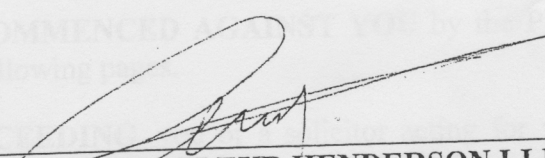


demands, the Defendant has failed to cease its activities and continues and threatens to continue with its wrongful activities.

23. Further infringing activities are unknown to Canada Post but are within the knowledge of the Defendants. The Plaintiff has no control over the Defendant and the entities to which the Defendant sells the CPCG Dataset and other infringing copies of the CPC Database. The Plaintiff seeks to recover from the Defendant damages and an accounting of profits with respect to all infringements and other damaging activities.
24. By reason of the activities of the Defendant set out above, the Defendant has made and will continue to make profits and Canada Post has suffered and will continue to suffer a loss. The Defendant will continue its wrongful activities as set out herein unless restrained by order of this Honourable Court.
25. This action is not being proceeded with as a Simplified Action.
26. The Plaintiff proposes that this action be tried at Ottawa, Ontario.

DATED at Ottawa, Ontario, this 9th day of March, 2012.



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