

FEDERAL COURT OF CANADA

BETWEEN:

Radu Hociung

Plaintiff

and

**Minister of Public Safety and Emergency Preparedness
and
Canada Border Services Agency
and
Her Majesty the Queen in Right of Canada**

Defendants

**LETTER TO THE COURT
Re: Response to Gleeson May 1 "Direction"**

Radu Hociung
246 Southwood Drive
Kitchener, Ontario
N2E 2B1
Tel: (519) 883-8454
Fax: (226) 336-8327
email: radu.cbsa@ohmi.org

TO:

The Registrar
Federal Court of Canada
180 Queen Street West
Suite 200
Toronto, Ontario
M5V 3L6

AND TO:

Eric Peterson, Counsel to the Defendant
DEPARTMENT OF JUSTICE
Ontario Regional Office
120 Adelaide Street West
Suite 400
Toronto, Ontario
Tel: (647) 256-7550
Fax: (416) 973-5004

May 6, 2020

Mr Gleeson,

In response to your May 1, 2020 letter titled “Direction”, the Plaintiff reiterates that the parties are mutually available for a “case management” teleconference, every day and at every time between the date of the letter, April 24, 2020 and December 18, 2020, as specified by the Honourable Chief Justice in his April 4 Covid order. For greater clarity, this means the parties are available at the following specific dates and times:

- Friday, 24 April 2020 at 9:00am, 10:00am, 11:00am, 12:00am, 1:00pm, 2:00pm, 3:00pm and 4:00pm EDT
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- Wednesday, 2 December 2020 at 9:00am, 10:00am, 11:00am, 12:00am, 1:00pm, 2:00pm, 3:00pm and 4:00pm EDT
- Thursday, 3 December 2020 at 9:00am, 10:00am, 11:00am, 12:00am, 1:00pm, 2:00pm, 3:00pm and 4:00pm EDT
- Friday, 4 December 2020 at 9:00am, 10:00am, 11:00am, 12:00am, 1:00pm, 2:00pm, 3:00pm and 4:00pm EDT
- Monday, 7 December 2020 at 9:00am, 10:00am, 11:00am, 12:00am, 1:00pm, 2:00pm, 3:00pm and 4:00pm EDT
- Tuesday, 8 December 2020 at 9:00am, 10:00am, 11:00am, 12:00am, 1:00pm, 2:00pm, 3:00pm and 4:00pm EDT
- Wednesday, 9 December 2020 at 9:00am, 10:00am, 11:00am, 12:00am, 1:00pm, 2:00pm, 3:00pm and 4:00pm EDT
- Thursday, 10 December 2020 at 9:00am, 10:00am, 11:00am, 12:00am, 1:00pm, 2:00pm, 3:00pm and 4:00pm EDT
- Friday, 11 December 2020 at 9:00am, 10:00am, 11:00am, 12:00am, 1:00pm, 2:00pm, 3:00pm and 4:00pm EDT

- Monday, 14 December 2020 at 9:00am, 10:00am, 11:00am, 12:00am, 1:00pm, 2:00pm, 3:00pm and 4:00pm EDT
- Tuesday, 15 December 2020 at 9:00am, 10:00am, 11:00am, 12:00am, 1:00pm, 2:00pm, 3:00pm and 4:00pm EDT
- Wednesday, 16 December 2020 at 9:00am, 10:00am, 11:00am, 12:00am, 1:00pm, 2:00pm, 3:00pm and 4:00pm EDT
- Thursday, 17 December 2020 at 9:00am, 10:00am, 11:00am, 12:00am, 1:00pm, 2:00pm, 3:00pm and 4:00pm EDT
- Friday, 18 December 2020 at 9:00am, 10:00am, 11:00am, 12:00am, 1:00pm, 2:00pm, 3:00pm and 4:00pm EDT

Additionally, the Plaintiff notes that he did not use the language “generally available” in his letter to the Court, although this specific language was used by the Defendant in communication with the Plaintiff when we were consulting regarding availability. It is therefore obvious to the Plaintiff from this slip and others that you are privately instructed by the Defendant.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Hociung'.

Radu Hociung - Plaintiff