respondents sought costs in respect of the Application against the Applicants' Solicitors;

NOW THEREFORE in consideration of the mutual agreements, covenants and undertakings set out herein, the parties, being the Applicants, the Applicants' Solicitors and the Respondents agree with each other as follows:

1. The Applicants' Solicitors will not seek to appeal nor seek leave to appeal the decision rendered by the Federal Court of Appeal in this matter on November 8, 2018 or any other decision made in connection with the Sixties Scoop Settlement Agreement;
2. Counsel for the Respondents will not seek costs against the Applicants' Solicitors in connection with the November 8, 2018 decision;
3. The Respondents' Counsel and the Applicants' Counsel warrant that:
 - a. Counsel executing this letter have discussed this agreement with their respective clients; and
 - b. Their respective clients agree to its terms and have confirmed that they will not take any further steps of any kind whatsoever to delay implementation of the settlement, including an appeal or an application for leave to appeal of the decision rendered by the Federal Court of Appeal in this matter on November 8, 2018 or otherwise.

Signed this 16 day of November, 2018.

For the Applicants:



WATSON GOEPEL LLP

For the Applicants:

DD WEST LLP

For the Applicants:

ABORIGINAL LAW GROUP

For the Respondents:

Catherine Moore

HER MAJESTY THE QUEEN

For the Respondents:

[Handwritten Signature]

KOSKIE MINSKY LLP

For the Respondents:

MERCHANT LAW GROUP LLP

For the Respondents:

KLEIN LAWYERS LLP

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1. The Applicants' Solicitors will not seek to appeal nor seek leave to appeal the decision rendered by the Federal Court of Appeal in this matter on November 8, 2018 or any other decision made in connection with the Sixties Scoop Settlement Agreement;
2. Counsel for the Respondents will not seek costs against the Applicants' Solicitors in connection with the November 8, 2018 decision;
3. The Respondents' Counsel and the Applicants' Counsel warrant that:
 - a. Counsel executing this letter have discussed this agreement with their respective clients; and
 - b. Their respective clients agree to its terms and have confirmed that they will not take any further steps of any kind whatsoever to delay implementation of the settlement, including an appeal or an application for leave to appeal of the decision rendered by the Federal Court of Appeal in this matter on November 8, 2018 or otherwise.

Signed this ____ day of November, 2018.

For the Applicants:

WATSON GOEPEL LLP

For the Applicants:



DD WEST LLP

For the Applicants:



ABORIGINAL LAW GROUP

For the Respondents:

HER MAJESTY THE QUEEN

For the Respondents:

KOSKIE MINSKY LLP

For the Respondents:

MERCHANT LAW GROUP LLP

For the Respondents:



KLEIN LAWYERS LLP

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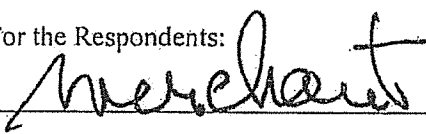
For the Respondents:

HER MAJESTY THE QUEEN

For the Respondents:

KOSKIE MINSKY LLP

For the Respondents:



MERCHANT LAW GROUP LLP

For the Respondents:

KLEIN LAWYERS LLP

KM-3509148v1