

Court File No.: CV-20-00653410-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

B E T W E E N:

**ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP, ANSON
INVESTMENTS MASTER FUND LP and MOEZ KASSAM**

Plaintiffs

-and-

**JAMES STAFFORD, ANDREW RUDENSKY, ROBERT LEE DOXTATOR,
JACOB DOXTATOR, AND JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN
DOE 4 AND OTHER PERSONS UNKNOWN**

Defendants

A N D B E T W E E N:

ROBERT LEE DOXTATOR

Plaintiff by Counterclaim

-and-

**ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP, ANSON
INVESTMENTS MASTER FUND LP, MOEZ KASSAM AND ALLEN SPEKTOR**

Defendants to the Counterclaim

MOTION RECORD (VOLUME 2 OF 3)
(Motion to Compel Answers to Undertakings and Refusals)

Date: November 30th, 2023
Returnable: May 7th, 2024

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Defendant/Plaintiff by Counterclaim

I N D E X

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TAB 2M

This is **Exhibit “M”** to the Affidavit of **Alexander Mulligan**,
sworn before me this **30th** day of **November, 2023**.

A handwritten signature in blue ink, appearing to read "Julie Kelly", written over a horizontal line.

A Commissioner for Taking Affidavits

LSO# 84488D

Court File No. CV-20-00653410-00CL

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B E T W E E N:

**ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP, ANSON
INVESTMENTS MASTER FUND LP, MOEZ KASSAM, ANSON
ADVISORS INC., ANSON FUNDS MANAGEMENT LP, ANSON
INVESTMENTS MASTER FUND LP and MOEZ KASSAM**

Plaintiffs

and

**ROBERT LEE DOXTATOR, JAMES STAFFORD, ANDREW RUDENSKY,
JACOB DOXTATOR, JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN
DOE 4 and OTHER PERSONS UNKNOWN**

Defendants

**SUPPLEMENTARY AFFIDAVIT OF DOCUMENTS
Sworn April 4, 2023**

I, Moez Kassam, of the City of Toronto, in the Province of Ontario MAKE OATH AND SAY.

1. I am the founder of the Plaintiffs Anson Advisors Inc., Anson Funds Management LP and Anson Investments Master Fund LP as well an individual Plaintiff in this action. This Affidavit supplements my Affidavit of Documents sworn January 25, 2023.
2. I have conducted a diligent search of my records and made appropriate enquiries of others to inform myself in order to make this Affidavit. This Affidavit discloses, to the full extent of my knowledge, information and belief, all documents relevant to any matter in issue in this action that are or have been in my possession, control or power not otherwise detailed in my Affidavit of Documents sworn January 25, 2023.
3. I have listed in Schedule "A" those additional documents that are in my possession, control or power and that I do not object to producing for inspection.
4. I have listed in Schedule "B1" correspondence between the Plaintiffs and Blakes as it relates to this action since September 2020 and documents relating to the transfer

of the Plaintiffs' file from Blakes to Davies that were or are are in my possession, control or power and that I object to producing because I claim they are privileged.

SWORN remotely by Moez Kassam at the City of Toronto, in the Province of Ontario, before me on the 4th day of April, 2023 in accordance with O. Reg. 431/20, *Administering Oath or Declaration Remotely*.



Commissioner for Taking Affidavits
(or as may be)

MAURA O'SULLIVAN



MOEZ KASSAM

LAWYER'S CERTIFICATE

I CERTIFY that I have explained to the deponent,

- (a) the necessity of making full disclosure of all documents relevant to any matter in issue in the action;
- (b) what kinds of documents are likely to be relevant to the allegations made in the Pleadings; and
- (c) if the action is brought under the simplified procedure, the necessity of providing the list required under rule 76.03.

Date: 2023/04/04



Maura O'Sullivan

SCHEDULE "A"

Documents in my possession, control or power that I do not object to producing for inspection.

Doc ID	Parent/Attachment	Parent_Date	Doc_Date	File_Type	Title	Author	Recipient	Redactions	Reason for redaction	ProductionSet	Production Date
AAI00014616	P	10/14/2008	10/14/2008	Web page	Hyphenated Domains are Massively Undervalued			No		Volume 002	2/22/2023
AAI00014613	P	6/1/2010	6/1/2010	Web page	http://fej.com/category/featured-articles/			No		Volume 002	2/22/2023
AAI00014710	P	6/9/2010	6/9/2010	Article	Turkey's Growing Influence in the Balkans OilPrice.com	Charles Kennedy		No		Volume 003	3/21/2023
AAI00014609	P	8/18/2010	8/18/2010	Article	F Words Fetch \$183,000 to Take the Top Two Spots on This Week's Domain Sales Chart	Ron Jackson		No		Volume 002	2/22/2023
AAI00014624	P	8/18/2010	8/18/2010	Article	F Words Fetch \$183,000 to Take the Top Two Spots on This Week's Domain Sales Chart	Ron Jackson		No		Volume 002	2/22/2023
AAI00014621	P	4/16/2012	4/16/2012	Web page	9i.com Now for Sale + 100 Other Top Names	www.namecake.com		No		Volume 002	2/22/2023
AAI00014625	P	12/1/2012	12/1/2012	Web page	The Oil Boom Will Only Last a Decade - Then What?	flybiggles555@yahoo.com (James Hamilton)		No		Volume 002	2/22/2023
AAI00014641	P	8/30/2013	8/30/2013	Form	Annual Return	Companies House		No		Volume 002	2/22/2023
AAI00014581	P	4/29/2015	4/29/2015	Article	Can Shell Afford To Drill In The Arctic?			No		Volume 002	2/22/2023
AAI00014642	P	11/10/2016	11/10/2016	Statement of Capital	Confirmation Statement/Statement of Capital			No		Volume 002	2/22/2023
AAI00014608	P	2/7/2018	2/7/2018	Web posting	Shocking: Insider Trading Announcement	James Stafford		No		Volume 002	2/22/2023
AAI00014606	P	4/6/2018	4/6/2018	Article	Tower One Wireless Comments on Marketing Activities	Tower One Wireless		No		Volume 002	2/22/2023
AAI00014602	P	4/10/2018	4/10/2018	Web page	https://www.pressreader.com/canada/stockwatch-daily			No		Volume 002	2/22/2023
AAI00014662	P	8/17/2018	8/17/2018	Court document	Notice of Civil Claim			No		Volume 002	2/22/2023
AAI00014673	P	8/17/2018	8/17/2018	Court Document	Notice of Civil Claim			No		Volume 002	2/22/2023
AAI00014599	P	9/4/2018	9/4/2018	Article	Scythian Biosciences Corp. Announces Andy DeFrancesco as a New Director	Page Vault		No		Volume 002	2/22/2023
AAI00014595	P	9/17/2018	9/17/2018	Article	Small NASDAQ Company Just Got A Huge \$900 Opportunity From Apple	Page Vault		No		Volume 002	2/22/2023
AAI00014717	P	9/17/2018	9/17/2018	Web Article	Small NASDAQ Company Just Got A Huge \$900 Opportunity From Apple	Safehaven.com		No		Volume 003	3/21/2023
AAI00014727	P	9/17/2018	9/17/2018	Article	Why is Apple giving this tiny stock a \$900 Million Opportunity	OilPrice.com		No		Volume 003	3/21/2023
AAI00014665	P	11/1/2018	11/1/2018	Court document	Response to Civil Claim			No		Volume 002	2/22/2023
AAI00014666	P	11/1/2018	11/1/2018	Court document	Counterclaim			No		Volume 002	2/22/2023
AAI00014703	P	12/3/2018	12/3/2018	Research report	Aphria: A Shell Game with a Cannabis Business on the Side	Hindenburg Research		No		Volume 003	3/21/2023
AAI00014667	P	1/8/2019	1/8/2019	Court document	Response to Counterclaim			No		Volume 002	2/22/2023
AAI00014668	P	1/8/2019	1/8/2019	Court document	Third Party Notice			No		Volume 002	2/22/2023
AAI00014669	P	1/10/2019	1/10/2019	Court document	Response to Counterclaim			No		Volume 002	2/22/2023
AAI00014597	P	1/14/2019	1/14/2019	Web page	How To Profit From The Death Of Las Vegas			No		Volume 002	2/22/2023
AAI00014585	P	2/18/2019	2/18/2019	Article	How two Canadian financiers took an obscure Apple reseller for a wild ride			No		Volume 002	2/22/2023
AAI00014670	P	3/29/2019	3/29/2019	Court document	Response to Third Party Notice			No		Volume 002	2/22/2023
AAI00014702	P	7/7/2019	7/7/2019	Article	The Tech Breakthrough Set to Reshape Cannabis Markets	Markets Insider		No		Volume 003	3/21/2023
AAI00010661	P	8/2/2019	8/2/2019	Chat capture	Untitled	Betting Bruiser <16132435556@s.whatsapp.net>	Moez Kassam <+14165009999>;Betting Bruiser <16132435556@s.whatsapp.net> [16132435556@s.whatsapp.net]	No		Volume 002	2/22/2023
AAI00010662	A	8/2/2019	1/1/1900	Article	HEXO's Harvested Yield Numbers Create Cause for Concern	Harvest Moon Research	Moez Kassam <+14165009999>;Betting Bruiser <16132435556@s.whatsapp.net> [16132435556@s.whatsapp.net]	No		Volume 002	2/22/2023
AAI00010663	A	8/2/2019	1/1/1900	MP4	Untitled		Moez Kassam <+14165009999>;Betting Bruiser <16132435556@s.whatsapp.net> [16132435556@s.whatsapp.net]	No		Volume 002	2/22/2023
AAI00010664	A	8/2/2019	1/1/1900	Screenshot	Sustainability in the Canabis Industry		Moez Kassam <+14165009999>;Betting Bruiser <16132435556@s.whatsapp.net> [16132435556@s.whatsapp.net]	No		Volume 002	2/22/2023
AAI00010665	A	8/2/2019	7/26/2019	Article	CANNTRUST FIRES CEO PETER ACETO - Chairman of embattled cannabis producer also resigns, as rival plans hostile takeover bid	Vanmala Subramaniam (National Post)	Moez Kassam <+14165009999>;Betting Bruiser <16132435556@s.whatsapp.net> [16132435556@s.whatsapp.net]	No		Volume 002	2/22/2023
AAI00010666	A	8/2/2019	8/2/2019	Screenshot	Untitled	Betting Bruiser	Moez Kassam <+14165009999>;Betting Bruiser <16132435556@s.whatsapp.net> [16132435556@s.whatsapp.net]	No		Volume 002	2/22/2023
AAI00010667	A	8/2/2019	1/1/1900	Screenshot	Untitled		Moez Kassam <+14165009999>;Betting Bruiser <16132435556@s.whatsapp.net> [16132435556@s.whatsapp.net]	No		Volume 002	2/22/2023
AAI00010668	A	8/2/2019	7/26/2019	Screenshot	Untitled	Johnny Lambo	Moez Kassam <+14165009999>;Betting Bruiser <16132435556@s.whatsapp.net> [16132435556@s.whatsapp.net]	No		Volume 002	2/22/2023

