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DELIVERED BY EMAIL

January 14, 2022

Registry  
Registry Branch  
Supreme Court of Canada  
301 Wellington Street  
Ottawa, Ontario  
K1A 0J1

*By email:* [Registry-Grefe@SCC-CSC.CA](mailto:Registry-Grefe@SCC-CSC.CA)

**RE: *Daniel Ramelson v. Her Majesty the Queen* (SCC File No. 39664),  
*Erhard Haniffa v. Her Majesty the Queen* (SCC File No. 39803),  
*Temitope Dare v. Her Majesty the Queen* (SCC File No. 39871) &  
*Muhammad Abbas Jaffer v. Her Majesty the Queen* (SCC File No. 39676)**

Dear Registrar:

I write regarding the appeals in the matters of *Daniel Ramelson v. Her Majesty the Queen*, *Erhard Haniffa v. Her Majesty the Queen*, *Temitope Dare v. Her Majesty the Queen* and regarding the application for leave to appeal in the matter of *Muhammad Abbas Jaffer v. Her Majesty the Queen*. These four appeals were all heard together in the Court of Appeal for Ontario in January 2021. In four separate decisions, the Court of Appeal for Ontario allowed the Crown's appeal in the *Ramelson* matter, and dismissed the defence appeals in the *Haniffa*, *Dare* and *Jaffer* matters. Those decisions gave rise to an as of right appeal to the Supreme Court of Canada in the *Ramelson* matter, and applications for leave to appeal in the *Haniffa*, *Dare* and *Jaffer* matters. As of the date of this letter, leave to appeal has now been granted in the *Haniffa* and *Dare* matters. The *Jaffer* application for leave has yet to be decided.

The first reason that I write is to advise of the Respondent's position on the application for leave to appeal in the *Jaffer* matter. The Respondent has no additional submissions to make on the question of leave than those we have already made on the leave applications that have been granted in *Haniffa* and *Dare*. Accordingly, in the circumstances, the Respondent agrees that leave should also be granted in the *Jaffer* matter.

The second reason that I write is regarding the targeted hearing date for the *Ramelson* and *Haniffa* appeals. The Respondent is in receipt of the correspondence from the Registrar targeting a hearing date for the *Ramelson* and *Haniffa* matters during the week of May 16, 2022. The Respondent understands from the Court's direction yesterday that the *Dare* matter will also be listed on that same date. The Respondent requests that the *Jaffer* matter be listed for hearing on the same date as the *Ramelson*, *Haniffa* and *Dare* appeals.

The final reason I write is regarding the filing deadlines for the materials on all four matters. First, I ask that the same filing schedule for the submission of the Appellant and Respondent's materials imposed on the *Haniffa* matter also be imposed on the *Dare* and *Jaffer* appeals. Second, I ask that the Respondent be permitted to file its response on the *Ramelson* matter on the same date as the Respondent's materials are due on the *Haniffa* matter. Given the overlap in the issues raised by the Appellants, the Respondent anticipates there will be significant repetition in the response to each appeal. It would be the Respondent's intention, if a single deadline was imposed, to seek to file a single factum responding to all four appeals.

Sincerely,



for  
Katie Doherty & Lisa Fineberg  
Crown Counsel

CC:

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Haniffa

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