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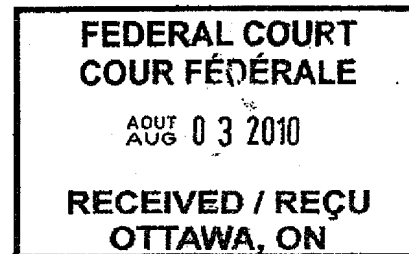


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Toronto, August 3, 2010

Federal Court of Canada
 Thomas D'Arcy McGee Building
 90 Sparks Street
 Ottawa, Ontario
 Canada K1A 0H9



Attention: Louise Leroux

Dear Ms. Leroux,

RE: His Highness Prince Karim Aga Khan v. Nagib Tajdin, Alnaz Jiwa, John Doe *et al.*
 Federal Court File No. T-514-10

We are the solicitors for the Plaintiff in the above-noted matter. We are writing with respect to the Court's request (of today's date) for Counsel's availability to schedule the Motion for a Special Sitting filed by the Defendants on July 30, 2010. By this motion, the Defendants are seeking to stay the cross-examinations for the parties' respective summary judgment motions scheduled for the week of August 9, 2010. The Defendants are also seeking an order requiring the Plaintiff to serve an affidavit of documents and attend discovery ("Defendants' Stay Motion").

Counsel for the Plaintiff can be available for the hearing of the Defendants' Stay Motion on August 4 or August 6, 2010. Unless this Court is prepared to dismiss the Defendants' Stay Motion on its face, the Plaintiff would like to have the opportunity to file responding evidence and written representations and to cross-examine the Defendants on the materials they have filed.

Both parties filed cross summary judgment motions in June 2010. As per the Direction of Justice Heneghan dated July 6, 2010, cross-examinations have been scheduled, and agreed upon by the parties, for well over a month. Our affiants have already made overseas travel

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arrangements based on the cross-examination schedule agreed to by the parties.

A successful summary judgment motion by either party would effectively end this proceeding so that the case would no longer have to proceed to discovery. Not only does the Defendants' present request to proceed with discovery contradict their request for summary judgment, it is clear from the Defendants' Stay Motion that they are not even seeking discovery, but rather are using this procedure to improperly compel a five-minute audience with His Highness Prince Karim Aga Khan.

The Plaintiff is highly concerned that the Defendants' Stay Motion will further delay cross-examinations and the hearing of the Summary Judgment Motions. The Plaintiff further notes that Mr. Tajdin has more than once expressed his limited availability to attend cross-examinations and a hearing for the summary judgment motions. Despite these representations to Counsel for the Plaintiff, the Defendants appear to have availability to schedule the hearing of this motion, and now apparently, to schedule a discovery of the Plaintiff.

The Plaintiff respectfully submits that the current arrangements for the summary judgment motion, as directed by Madam Justice Heneghan, remain the most expeditious way to have this matter resolved. The summary judgment cross-examinations should proceed as scheduled so that the summary judgment motions can be scheduled and heard as soon as possible.

If the Court determines that the Defendants' Stay Motion should proceed, then a schedule should be arranged for the Plaintiff to file the requested responding materials.

Respectfully submitted,

Ogilvy Renault LLP
Ogilvy Renault LLP *per Brian W. Gray*

per Brian Gray

cc. Nagib Tajdin (by e-mail)
Alnaz Jiwa (by e-mail)