Doc ID	Parent/Attachment	Parent_Date	Doc_Date	File_Type	Title	Author	Recipient	Redactions	Reason for redaction	ProductionSet	Production Date
AAI00014598	P	8/5/2019	8/5/2019	Article	SEC subpoenas Cool Holdings, settles fraud charges against investor	David Milstead		No		Volume 002	2/22/2023
AAI00014603	P	8/5/2019	8/5/2019	Web Page	Buy Domain names			No		Volume 002	2/22/2023
AAI00014671	P	8/28/2019	8/28/2019	Court document	Notice of Trial			No		Volume 002	2/22/2023
AAI00014604	P	9/2/2019	9/2/2019	Article (Spanish)	http://economiatecnologiaentrujillo.blogspot.com			No		Volume 002	2/22/2023
AAI00014709	P	3/3/2020	3/3/2020	Article	The 3 Hottest Inverse Energy ETFs	Alex Kimani		No		Volume 003	3/21/2023
AAI00014601	P	3/27/2020	3/27/2020	Article	Markets rallied this week ?	Tom Kool		No		Volume 002	2/22/2023
AAI00014612	P	4/20/2020	4/20/2020	Article	Champignon Brands Vs Mind Medicine: A Comparison	Harvest Moon Research		No		Volume 002	2/22/2023
AAI00014593	P	7/23/2020	7/23/2020	Article	Facedrive: A \$1.4b ESG Stock Promotion with a Hollow Core Business, Flailing Business Pivots and Multi-Million Dollar Payments to an Opaque BVI Entity; 95% Downside	Page Vault		No		Volume 002	2/22/2023
AAI00014672	P	9/21/2020	9/21/2020	Court document	Application Response			No		Volume 002	2/22/2023
AAI00014663	P	9/25/2020	9/25/2020	Court document	Application Response			No		Volume 002	2/22/2023
AAI00014664	P	9/28/2020	9/28/2020	Court document	Application Response			No		Volume 002	2/22/2023
AAI00014596	P	9/30/2020	9/30/2020	Article	Andy DeFrancesco sued for Securities Fraud for role in Aphria: \$APHA	Page Vault		No		Volume 002	2/22/2023
AAI00014713	P	10/4/2020	10/4/2020	Email	a1.jpg	anesalic@protonmail.com		No		Volume 003	3/21/2023
AAI00014714	P	10/4/2020	10/4/2020	Email	a2.jpg	anesalic@protonmail.com		No		Volume 003	3/21/2023
AAI00014715	P	10/4/2020	10/4/2020	Email	a3.jpg	anesalic@protonmail.com		No		Volume 003	3/21/2023
AAI00014633	P	10/19/2020	10/19/2020	Email Message	HARVEST HEALTH/ANSON	"Jeff7621" <Jeff7621@protonmail.com>	"zajdi@protonmail.com"	No		Volume 002	2/22/2023
AAI00014634	A	10/19/2020	10/19/2020	Microsoft Word	Anson.docx			No		Volume 002	2/22/2023
AAI00014635	A	10/19/2020	10/19/2020	HyperText Markup Language (HTML)	Fortune			No		Volume 002	2/22/2023
AAI00014627	P	10/20/2020	10/20/2020	Email Message	Re: HARVEST HEALTH/ANSON	"zajdi" <zajdi@protonmail.com>	"Jeff7621" <Jeff7621@protonmail.com>	No		Volume 002	2/22/2023
AAI00014637	P	10/22/2020	10/22/2020	Email Message	Re: HARVEST HEALTH/ANSON	"zajdi" <zajdi@protonmail.com>	"Jeff7621" <Jeff7621@protonmail.com>	No		Volume 002	2/22/2023
AAI00014638	P	10/22/2020	10/22/2020	Email Message	Re: HARVEST HEALTH/ANSON	"Jeff7621" <Jeff7621@protonmail.com>	"zajdi" <zajdi@protonmail.com>	No		Volume 002	2/22/2023
AAI00014636	P	10/25/2020	10/25/2020	Email Message	Re: HARVEST HEALTH/ANSON	"Jeff7621" <Jeff7621@protonmail.com>	"zajdi" <zajdi@protonmail.com>	No		Volume 002	2/22/2023
AAI00014626	P	10/27/2020	10/27/2020	Email Message	Re: HARVEST HEALTH/ANSON	"zajdi" <zajdi@protonmail.com>	"Jeff7621" <Jeff7621@protonmail.com>	No		Volume 002	2/22/2023
AAI00014630	P	10/29/2020	10/29/2020	Email Message	Re: HARVEST HEALTH/ANSON	"Jeff7621" <Jeff7621@protonmail.com>	"zajdi" <zajdi@protonmail.com>	No		Volume 002	2/22/2023
AAI00014631	A	10/29/2020	10/29/2020	Summary of Terms	Margin Loan Confidential Summary of Terms			No		Volume 002	2/22/2023
AAI00014632	P	10/29/2020	10/29/2020	Email Message	Re: HARVEST HEALTH/ANSON	"zajdi" <zajdi@protonmail.com>	"Jeff7621" <Jeff7621@protonmail.com>	No		Volume 002	2/22/2023
AAI00014628	P	10/30/2020	10/30/2020	Email Message	Re: HARVEST HEALTH/ANSON	"zajdi" <zajdi@protonmail.com>	"Jeff7621" <Jeff7621@protonmail.com>	No		Volume 002	2/22/2023
AAI00014629	P	11/1/2020	11/1/2020	Email Message	Re: HARVEST HEALTH/ANSON	"Jeff7621" <Jeff7621@protonmail.com>	"zajdi" <zajdi@protonmail.com>	No		Volume 002	2/22/2023
AAI00014639	P	11/2/2020	11/2/2020	Email Message	Re: Fw: Re: HARVEST HEALTH/ANSON	"zajdi" <zajdi@protonmail.com>	"Jeff7621" <Jeff7621@protonmail.com>	No		Volume 002	2/22/2023
AAI00014695	P	12/16/2020	12/16/2020	Email message	Re: Bane	"Haris webdesign" <webdesignharisba@gmail.com>	banekojc@yahoo.com	No		Volume 002	2/22/2023
AAI00014704	P	12/16/2020	12/16/2020	Email	Re: Bane	Haris webdesign <webdesignharisba@gmail.com>	banekojc @ yahoo.com	No		Volume 003	3/21/2023
AAI00014696	P	12/17/2020	12/17/2020	Email Message	Haris	"Haris webdesign" <webdesignharisba@gmail.com>	banekojc@yahoo.com	No		Volume 002	2/22/2023
AAI00014697	A	12/17/2020	10/1/2020	Chart	Untitled	James Stafford		No		Volume 002	2/22/2023
AAI00014705	P	12/17/2020	12/17/2020	Email	Haris	Haris webdesign <webdesignharisba@gmail.com>	banekojc @ yahoo.com	No		Volume 003	3/21/2023
AAI00014650	P	12/18/2020	12/18/2020	Domain Info	Whois Record for MoEzKassam.com			No		Volume 002	2/22/2023
AAI00014651	P	12/18/2020	12/18/2020	Domain Info	Whois Record for CapitalMarketCrimes.org			No		Volume 002	2/22/2023
AAI00014652	P	12/18/2020	12/18/2020	Domain Info	Whois Record for StockManipulators.com			No		Volume 002	2/22/2023
AAI00014694	P	12/21/2020	12/21/2020	Email message	Branko	"Haris webdesign" <webdesignharisba@gmail.com>	banekojc@yahoo.com	No		Volume 002	2/22/2023
AAI00014706	P	12/21/2020	12/21/2020	Email	Branko	Haris webdesign <webdesignharisba@gmail.com>	banekojc @ yahoo.com	No		Volume 003	3/21/2023
AAI00014580	P	6/21/2021	6/21/2021	Article	Phenomenal riches: Inside ReconAfrica's aggressive stock promotion campaign			No		Volume 002	2/22/2023
AAI00014698	P	6/21/2021	6/21/2021	Article	Phenomenal riches: Inside ReconAfrica's aggressive stock promotion campaign.	Niall McGee		No		Volume 003	3/21/2023
AAI00014699	P	6/24/2021	6/24/2021	Article	ReconAfrica - No Oil? Pump Stock	Viceroy Research Group		No		Volume 003	3/21/2023
AAI00014674	P	6/29/2021	6/29/2021	Chart	Microsoft Office User	Microsoft Office User		No		Volume 002	2/22/2023
AAI00014683	P	6/29/2021	6/29/2021	Chart	User Profile Data	Microsoft Office User		No		Volume 002	2/22/2023
AAI00014681	P	7/1/2021	7/1/2021	Chart	User Data	Microsoft Office User		No		Volume 002	2/22/2023
AAI00014682	P	7/5/2021	7/5/2021	Chart	User Posts	Microsoft Office User		No		Volume 002	2/22/2023
AAI00014591	P	8/31/2021	8/31/2021	Financial Statements	Unaudited Financial Statements for the Year Ended 31 August 2021			No		Volume 002	2/22/2023
AAI00014586	P	1/25/2022	1/25/2022	Web page	Latest articles from James Stafford	Page Vault		No		Volume 002	2/22/2023
AAI00014701	P	5/17/2022	5/17/2022	Article	Anatomy of an Anson Funds Short & Distort Attack: Recon Africa	Market Frauds		No		Volume 003	3/21/2023
AAI00014592	P	11/22/2022	11/22/2022	Form	AD01 Change of Registered Office Address			No		Volume 002	2/22/2023
AAI00014721	P	1/6/2023	1/6/2023	Court document	Complaint	Attorneys for Plaintiff SECURITIES AND EXCHANGE COMMISSION		No		Volume 003	3/21/2023

Doc ID	Parent/Attachment	Parent_Date	Doc_Date	File_Type	Title	Author	Recipient	Redactions	Reason for redaction	ProductionSet	Production Date
AAI00014575	P	1/30/2023	1/30/2023	Web Capture	Was Anson Funds Involved in the Hindenburg Report on The Adani Group?	Page Vault		No		Volume 002	2/22/2023
AAI00014576	P	1/30/2023	1/30/2023	Web page	Was Anson Funds Involved in the Hindenburg Report on the Adani Group	Page Vault		No		Volume 002	2/22/2023
AAI00014577	P	1/31/2023	1/31/2023	Web page	OILPRICE.COM trademark of James Stafford Serial Number: 85621712 :: Trademarkia Trademarks			No		Volume 002	2/22/2023
AAI00014578	P	1/31/2023	1/31/2023	Web page	James Landon STAFFORD personal appointments - Find and update company information - GOV.UK			No		Volume 002	2/22/2023
AAI00014579	P	1/31/2023	1/31/2023	Web page	OilPrice.com The No.1 Source For Oil And Energy News	Page Vault		No		Volume 002	2/22/2023
AAI00014587	P	2/3/2023	2/3/2023	Web page	A Media Solution Limited	Page Vault		No		Volume 002	2/22/2023
AAI00014588	P	2/3/2023	2/3/2023	Web page	A Media Solution Limited - Filing History	Page Vault		No		Volume 002	2/22/2023
AAI00014589	P	2/3/2023	2/3/2023	Web Page	A Media Solution Limited - People (Officers)	Page Vault		No		Volume 002	2/22/2023
AAI00014590	P	2/3/2023	2/3/2023	Web page	A Media Solution Limited - People (Persons with significant control)	Page Vault		No		Volume 002	2/22/2023
AAI00014594	P	2/3/2023	2/3/2023	Web page	OilPrice.com - About Us	Page Vault		No		Volume 002	2/22/2023
AAI00014614	P	2/3/2023	2/3/2023	Web page	James Stafford's Email & Phone Number	contactout.com		No		Volume 002	2/22/2023
AAI00014615	P	2/3/2023	2/3/2023	Web page	About Us - Oilprice.com	Oilprice.com		No		Volume 002	2/22/2023
AAI00014617	P	2/3/2023	2/3/2023	Web page	About Us - www.namecake.com			No		Volume 002	2/22/2023
AAI00014618	P	2/3/2023	2/3/2023	Web page	Write for OilPrice.com	Oilprice.com		No		Volume 002	2/22/2023
AAI00014619	P	2/3/2023	2/3/2023	Web page	https://www.wickedfire.com/misc-products-software-services/42201-generic-domains-great-prices-sixth-com-walked-com-others.html			No		Volume 002	2/22/2023
AAI00014620	P	2/3/2023	2/3/2023	Web page	www.namecake.com/contact-us/			No		Volume 002	2/22/2023
AAI00014622	P	2/3/2023	2/3/2023	Web page	https://www.tuugo.co.uk/Companies/roye-security-services			No		Volume 002	2/22/2023
AAI00014643	P	2/3/2023	2/3/2023	Web page	James Stafford - Publisher - OilPrice.com LinkedIn			No		Volume 002	2/22/2023
AAI00014644	P	2/3/2023	2/3/2023	Web page	James Landon STAFFORD personal appointments - Find and update company information - GOV.UK			No		Volume 002	2/22/2023
AAI00014582	P	2/6/2023	2/6/2023	Web page	Oil and Energy Services	Page Vault		No		Volume 002	2/22/2023
AAI00014583	P	2/6/2023	2/6/2023	Web page	Articles Posted by bananaman22			No		Volume 002	2/22/2023
AAI00014584	P	2/6/2023	2/6/2023	LinkedIn page	James Stafford Profile	Page Vault		No		Volume 002	2/22/2023
AAI00014684	P	2/6/2023	2/6/2023	History Search	Historical WHOIS report for floatingmix.com			No		Volume 002	2/22/2023
AAI00014605	P	2/7/2023	2/7/2023	Web page	https://flippa.com/4460324-previous-popular-domain-website-for-sale			No		Volume 002	2/22/2023
AAI00014607	P	2/7/2023	2/7/2023	Web page	The Next Real Estate Boom			No		Volume 002	2/22/2023
AAI00014610	P	2/7/2023	2/7/2023	Web page	Introducing Global Energy Alert: A Research Service Unlike Any Other	oilprice.com		No		Volume 002	2/22/2023
AAI00014611	P	2/7/2023	2/7/2023	Web page	Crude oil prices today - Oilprice.com	Oilprice.com		No		Volume 002	2/22/2023
AAI00014623	P	2/7/2023	2/7/2023	Web page	https://oilprice.com/directortrades	James Stafford		No		Volume 002	2/22/2023
AAI00014656	P	2/7/2023	2/7/2023	LinkedIn page	Rajan Vig Profile	Page Vault		No		Volume 002	2/22/2023
AAI00014657	P	2/7/2023	2/7/2023	Web page	WHOIS search results			No		Volume 002	2/22/2023
AAI00014658	P	2/7/2023	2/7/2023	Web page	IP Address Lookup for 189.136.53.166 in Tlahuac, Mexico			No		Volume 002	2/22/2023
AAI00014659	P	2/7/2023	2/7/2023	Web page	namePros post	Page Vault		No		Volume 002	2/22/2023
AAI00014660	P	2/7/2023	2/7/2023	Web page	whatismyipaddress.com ip_189.136.53.166	Page Vault		No		Volume 002	2/22/2023
AAI00014661	P	2/7/2023	2/7/2023	LinkedIn page	Josh Owens Profile	Page Vault		No		Volume 002	2/22/2023
AAI00014685	P	2/14/2023	2/14/2023	Web page	Historical WHOIS report for oilprice.com			No		Volume 002	2/22/2023
AAI00014686	P	2/15/2023	2/15/2023	Web page	Columnists - James Stafford, OilPrice.com's Most Recent Articles	Page Vault		No		Volume 002	2/22/2023
AAI00014687	P	2/15/2023	2/15/2023	Web page	namePros - OilPrice.com	Page Vault		No		Volume 002	2/22/2023
AAI00014689	P	2/15/2023	2/15/2023	Web post	New Market frauds website live following cyber attack	Page Vault		No		Volume 002	2/22/2023
AAI00014690	P	2/15/2023	2/15/2023	Web post	New Market frauds website live following cyber attack	Page Vault		No		Volume 002	2/22/2023
AAI00014688	P	2/16/2023	2/16/2023	Web page	Market Frauds posts	Page Vault		No		Volume 002	2/22/2023
AAI00014691	P	2/16/2023	2/16/2023	Web post	Anson Hedge Fund Pivots to Long Wagers, Betting on Weed Stocks	Page Vault		No		Volume 002	2/22/2023
AAI00014692	P	2/17/2023	2/17/2023	Web post	Cokiga Damke	Page Vault		No		Volume 002	2/22/2023
AAI00014693	P	2/17/2023	2/17/2023	Web post	Cokiga Damke	Page Vault		No		Volume 002	2/22/2023
AAI00014700	P	2/27/2023	2/27/2023	Web capture	Home/Privacy and Cookie Policy	SafeHeaven.com		No		Volume 003	3/21/2023
AAI00014708	P	3/3/2023	3/3/2023	Web capture	"ANES ALIC" ARTICLES	Page Vault		No		Volume 003	3/21/2023
AAI00014711	P	3/3/2023	3/3/2023	Web capture	Anes Alic LinkedIn	Page Vault		No		Volume 003	3/21/2023
AAI00014707	P	3/6/2023	3/6/2023	Web capture	Cokiga Damke's Profile Oilprice.com Journalist Muck Rack	Page Vault		No		Volume 003	3/21/2023
AAI00014712	P	3/9/2023	3/9/2023	Web capture	Haris M. Profile Freelancer	Page Vault		No		Volume 003	3/21/2023

Doc ID	Parent/Attachment	Parent_Date	Doc_Date	File_Type	Title	Author	Recipient	Redactions	Reason for redaction	ProductionSet	Production Date
AAI00014716	P	3/10/2023	3/10/2023	Web Article	Moez Kassam & Anson Funds Part IV: Selling Everyone Out	Market Frauds		No		Volume 003	3/21/2023
AAI00014718	P	3/20/2023	3/20/2023	Web capture	James Stafford - FinNotes profile	Page Vault		No		Volume 003	3/21/2023
AAI00014719	P	3/20/2023	3/20/2023	Web capture	Advanced Media Solutions	Page Vault		No		Volume 003	3/21/2023
AAI00014722	P	3/20/2023	3/20/2023	Web capture	Frank on Twitter: "@JohnMur67039142 @stoolstocks @realwillmeade @PNGamingInc Oops, was it something I said?"	Page Vault		No		Volume 003	3/21/2023
AAI00014723	P	3/20/2023	3/20/2023	Web page	Frank on Twitter: "@JohnMur67039142 @stoolstocks @realwillmeade @PNGamingInc Oops, was it something I said?"	Page Vault		No		Volume 003	3/21/2023
AAI00014724	P	3/20/2023	3/20/2023	Web capture	Frank on Twitter: "@JohnMur67039142 @stoolstocks @realwillmeade @PNGamingInc Oops, was it something I said?"	Page Vault		No		Volume 003	3/21/2023
AAI00014725	P	3/20/2023	3/20/2023	Web capture	Frank on Twitter: "@JohnMur67039142 @stoolstocks @realwillmeade @PNGamingInc Oops, was it something I said?"	Page Vault		No		Volume 003	3/21/2023
AAI00014726	P	3/20/2023	3/20/2023	Web capture	Moez Kassam & Anson Funds: The Big Secret - Market Frauds	Page Vault		No		Volume 003	3/21/2023
AAI00014728	P	3/21/2023	3/21/2023	Web capture	Whois marketfrauds.to	Page Vault		No		Volume 003	3/21/2023

SCHEDULE "B1"

Documents that are or were in my possession, control or power that I object to producing on the grounds of privilege.

