

- f) the Plaintiff's costs of this Action plus all applicable taxes; and
- g) such further and other relief as this Honourable Court may deem just.

The Parties

- 2. The Plaintiff Canada Post Corporation ("Canada Post") is a Crown corporation created by the *Canada Post Corporation Act*, R.S.C. 1985, c. C-10 (the "CPC ACT"), and having a principle place of business at 2701 Riverside Drive, Ottawa, ON K1A 0B1. Canada Post is Canada's primary postal operator and a provider of logistics and communication goods and services.
- 3. The Defendant Geolytica Inc. ("Geolytica") is a corporation incorporated under the laws of Canada and having a registered office at 1435 Prince of Wales, Suite 601, Ottawa, ON K2C 1N5.
- 4. The Defendant operates a commercial website at www.geocoder.ca where it offers geographic information systems (GIS) data products and services to the public.

The Plaintiff's Rights

- 5. Canada Post is the owner of the copyright in an original compilation of geographic, operational and postal data (hereinafter the "CPC Database"). The CPC Database is an original work within the meaning of the *Copyright Act*. As the owner of the copyright in the CPC Database, Canada Post enjoys the sole right to produce and reproduce the compilation, or any parts thereof.
- 6. Canada Post was formed in 1981 and is a successor to the Post Office Department of Her Majesty in Right of Canada ("Post Office Department"). It is responsible for maintaining a postal system for businesses and individuals in Canada ensuring the collection, delivery and transmission of letters, parcels and publications across the country, including to remote and rural regions. As a non-appropriation Crown Corporation, Canada Post does