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September 6, 2011

**Via Facsimile and E-mail**

Mr. Nagib Tajdin and  
 Mr. Alnaz Jiwa  
 Jiwa & Associates  
 37 Sandiford Drive  
 Unit 205A  
 Stouffville, ON  
 L4A 7X5

Our reference  
 01020560-0001

Dear Sirs:

**His Highness Prince Karim Aga Khan v. Nagib Tajdin and Alnaz Jiwa**

We are writing to you as counsel for the Plaintiff in connection with the Case Management Conference of August 26, 2011 in front of Prothonotary Milczynski.

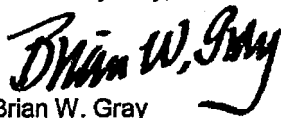
At this conference you were directed to produce original relevant unredacted documents for inspection by October 7. To assist you, we have been requested to provide a detailed list of those documents. This list is not intended to be exhaustive. In addition where you do not have documents in your possession you have an obligation to enquire of others concerning them. While we will accept photocopies for the production on October 7, we would like the originals to be available for inspection prior to the scheduled examination on November 8 and 9, 2011.

We need to emphasize again that all documents need to be unredacted, unaltered and in their original form, including with any handwritten notations.

In addition your electronic and computer records need to be searched and all e-mails or other documents produced. We suggest that you search through the electronic records of Mr. Jiwa and Mr. Tajdin using the key words "Golden Edition", "Farman", "Firman", "Talika" and "Golden Kiz" to locate relevant material.

The detailed list is attached as Schedule 1 to this letter. Please let us know if you have any questions concerning it.

Yours very truly,



Brian W. Gray

BWG/cf

## Schedule 1

In this Schedule the following terms have the following meaning:

"Golden Edition" means the Golden Edition itself and originals and copies of the Farmans and Talikas contained therein as well as all precursor material used in the preparation of the Golden Edition, all proofs, galleys, prepublication layouts, photographs or any other material whether electronic or on paper used in the preparation of the Golden Edition and includes the MP3 player and all audios tapes.

"Distributor" means any person who has received directly or indirectly (whether for payment or otherwise) more than 8 copies of the Golden Edition.

"Document" includes papers and books and includes an audio recording, video recording, film, photograph, chart, graph, map, plan, survey, book of account, computer diskette, hard drive, flash memory stick or any other device on which information is recorded or stored including any information which is stored at any location and accessible via the Internet or a communications link.

1. All Documents relating to the printing of the Golden Edition, including discussion or estimates of the printing costs, purchase orders, confirmation of the purchase order, waybills, invoices for printing, packing slips or any other Document evidencing the ordering, shipment to you or to others of the Golden Edition and/or payment for the Golden Edition. If not otherwise shown on such documents, the name, address and contact information for all those involved in the printing and distribution of the Golden Edition.
2. All bank account statements and books of account from which payment for the printing of the Golden Edition was made or showing such payment.
3. Copies of cheques, money orders, wire transfer receipts or any other financial Documents evidencing payment for the Golden Edition.
4. Please deliver electronically a reproduction of the entire mailbox (inbox, outbox and deleted items) of [goldenkiz@live.com](mailto:goldenkiz@live.com).
5. Copies of all correspondence, electronic or otherwise, relating to the sale of the Golden Edition and copies of all advertising and promotion of the Golden Edition, electronically or otherwise, and receipts for same.
6. All bank account statements or books of account showing receipts of money from the sale of the Golden Edition, including PayPal and credit card statements, and including identification of the Defendants' PayPal accounts.

7. In respect of the distribution, delivery or sale of the Golden Edition to others, all invoices, purchase orders, confirmation of purchase orders, waybills or any other Document evidencing the receipt of or payment for copies of the Golden Edition.

8. In respect of copies of the Golden Edition which are alleged to have been given away, the names and addresses of those who received free copies of such books and any other Documents evidencing such free distribution.

9. In respect of all those who are Distributors of the Golden Edition, the names and addresses of such Distributors, and all Documents or books of account from such Distributors evidencing receipt, distribution and sale of the Golden Edition and any remittance of amounts back to the Defendants.

10. To the extent that any expenses are claimed as a deduction from the moneys received from the sale of the Golden Edition, original receipts, credit card statements, books of account and other Documents evidencing such expenses

11. To the extent that personal loans are claimed as deductions from moneys received from the sale of the Golden Edition, a copy of original receipts, credit card statements, books of account and other Documents evidencing the application of the proceeds of such loans..

12. To the extent that travel, hotel, meals or other expenses are claimed as deductions from the moneys received from the sale of the Golden Edition, original receipts, credit card statements or other Documents evidencing such expenses and the names of the persons to whom such expenses relate and the activities undertaken as it relates to the production of the Golden Edition.

13. Bank statements, check and transaction details for any account used to pay expenses that are claimed as a deduction from the moneys received from the sale of the Golden Edition.

14. The e-mail boxes of the Defendants used to correspond about the printing, sale and distribution of the Golden Edition or in the alternative a search of such e-mail boxes using the words "book", "golden edition", "farman", "firman" and "talika".



00059

**FW: Letter to Defendants re document request**

Tuesday, September 6, 2011 5:07 PM

**From:** "Gray, Brian" <Brian.Gray@nortonrose.com>  
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1 File (149KB)



Letter to Mr.

Please see the attached letter

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*Ogilvy Renault has joined Norton Rose Group.*  
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*Ogilvy Renault s'est joint au Groupe Norton Rose.*  
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