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00000003	P	11/15/2021 7:53 PM	11/15/2021 7:53 PM	Email Message	Call re: James Stafford		"O'Sullivan, Maura" </O=EXCHANGE/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=O'SULLIVAN, MAURAC7D>		"O'Sullivan, Maura" <mosullivan@dwpv.com>;"Milne-Smith, Matthew" <mmilne-smith@dwpv.com>;"michael.barrack@blakes.com" <michael.barrack@blakes.com>;"iris.fischer@blakes.com" <iris.fischer@blakes.com>;"Carlson, Andrew" <acarlson@dwpv.com>		Solicitor Client Privileged Litigation Privileged
BLK00000004	P	11/16/2021 4:10 PM	11/16/2021 4:10 PM	Email Message	File Transfer - 00024605/000001 - ANSON FUNDS / Defamation Matters		"TransferFiles" <TransferFiles@blakes.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwpv.com>;"Carlson, Andrew" <acarlson@dwpv.com>;"Barbiero, Tanya" <TBarbiero@dwpv.com>	Fischer, Iris;DiMatteo, Christopher;Kushnir, Amanda	Solicitor Client Privileged Litigation Privileged
BLK00000005	P	11/12/2021 4:44 PM	11/12/2021 4:44 PM	Email Message	FW: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Fischer, Iris" <iris.fischer@blakes.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwpv.com>;"Carlson, Andrew" <acarlson@dwpv.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00000006	P	11/12/2021 6:04 PM	11/12/2021 6:04 PM	Email Message	FW: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Fischer, Iris" <iris.fischer@blakes.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwpv.com>;"Carlson, Andrew" <acarlson@dwpv.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00000007	P	11/19/2021 7:34 PM	11/19/2021 7:34 PM	Email Message	Fwd: Blakes Conflict		"Milne-Smith, Matthew" <MMilne-Smith@dwpv.com>		"iris.fischer@blakes.com" <iris.fischer@blakes.com>;"michael.barrack@blakes.com" <michael.barrack@blakes.com>	Carlson, Andrew;Jonathan Lissus	Solicitor Client Privileged Litigation Privileged
BLK00000008	A	11/19/2021 7:34 PM	11/19/2021 7:16 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00000009	P	11/17/2021 7:24 PM	11/17/2021 7:24 PM	Email Message	RE: Anson		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Carlson, Andrew" <acarlson@dwpv.com>		Solicitor Client Privileged Litigation Privileged
BLK00000010	A	11/17/2021 7:24 PM	11/17/2021 7:23 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000011	A	11/17/2021 7:24 PM	10/6/2021 6:47 PM	Email Message	Anson Advisors Inc. et al. v. James Stafford et al. - Court File No. CV-20-00653410-00CL		"DiMatteo, Christopher"		"Andrew.rudensky@gmail.com" <Andrew.rudensky@gmail.com>;"ar@delavaco.com" <ar@delavaco.com>	Barrack, Michael;Fischer, Iris;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000012	A	11/17/2021 7:24 PM	10/6/2021 6:52 PM	Email Message	Anson Advisors Inc. et al. v. James Stafford et al. - Court File No. CV-20-00653410-00CL		"DiMatteo, Christopher"		"Trevor Fairlie" <tfairlie@groiaco.com>;"jgroia@groiaco.com" <jgroia@groiaco.com>	Barrack, Michael;Fischer, Iris;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000013	A	11/17/2021 7:24 PM	10/6/2021 6:37 PM	Email Message	Anson Advisors Inc. et al. v. James Stafford et al. - Court File No. CV-20-00653410-00CL		"DiMatteo, Christopher"		"admin@oilprice.com" <admin@oilprice.com>;"james@floatingmix.com" <james@floatingmix.com>	Barrack, Michael;Fischer, Iris;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000019	P	11/11/2021 8:19 PM	11/11/2021 8:19 PM	Email Message	RE: Anson		"Milne-Smith, Matthew" <MMilne-Smith@dwpv.com>		"Barrack, Michael" <michael.barrack@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>	Barbiero, Tanya;Carlson, Andrew	Solicitor Client Privileged Litigation Privileged
BLK00000020	P	11/16/2021 1:08 AM	11/16/2021 1:08 AM	Email Message	RE: Anson		"Fischer, Iris" <iris.fischer@blakes.com>		"Carlson, Andrew" <acarlson@dwpv.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Sheppard, Gregory" <gregory.sheppard@blakes.com>	Barbiero, Tanya;O'Sullivan, Maura;Milne-Smith, Matthew	Solicitor Client Privileged Litigation Privileged
BLK00000021	P	11/11/2021 10:26 PM	11/11/2021 10:26 PM	Email Message	RE: Anson		"Fischer, Iris" <iris.fischer@blakes.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwpv.com>	Barrack, Michael;Barbiero, Tanya;Carlson, Andrew;DiMatteo, Christopher;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000022	A	11/11/2021 10:26 PM	11/11/2021 9:41 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000023	A	11/11/2021 10:26 PM	11/11/2021 7:04 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000024	P	11/11/2021 8:41 PM	11/11/2021 8:41 PM	Email Message	RE: Anson		"Fischer, Iris" <iris.fischer@blakes.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwpv.com>;"Barrack, Michael" <michael.barrack@blakes.com>	Barbiero, Tanya;Carlson, Andrew;DiMatteo, Christopher;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000025	A	11/11/2021 8:41 PM	11/9/2021 2:53 PM	Email Message	RE: Subject: RE: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"McEwen, Mr. Justice Thomas John (SCJ)" <Thomas.John.McEwen@scj-csj.ca>		"Won J. Kim" <wj@complexlaw.ca>	Barrack, Michael;Joe Groia;Trevor Fairlie;James Stafford;james@floatingmix.com;staffjam888@yahoo.co.uk;admin@safehaven.com;flybiggles555@yahoo.com;webmaster@amswebdesign.com;james@oilprice.com;andrew.rudensky@gmail.com;ar@delavaco.com;allenspektor@gmail.com;Fischer, Iris;DiMatteo, Christopher;Sheppard, Gregory;Megan B. McPhee;Aris Gyamfi	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00000026	P	11/11/2021 8:49 PM	11/11/2021 8:49 PM	Email Message	Re: Anson RE: Anson Advisors Inc et al v. Robert Duxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Barrack, Michael;Barbiero, Tanya;Carlson, Andrew;DiMatteo, Christopher;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000027	P	11/12/2021 5:22 PM	11/12/2021 5:22 PM	Email Message	Re: Anson Advisors Inc et al v. Robert Duxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Fischer, Iris" <iris.fischer@blakes.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>	Carlson, Andrew;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00000028	P	11/12/2021 5:19 PM	11/12/2021 5:19 PM	Email Message	Re: Anson Advisors Inc et al v. Robert Duxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Carlson, Andrew;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00000030	P	11/12/2021 9:09 PM	11/12/2021 9:09 PM	Email Message	RE: Anson Advisors Inc et al v. Robert Duxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Fischer, Iris" <iris.fischer@blakes.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>;"Prosa, Sandy" <SProsa@dwvp.com>	Carlson, Andrew;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00000031	P	11/12/2021 9:10 PM	11/12/2021 9:10 PM	Email Message	RE: Anson Advisors Inc et al v. Robert Duxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Prosa, Sandy" <SProsa@dwvp.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Milne-Smith, Matthew" <mmilne-smith@dwvp.com>	Carlson, Andrew;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00000032	P	11/17/2021 7:05 PM	11/17/2021 7:05 PM	Email Message	RE: Anson		"Fischer, Iris" <iris.fischer@blakes.com>		"Carlson, Andrew" <acarson@dwvp.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00000033	P	11/15/2021 3:59 PM	11/15/2021 3:59 PM	Email Message	RE: James Stafford		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>		"Barrack, Michael" <michael.barrack@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>	Carlson, Andrew;O'Sullivan, Maura	Solicitor Client Privileged Litigation Privileged
BLK00000034	P	11/15/2021 7:32 PM	11/15/2021 7:32 PM	Email Message	RE: James Stafford		"Fischer, Iris" <iris.fischer@blakes.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>;"Barrack, Michael" <michael.barrack@blakes.com>	Carlson, Andrew;O'Sullivan, Maura	Solicitor Client Privileged Litigation Privileged
BLK00000035	P	11/15/2021 7:39 PM	11/15/2021 7:39 PM	Email Message	RE: James Stafford		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Barrack, Michael" <michael.barrack@blakes.com>	Carlson, Andrew;O'Sullivan, Maura	Solicitor Client Privileged Litigation Privileged
BLK00000036	P	11/15/2021 7:47 PM	11/15/2021 7:47 PM	Email Message	RE: James Stafford		"Fischer, Iris" <iris.fischer@blakes.com>		"O'Sullivan, Maura" <mosullivan@dwvp.com>;"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>	Barrack, Michael;Carlson, Andrew	Solicitor Client Privileged Litigation Privileged
BLK00000041	P	11/6/2021 11:04 PM	11/6/2021 11:04 PM	Email Message	FW: Anson Advisors Inc et al v. Robert Duxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>		Solicitor Client Privileged Litigation Privileged
BLK00000046	P	11/12/2021 4:44 PM	11/12/2021 4:44 PM	Email Message	FW: Anson Advisors Inc et al v. Robert Duxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Fischer, Iris" <iris.fischer@blakes.com>		"Milne-Smith, Matthew" <mmilne-smith@dwvp.com>;"Carlson, Andrew" <acarson@dwvp.com>	christopher.dimatteo@blakes.com	Solicitor Client Privileged Litigation Privileged
BLK00000047	P	11/11/2021 7:42 PM	11/11/2021 7:42 PM	Email Message	RE: Anson		"Barrack, Michael" <michael.barrack@blakes.com>		"Milne-Smith, Matthew" <mmilne-smith@dwvp.com>;"Iris, Fischer" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000048	P	11/24/2021 6:33 PM	11/24/2021 6:33 PM	Email Message	RE: Anson - Defamation Matters - Conflict Matter		"Sunny Puri" <spuri@ansonfunds.com>		"Carlson, Andrew" <acarson@dwvp.com>;"lsalvatori@ansonfunds.com" <lsalvatori@ansonfunds.com>;"Milne-Smith, Matthew" <mmilne-smith@dwvp.com>;"O'Sullivan, Maura" <mosullivan@dwvp.com>		Solicitor Client Privileged Litigation Privileged
BLK00000049	P	11/16/2021 1:08 AM	11/16/2021 1:08 AM	Email Message	RE: Anson		"Fischer, Iris" <iris.fischer@blakes.com>		"Carlson, Andrew" <acarson@dwvp.com>;"christopher.dimatteo@blakes.com" <christopher.dimatteo@blakes.com>;"gregory.sheppard@blakes.com" <gregory.sheppard@blakes.com>	Barbiero, Tanya;O'Sullivan, Maura;Milne-Smith, Matthew	Solicitor Client Privileged Litigation Privileged
BLK00000050	P	11/15/2021 3:19 PM	11/15/2021 3:19 PM	Email Message	RE: James Stafford		"Barrack, Michael" <michael.barrack@blakes.com>		"Milne-Smith, Matthew" <mmilne-smith@dwvp.com>;"Iris, Fischer" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000053	P	11/11/2021 4:25 PM	11/11/2021 4:25 PM	Email Message	Re: Justice McEwen		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Milne-Smith, Matthew" <mmilne-smith@dwvp.com>	spuri@ansonfunds.com	Solicitor Client Privileged Litigation Privileged
BLK00000057	P	11/25/2021 7:14 PM	11/25/2021 7:14 PM	Email Message	Re: Anson - Defamation Matters - Conflict Matter		"Sunny Puri" <spuri@ansonfunds.com>		"Milne-Smith, Matthew" <mmilne-smith@dwvp.com>		Solicitor Client Privileged Litigation Privileged
BLK00000058	P	11/23/2021 11:31 PM	11/23/2021 11:31 PM	Email Message	RE: Norwich Order materials		"Sunny Puri" <spuri@ansonfunds.com>		"Carlson, Andrew" <acarson@dwvp.com>;"lsalvatori@ansonfunds.com" <lsalvatori@ansonfunds.com>	O'Sullivan, Maura;Milne-Smith, Matthew	Solicitor Client Privileged Litigation Privileged
BLK00000059	A	11/23/2021 11:31 PM	6/11/2021 8:26 PM	Email Message	FW: Anson		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000060	A	11/23/2021 11:31 PM	6/11/2021 8:25 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00000061	A	11/23/2021 11:31 PM	6/11/2021 8:32 PM	Email Message	RE: RE: RE: Correspondence from Blakes/Anson Funds		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Stockhouse Member Support" <support@stockhouse.com>;"Wong, Winnie" <winnie.wong@blakes.com>	Gary Kelly;Laura Salvatori;Sunny Puri;Puffer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00000062	A	11/23/2021 11:31 PM	6/11/2021 8:32 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00000063	A	11/23/2021 11:31 PM	6/11/2021 8:32 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00000064	A	11/23/2021 11:31 PM	4/21/2021 1:46 AM	Email Message	RE: RE: RE: Correspondence from Blakes/Anson Funds		"Fischer, Iris" <iris.fischer@blakes.com>		"Stockhouse Member Support" <support@stockhouse.com>	Gary Kelly;Laura Salvatori;Sunny Puri;DiMatteo, Christopher;Puffer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00000065	A	11/23/2021 11:31 PM	4/21/2021 1:46 AM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000066	A	11/23/2021 11:31 PM	4/21/2021 1:46 AM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00000067	A	11/23/2021 11:31 PM	6/8/2021 2:37 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000068	A	11/23/2021 11:31 PM	5/26/2021 8:18 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000070	P	11/12/2021 11:04 PM	11/12/2021 11:04 PM	Email Message	Fwd: Subject: RE: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Fischer, Iris" <iris.fischer@blakes.com>		"Milne-Smith, Matthew" <mmilne-smith@dwpv.com>	christopher.dimatteo@mail.utoronto.ca	Solicitor Client Privileged Litigation Privileged
BLK00000071	P	11/5/2021 5:34 PM	11/5/2021 5:34 PM	Email Message	Fw: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Milne-Smith, Matthew" <mmilne-smith@dwpv.com>		Solicitor Client Privileged Litigation Privileged
BLK00000072	P	11/12/2021 6:04 PM	11/12/2021 6:04 PM	Email Message	FW: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Fischer, Iris" <iris.fischer@blakes.com>		"Milne-Smith, Matthew" <mmilne-smith@dwpv.com>;"Carlson, Andrew" <acarlson@dwpv.com>	christopher.dimatteo@blakes.com	Solicitor Client Privileged Litigation Privileged
