

**Tax Dispute with Canada Revenue Agency ("CRA")
Update January 8, 2013**

In an order dated November 8, 2012, upon joint application the Tax Court of Canada amended the original Order (from June 1, 2012) to provide the following deadlines concerning action number 2009-2248(IT)G (the MLP action):

- The examinations for discovery are to be completed by February 28, 2013;
- Undertakings given at the discoveries are to be satisfied by April 30, 2013; and
- The parties are to report to the Hearings Coordinator on or before May 14, 2013 to advise the Court whether the case will settle, whether a Settlement Conference would be beneficial or whether a hearing date should be set (by joint application to fix a time and place for the hearing).

In an order dated November 6, 2012, upon joint application the Tax Court of Canada amended the original Order (from June 1, 2012) to provide the following deadlines concerning action number 2009-2247(IT)G (the PLP No. 207 action):

- The examinations for discovery are to be completed by February 28, 2013;
- Undertakings given at the discoveries are to be satisfied by April 30, 2013; and
- The parties are to report to the Hearings Coordinator on or before May 14, 2013 to advise the Court whether the case will settle, whether a Settlement Conference would be beneficial or whether a hearing date should be set (by joint application to fix a time and place for the hearing).

The examination for discovery of the Respondent's representative, namely David Duff, has been scheduled for January 22, 23, 24, and 25 of 2013 in Ottawa, ON. The examination of Sentinel Hill's representative will follow in February of 2013.