

Claimant indicated that it had completed its document research and was reviewing the documents with a view to eliminating documents duplicated in the Respondent's produced documents. When this review is complete, the Claimant will produce copies of its documents to the Respondent; however, the Claimant indicated that this process might take several months. In the meantime, the Parties should be reviewing the documents to identify those that may not be relevant or necessary, in order to minimize the contents of a Common Book of Documents. Each party undertook to prepare transcripts of illegible documents in the documents it was producing.

[2] The Claimant reported that its intended expert had declined a retainer. Accordingly, the Claimant is in negotiation with another expert who will review the pleadings and background to the Claim. The Claimant hopes a retainer will be confirmed by the end of February 2015, and when the retainer is complete, it will identify the expert to the Respondent.

[3] The Claimant reported that it had only identified one potential elder to give oral history evidence. The Claimant has had difficulty coordinating a time for the interview of this potential elder, who will likely be the only such witness unless he identifies other potential witnesses. Once the witness has been interviewed, the Claimant will prepare a "Will-Say" Statement, which it will produce to the Respondent. The Parties reported that they are still considering a protocol for the reception and handling of oral history evidence and hope to agree on this before the next CMC.

[4] It is premature to consider an Agreed Statement of Facts, an Agreed Statement of Issues and a Common Book of Documents until the matters discussed above have been completed.

[5] The next CMC will be held by teleconference on **June 2, 2015**, at 11:00 A.M. Eastern Time (Ottawa).

W.L. WHALEN

Honourable W.L. Whalen