BLK00000073	P	11/11/2021 10:26 PM	11/11/2021 10:26 PM	Email Message	RE: Anson		"Fischer, Iris" <iris.fischer@blakes.com>		"Milne-Smith, Matthew" <mmilne-smith@dwpv.com>	michael.barrack@blakes.com;Barbiero, Tanya;Carlson, Andrew;christopher.dimatteo@blakes.com;gregory.sheppard@blakes.com	Solicitor Client Privileged Litigation Privileged
BLK00000074	A	11/11/2021 10:26 PM	11/11/2021 9:41 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000075	A	11/11/2021 10:26 PM	11/11/2021 7:04 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000083	P	11/15/2021 3:27 PM	11/15/2021 3:27 PM	Email Message	RE: James Stafford		"Barrack, Michael" <michael.barrack@blakes.com>		"Milne-Smith, Matthew" <mmilne-smith@dwpv.com>;"iris.fischer@blakes.com" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000094	P	11/6/2021 11:04 PM	11/6/2021 11:04 PM	Email Message	FW: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Milne-Smith, Matthew" <mmilne-smith@dwpv.com>		Solicitor Client Privileged Litigation Privileged
BLK00000095	P	11/1/2021 11:34 PM	11/1/2021 11:34 PM	Email Message	Fwd: Update		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Milne-Smith, Matthew" <mmilne-smith@dwpv.com>		Solicitor Client Privileged Litigation Privileged
BLK00000096	P	11/15/2021 7:54 PM	11/15/2021 7:54 PM	Email Message	Accepted: Call re: James Stafford		"Barrack, Michael" <michael.barrack@blakes.com>		"O'Sullivan, Maura" <mosullivan@dwpv.com>		Solicitor Client Privileged Litigation Privileged
BLK00000097	P	11/15/2021 7:55 PM	11/15/2021 7:55 PM	Email Message	Accepted: Call re: James Stafford		"Fischer, Iris" <iris.fischer@blakes.com>		"O'Sullivan, Maura" <mosullivan@dwpv.com>		Solicitor Client Privileged Litigation Privileged
BLK00000098	P	11/15/2021 7:53 PM	11/15/2021 7:53 PM	Email Message	Call re: James Stafford		"O'Sullivan, Maura" <mosullivan@dwpv.com>;"michael.barrack@blakes.com" </o=Exchange/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=O'Sullivan, Maurac7d>		"Milne-Smith, Matthew" <mmilne-smith@dwpv.com>;"michael.barrack@blakes.com" </o=Exchange/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=O'Sullivan, Maurac7d>;"iris.fischer@blakes.com" <iris.fischer@blakes.com>;"Carlson, Andrew" <acarlson@dwpv.com>		Solicitor Client Privileged Litigation Privileged
BLK00000099	P	11/23/2021 5:17 PM	11/23/2021 5:17 PM	Email Message	Fwd: Anson - Defamation Matters - Conflict Matter		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Milne-Smith, Matthew" <mmilne-smith@dwpv.com>;"Carlson, Andrew" <acarlson@dwpv.com>;"O'Sullivan, Maura" <mosullivan@dwpv.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00000100	P	11/15/2021 10:21 PM	11/15/2021 10:21 PM	Email Message	RE: Anson		"Milne-Smith, Matthew" <mmilne-smith@dwpv.com>		"Carlson, Andrew" <acarlson@dwpv.com>	Barbiero, Tanya;O'Sullivan, Maura	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00000101	P	11/15/2021 10:18 PM	11/15/2021 10:18 PM	Email Message	RE: Anson		"Carlson, Andrew" <acarlson@dwpv.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Sheppard, Gregory" <gregory.sheppard@blakes.com>	Barbiero, Tanya;O'Sullivan, Maura;Milne-Smith, Matthew	Solicitor Client Privileged Litigation Privileged
BLK00000102	P	11/16/2021 1:20 AM	11/16/2021 1:20 AM	Email Message	Re: Anson		"Carlson, Andrew" <acarlson@dwpv.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher;Sheppard, Gregory;Barbiero, Tanya;O'Sullivan, Maura;Milne-Smith, Matthew	Solicitor Client Privileged Litigation Privileged
BLK00000104	P	11/15/2021 7:40 PM	11/15/2021 7:40 PM	Email Message	Re: James Stafford		"O'Sullivan, Maura" </o=Exchange/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)cn=Recipients/cn=O'Sullivan, Maurac7d>		"Milne-Smith, Matthew" <MMilne-Smith@dwpv.com>	Fischer, Iris;Barrack, Michael;Carlson, Andrew	Solicitor Client Privileged Litigation Privileged
BLK00000106	P	11/9/2021 4:16 PM	11/9/2021 4:16 PM	Email Message	FW: Justice McEwen		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwpv.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00000107	A	11/9/2021 4:16 PM	11/9/2021 2:00 PM	Email Message	RE: Subject: RE: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Joe Groia" <jgroia@groiacom.com>		"McEwen, Mr. Justice Thomas John (SCJ)" <ThomasJohn.McEwen@scj-csj.ca>;"Barrack, Michael" <michael.barrack@blakes.com>	Trevor Fairlie;admin@oilprice.com;james@floatingmix.com;Staffjam888@yahoo.co.uk;admin@safehaven.com;flybiggles555@yahoo.com;webmaster@amswebdesign.com;james@oilprice.com;Andrew.rudensky@gmail.com;ar@delavaco.com;allenspektor@gmail.com;Fischer, Iris;DiMatteo, Christopher;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000108	A	11/9/2021 4:16 PM	11/9/2021 2:53 PM	Email Message	RE: Subject: RE: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"McEwen, Mr. Justice Thomas John (SCJ)" <ThomasJohn.McEwen@scj-csj.ca>		"Won J. Kim" <wjkim@complexlaw.ca>	Barrack, Michael;Joe Groia;Trevor Fairlie;James Stafford;james@floatingmix.com;staffjam888@yahoo.co.uk;admin@safehaven.com;flybiggles555@yahoo.com;webmaster@amswebdesign.com;james@oilprice.com;andrew.rudensky@gmail.com;ar@delavaco.com;allenspektor@gmail.com;Fischer, Iris;DiMatteo, Christopher;Sheppard, Gregory;Megan B. McPhee;Aris Gyamfi	Solicitor Client Privileged Litigation Privileged
BLK00000121	P	9/20/2021 10:31 PM	9/20/2021 10:31 PM	Email Message	Re: Anson/Stafford litigation - revised claim		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000122	P	11/10/2021 3:44 PM	11/10/2021 3:44 PM	Email Message	RE: Justice McEwen		"Moez Kassam" <mkassam@ansonfunds.com>		"Barrack, Michael" <michael.barrack@blakes.com>;"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000124	P	10/14/2021 4:54 PM	10/14/2021 4:54 PM	Email Message	Thank you, thank you		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000126	P	10/6/2021 6:55 PM	10/6/2021 6:55 PM	Email Message	Amended claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>;"Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000127	A	10/6/2021 6:55 PM	10/6/2021 6:47 PM	Email Message	Anson Advisors Inc. et al. v. James Stafford et al. - Court File No. CV-20-00653410-00CL		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Andrew.rudensky@gmail.com" <Andrew.rudensky@gmail.com>;"ar@delavaco.com" <ar@delavaco.com>	Barrack, Michael;Fischer, Iris;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000128	A	10/6/2021 6:55 PM	10/6/2021 6:47 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00000129	A	10/6/2021 6:55 PM	10/6/2021 6:52 PM	Email Message	Anson Advisors Inc. et al. v. James Stafford et al. - Court File No. CV-20-00653410-00CL		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Trevor Fairlie" <tfairlie@groiacom.com>;"jgroia@groiacom.com" <jgroia@groiacom.com>	Barrack, Michael;Fischer, Iris;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000130	A	10/6/2021 6:55 PM	10/6/2021 6:52 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00000131	A	10/6/2021 6:55 PM	10/6/2021 6:37 PM	Email Message	Anson Advisors Inc. et al. v. James Stafford et al. - Court File No. CV-20-00653410-00CL		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"admin@oilprice.com" <admin@oilprice.com>;"james@floatingmix.com" <james@floatingmix.com>	Barrack, Michael;Fischer, Iris;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000132	A	10/6/2021 6:55 PM	10/6/2021 6:37 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00000133	P	9/20/2021 5:26 PM	9/20/2021 5:26 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Fischer, Iris" <iris.fischer@blakes.com>	Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00000134	P	10/28/2021 7:54 PM	10/28/2021 7:54 PM	Email Message	RE: Motion to amend claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	DiMatteo, Christopher; Laura Salvatori; Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000152	P	9/22/2021 3:05 PM	9/22/2021 3:05 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000153	P	9/24/2021 2:23 PM	9/24/2021 2:23 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000158	P	11/1/2021 6:39 PM	11/1/2021 6:39 PM	Email Message	RE: Costumes??		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000161	P	10/5/2021 6:31 PM	10/5/2021 6:31 PM	Email Message	emails		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000162	P	11/4/2021 11:51 PM	11/4/2021 11:51 PM	Email Message	RE: Quick question		"Barrack, Michael" <michael.barrack@blakes.com>		"Moez Kassam" <mkassam@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000163	P	10/20/2021 3:54 AM	10/20/2021 3:54 AM	iCalendar	Anson - call		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000169	P	11/9/2021 4:31 PM	11/9/2021 4:31 PM	Email Message	RE: Justice McEwen		"Moez Kassam" <mkassam@ansonfunds.com>		"Barrack, Michael" <michael.barrack@blakes.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000170	P	10/19/2021 11:47 PM	10/19/2021 11:47 PM	Email Message	Re: Quick call tomorrow ?		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000172	P	9/30/2021 1:53 AM	9/30/2021 1:53 AM	Email Message	RE: Anson/Stafford litigation - revised claim		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "Sunny Puri" <spuri@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000173	A	9/30/2021 1:53 AM	9/30/2021 1:53 AM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000174	P	10/28/2021 12:19 AM	10/28/2021 12:19 AM	Email Message	Re: Motion to amend claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Laura Salvatori; Fischer, Iris; Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000177	P	12/13/2021 1:36 PM	12/13/2021 1:36 PM	Email Message	Quick Call?		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000181	P	10/1/2021 1:36 PM	10/1/2021 1:36 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "Moez Kassam" <mkassam@ansonfunds.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>	Barrack, Michael; DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00000191	P	10/24/2021 2:03 PM	10/24/2021 2:03 PM	Email Message	Re: Anson - Amended SoC / Update		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Moez Kassam; Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00000193	P	10/3/2021 6:15 PM	10/3/2021 6:15 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00000194	P	10/29/2021 2:25 PM	10/29/2021 2:25 PM	Email Message	RE: Motion to amend claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Fischer, Iris" <iris.fischer@blakes.com>	Laura Salvatori; Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000203	P	9/30/2021 4:06 PM	9/30/2021 4:06 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	Moez Kassam	Solicitor Client Privileged Litigation Privileged
BLK00000206	P	11/5/2021 3:53 AM	11/5/2021 3:53 AM	Email Message	Fwd: Anson Advisors Inc et al v. Robert Dostator et al - CV-20-00653410-00CL -- Motion Scheduling		"Fischer, Iris" <iris.fischer@blakes.com>		"Moez Kassam" <mkassam@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>	Barrack, Michael	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00000215	P	10/18/2021 1:02 AM	10/18/2021 1:02 AM	Email Message	Re: Amended claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	Laura Salvatori;DiMatteo, Christopher;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000216	P	9/16/2021 6:38 PM	9/16/2021 6:38 PM	Email Message	Facedrive emails 3		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00000217	A	9/16/2021 6:38 PM	7/23/2020 1:12 PM	Email Message	Facedrive: A \$1.4b ESG Stock Promotion with a Hollow Core Business, and Multi-Million Dollar Payments to an Opaque BVI Entity; 95% Downside		"Hindenburg Research" <info@hindenburgresearch.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000218	A	9/16/2021 6:38 PM	7/14/2020 8:35 PM	Email Message	RE: FD		"Nathan" <nathan@hindenburgresearch.com>		"Michael Roussel" <mrousseau@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000219	A	9/16/2021 6:38 PM	7/13/2020 7:44 PM	Adobe Portable Document Format		Firefox		wheatleysk			Solicitor Client Privileged Litigation Privileged
BLK00000220	A	9/16/2021 6:38 PM	7/22/2020 3:35 AM	Email Message	RE: Facedrive		"Nathan" <nathan@hindenburgresearch.com>		"Michael Roussel" <mrousseau@ansonfunds.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00000221	A	9/16/2021 6:38 PM	7/22/2020 3:33 AM	Microsoft Word				X			Solicitor Client Privileged Litigation Privileged
BLK00000222	A	9/16/2021 6:38 PM	7/22/2020 6:36 PM	Email Message	RE: Facedrive		"Nathan" <nathan@hindenburgresearch.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000223	A	9/16/2021 6:38 PM	7/20/2020 8:20 PM	Email Message	RE: Facedrive		"Nathan" <nathan@hindenburgresearch.com>		"Michael Roussel" <mrousseau@ansonfunds.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00000224	A	9/16/2021 6:38 PM	7/14/2020 10:09 PM	Email Message	RE: FD		"Michael Roussel" <mrousseau@ansonfunds.com>		"Nathan" <nathan@hindenburgresearch.com>;"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000225	A	9/16/2021 6:38 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00000226	A	9/16/2021 6:38 PM	7/23/2020 12:15 PM	Email Message	Re:FD		"Joshua Fineman (BLOOMBERG/NEWSROOM:)" <jfineman@bloomberg.net>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000227	A	9/16/2021 6:38 PM	7/23/2020 12:13 PM	Microsoft Word				X			Solicitor Client Privileged Litigation Privileged
