

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

CANADIAN FEDERATION OF STUDENTS,
CANADIAN FEDERATION OF STUDENTS BRITISH COLUMBIA COMPONENT
and
CANADIAN FEDERATION OF STUDENTS-SERVICES

PLAINTIFFS

AND:

KWANTLEN UNIVERSITY COLLEGE STUDENT ASSOCIATION

DEFENDANT

MINUTES OF SETTLEMENT

1. Kwantlen University College Student Association (the "Association") will pay to the Plaintiffs a total of \$108,533.15 as follows:
 - a. by consent to payment of \$78,344.78 out of court;
 - b. payment of the balance by certified cheque payable to the Plaintiffs, delivered no later than February 19, 1999.

Such amount includes all membership fees in the Plaintiffs up to and including the academic year 1991/1992.


2. The Association acknowledges that the referendum on membership in the Plaintiffs held September 25, 1991, was invalid and that it has continued to be a member of the Plaintiffs subject to the terms of this Agreement.
3. The Plaintiffs and the Association agree to hold a referendum of the Association's members (the "Referendum") on its continued membership in the Plaintiffs on the following terms:
 - a. the Referendum is to be held on dates to be mutually agreed upon, but no later than October 30, 1999, unless otherwise agreed in writing, such dates to be determined at least 90 days prior to the Referendum dates;
 - b. the Referendum will be conducted in accordance with the Plaintiffs' current by-laws;
 - c. the Association will not hold a referendum on membership in any other student organization within 90 days of the Referendum;
 - d. neither the Association nor its Executive Council members will, directly or indirectly, support either side of the Referendum;
 - e. the Referendum question is to be agreed but shall be on the continued membership of the Association and shall not refer to fees.
4. In consideration for the above, the Plaintiffs waive any claim for membership fees from the Association from academic year 1992/1993 to the date of the Referendum.

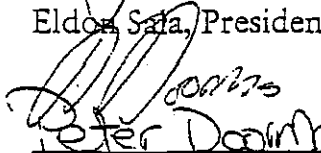
5. If the Referendum approves continued membership, the Association and the Plaintiffs will cooperate in arranging for the collection by the College and direct payment to the Plaintiffs of the Plaintiffs' membership fees as soon as possible. The Association's obligation to pay membership fees shall be contingent upon the College's collection thereof.
6. The Association and each member of its current Executive Council agree:
 - a. not to disclose the terms of this Agreement to any other person, except as required by law or to the Association's legal and accounting advisors or as required by this Agreement;
 - b. to fully explain the terms of this Agreement and the obligations of the Association and its Executive Council under it to any new Executive Council members joining it subsequent to this Agreement.
7. This Agreement constitutes a comprehensive settlement of all claims made by the parties in the British Columbia Supreme Court, Vancouver Registry Action No. C974704. The trial herein shall be adjourned generally forthwith and the parties' solicitors will sign a Consent Dismissal Order to be filed only on completion of all obligations hereunder.
8. The parties will exchange full and final Releases of all claims up to the date of this Agreement, which shall only be effective on completion of payment hereunder.
9. The signatories of this Agreement warrant and represent that they are authorized to enter into this Agreement, subject to ratification by the appropriate executive committees/councils/officers of their organizations, which ratification shall take place no later than February 5, 1999. This Agreement shall be deemed to be

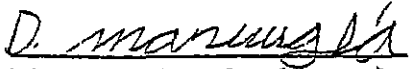
binding effective February 5, 1999, in the absence of written notice to the other party of non-ratification prior thereto. The Executive Council Members of the Association will sign a copy of this Agreement to confirm their obligations hereunder on or before February 5, 1999, which copy will be delivered to the Plaintiffs' solicitors.


DATED this 27th day of January, 1999.


For the Kwantlen University College Student Association and for each Member of its Executive Council in his/her personal capacity:



 Eldon Sata, President

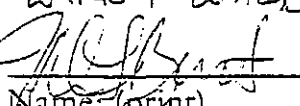

 Peter Doornbos Campus Director Newton
 Name: (print)


 Name: (print) DAVID MARVAGLIA, CAMPUS DIRECTOR


 Name: (print) HEATHER ARTHUR, OMBUDSPERSON


 Name: (print) Kelsy Munn, Richmond Campus Director


 Name: (print) WARREN WALKER - VICE PRESIDENT FINANCE AND OPERATIONS


 Name: (print) MICHELLE BURT Campus Director

Name: (print)

Name: (print)

Name: (print)

For the Canadian Federation of Students:

Name: (print)

For the Canadian Federation of Students British Columbia Component

Maura Parte, Chair

For the Canadian Federation of Students-Services

Name: (print)

