

## CLAIM

1. The Plaintiff claims:

a) a Declaration that:

- i) Canada Post is the owner of copyright in the CPC Database as further defined herein;
- ii) the Defendant has infringed Canada Post's copyright in the CPC Database by producing and reproducing, without the consent of the Plaintiff, the CPC Database and substantial parts thereof in the course of the development, update, distribution and sale of the Defendant's dataset products, including the Defendant's Canadian Postal Code Geocoded Dataset ( the "CPCG Dataset") contrary to section 27(1) of the *Copyright Act*, R.S.C. 1985, c.C-42 as amended (the "*Copyright Act*"); and
- iii) the Defendant has infringed Canada Post's copyright in the CPC Database by:
  - (a) selling or renting out;
  - (b) distributing to such an extent as to affect Canada Post prejudicially as owner of the copyright;
  - (c) by way of trade, distributing, exposing, offering for sale and exhibiting in public;
  - (d) possessing for the purposes of the activities described in sub-paragraphs (a) to (c) copies of the CPC Database and substantial parts thereof, including the CPCG Dataset which the Defendant knew or should have known infringed the Plaintiff's exclusive copyright, contrary to Section 27(2) of the *Copyright Act*;