BLK00000228	P	11/5/2021 1:09 PM	11/5/2021 1:09 PM	Email Message	Automatic reply: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Barrack, Michael" <michael.barrack@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000231	P	10/28/2021 3:06 PM	10/28/2021 3:06 PM	Email Message	RE: Motion to amend claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher;Laura Salvatori;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000234	P	9/20/2021 11:20 PM	9/20/2021 11:20 PM	iCalendar	Accepted: Anson		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000235	P	9/20/2021 9:45 PM	9/20/2021 9:45 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000252	P	10/18/2021 12:26 AM	10/18/2021 12:26 AM	Email Message	RE: Amended claim		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Sunny Puri" <spuri@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000253	P	9/29/2021 8:53 PM	9/29/2021 8:53 PM	Email Message	Re: Anson/Stafford litigation - revised claim		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Sunny Puri" <spuri@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000259	P	10/18/2021 12:16 AM	10/18/2021 12:16 AM	Email Message	RE: Amended claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Sheppard, Gregory;Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00000264	P	10/4/2021 11:56 PM	10/4/2021 11:56 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	Barrack, Michael;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000265	A	10/4/2021 11:56 PM	10/4/2021 8:27 PM	Adobe Portable Document Format		C:_Users_GRG_AppData_Local_Temp_1_Workshare_wtemp1988_~wf1AC6B4C6.ps					Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00000266	A	10/4/2021 11:56 PM	10/4/2021 8:00 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000267	A	10/4/2021 11:56 PM	10/4/2021 3:32 PM	Microsoft Word				Sheppard, Gregory			Solicitor Client Privileged Litigation Privileged
BLK00000269	P	10/5/2021 9:17 PM	10/5/2021 9:17 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>; "Fischer, Iris" <iris.fischer@blakes.com>	Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000270	A	10/5/2021 9:17 PM	10/5/2021 9:17 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00000271	A	10/5/2021 9:17 PM	10/5/2021 9:17 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00000272	A	10/5/2021 9:17 PM	10/5/2021 9:17 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000273	A	10/5/2021 9:17 PM	10/5/2021 9:17 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000274	A	10/5/2021 9:17 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00000280	P	11/1/2021 9:15 PM	11/1/2021 9:15 PM	Email Message	RE: Update		"Fischer, Iris" <iris.fischer@blakes.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Sunny Puri" <spuri@ansonfunds.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000283	P	11/11/2021 4:32 PM	11/11/2021 4:32 PM	Email Message	RE: Justice McEwen		"Moez Kassam" <mkassam@ansonfunds.com>		"Barrack, Michael" <michael.barrack@blakes.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000284	P	10/29/2021 4:51 PM	10/29/2021 4:51 PM	Email Message	Re: Costumes??		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000291	P	11/11/2021 4:25 PM	11/11/2021 4:25 PM	Email Message	Re: Justice McEwen		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00000302	P	9/22/2021 2:54 PM	9/22/2021 2:54 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000303	A	9/22/2021 2:54 PM	9/22/2021 2:10 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000304	A	9/22/2021 2:54 PM	9/22/2021 2:11 PM	Adobe Portable Document Format		C:_Users_HRI_AppData_Local_Temp_1_Workshare_wmtemp4600_~wtf495DB0E7.ps					Solicitor Client Privileged Litigation Privileged
BLK00000305	P	9/30/2021 12:11 AM	9/30/2021 12:11 AM	Email Message	RE: Anson/Stafford litigation - revised claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000306	P	10/4/2021 1:19 PM	10/4/2021 1:19 PM	Email Message	Re: Anson/Stafford litigation - revised claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00000307	P	11/8/2021 9:05 PM	11/8/2021 9:05 PM	Email Message	FW: Subject: RE: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410 00CL -- Motion Scheduling		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>		Solicitor Client Privileged Litigation Privileged
BLK00000309	P	10/10/2021 9:04 PM	10/10/2021 9:04 PM	Email Message	RE: Amended claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris, Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000310	P	9/28/2021 12:37 PM	9/28/2021 12:37 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000312	P	10/29/2021 8:56 PM	10/29/2021 8:56 PM	Email Message	Re: Costumes??		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000319	P	10/1/2021 7:05 PM	10/1/2021 7:05 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00000324	P	10/1/2021 3:33 PM	10/1/2021 3:33 PM	iCalendar	Accepted: Anson - Amended Statement of Claim		"Moez Kassam" <mkassam@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000327	P	10/4/2021 2:25 PM	10/4/2021 2:25 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher;Moez Kassam	Solicitor Client Privileged Litigation Privileged
BLK00000329	P	10/1/2021 1:14 PM	10/1/2021 1:14 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	Barrack, Michael;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00000340	P	9/14/2021 1:57 PM	9/14/2021 1:57 PM	Email Message	Automatic reply: Anson Funds - Blakes Invoice re. Defamation Matters (July + August 2021)		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000344	P	10/2/2021 1:27 AM	10/2/2021 1:27 AM	Email Message	Re: Anson/Stafford litigation - revised claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00000352	P	11/5/2021 10:28 PM	11/5/2021 10:28 PM	Email Message	Re: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>		Solicitor Client Privileged Litigation Privileged
BLK00000353	P	9/21/2021 10:03 PM	9/21/2021 10:03 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000354	A	9/21/2021 10:03 PM	4/18/2021 5:44 PM	Microsoft Word				Josh Owens			Solicitor Client Privileged Litigation Privileged
BLK00000355	A	9/21/2021 10:03 PM	9/21/2021 8:11 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000363	P	11/24/2021 6:51 PM	11/24/2021 6:51 PM	Email Message	RE: Anson - Defamation Matters - Conflict Matter		"Sunny Puri" <spuri@ansonfunds.com>		"Carlson, Andrew" <acarlson@dwvp.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>;"O'Sullivan, Maura" <mosullivan@dwvp.com>		Solicitor Client Privileged Litigation Privileged
BLK00000369	P	10/28/2021 9:25 PM	10/28/2021 9:25 PM	Email Message	RE: Motion to amend claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	Laura Salvatori;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000370	P	9/27/2021 2:42 PM	9/27/2021 2:42 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000372	P	11/1/2021 8:59 PM	11/1/2021 8:59 PM	Email Message	RE: Update		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000375	P	9/20/2021 9:18 PM	9/20/2021 9:18 PM	Email Message	Re: Anson/Stafford litigation - revised claim		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000376	P	10/22/2021 8:26 PM	10/22/2021 8:26 PM	Email Message	RE: Anson - Amended SoC / Update		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>	Moez Kassam;Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00000380	P	10/14/2021 10:21 PM	10/14/2021 10:21 PM	Email Message	RE: Thank you, thank you		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000382	P	10/12/2021 11:24 PM	10/12/2021 11:24 PM	Email Message	Anson - Defamation Matters - Available for a Call?		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000383	P	9/21/2021 3:03 PM	9/21/2021 3:03 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000385	P	10/19/2021 10:43 PM	10/19/2021 10:43 PM	Email Message	Re: Quick call tomorrow ?		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00000390	P	11/5/2021 1:09 PM	11/5/2021 1:09 PM	Email Message	RE: Anson Advisors Inc et al v. Robert Duxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	Barrack, Michael	Solicitor Client Privileged Litigation Privileged
BLK00000391	P	10/18/2021 10:00 PM	10/18/2021 10:00 PM	Email Message	Re: Amended claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Laura Salvatori;DiMatteo, Christopher;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000392	P	9/26/2021 10:58 PM	9/26/2021 10:58 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000393	P	11/6/2021 2:13 AM	11/6/2021 2:13 AM	Email Message	RE: Anson Advisors Inc et al v. Robert Duxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>	Barrack, Michael	Solicitor Client Privileged Litigation Privileged
BLK00000398	P	9/16/2021 3:59 PM	9/16/2021 3:59 PM	Email Message	Oilprice.com Employees Mexico		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00000399	A	9/16/2021 3:59 PM	9/7/2021 7:13 PM	Microsoft Word				Nitish Dang			Solicitor Client Privileged Litigation Privileged
BLK00000404	P	11/24/2021 7:04 PM	11/24/2021 7:04 PM	Email Message	RE: Anson - Defamation Matters - Conflict Matter		"Carlson, Andrew" <acarlson@dwvp.com>		"Sunny Puri" <spuri@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>;"O'Sullivan, Maura" <mosullivan@dwvp.com>		Solicitor Client Privileged Litigation Privileged
BLK00000405	P	11/5/2021 12:03 AM	11/5/2021 12:03 AM	Email Message	Re: Quick question		"Moez Kassam" <mkassam@ansonfunds.com>		"Barrack, Michael" <michael.barrack@blakes.com>	Fischer, Iris;Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00000408	P	10/28/2021 2:48 PM	10/28/2021 2:48 PM	Email Message	24204496-v7-Fresh as Amended Statement of Claim copy.docx		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000409	A	10/28/2021 2:48 PM	10/28/2021 1:50 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000411	P	10/12/2021 5:42 PM	10/12/2021 5:42 PM	Email Message	RE: Amended claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000413	P	10/18/2021 12:37 AM	10/18/2021 12:37 AM	Email Message	RE: Amended claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	DiMatteo, Christopher;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000414	P	9/26/2021 8:57 PM	9/26/2021 8:57 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000415	A	9/26/2021 8:57 PM	9/26/2021 8:56 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000417	P	10/1/2021 3:06 PM	10/1/2021 3:06 PM	Email Message	Re: Anson/Stafford litigation - revised claim		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	Moez Kassam;Barrack, Michael;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00000420	P	9/20/2021 11:10 PM	9/20/2021 11:10 PM	iCalendar	Anson		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000424	P	9/30/2021 3:34 PM	9/30/2021 3:34 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Moez Kassam	Solicitor Client Privileged Litigation Privileged
BLK00000425	P	1/10/2022 6:28 PM	1/10/2022 6:28 PM	Email Message	FW: Anson Matter / Blakes [LOLG-DMS.FID120424]		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000426	P	11/5/2021 5:34 PM	11/5/2021 5:34 PM	Email Message	Fw: Anson Advisors Inc et al v. Robert Duxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00000428	P	11/1/2021 8:44 PM	11/1/2021 8:44 PM	Email Message	RE: Update		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000430	P	11/6/2021 9:18 PM	11/6/2021 9:18 PM	Email Message	RE: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>	Barrack, Michael	Solicitor Client Privileged Litigation Privileged
BLK00000433	P	10/6/2021 11:04 PM	10/6/2021 11:04 PM	Email Message	Re: Amended claim		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000437	P	11/1/2021 6:13 PM	11/1/2021 6:13 PM	Email Message	RE: Update		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00000445	P	10/11/2021 4:14 PM	10/11/2021 4:14 PM	Email Message	RE: Amended claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000457	P	11/10/2021 3:52 PM	11/10/2021 3:52 PM	Email Message	RE: Justice McEwen		"Barrack, Michael" <michael.barrack@blakes.com>		"Moez Kassam" <mkassam@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000460	P	3/22/2022 4:05 PM	3/22/2022 4:05 PM	Email Message	Holbox		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000463	P	10/24/2021 3:58 PM	10/24/2021 3:58 PM	iCalendar	Tentative: Anson Discussion		"Sunny Puri" <spuri@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000466	P	9/23/2021 5:50 PM	9/23/2021 5:50 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000471	P	1/20/2022 3:18 PM	1/20/2022 3:18 PM	Email Message	FW: recommendation from Moez Kassam		"Barrack, Michael" <michael.barrack@blakes.com>		"Moez Kassam" <mkassam@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000472	A	1/20/2022 3:18 PM	1/19/2022 2:56 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00000473	A	1/20/2022 3:18 PM	4/7/2017 6:28 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00000474	A	1/20/2022 3:18 PM	1/19/2022 2:57 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00000490	P	10/24/2021 3:57 PM	10/24/2021 3:57 PM	iCalendar	Anson Discussion		"Hickey, Michael" <michael.hickey@blakes.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Barrack, Michael" <michael.barrack@blakes.com>;"Kushnir, Amanda" <amanda.kushnir@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Jisus@lolg.ca" <jisus@lolg.ca>	Sunny Puri;mkassam@ansonfunds.com	Solicitor Client Privileged Litigation Privileged
BLK00000492	P	9/21/2021 4:00 PM	9/21/2021 4:00 PM	iCalendar	Canceled: Anson		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000493	P	11/1/2021 8:47 PM	11/1/2021 8:47 PM	Email Message	RE: Update		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000494	P	11/8/2021 10:04 PM	11/8/2021 10:04 PM	Email Message	Re: Subject: RE: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged

