



Department of Justice
Canada

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Our File/Notre dossier: 8734327
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SPECIFIC CLAIMS TRIBUNAL
TRIBUNAL DES REVENDICATIONS
PARTICULIÈRES

September 26, 2018

RECEIVED / REÇU
OTTAWA, ON

September 26, 2018

VIA E-FILING

Specific Claims Tribunal
4th Floor, 427 Laurier Avenue West
P.O. Box 31
Ottawa, Ontario
K1R 7Y2

Dear Sir/Madam:

**Re: Joint Request for a six month Stay of Proceedings
Keeseekoose SCT-5001-16**

Please place the within letter before the Honourable Justice Harry Slade prior to the pre-hearing CMC scheduled to take place on the above-noted file on September 27, 2018.

The parties jointly request a six month stay of proceedings and an adjournment of the expert evidence hearing scheduled for November 13-16, 2018 to see if the validity stage of above-noted Claim can be resolved outside of the Tribunal.

Both parties are committed to reconciliation and prefer to resolve this Claim through negotiation, if possible. The parties submit that a six month stay of proceedings would provide the parties an opportunity to determine whether a negotiated resolution is feasible. We request this opportunity to do so prior to the parties and Tribunal spending additional time and resources on this Claim.

Both parties have filed historical expert reports and response reports in May and August 2018, which will be relied upon.

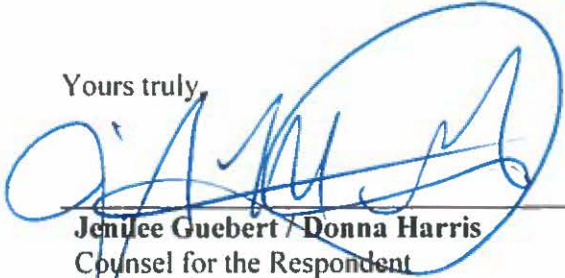
Subject to the consideration of the Tribunal, over the next six months the parties agree to undertake the following:

- advise the Tribunal in writing on or before January 14, 2019 of our progress towards negotiating a resolution;
- provide the Tribunal with a plan of scheduled meetings, once one is in place, with the first meeting arranged to take place on or by October 22, 2018;
- provide the Tribunal with status reports upon request;
- if it appears the parties are unable to resolve the validity phase by March 2019, the parties will request a CMC by April 2, 2019 to reschedule the expert evidence hearing; and

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- that either party may reactivate the Claim upon 30 days' written notice to the opposing party and Tribunal.

Yours truly,



Jenilee Guebert / Donna Harris
Counsel for the Respondent
Prairie Region
Department of Justice Canada



Steve Carey / Amy Barrington
Counsel for the Claimant
Maurice Law