



By Email

April 20, 2022

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Attention: Simon Lin

Department of Justice Canada
Civil Litigation Section
50 O'Connor Street, Suite 500
Ottawa, ON
K1A 0H8

Attention Lorne Ptack
J. Sanderson (Sandy) Graham

Dear Sirs:

Re: *Air Passenger Rights v AGC*
Court File No.: A-102-20

We are writing further to the Court's Order dated April 11, 2022 ("Additional Production Order").

Additional Production Order – Paragraph 4

Pursuant to paragraph four (4) of the Additional Production Order, the Agency has been ordered to produce the documents identified as items A1, A5, C2 and B4 in the Appendix to the Reasons for the Order.

Item A1 - Included in the email accompanying this letter are links to the original Microsoft Word files for the Statement on Vouchers, and drafts of the Statement on Vouchers, attached to emails that were sent to/from a CTA Member (including the Chairperson and Vice-Chairperson) between March 9, 2020 and March 25, 2020.

Item A5 - Included in the email accompanying this letter is a link to the original Microsoft Word file(s) for the template media response in the March 24, 2020 at 7:34PM email sent by the Chairperson with subject line "Answer," which were sent to/from a CTA Member (including the Chairperson and Vice-Chairperson) between March 24, 2020 and March 25, 2020.

Item B4 – Included in the email attached to this letter is a link to copies of all non-privileged documents sent to or from the CTA in respect of the Statement on Vouchers between March 9, 2020 and March 25, 2020 using:

- (a) the CTA's Info email account (info@otc-cta.gc.ca); and
- (b) the CTA's Twitter accounts in English (CTA_gc) and French (OTC_gc), including but not limited to Private Messages.

Item C2 – attached in Appendix C2 are all non-privileged documents in respect of the CTA's EC call on March 20, 2020.

Additional Production Order – Paragraph 5

Pursuant to paragraph five (5) of the Additional Production Order, the Agency is required to determine if the Statement on Vouchers was discussed during the March 19, 22 and 23 calls. If it was then documents relating to these calls as listed as items C1, C5 and C6 in the Appendix to the Reasons for the Additional Production Order are required to be produced.

Based on the materials that we have gathered, it appears that the Statement of Vouchers was discussed during the March 19, 22 and 23 calls.

Included with the email attached to this letter are links to the documents listed in Appendices C1, C5 and C6 of the Additional Production Order for the March 19, 22 and 23 calls respectively.

Yours truly,



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