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BLK00000495	P	10/7/2021 12:16 AM	10/7/2021 12:16 AM	Email Message	FW: emails		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000501	P	9/21/2021 3:59 PM	9/21/2021 3:59 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000504	P	9/16/2021 6:38 PM	9/16/2021 6:38 PM	Email Message	Facedrive emails 1		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00000505	A	9/16/2021 6:38 PM	7/23/2020 1:51 AM	Email Message	fd front page edits		"Michael Roussel" <mroussel@ansonfunds.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000506	A	9/16/2021 6:38 PM	7/23/2020 1:51 AM	Microsoft Word				X			Solicitor Client Privileged Litigation Privileged
BLK00000507	A	9/16/2021 6:38 PM	7/23/2020 1:58 AM	Email Message	Re:FD Draft		"Joshua Fineman (BLOOMBERG/NEWSROOM:)" <jfineman@bloomberg.net>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000508	A	9/16/2021 6:38 PM	7/23/2020 12:41 AM	Microsoft Word				X			Solicitor Client Privileged Litigation Privileged
BLK00000509	A	9/16/2021 6:38 PM	7/23/2020 10:28 AM	Email Message	RE: FD		"Nathan" <nathan@hindenburesearch.com>		"Sunny Puri" <spuri@ansonfunds.com>;"Michael Roussel" <mroussel@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000510	A	9/16/2021 6:38 PM	7/23/2020 11:42 AM	Email Message	RE: FD		"Nathan" <nathan@hindenburesearch.com>		"Sunny Puri" <spuri@ansonfunds.com>;"Michael Roussel" <mroussel@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000511	A	9/16/2021 6:38 PM	7/23/2020 11:41 AM	Microsoft Word				X			Solicitor Client Privileged Litigation Privileged
BLK00000512	A	9/16/2021 6:38 PM	7/23/2020 2:47 AM	Email Message	Facedrive edits		"Michael Roussel" <mroussel@ansonfunds.com>		"Nathan" <nathan@hindenburesearch.com>;"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000513	A	9/16/2021 6:38 PM	7/23/2020 2:45 AM	Microsoft Word				X			Solicitor Client Privileged Litigation Privileged
BLK00000514	A	9/16/2021 6:38 PM	7/23/2020 10:03 AM	Email Message	RE: FD		"Nathan" <nathan@hindenburesearch.com>		"Michael Roussel" <mroussel@ansonfunds.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00000515	A	9/16/2021 6:38 PM	7/23/2020 4:46 AM	Email Message	FD		"Michael Roussel" <mroussel@ansonfunds.com>		"Nathan" <nathan@hindenburesearch.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00000516	A	9/16/2021 6:38 PM	7/23/2020 4:42 AM	Microsoft Word				X			Solicitor Client Privileged Litigation Privileged
BLK00000517	A	9/16/2021 6:38 PM	7/23/2020 2:59 AM	Email Message	RE: Facedrive edits		"Nathan" <nathan@hindenburesearch.com>		"Michael Roussel" <mroussel@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000518	A	9/16/2021 6:38 PM	7/23/2020 2:42 AM	Microsoft Word				X			Solicitor Client Privileged Litigation Privileged
BLK00000519	A	9/16/2021 6:38 PM	7/23/2020 12:15 PM	Email Message	Re:FD		"Joshua Fineman (BLOOMBERG/NEWSROOM:)" <jfineman@bloomberg.net>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000520	A	9/16/2021 6:38 PM	7/23/2020 12:13 PM	Microsoft Word				X			Solicitor Client Privileged Litigation Privileged
BLK00000521	A	9/16/2021 6:38 PM	7/23/2020 12:41 AM	Email Message	Draft		"Nathan" <nathan@hindenburesearch.com>		"Sunny Puri" <spuri@ansonfunds.com>	Michael Roussel	Solicitor Client Privileged Litigation Privileged
BLK00000522	A	9/16/2021 6:38 PM	7/23/2020 12:41 AM	Microsoft Word				X			Solicitor Client Privileged Litigation Privileged
BLK00000525	P	11/9/2021 6:51 PM	11/9/2021 6:51 PM	Email Message	Re: Justice McEwen		"Milne-Smith, Matthew" <MMilne-Smith@dpv.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00000526	P	1/20/2022 3:35 PM	1/20/2022 3:35 PM	Email Message	RE: recommendation from Moez Kassam		"Barrack, Michael" <michael.barrack@blakes.com>		"Moez Kassam" <mkassam@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00000532	P	12/6/2021 3:25 PM	12/6/2021 3:25 PM	Email Message	RE: Defamation Matter		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000534	P	9/29/2021 2:42 AM	9/29/2021 2:42 AM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000535	A	9/29/2021 2:42 AM	9/29/2021 2:41 AM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000536	P	9/30/2021 12:30 PM	9/30/2021 12:30 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Fischer, Iris" <iris.fischer@blakes.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000548	P	12/14/2022 3:44 PM	12/14/2022 3:44 PM	Email Message	RE: Anson - Follow-up		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000549	A	12/14/2022 3:44 PM	2/17/2022 7:40 PM	Email Message	RE: Anson Advisors Inc. - Audit Legal Confirmation Letter		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000550	P	9/30/2021 11:55 PM	9/30/2021 11:55 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>; "Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000551	A	9/30/2021 11:55 PM	9/27/2021 3:49 PM	Email Message	FW: Haris		"Jolene Watson - Artemis Risk" <jolene.watson@artemisrisk.com>		"Navin Reddy" <navin.reddy@artemisrisk.com>		Solicitor Client Privileged Litigation Privileged
BLK00000552	A	9/30/2021 11:55 PM	10/1/2020 8:29 PM	Microsoft Excel				James Stafford			Solicitor Client Privileged Litigation Privileged
BLK00000554	P	11/2/2021 10:59 AM	11/2/2021 10:59 AM	Email Message	Automatic reply: Quick question		"Barrack, Michael" <michael.barrack@blakes.com>		"Moez Kassam" <mkassam@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000566	P	9/27/2021 3:10 PM	9/27/2021 3:10 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>; "Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000567	A	9/27/2021 3:10 PM	9/27/2021 3:07 PM	Adobe Portable Document Format		C:_Users_HRI_AppData_Local_Temp_1_Workshare_wmtemp2438_~wtf229FB598.ps					Solicitor Client Privileged Litigation Privileged
BLK00000568	A	9/27/2021 3:10 PM	9/27/2021 3:05 PM	Adobe Portable Document Format		C:_Users_HRI_AppData_Local_Temp_1_Workshare_wmtemp26a0_~wtf2005CAF5.ps					Solicitor Client Privileged Litigation Privileged
BLK00000569	A	9/27/2021 3:10 PM	9/27/2021 2:44 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000576	P	11/8/2021 10:09 PM	11/8/2021 10:09 PM	Email Message	RE: Subject: RE: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-0065341000CL -- Motion Scheduling		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwpy.com>		Solicitor Client Privileged Litigation Privileged
BLK00000578	P	10/29/2021 3:11 PM	10/29/2021 3:11 PM	Email Message	RE: Motion to amend claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Laura Salvatori; Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000586	P	12/14/2022 3:30 PM	12/14/2022 3:30 PM	Email Message	Automatic reply: Anson - Follow-up		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000587	P	10/18/2021 12:34 AM	10/18/2021 12:34 AM	Email Message	Re: Amended claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Sunny Puri; DiMatteo, Christopher; Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000597	P	12/15/2021 4:22 PM	12/15/2021 4:22 PM	Email Message	Re: Quick Call?		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000604	P	9/23/2021 5:52 PM	9/23/2021 5:52 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000606	P	11/12/2021 7:44 PM	11/12/2021 7:44 PM	Email Message	Defamation Matter		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000607	P	10/27/2021 10:31 PM	10/27/2021 10:31 PM	Email Message	Motion to amend claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris; Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
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BLK00000609	A	10/27/2021 10:31 PM	10/12/2021 8:05 PM	Microsoft Word		Notice of Motion Form 37A		DIMATTEO, CHRISTOPHER			Solicitor Client Privileged Litigation Privileged
BLK00000611	P	9/24/2021 1:55 PM	9/24/2021 1:55 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000612	A	9/24/2021 1:55 PM	9/24/2021 1:54 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000623	P	11/11/2021 5:08 PM	11/11/2021 5:08 PM	Email Message	RE: Justice McEwen		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000625	P	10/8/2021 2:40 PM	10/8/2021 2:40 PM	Email Message	Re: Amended claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00000626	P	10/1/2021 2:55 PM	10/1/2021 2:55 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000627	A	10/1/2021 2:55 PM	10/1/2021 1:20 PM	Email Message	FW: Bane		"Jolene Watson - Artemis Risk" <jolene.watson@artemisrisk.com>		"Navin Reddy" <navin.reddy@artemisrisk.com>		Solicitor Client Privileged Litigation Privileged
BLK00000628	A	10/1/2021 2:55 PM		JPEG Image							Solicitor Client Privileged Litigation Privileged
BLK00000634	P	9/26/2021 11:34 PM	9/26/2021 11:34 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000635	P	10/8/2021 6:43 PM	10/8/2021 6:43 PM	Email Message	RE: Amended claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000636	A	10/8/2021 6:43 PM	10/8/2021 6:43 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000649	P	12/13/2021 1:49 PM	12/13/2021 1:49 PM	Email Message	Re: Quick Call?		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000660	P	11/11/2021 5:08 PM	11/11/2021 5:08 PM	iCalendar	Accepted: Doxtator/Stafford litigation next steps		"Moez Kassam" <mkassam@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000662	P	9/30/2021 6:01 PM	9/30/2021 6:01 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	Moez Kassam	Solicitor Client Privileged Litigation Privileged
BLK00000665	P	11/23/2021 5:17 PM	11/23/2021 5:17 PM	Email Message	Fwd: Anson - Defamation Matters - Conflict Matter		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>; "Carlson, Andrew" <acarlson@dwvp.com>; "O'Sullivan, Maura" <mosullivan@dwvp.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00000667	P	9/26/2021 6:46 PM	9/26/2021 6:46 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000668	A	9/26/2021 6:46 PM	9/26/2021 6:32 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000669	A	9/26/2021 6:46 PM	9/26/2021 6:42 PM	Adobe Portable Document Format		C:\Users\HRI\AppData\Local\Temp\1\Workshare_wmtemp3cc0_~wtf3E8669A8.ps					Solicitor Client Privileged Litigation Privileged
BLK00000670	P	10/25/2021 2:28 PM	10/25/2021 2:28 PM	Email Message	Automatic reply: follow up		"Barrack, Michael" <mkassam@ansonfunds.com>		"Moez Kassam" <mkassam@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000671	P	1/11/2022 3:01 PM	1/11/2022 3:01 PM	Email Message	Re: Anson Matter / Blakes [LOLG-DMS.FID120424]		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000674	P	10/1/2021 3:04 PM	10/1/2021 3:04 PM	Email Message	Re: Anson/Stafford litigation - revised claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	Moez Kassam; Laura Salvatori; Barrack, Michael; DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00000675	P	10/24/2021 4:00 PM	10/24/2021 4:00 PM	iCalendar	Accepted: Anson Discussion		"Moez Kassam" <mkassam@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000676	P	10/20/2021 10:05 AM	10/20/2021 10:05 AM	iCalendar	Accepted: Anson - call		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000679	P	10/10/2021 9:04 PM	10/10/2021 9:04 PM	Email Message	RE: Amended claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000680	P	10/14/2021 4:54 PM	10/14/2021 4:54 PM	Email Message	Automatic reply: Thank you, thank you		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000682	P	11/24/2021 7:07 PM	11/24/2021 7:07 PM	Email Message	RE: Anson - Defamation Matters - Conflict Matter		"Sunny Puri" <spuri@ansonfunds.com>		"Carlson, Andrew" <acarlson@dpvp.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Milne-Smith, Matthew" <MMilne-Smith@dpvp.com>;"O'Sullivan, Maura" <mosullivan@dpvp.com>		Solicitor Client Privileged Litigation Privileged
BLK00000691	P	11/11/2021 5:07 PM	11/11/2021 5:07 PM	Email Message	RE: Justice McEwen		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Barrack, Michael" <michael.barrack@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000695	P	10/3/2021 6:51 PM	10/3/2021 6:51 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00000706	P	9/16/2021 9:45 PM	9/16/2021 9:45 PM	Email Message	RE: Facedrive emails 3		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>	Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00000707	P	10/27/2021 9:18 PM	10/27/2021 9:18 PM	Email Message	RE: follow up		"Moez Kassam" <mkassam@ansonfunds.com>		"Barrack, Michael" <michael.barrack@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000712	P	10/24/2021 4:11 PM	10/24/2021 4:11 PM	Email Message	Re: Anson - Amended SoC / Update		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Moez Kassam;Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00000713	P	11/5/2021 4:20 PM	11/5/2021 4:20 PM	Email Message	RE: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	Barrack, Michael	Solicitor Client Privileged Litigation Privileged
BLK00000717	P	10/8/2021 5:18 PM	10/8/2021 5:18 PM	Email Message	Re: Amended claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00000729	P	11/1/2021 9:14 PM	11/1/2021 9:14 PM	Email Message	RE: Update		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000730	P	11/25/2021 4:09 PM	11/25/2021 4:09 PM	Email Message	RE: Anson - Defamation Matters - Conflict Matter		"Carlson, Andrew" <acarlson@dpvp.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"Milne-Smith, Matthew" <MMilne-Smith@dpvp.com>;"O'Sullivan, Maura" <mosullivan@dpvp.com>		Solicitor Client Privileged Litigation Privileged
BLK00000739	P	9/30/2021 5:54 PM	9/30/2021 5:54 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Moez Kassam	Solicitor Client Privileged Litigation Privileged
BLK00000740	P	11/9/2021 6:48 PM	11/9/2021 6:48 PM	Email Message	RE: Justice McEwen		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Milne-Smith, Matthew" <MMilne-Smith@dpvp.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00000742	P	9/30/2021 2:58 PM	9/30/2021 2:58 PM	Email Message	Re: Anson/Stafford litigation - revised claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	Laura Salvatori;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00000743	P	9/27/2021 5:19 PM	9/27/2021 5:19 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00000744	A	9/27/2021 5:19 PM	9/27/2021 3:49 PM	Email Message	FW: Haris		"Jolene Watson - Artemis Risk" <jolene.watson@artemisrisk.com>		"Navin Reddy" <navin.reddy@artemisrisk.com>		Solicitor Client Privileged Litigation Privileged
BLK00000745	A	9/27/2021 5:19 PM	10/1/2020 8:29 PM	Microsoft Excel				James Stafford			Solicitor Client Privileged Litigation Privileged
BLK00000760	P	10/4/2021 2:21 PM	10/4/2021 2:21 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher;Moez Kassam	Solicitor Client Privileged Litigation Privileged
BLK00000763	P	11/11/2021 4:57 PM	11/11/2021 4:57 PM	Email Message	Re: Justice McEwen		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Barrack, Michael" <michael.barrack@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000767	P	11/24/2021 6:48 PM	11/24/2021 6:48 PM	Email Message	RE: Anson - Defamation Matters - Conflict Matter		"Carlson, Andrew" <acarlson@dwvp.com>		"Sunny Puri" <spuri@ansonfunds.com>;"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>;"O'Sullivan, Maura" <mosullivan@dwvp.com>		Solicitor Client Privileged Litigation Privileged
BLK00000770	P	9/20/2021 9:18 PM	9/20/2021 9:18 PM	Email Message	Automatic reply: Anson/Stafford litigation - revised claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000788	P	9/19/2021 8:01 PM	9/19/2021 8:01 PM	Email Message	Anson/Stafford litigation - revised claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>	Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00000789	A	9/19/2021 8:01 PM	9/19/2021 7:54 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000790	A	9/19/2021 8:01 PM	9/19/2021 7:55 PM	Adobe Portable Document Format		C:_Users_HRI_AppData_Local_Temp_1 _Workshare_wmtemp8b8_~wtf099D88C6 .ps					Solicitor Client Privileged Litigation Privileged
BLK00000796	P	11/3/2021 12:40 AM	11/3/2021 12:40 AM	Email Message	RE: Quick question		"Barrack, Michael" <michael.barrack@blakes.com>		"Moez Kassam" <mkassam@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000799	P	1/11/2022 5:01 PM	1/11/2022 5:01 PM	iCalendar	Anson Matter / Blakes		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000800	P	11/25/2021 4:05 PM	11/25/2021 4:05 PM	Email Message	RE: Anson - Defamation Matters - Conflict Matter		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Carlson, Andrew" <acarlson@dwvp.com>;"Sunny Puri" <spuri@ansonfunds.com>;"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>;"O'Sullivan, Maura" <mosullivan@dwvp.com>		Solicitor Client Privileged Litigation Privileged
