

FEDERAL COURT OF CANADA

BETWEEN:

Radu Hociung

Plaintiff

and

Minister of Public Safety and Emergency Preparedness

Defendant

PROPOSED TIMETABLE

Radu Hociung

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TO:

The Registrar

Federal Court of Canada

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Mr. Prothonotary Aalto,

1. I am writing to provide the Plaintiff's proposed timetable to govern the remaining steps in this action, as ordered by Madam Prothonotary Milczynski on September 21, 2016.
2. Also, should a teleconference be appropriate, I am available every Monday-Thursday all day, and Fridays after 2pm EST. I currently live in rural Guatemala, and can communicate by phone, Skype, Google Talk, or other such methods. I would like to mention that infrastructure here is unreliable, and at times, power and/or internet/phone are down for hours at a time. Such events happen about once a month, so there is a very small chance that I could be prevented from attending a scheduled teleconference. However, in such a case, I should still be able to call in via cell-phone.
3. The current state of the action is stalled in the examination for discovery phase. On July 19, 2016 I served upon the Defendant the Plaintiff's Written examination questions, and on July 21st, Mr. Eric Peterson, Crown Counsel for the Defendant agreed to provide his client's response within 30 days, as provided by Federal Court Rules. At the same time, he indicated that his client was considering whether to use the same form of discovery for me, the Plaintiff, namely, written questions.
4. On August 11, I requested an update from Mr Peterson regarding the CBSA's examination of me, and at the same time I requested his consent to my amending the Statement of Claim based on facts discovered in the Defendant's Affidavit of Documents.
5. In response to the request to amend the Statement of Claim, the Defendant, declined consent, and further changed his earlier decision to respond to my Written Examination questions, stating that he would pursue an order that both parties conduct oral, rather than written

examinations.

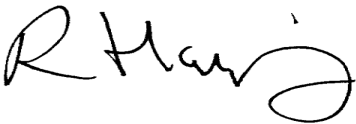
6. I informed Mr Peterson that I do not object to being examined orally, but I would like the answers to my examination questions be given in writing, as he had agreed on July 21st.

Proposed timetable

7. Written Examination Response from the Defendant ... by December 1st, 2016
8. Motion for Leave to Amend the Statement of Claim ... by December 14, 2016, or 2 weeks after Exam response.
9. Serve Defendant with Request to Admit ... by December 14, 2016, or 2 weeks after Exam response.
10. Requisition of Trial entered by December 14th, 2016, or 2 weeks after Exam response.
11. Serve request to admit to Defendant ... by December 14, 2016, or 2 weeks after Exam response.
12. Pre-Trial Conference ... as soon as the Court schedules it.
13. Trial ... as soon as the Court schedules it.

ALL OF WHICH IS RESPECTFULLY SUBMITTED

Dated at Panajachel, Guatemala this 11th day of November, 2016



Radu Hociung, Plaintiff