

**FEDERAL COURT OF CANADA**

BETWEEN:

**Radu Hociung**

Appellant

and

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

Respondents

**LETTER TO THE COURT  
Re: Costs**

Radu Hociung  
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Kitchener, Ontario  
N2E 2B1  
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**TO:**

Department of Justice  
Mr. Eric Peterson, Counsel for the Respondent  
120 Adelaide Street West  
Suite #400  
Toronto, Ontario  
M5H 1T1  
by fax: (416) 973-5004

**AND TO:**

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

## **Re: Court dockets A-101-18 and A-102-18, Costs**

### **Honourable Court,**

1. At the May 23, 2019 Toronto hearing of these appeals before Justices Gauthier, Webb and Rivoalen, the Appellant was directed to serve and file a letter by June 7, 2019 explaining what makes the Crown vicariously liable for the actions of the four individuals named in the Statement of claim, to make submissions pertaining costs, and to respond to the Respondent's Letter to the Court date May 29, 2019.
2. On June 7, the Appellant filed and served the letter explaining the Crown's liability, and requested an extension of time to make costs submissions.
3. The Appellant hereby respectfully submits his costs for the two appeals, and for the two motions that were appealed, from the Federal Court docket T-1450-15, including itemized summaries, enclosed.
4. Although the Appellant is self represented, he is entitled to compensation for his time in handling this matter (*Yu. v. Canada (AG)*, 2011 FCA 42 at para 37; *Sherman v. Canada (Minister of National Revenue)*, 2003 FCA 202 at para 42-52, *Air Canada v. Thibodeau* 2007 FCA 115 at para 24). This case is much larger than a simple non-reporting infraction, which is only the tip of the iceberg. The real issue is that of money laundering by a Crown corporation, which has required much research and preparation. The appellant saw this work as so important as he practically abandoned his electrical engineering career to focus on learning and prosecuting this case. Even this choice is likely orders of magnitude cheaper than if he had hired professional lawyers to do the same work. That would have been financially untenable
5. The Appellant normally works in engineering, at a rate of \$110/hour
6. Please note that the Appellant lives in Mexico, and the seized coins that are at the heart of this proceeding are currently located at the Queenston Bridge Point of Entry, in Niagara Falls, Ontario. Should your determination be that the coins must be returned, kindly provide additional costs to cover the Appellant's travel to pick up the coins. The CBSA has informed the Appellant that they do not ship seized items, and they would

have to be picked up in person.

***All of which is respectfully submitted,***

A handwritten signature in black ink, appearing to read 'R. Hociung', with a stylized, cursive script.

Radu Hociung - Appellant

Summary

**Radu Hociung A-101-18 and A-102-18 Costs Summary**

	Disbursements	Time (hours)
T-1450-15 Motion to Amend Statement of Claim	\$133.34	5
T-1450-15 Defendant's Motion for Summary Judgment	\$1,171.50	126
A-101-18 and A-102-18 Appeals	\$3,390.75	94.5
<b>Total:</b>	<b>\$4,695.59</b>	<b>225.5</b>

**A-101-18 and A-102-18 Appeals Costs**

<b>Date</b>	<b>A-101-18 and A-102-18 Disbursements</b>	<b>Local currency</b>	<b>Disbursement</b>	<b>Prep Time (hours)</b>
2018-03-27	Filing appeal notices		\$100.00	
	<b>Appeal Books v1 (registry requested retraction)</b>			
	Prepare			8
	Printing	MXN 3100	\$229.63	
2018-05-09	Shipping	MXN 4200	\$311.10	
	Affidavit of service		\$50.00	
	<b>Appeal Books v2 (registry refused filing)</b>			
2018-05-26	Printing supplies (Staples, Canada Computers)		\$333.51	
2018-05-28	Filing in person in Toronto (return flight from Mexico)		\$605.40	
	outcome: registry refused on ground agreement had not been filed			
	<b>Motion requesting preparation of Appeal Book</b>			
2018-06-22	Preparation			1
2018-06-22	Affidavit of service		\$50.00	
	<b>Appeal Books v3 (accepted for filing)</b>			
2018-08-13	Printing v3	MXN 3285.5	\$243.37	
	Shipping	MXN 3900	\$288.89	
	Affidavit of service		\$50.00	
	<b>Memorandum of Fact and Law</b>			
	Preparation			16
2018-10-31	Fax delivery			
2018-10-31	Affidavit of service		\$50.00	
	<b>Book of Authorities</b>			
	Preparation			2
2018-04-18	Printing		\$111.10	
2018-04-18	Shipping		\$140.47	
2018-04-23	Affidavit of service		\$50.00	
	<b>Hearing May 23</b>			
	Study, Preparation, rehearsing			67

A-101-18, A-102-18 Appeals

2018-12-19	Requisition			0.5
2018-12-21	Affidavit of service		\$50.00	
2019-05-21	Flight to TO		\$330.10	
	Flight to CUN		\$263.59	
	Bus + Taxi		\$52.16	
	Printing, Supplies		\$81.43	
		<b>Total:</b>	<b>\$3,390.75</b>	<b>94.5</b>

**T-1450-15 Plaintiff's Motion for Leave to Amend Statement of Claim**

<b>Date</b>	<b>Item</b>	<b>Local Cost</b>	<b>CAD cost</b>	<b>Time to prepare (hours)</b>
	<b>Motion to Amend statement of Claim T-1450-15</b>			
	Preparation			4
2017-02-21	Faxed			
2017-02-21	Affidavit of service	400 GTQ	\$66.67	
	<b>Reply to Respondent's Motion Responding Motion Record</b>			
	Preparation			1
2017-03-06	Emailed Mar 6, 2017			
2017-03-07	Affidavit of service	400 GTQ	\$66.67	
		<b>Total:</b>	<b>\$133.34</b>	<b>5</b>

**T-1450-15 Defendant's Motion for Summary Judgment**

<b>Date</b>	<b>Item</b>	<b>Local Cost</b>	<b>CAD costs</b>	<b>Time to prepare (hours)</b>
<b>Response to Defendant's motion for Summary Judgment</b>				
	Preparation			126
2017-03-26	Printing, binding	3335 GTQ	\$555.83	
2017-03-27	Shipping (Guatemala > TO)	3294 GTQ	\$549.00	
2017-03-27	Affidavit of service	400 GTQ	\$66.67	
	<b>Total:</b>		<b>\$1,171.50</b>	<b>126</b>