BLK00000801	P	11/25/2021 7:29 PM	11/25/2021 7:29 PM	Email Message	Re: Anson - Defamation Matters - Conflict Matter		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000802	P	3/22/2022 6:40 PM	3/22/2022 6:40 PM	Email Message	RE: Deloitte Audit Confirmation Request (Ref ID: 1874346) - Anson Funds Management		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>;"jongoodwin@deloitte.com" <jongoodwin@deloitte.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000804	P	9/20/2021 4:16 PM	9/20/2021 4:16 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>	Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00000805	P	10/27/2021 10:53 PM	10/27/2021 10:53 PM	Email Message	Automatic reply: Motion to amend claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000808	P	10/19/2021 10:42 PM	10/19/2021 10:42 PM	Email Message	Quick call tomorrow ?		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000814	P	11/9/2021 3:17 PM	11/9/2021 3:17 PM	Email Message	Justice McEwen		"Barrack, Michael" <michael.barrack@blakes.com>		"Moez Kassam" <mkassam@ansonfunds.com>;"l.salvatori@ansonfunds.com" <l.salvatori@ansonfunds.com>;"spuri@ansonfunds.com" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00000815	A	11/9/2021 3:17 PM	11/9/2021 2:00 PM	Email Message	RE: Subject: RE: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410 00CL -- Motion Scheduling		"Joe Groia" <jgroia@groiacom.com>		"McEwen, Mr. Justice Thomas John (SCJ)" <ThomasJohn.McEwen@scj-cs.ca>; "Barrack, Michael" <michael.barrack@blakes.com>	Trevor Fairlie;admin@oilprice.com;james@floatingmix.com;Staffjam888@yahoo.co.uk;admin@safehaven.com;flybiggles555@yahoo.com;webmaster@amswebdesign.com;james@oilprice.com;Andrew.rudensky@gmail.com;ar@delavaco.com;allenspektor@gmail.com;Fischer, Iris;DiMatteo, Christopher;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000816	A	11/9/2021 3:17 PM	11/9/2021 2:53 PM	Email Message	RE: Subject: RE: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410 00CL -- Motion Scheduling		"McEwen, Mr. Justice Thomas John (SCJ)" <ThomasJohn.McEwen@scj-cs.ca>		"Won J. Kim" <wjkim@complexlaw.ca>	Barrack, Michael;Joe Groia;Trevor Fairlie;James Stafford;james@floatingmix.com;staffjam888@yahoo.co.uk;admin@safehaven.com;flybiggles555@yahoo.com;webmaster@amswebdesign.com;james@oilprice.com;andrew.rudensky@gmail.com;ar@delavaco.com;allenspektor@gmail.com;Fischer, Iris;DiMatteo, Christopher;Sheppard, Gregory;Megan B. McPhee;Aris Gyamfi	Solicitor Client Privileged Litigation Privileged
BLK00000824	P	12/14/2022 3:30 PM	12/14/2022 3:30 PM	Email Message	RE: Anson - Follow-up		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000828	P	9/21/2021 1:05 AM	9/21/2021 1:05 AM	iCalendar	Accepted: Anson		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000830	P	11/1/2021 5:11 PM	11/1/2021 5:11 PM	Email Message	RE: Update		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00000831	P	10/8/2021 4:49 PM	10/8/2021 4:49 PM	Email Message	RE: Amended claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00000834	P	12/14/2022 6:29 PM	12/14/2022 6:29 PM	Email Message	RE: Anson - Follow-up		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000835	A	12/14/2022 6:29 PM	2/18/2022 7:37 PM	Email Message	RE: Anson Advisors Inc. - Audit Legal Confirmation Letter		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000838	P	11/8/2021 9:52 PM	11/8/2021 9:52 PM	Email Message	Re: Subject: RE: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410 00CL -- Motion Scheduling		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000840	P	11/8/2021 10:01 PM	11/8/2021 10:01 PM	Email Message	RE: Subject: RE: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410 00CL -- Motion Scheduling		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>		Solicitor Client Privileged Litigation Privileged
BLK00000841	P	10/6/2021 5:09 PM	10/6/2021 5:09 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>	Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000842	A	10/6/2021 5:09 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00000849	P	11/9/2021 5:22 PM	11/9/2021 5:22 PM	Email Message	Re: Justice McEwen		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00000851	P	10/28/2021 3:06 PM	10/28/2021 3:06 PM	Email Message	RE: Motion to amend claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher;Laura Salvatori;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000854	P	10/13/2021 3:37 PM	10/13/2021 3:37 PM	Email Message	RE: SEEKING REFERRALS :Litigator lawyer in Toronto		"Barrack, Michael" <michael.barrack@blakes.com>		"Moez Kassam" <mkassam@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000864	P	10/5/2021 1:31 AM	10/5/2021 1:31 AM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>	Barrack, Michael;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000865	A	10/5/2021 1:31 AM	10/5/2021 1:30 AM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000866	A	10/5/2021 1:31 AM	10/5/2021 1:23 AM	Microsoft Word				Sheppard, Gregory			Solicitor Client Privileged Litigation Privileged
BLK00000867	P	11/25/2021 7:14 PM	11/25/2021 7:14 PM	Email Message	Re: Anson - Defamation Matters - Conflict Matter		"Sunny Puri" <spuri@ansonfunds.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00000874	P	9/13/2021 1:37 PM	9/13/2021 1:37 PM	Email Message	Doxtator/Stafford litigation - revised claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000875	A	9/13/2021 1:37 PM	9/13/2021 1:25 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000876	A	9/13/2021 1:37 PM	9/13/2021 1:26 PM	Adobe Portable Document Format		C:_Users_HRI_AppData_Local_Temp_1_Workshare_wmtemp192c_~wtf1F671E2A.ps					Solicitor Client Privileged Litigation Privileged
BLK00000884	P	9/21/2021 9:26 PM	9/21/2021 9:26 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000885	A	9/21/2021 9:26 PM	9/21/2021 8:11 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000886	A	9/21/2021 9:26 PM	9/21/2021 9:17 PM	Adobe Portable Document Format		C:_Users_HRI_AppData_Local_Temp_1_Workshare_wmtemp4704_~wtf4CB93734.ps					Solicitor Client Privileged Litigation Privileged
BLK00000889	P	9/22/2021 12:13 AM	9/22/2021 12:13 AM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00000890	P	11/6/2021 12:40 AM	11/6/2021 12:40 AM	Email Message	RE: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>		Solicitor Client Privileged Litigation Privileged
BLK00000891	P	10/27/2021 10:53 PM	10/27/2021 10:53 PM	Email Message	Re: Motion to amend claim		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000905	P	12/16/2021 10:47 PM	12/16/2021 10:47 PM	Email Message	Re: Quick Call?		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000909	P	9/23/2021 5:29 PM	9/23/2021 5:29 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000913	P	11/25/2021 6:49 PM	11/25/2021 6:49 PM	Email Message	Re: Anson - Defamation Matters - Conflict Matter		"Sunny Puri" <spuri@ansonfunds.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>		Solicitor Client Privileged Litigation Privileged
BLK00000916	P	11/1/2021 8:55 PM	11/1/2021 8:55 PM	Email Message	RE: Update		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000917	P	10/3/2021 3:54 PM	10/3/2021 3:54 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00000918	P	10/26/2021 5:56 PM	10/26/2021 5:56 PM	Email Message	RE: Call Tomorrow?		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00000919	A	10/26/2021 5:56 PM	10/6/2021 3:17 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00000920	P	9/16/2021 8:11 PM	9/16/2021 8:11 PM	Email Message	Re: Facedrive emails 3		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	DiMatteo, Christopher;Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00000937	P	2/24/2022 2:55 PM	2/24/2022 2:55 PM	Email Message	RE: Anson Advisors Inc. - Audit Legal Confirmation Letter		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000938	P	11/25/2021 4:17 PM	11/25/2021 4:17 PM	Email Message	Re: Anson - Defamation Matters - Conflict Matter		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>		"Carlson, Andrew" <acarlson@dwvp.com>	Laura Salvatori;Sunny Puri;O'Sullivan, Maura	Solicitor Client Privileged Litigation Privileged
BLK00000939	P	1/11/2022 5:04 PM	1/11/2022 5:04 PM	iCalendar	Accepted: Anson Matter / Blakes		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000941	P	9/16/2021 6:38 PM	9/16/2021 6:38 PM	Email Message	facedrive emails 2		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00000942	A	9/16/2021 6:38 PM	7/20/2020 12:31 AM	Email Message	RE: Facedrive Restaurants, Waterloo exchange		"Sunny Puri" <spuri@ansonfunds.com>		"Michael Rousset" <mrousset@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000943	A	9/16/2021 6:38 PM	7/15/2020 1:51 AM	Email Message	Fwd: FD		"Sunny Puri" <spuri@ansonfunds.com>		"Moez Kassam" <mkassam@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00000944	A	9/16/2021 6:38 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00000945	A	9/16/2021 6:38 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00000946	A	9/16/2021 6:38 PM	7/22/2020 2:13 PM	Email Message	RE: Facedrive		"Sunny Puri" <spuri@ansonfunds.com>		"Nathan" <nathan@hindenburesearch.com>	Michael Roussel	Solicitor Client Privileged Litigation Privileged
BLK00000947	A	9/16/2021 6:38 PM	7/22/2020 12:29 PM	Microsoft Excel	Erep request id:5f18291c3e100020 on NXPGR-OB-759			Bloomberg EREP Reporting platform			Solicitor Client Privileged Litigation Privileged
BLK00000948	A	9/16/2021 6:38 PM	7/22/2020 12:22 PM	Microsoft Word				X			Solicitor Client Privileged Litigation Privileged
BLK00000949	A	9/16/2021 6:38 PM	7/22/2020 2:37 PM	Email Message	RE: Facedrive		"Sunny Puri" <spuri@ansonfunds.com>		"Nathan" <nathan@hindenburesearch.com>	Michael Roussel	Solicitor Client Privileged Litigation Privileged
BLK00000950	A	9/16/2021 6:38 PM	7/20/2020 8:48 PM	Email Message	RE: Facedrive		"Sunny Puri" <spuri@ansonfunds.com>		"Nathan" <nathan@hindenburesearch.com>;"Michael Roussel" <mrousseau@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00000951	A	9/16/2021 6:38 PM	7/15/2020 12:06 AM	Email Message	RE: FD		"Sunny Puri" <spuri@ansonfunds.com>		"Michael Roussel" <mrousseau@ansonfunds.com>;"Nathan" <nathan@hindenburesearch.com>		Solicitor Client Privileged Litigation Privileged
BLK00000952	A	9/16/2021 6:38 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00000953	A	9/16/2021 6:38 PM	7/22/2020 6:02 PM	Email Message	RE: Facedrive		"Sunny Puri" <spuri@ansonfunds.com>		"Nathan" <nathan@hindenburesearch.com>		Solicitor Client Privileged Litigation Privileged
BLK00000957	P	9/14/2021 3:18 PM	9/14/2021 3:18 PM	iCalendar	Anson - Doxtator/Stafford litigation		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>;"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000963	P	9/16/2021 9:05 PM	9/16/2021 9:05 PM	Email Message	RE: Facedrive emails 3		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00000964	P	10/12/2021 11:37 PM	10/12/2021 11:37 PM	Email Message	Re: Anson - Defamation Matters - Available for a Call?		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000965	P	10/1/2021 3:59 PM	10/1/2021 3:59 PM	iCalendar	Accepted: Anson - Amended Statement of Claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00000985	P	10/6/2021 4:12 PM	10/6/2021 4:12 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>	Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00000986	A	10/6/2021 4:12 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00000987	P	10/8/2021 6:04 PM	10/8/2021 6:04 PM	Email Message	RE: Amended claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00000988	P	9/16/2021 3:25 PM	9/16/2021 3:25 PM	Email Message	FW: reasons its rudensky		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00000989	A	9/16/2021 3:25 PM	9/8/2021 11:34 AM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00001007	P	2/18/2022 7:37 PM	2/18/2022 7:37 PM	Email Message	RE: Anson Advisors Inc. - Audit Legal Confirmation Letter		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001016	P	10/5/2021 12:23 PM	10/5/2021 12:23 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>	Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00001018	P	11/1/2021 5:21 PM	11/1/2021 5:21 PM	Email Message	RE: Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>;"Laura Salvatori" <l.salvatori@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00001034	P	9/27/2021 2:43 PM	9/27/2021 2:43 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>; "Fischer, Iris" <iris.fischer@blakes.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001037	P	11/5/2021 3:53 AM	11/5/2021 3:53 AM	Email Message	Automatic reply: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001038	P	10/6/2021 5:03 PM	10/6/2021 5:03 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>; "Fischer, Iris" <iris.fischer@blakes.com>	Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00001039	A	10/6/2021 5:03 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00001046	P	11/8/2021 3:59 PM	11/8/2021 3:59 PM	Email Message	RE: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Milne-Smith, Matthew" <MMilne-Smith@dpv.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001047	P	10/28/2021 2:33 AM	10/28/2021 2:33 AM	Email Message	Re: Motion to amend claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	DiMatteo, Christopher; Laura Salvatori; Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00001058	P	10/13/2021 2:56 AM	10/13/2021 2:56 AM	iCalendar	Anson - Discussion		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001060	P	10/27/2021 6:05 PM	10/27/2021 6:05 PM	Email Message	RE: Two questions		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Milne-Smith, Matthew" <MMilne-Smith@dpv.com>		Solicitor Client Privileged Litigation Privileged
BLK00001061	A	10/27/2021 6:05 PM	4/28/2021 8:53 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00001062	A	10/27/2021 6:05 PM	1/21/2021 5:03 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00001063	A	10/27/2021 6:05 PM	4/9/2021 8:09 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00001064	A	10/27/2021 6:05 PM	12/17/2020 9:28 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00001065	A	10/27/2021 6:05 PM	3/25/2021 7:56 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00001066	A	10/27/2021 6:05 PM	4/19/2021 6:28 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00001071	P	9/16/2021 3:27 PM	9/16/2021 3:27 PM	Email Message	Automatic reply: reasons its rudensky		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001072	P	10/3/2021 3:49 PM	10/3/2021 3:49 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00001079	P	9/14/2021 3:17 PM	9/14/2021 3:17 PM	Email Message	RE: Doxtator/Stafford litigation - revised claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001080	P	10/29/2021 9:07 PM	10/29/2021 9:07 PM	Email Message	Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00001081	P	10/25/2021 2:28 PM	10/25/2021 2:28 PM	Email Message	follow up		"Moez Kassam" <mkassam@ansonfunds.com>		"Michael Barrack" <michael.barrack@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001082	P	10/11/2021 4:08 PM	10/11/2021 4:08 PM	Email Message	RE: Amended claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001085	P	3/22/2022 6:25 PM	3/22/2022 6:25 PM	Email Message	RE: Holbox		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001087	P	10/24/2021 3:06 PM	10/24/2021 3:06 PM	Email Message	Re: Anson - Amended SoC / Update		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>	Moez Kassam; Sunny Puri	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00001095	P	10/1/2021 3:21 PM	10/1/2021 3:21 PM	iCalendar	Anson - Amended Statement of Claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Moez Kassam" <mkassam@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>; "Barrack, Michael" <michael.barrack@blakes.com>; "Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001102	P	11/5/2021 10:49 PM	11/5/2021 10:49 PM	Email Message	Re: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Milne-Smith, Matthew" <MMilne-Smith@dpwv.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001103	P	11/4/2021 8:20 PM	11/4/2021 8:20 PM	Email Message	RE: Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00001109	P	10/28/2021 6:29 PM	10/28/2021 6:29 PM	Email Message	FW: Motion to amend claim		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Milne-Smith, Matthew" <MMilne-Smith@dpwv.com>		Solicitor Client Privileged Litigation Privileged
BLK00001110	A	10/28/2021 6:29 PM	10/12/2021 8:09 PM	Adobe Portable Document Format		C:_Users_HRI_AppData_Local_Temp_1_Workshare_wmtemp35ac_~wtf3430C11A.ps					Solicitor Client Privileged Litigation Privileged
BLK00001111	A	10/28/2021 6:29 PM	10/12/2021 8:05 PM	Microsoft Word		Notice of Motion Form 37A		DIMATTEO, CHRISTOPHER			Solicitor Client Privileged Litigation Privileged
BLK00001114	P	10/6/2021 3:32 AM	10/6/2021 3:32 AM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Fischer, Iris" <iris.fischer@blakes.com>	Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00001115	A	10/6/2021 3:32 AM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00001122	P	11/4/2021 10:46 AM	11/4/2021 10:46 AM	Email Message	Re: Update		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris; Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00001123	P	10/8/2021 2:02 PM	10/8/2021 2:02 PM	Email Message	RE: Amended claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001124	P	9/28/2021 12:54 PM	9/28/2021 12:54 PM	Email Message	Re: Anson/Stafford litigation - revised claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001128	P	1/10/2022 7:41 PM	1/10/2022 7:41 PM	Email Message	RE: Anson Matter / Blakes [LOLG-DMS.FID120424]		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001135	P	11/24/2021 7:31 PM	11/24/2021 7:31 PM	Email Message	RE: Anson - Defamation Matters - Conflict Matter		"Carlson, Andrew" <acosullivan@dpwv.com>		"Sunny Puri" <spuri@ansonfunds.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>; "Milne-Smith, Matthew" <MMilne-Smith@dpwv.com>; "O'Sullivan, Maura" <mosullivan@dpwv.com>		Solicitor Client Privileged Litigation Privileged
