

**SHAAE (2001) Master Limited Partnership
Litigation Update November 10, 2014**

Following several exchanges of communications, the parties (being the Appellants, via counsel Gall Legge Grant & Munroe LLP (“GLGM”), and the Respondent, via Crown counsel Robert Carvalho) have jointly submitted dates for the completion of the discovery process.

The proposed dates are as follows:

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| Complete Examinations for Discovery by: | April 30, 2015 |
| Satisfy Undertakings from Discoveries by: | June 30, 2015 |
| Communicate with the Hearings Coordinator, in writing, 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: | July 31, 2015 |

The Court will consider these proposed dates and advise the parties in due course.

These proposed dates were arrived at as the result of a compromise, as Appellants’ counsel was arguing for earlier dates while Canada Revenue Agency (“CRA”), through Crown counsel, argued for later dates.

Crown counsel suggested a settlement conference be scheduled. GLGM again expressed its interest in serious settlement negotiations, including a settlement conference.