



Department of Justice  
Canada

Ministère de la Justice  
Canada

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**VIA EMAIL**

Our File Number: LEX-500040961

May 4, 2021

Federal Court  
90 Sparks Street  
Ottawa, Ontario  
K1A 0H9

Dear Ms. Craigie:

**Re: *TURMEL, John v Her Majesty the Queen* (Court File No. : T-130-21)**

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I am writing on behalf of the defendant in the above-noted matter, Her Majesty the Queen in Right of Canada (“Canada”), in response to the Court’s April 27, 2021, direction. I ask that you kindly place this letter before the case-management judge, Madam Prothonotary Ayles.

Although the parties conferred regarding the timetable for next steps, we were unable to come to an agreement. Canada’s proposed timetable for its joint motions to strike and for security for costs (in the alternative) are as follows:

- Service and filing of Canada’s Notice of Motion and Affidavits: 15 days from the date that the Court implements this timetable
- Service and filing of the Plaintiff’s Affidavits: 15 days from the date that Canada serves its Notice of Motion and Affidavits
- Cross-examinations on affidavits: 10 days from the date that the Plaintiff serves his Affidavits
- Service and filing of Canada’s Motion Record: 15 days from the expiration of the time for cross-examinations, or, if the Plaintiff does not intend to serve an affidavit or conduct cross-examinations, 15 days from the date that Canada is advised of this
- Service and filing of the Plaintiff’s Responding Record: 15 days from the date that Canada serves its Motion Record
- Service and filing of Canada’s Reply Submissions: 7 days from the date that the Plaintiff serves his Responding Record

Canada 

Canada is available for a case management conference at the following times:

- May 10, 11, 14, 17, 18, 19 at any time
- May 6 after 12pm
- May 7 after 11:30am
- May 13 after 11am

Sincerely,

A handwritten signature in black ink, appearing to read 'Ben Wong', with a stylized flourish extending from the end.

Benjamin Wong  
Counsel

c.c. (via email)

John Turmel, plaintiff