

Ministère de la Justice Canada

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Via Email

Our File Number: LEX-500033945

August 2, 2024

Registrar Federal Court Thomas D'Arcy McGee Building 90 Sparks Street, Main Floor Ottawa, ON K1A 0H9

Dear Sir/Madam:

Re: Ronsco Inc. v. His Majesty the King et al. (Court File No: T-1295-20)

I ask that this letter be placed before Associate Judge Horne, the case management judge assigned to the above-noted proceeding. I write on behalf of the Parties to provide a status update in this matter, per the Direction of Associate Judge Horne dated June 6, 2024.

In accordance with the timetable established by the Court, the Defendants provided their response to the last outstanding undertaking (Question 1343) on July 26, 2024.

Following discussions between the Parties, the Defendants have consented to certain amendments contained in a Draft Amended Fresh as Amended Statement of Claim proposed by the Plaintiff, on the condition that the Plaintiff's representative attend a further examination for discovery of three hours with respect to the subject matter of these amendments. The Plaintiff has agreed, and the Parties intend to schedule the further examination for Fall 2024 following service of the Plaintiff's Amended Fresh as Amended Statement of Claim.

In light of the above agreement, the Parties request that the Court amend the timeline for next steps in this proceeding as follows:

- Answers to undertakings arising from the further examination of the Plaintiff's representative shall be served within 30 days of the date of the examination;
- Any motions arising from examinations for discovery shall be served and filed within 30 days of the completion of answers to undertakings.

The Parties do not believe that a case management conference is required at this time but remain available should the Court wish to convene a case management conference.

Yours sincerely,

Adrian Johnston A/ Senior Counsel Civil Litigation Section

Encl.

cc. Colin Baxter, Chris Trivisonno, and Sean Grassie, Counsel for the Plaintiff

