



**Department of Justice  
Canada**

**Ministère de la Justice  
Canada**

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Via E-mail

Our File Number: LEX-500161762

May 31, 2024

**The Administrator**

Federal Court  
Pacific Centre  
PO Box 10065  
701 West Georgia Street  
Vancouver, BC V7Y 1B6

**ATTN: Registry Officer Carla Lessard**

Email: Carla.Lessard@cas-satj.gc.ca

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	Carla Lessard	E	
Ottawa, ONT		- 7 -	

Dear Registry Officer:

**Re: Payne et al v HMK (Court File No.: T-2142-23)**  
Status Review

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Please accept, by this letter, Canada’s response to the Plaintiff’s representations in respect of the Status Review of the above noted file and place the same before Ms. Carla Lessard for her attention.

Canada intends to defend this matter and to pursue a motion to strike this proposed class proceeding. Canada acknowledges that the Plaintiff has communicated with Canada to determine a mutually acceptable timetable to proceed regarding which the parties have not yet agreed.

Canada cannot agree to the Plaintiff’s proposed timetable and proposes that: Canada serve and file its motion to strike the Statement of Claim by **August 19, 2024**; the Plaintiff serve and file her response by **September 30, 2024**; and that a hearing be scheduled thereafter, if required, based on the availability of the parties and at the Courts earliest availability.

Canada is available for a case management conference in the month of June except for June 10 – 13.

Sincerely,

A handwritten signature in blue ink, appearing to read "Adam Gilani". The signature is fluid and cursive, with the first name "Adam" and last name "Gilani" clearly distinguishable.

Adam Gilani  
Counsel  
National Litigation Sector

CC: Umar Sheikh (umar@sheikhlaw.ca), Counsel for the Plaintiffs