



SUPERIOR COURT OF JUSTICE

COUNSEL SLIP/ENDORSEMENT

COURT FILE NO.: CV-20-00649558-00CL

DATE: Monday, September 11, 2023

NO. ON LIST: 4

TITLE OF PROCEEDING: **EXPRESS GOLD REFINING LTD. v. THE ATTORNEY GENERAL
OF CANADA on behalf of Her Majesty the Queen in Right
of Canada as represented by the Minister of National
Revenue**

BEFORE JUSTICE: **Justice CAVANAGH**

PARTICIPANT INFORMATION

For Applicant, Moving Party, Crown:

Name of Person Appearing	Name of Party	Contact Info
Mario Forte	Express Gold Refining Ltd., the Applicant	forte@gsnh.com
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Warren Leung		waleung@deloitte.ca
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For Respondent, Responding Party, Defence:

Name of Person Appearing	Name of Party	Contact Info
Kevin Dias	Department of Justice Canada/CRA	kdias@justice.gc.ca
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ENDORSEMENT OF JUSTICE CAVANAGH:

[1] The Applicant, Express Gold Refining Ltd., moves for an order extending the “Stay Period” as defined in the second amended and restated initial order made on October 27, 2020 to and including December 12, 2023.

[2] The extension will allow the tax litigation in the Tax Court of Canada to proceed. I am advised that hearing dates have been requested in the Tax Court of Canada in May or June 2024. I grant the requested extension.

[3] The Monitor intends to bring a motion to seek approval of a mediation process and, possibly, a claims process. The Monitor will serve the motion materials on or before September 22, 2023. Counsel for the CRA will review the materials and confer with counsel for the Monitor about a timetable for the motion and the amount of time needed for the hearing.

[4] A scheduling case conference will be held on October 6, 2023 at 10:30 a.m. for 30 minutes.

[5] Order to issue in form of order signed by me today.

Justice CAVANAGH

Date: September 11, 2023