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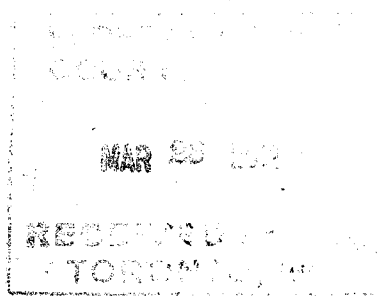
Direct line
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 kristin.wall@nortonrose.com

March 22, 2012

Sent By Facsimile

Registrar
 Federal Court of Canada
 180 Queen Street West, Suite 200
 Toronto, Ontario M5V 3L6



Your reference

Our reference
 01020560-0001

Dear Madam or Sir:

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

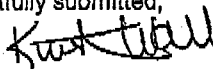
We are the solicitors for the Plaintiff, His Highness Prince Karim Aga Khan. We ask that you bring this letter to the attention of Madam Prothonotary Milczynski, who is the designated Referee in this reference proceeding.

The Plaintiff intends to bring a refusals motion based on the Defendants' examinations for discovery held on November 8, 2011. We are writing to request a hearing date for this motion and a schedule for the exchange of materials.

The Defendants attended examinations for discovery in this Reference Proceeding on November 8, 2011. There were a number of outstanding questions from these examinations, which were either refused or taken under advisement. The Plaintiff provided the Defendants with charts of outstanding discovery questions on February 1, 2012. The Plaintiff requested that the Defendants provide their positions on the outstanding questions, including whether they intended to maintain their refusals. The Plaintiff also requested that the Defendants provide their availability for a refusals motion.

The Defendant Mr. Jiwa advised that he would respond to the Plaintiff's requests by March 17, 2012. To date, the Plaintiff has not received any response from Mr. Jiwa. The Defendant Mr. Tajdin has advised that he can be available in Canada for a refusals motion from April 20 to May 10, 2012. The Plaintiff is not available on April 20, 2012. As a result, the parties are jointly available for the hearing of the Plaintiff's refusals motion from **April 21 to May 10, 2012.**

Respectfully submitted,



Kristin Wall

KEW/

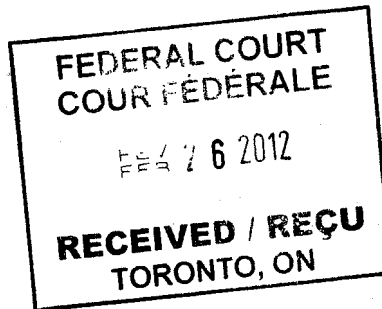
c.c. Nagib Tajdin at nagib@tajdin.com and Alnaz Jiwa at jjiwalaw@yahoo.ca

DOCSTOR: 238421911

March 26, 2012

Sent By Fax: (416) 954-5068

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Federal Court of Canada
180 Queen Street West
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Dear Sirs:

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

We have been waiting for months to have the questions asked on discovery answered. If they are ordered to be answered, then Mr. Tajdin may appeal that as well whereas now he has only appealed the order of Mr. Justice Russell about the production of unredacted documents. There are questions which do not relate only to the unredacted documents. The relevance of those questions can be considered and ordered answered without regard to the appeal.

If Mr. Tajdin were to agree that if he loses the Russell appeal, that he will then answer all of the unanswered questions, then we will not pursue a motion in relation to them at this time. I expect however that even if Mr. Tajdin loses the Russell appeal he will still contest answering the unanswered questions. That being the case we need to have those issues resolved now.

As to confidentiality, Mr. Tajdin has constantly made this assertion, but has never produced any cogent evidence why any confidentiality is necessary, let alone the drastic remedy of a counsel's eyes only order.

Yours very truly,

Brian W. Gray

BWG/cf

Cop(y/ies) to: Nagib Tajdin (by e-mail: nagib@tajdin.com)
Noel & Associates (by e-mail: info@noellawyers.com)

DOCSTOR: 23881551

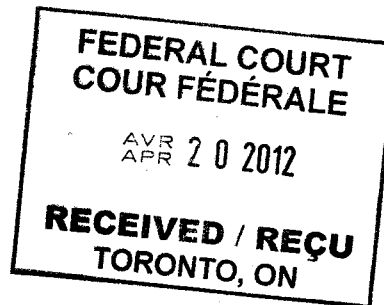
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316**NORTON ROSE**

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April 20, 2012

Sent By Fax: (416) 954-5068

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Dear Sirs:

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

Please bring this letter to the attention of Prothonotary Milczynski. Tuesday, April 24, 2012 has been set aside for a refusals motion in respect of the questions undertaken to be answered or refused on examinations for discovery of Mr. Tajdin and Mr. Jiwa taken on November 8, 2011.

Yesterday, we received a motion from Mr. Jiwa returnable April 24, 2012 to have the reference dismissed against him. We object to this motion on the following grounds:

1. A reference was ordered pursuant to the Judgment of Mr. Justice Harrington on March 4, 2011 by Order of the Chief Justice dated March 16, 2011. Madam Prothonotary Milczynski was designated as the Referee. There is a significant question as to whether the Prothonotary acting as Referee has the authority to simply dismiss the reference without delivering a report.
2. Mr. Jiwa has unanswered undertakings. Mr. Jiwa delivered with his motion some documents which he says answers the undertakings but he did not relate the documents to the questions asked so it is not clear whether the undertakings have all been fulfilled. In any event, there are a number of refusals. Therefore, the discovery of Mr. Jiwa is not finished and it would be premature to decide to end the reference in respect of Mr. Jiwa until such time as the discovery which has already been ordered is completed.
3. The April 24, 2012 date was set down for the refusals motion and there will be little or no time for this motion, which has not been directed to be heard on the 24th.
4. Also, this is in effect a motion for summary judgment and would therefore need to be brought on 20 days notice. In addition, if this is a second motion for summary judgment within the same proceeding, it cannot be brought without leave.

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5. There is no point in ending the reference with respect to one of the two co-defendants. Each of the co-defendants has information that is potentially relevant to the other co-defendant and arguably, each of the co-defendants is jointly and severely liable for any profits that may be ordered. This can be determined by the Referee upon hearing of the reference after discovery.

For all of these reasons if Mr. Jiwa wants to continue with this motion and have the references dismissed against him, he should do so by obtaining a separate motion date.

Yours very truly,



Brian W. Gray

BWG/cf

Cop(y/ies) to: Alnaz Jiwa (by e-mail: jiwalaw@yahoo.ca)