BLK00001137	P	11/15/2021 9:25 PM	11/15/2021 9:25 PM	Email Message	RE: James Stafford		"Barrack, Michael" <michael.barrack@blakes.com>		"Moez Kassam" <mkassam@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001155	P	10/29/2021 3:06 PM	10/29/2021 3:06 PM	Email Message	RE: Motion to amend claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Fischer, Iris" <iris.fischer@blakes.com>	Laura Salvatori; Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00001159	P	10/5/2021 4:20 PM	10/5/2021 4:20 PM	Email Message	Automatic reply: Anson/Stafford litigation - revised claim		"Sheppard, Gregory" <gregory.sheppard@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001171	P	9/24/2021 4:44 PM	9/24/2021 4:44 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001174	P	11/25/2021 10:55 PM	11/25/2021 10:55 PM	Email Message	Re: Anson - Defamation Matters - Conflict Matter		"Sunny Puri" <spuri@ansonfunds.com>		"Milne-Smith, Matthew" <MMilne-Smith@dpwv.com>		Solicitor Client Privileged Litigation Privileged
BLK00001178	P	11/4/2021 8:24 PM	11/4/2021 8:24 PM	Email Message	RE: Quick question		"Moez Kassam" <mkassam@ansonfunds.com>		"Barrack, Michael" <michael.barrack@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001180	P	10/5/2021 12:24 PM	10/5/2021 12:24 PM	Email Message	Automatic reply: Anson/Stafford litigation - revised claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00001183	P	12/14/2022 3:03 PM	12/14/2022 3:03 PM	Email Message	Anson - Follow-up		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001184	A	12/14/2022 3:03 PM	2/22/2022 8:41 PM	Adobe Portable Document Format				Warren Ly			Solicitor Client Privileged Litigation Privileged
BLK00001189	P	10/6/2021 8:14 PM	10/6/2021 8:14 PM	Email Message	Re: Amended claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001191	P	11/25/2021 7:09 PM	11/25/2021 7:09 PM	Email Message	Re: Anson - Defamation Matters - Conflict Matter		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001192	P	2/25/2022 1:17 PM	2/25/2022 1:17 PM	Email Message	RE: Anson Advisors Inc. - Audit Legal Confirmation Letter		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001195	P	11/11/2021 4:54 PM	11/11/2021 4:54 PM	Email Message	RE: Justice McEwen		"Fischer, Iris" <iris.fischer@blakes.com>		"Moez Kassam" <mkassam@ansonfunds.com>; "Barrack, Michael" <michael.barrack@blakes.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001197	P	11/1/2021 6:21 PM	11/1/2021 6:21 PM	Email Message	RE: Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00001198	P	10/12/2021 11:49 PM	10/12/2021 11:49 PM	Email Message	Re: Anson - Defamation Matters - Available for a Call?		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001206	P	9/14/2021 1:14 AM	9/14/2021 1:14 AM	Email Message	RE: Doxtator/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001207	A	9/14/2021 1:14 AM	9/13/2021 7:35 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00001211	P	10/23/2021 10:01 PM	10/23/2021 10:01 PM	Email Message	Re: Anson - Amended SoC / Update		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Moez Kassam; Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00001212	P	9/23/2021 5:52 PM	9/23/2021 5:52 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001215	P	9/30/2021 3:34 PM	9/30/2021 3:34 PM	Email Message	Automatic reply: Anson/Stafford litigation - revised claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001216	P	11/1/2021 11:34 PM	11/1/2021 11:34 PM	Email Message	Fwd: Update		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>		Solicitor Client Privileged Litigation Privileged
BLK00001219	P	11/19/2021 7:45 PM	11/19/2021 7:45 PM	Email Message	FW: TOR_DOCUMENTS-#10394112-vPDF-Fresh_as_Amended_Statement_of_Claim v7_as_received_from_Blakes		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>	Carlson, Andrew	Solicitor Client Privileged Litigation Privileged
BLK00001220	A	11/19/2021 7:45 PM	11/19/2021 5:22 PM	Adobe Portable Document Format		TOR_DOCUMENTS-#10394112-v2-Fresh_as_Amended_Statement_of_Claim_v7_as_received_from_Blakes compared with TOR_DOCUMENTS-#10394112-v3-Fresh_as_Amended_Statement_of_Claim v7_as_received_from_Blakes					Solicitor Client Privileged Litigation Privileged
BLK00001221	A	11/19/2021 7:45 PM	11/19/2021 5:21 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00001233	P	1/10/2022 10:30 PM	1/10/2022 10:30 PM	Email Message	RE: Anson Matter / Blakes [LOLG-DMS.FID120424]		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001234	P	11/2/2021 10:59 AM	11/2/2021 10:59 AM	Email Message	Quick question		"Moez Kassam" <mkassam@ansonfunds.com>		"Michael Barrack" <michael.barrack@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001235	P	10/27/2021 11:32 PM	10/27/2021 11:32 PM	Email Message	Automatic reply: Motion to amend claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001240	P	9/14/2021 1:57 PM	9/14/2021 1:57 PM	Email Message	Anson Funds - Blakes Invoice re. Defamation Matters (July + August 2021)		"Hickey, Michael" <michael.hickey@blakes.com>		"Anthony Rizzo" <arizzo@ansonfunds.com>	Laura Salvatori	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00001241	A	9/14/2021 1:57 PM	9/14/2021 12:30 PM	Adobe Portable Document Format				Warren Ly			Solicitor Client Privileged Litigation Privileged
BLK00001243	P	9/24/2021 2:23 AM	9/24/2021 2:23 AM	Email Message	Re: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Laura Salvatori;Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001246	P	12/15/2021 4:17 PM	12/15/2021 4:17 PM	Email Message	Re: Quick Call?		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001247	P	1/20/2022 3:33 PM	1/20/2022 3:33 PM	Email Message	RE: recommendation from Moez Kassam		"Moez Kassam" <mkassam@ansonfunds.com>		"Barrack, Michael" <michael.barrack@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001249	P	11/11/2021 5:08 PM	11/11/2021 5:08 PM	iCalendar	Doxtator/Stafford litigation next steps		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Barrack, Michael" <michael.barrack@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001258	P	11/23/2021 5:18 PM	11/23/2021 5:18 PM	Email Message	RE: Anson - Defamation Matters - Conflict Matter		"Carlson, Andrew" <acarlson@dwvp.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>;"O'Sullivan, Maura" <mosullivan@dwvp.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00001259	P	11/25/2021 11:05 PM	11/25/2021 11:05 PM	Email Message	Re: Anson - Defamation Matters - Conflict Matter		"Sunny Puri" <spuri@ansonfunds.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwvp.com>		Solicitor Client Privileged Litigation Privileged
BLK00001260	P	11/5/2021 12:22 AM	11/5/2021 12:22 AM	Email Message	RE: Quick question		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Moez Kassam" <mkassam@ansonfunds.com>;"Barrack, Michael" <michael.barrack@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001261	P	9/13/2021 1:38 PM	9/13/2021 1:38 PM	Email Message	Automatic reply: Doxtator/Stafford litigation - revised claim		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001263	P	11/11/2021 5:10 PM	11/11/2021 5:10 PM	iCalendar	Accepted: Doxtator/Stafford litigation next steps		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001268	P	12/17/2021 1:43 PM	12/17/2021 1:43 PM	Email Message	Re: Quick Call?		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001269	P	10/2/2021 12:49 AM	10/2/2021 12:49 AM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001270	P	9/14/2021 7:18 PM	9/14/2021 7:18 PM	iCalendar	Accepted: Anson - Doxtator/Stafford litigation		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001271	P	10/27/2021 11:32 PM	10/27/2021 11:32 PM	Email Message	RE: Motion to amend claim		"Sunny Puri" <spuri@ansonfunds.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00001272	P	10/5/2021 6:32 PM	10/5/2021 6:32 PM	Email Message	RE: emails		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001275	P	10/12/2021 7:11 PM	10/12/2021 7:11 PM	Email Message	RE: Amended claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Laura Salvatori;Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00001276	P	10/29/2021 3:00 AM	10/29/2021 3:00 AM	Email Message	Costumes??		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001280	P	10/27/2021 4:11 PM	10/27/2021 4:11 PM	Email Message	RE: follow up		"Barrack, Michael" <michael.barrack@blakes.com>		"Moez Kassam" <mkassam@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001296	P	10/8/2021 1:45 PM	10/8/2021 1:45 PM	Email Message	Automatic reply: Amended claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001303	P	11/1/2021 6:21 PM	11/1/2021 6:21 PM	Email Message	Re: Costumes??		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001305	P	10/21/2021 11:53 PM	10/21/2021 11:53 PM	Email Message	RE: Anson - Amended SoC / Update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00001306	P	10/24/2021 4:05 PM	10/24/2021 4:05 PM	iCalendar	Accepted: Anson Discussion		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001319	P	12/6/2021 3:24 PM	12/6/2021 3:24 PM	Email Message	Re: Defamation Matter		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001331	P	9/20/2021 5:26 PM	9/20/2021 5:26 PM	Email Message	Automatic reply: Anson/Stafford litigation - revised claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001332	P	11/10/2021 3:58 PM	11/10/2021 3:58 PM	Email Message	RE: Justice McEwen		"Moez Kassam" <mkassam@ansonfunds.com>		"Barrack, Michael" <michael.barrack@blakes.com>; "Laura Salvatori" <l.salvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001334	P	10/5/2021 4:20 PM	10/5/2021 4:20 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Fischer, Iris" <iris.fischer@blakes.com>	Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00001335	P	2/24/2022 2:31 PM	2/24/2022 2:31 PM	Email Message	RE: Anson Advisors Inc. - Audit Legal Confirmation Letter		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001336	A	2/24/2022 2:31 PM	2/24/2022 2:21 PM	Adobe Portable Document Format		Microsoft Word - TOR_2024-#13131813-v1-Audit_letter_to_Anson_Advisors.docx		ldw			Solicitor Client Privileged Litigation Privileged
BLK00001337	P	9/29/2021 9:48 PM	9/29/2021 9:48 PM	Email Message	RE: touching base		"Barrack, Michael" <mbarrack@ansonfunds.com>		"Moez Kassam" <mkassam@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001340	P	10/1/2021 3:25 PM	10/1/2021 3:25 PM	iCalendar	Accepted: Anson - Amended Statement of Claim		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001352	P	10/1/2021 12:42 AM	10/1/2021 12:42 AM	Email Message	Re: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Laura Salvatori; Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001353	P	11/6/2021 1:52 AM	11/6/2021 1:52 AM	Email Message	Re: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Milne-Smith, Matthew" <MMilne-Smith@dpv.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001354	P	10/7/2021 3:19 AM	10/7/2021 3:19 AM	Email Message	Re: emails		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001356	P	9/28/2021 12:56 PM	9/28/2021 12:56 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001357	P	11/11/2021 5:08 PM	11/11/2021 5:08 PM	iCalendar	Accepted: Doxtator/Stafford litigation next steps		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001358	P	10/8/2021 1:44 PM	10/8/2021 1:44 PM	Email Message	Re: Amended claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Iris Fischer	Solicitor Client Privileged Litigation Privileged
BLK00001372	P	10/2/2021 1:30 PM	10/2/2021 1:30 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00001373	A	10/2/2021 1:30 PM	10/2/2021 1:27 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00001376	P	10/1/2021 2:56 PM	10/1/2021 2:56 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001385	P	11/5/2021 12:22 AM	11/5/2021 12:22 AM	Email Message	Automatic reply: Quick question		"Barrack, Michael" <michael.barrack@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001388	P	12/15/2021 3:17 PM	12/15/2021 3:17 PM	Email Message	Automatic reply: Quick Call?		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001391	P	10/20/2021 3:43 PM	10/20/2021 3:43 PM	Email Message	One Follow Up		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001393	P	12/6/2021 3:19 PM	12/6/2021 3:19 PM	Email Message	Re: Defamation Matter		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001394	P	10/24/2021 4:05 PM	10/24/2021 4:05 PM	Email Message	Re: Anson - Amended SoC / Update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>	Moez Kassam; Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00001397	P	2/17/2022 7:40 PM	2/17/2022 7:40 PM	Email Message	RE: Anson Advisors Inc. - Audit Legal Confirmation Letter		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00001410	P	10/12/2021 5:10 PM	10/12/2021 5:10 PM	Email Message	Re: Amended claim		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001420	P	11/24/2021 6:33 PM	11/24/2021 6:33 PM	Email Message	RE: Anson - Defamation Matters - Conflict Matter		"Sunny Puri" <spuri@ansonfunds.com>		"Carlson, Andrew" <acarlson@dpvp.com>,"Laura Salvatori" <l.salvatori@ansonfunds.com>,"Milne-Smith, Matthew" <MMilne-Smith@dpvp.com>,"O'Sullivan, Maura" <mosullivan@dpvp.com>		Solicitor Client Privileged Litigation Privileged
BLK00001421	P	10/13/2021 3:36 AM	10/13/2021 3:36 AM	iCalendar	Accepted: Anson - Discussion		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001422	P	10/10/2021 9:05 PM	10/10/2021 9:05 PM	Email Message	Automatic reply: Amended claim		"Sheppard, Gregory" <gregory.sheppard@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001423	P	10/1/2021 7:18 PM	10/1/2021 7:18 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>,"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001424	A	10/1/2021 7:18 PM	10/1/2021 7:17 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00001427	P	12/17/2021 1:05 PM	12/17/2021 1:05 PM	Email Message	Re: Quick Call?		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001436	P	11/5/2021 6:01 PM	11/5/2021 6:01 PM	Email Message	Re: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Milne-Smith, Matthew" <MMilne-Smith@dpvp.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001438	P	10/8/2021 6:10 PM	10/8/2021 6:10 PM	Email Message	Re: Amended claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00001455	P	9/24/2021 2:28 PM	9/24/2021 2:28 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001456	P	12/17/2021 3:30 PM	12/17/2021 3:30 PM	Email Message	Follow-up re. Recommendations		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001460	P	11/25/2021 10:17 PM	11/25/2021 10:17 PM	Email Message	Re: Anson - Defamation Matters - Conflict Matter		"Milne-Smith, Matthew" <MMilne-Smith@dpvp.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001469	P	9/30/2021 2:50 PM	9/30/2021 2:50 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>,"Fischer, Iris" <iris.fischer@blakes.com>,"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001471	P	10/11/2021 4:10 PM	10/11/2021 4:10 PM	Email Message	FW: Amended claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001472	P	10/26/2021 1:09 AM	10/26/2021 1:09 AM	Email Message	Re: follow up		"Moez Kassam" <mkassam@ansonfunds.com>		"Barrack, Michael" <michael.barrack@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001473	P	11/15/2021 7:06 PM	11/15/2021 7:06 PM	Email Message	FW: James Stafford		"Moez Kassam" <mkassam@ansonfunds.com>		"Michael Barrack" <michael.barrack@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001474	P	10/23/2021 6:51 PM	10/23/2021 6:51 PM	Email Message	Follow up		"Moez Kassam" <mkassam@ansonfunds.com>		"Michael Barrack" <michael.barrack@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001475	P	11/25/2021 9:52 PM	11/25/2021 9:52 PM	Email Message	RE: Anson - Defamation Matters - Conflict Matter		"Milne-Smith, Matthew" <MMilne-Smith@dpvp.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001483	P	11/13/2021 8:16 PM	11/13/2021 8:16 PM	Email Message	Automatic reply: Defamation Matter		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001486	P	10/19/2021 11:38 PM	10/19/2021 11:38 PM	Email Message	Re: Quick call tomorrow ?		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001490	P	10/5/2021 4:55 PM	10/5/2021 4:55 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>,"Fischer, Iris" <iris.fischer@blakes.com>	Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00001491	A	10/5/2021 4:55 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00001497	P	10/6/2021 3:27 PM	10/6/2021 3:27 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>; "Fischer, Iris" <iris.fischer@blakes.com>	Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00001498	A	10/6/2021 3:27 PM	10/6/2021 3:17 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00001499	A	10/6/2021 3:27 PM	10/6/2021 3:19 PM	Adobe Portable Document Format		C:\Users\GRG\AppData\Local\Temp\1\Workshare_wmtemp1ea0_wtf12216A\BE.ps					Solicitor Client Privileged Litigation Privileged
BLK00001500	A	10/6/2021 3:27 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00001501	P	10/6/2021 4:12 PM	10/6/2021 4:12 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Fischer, Iris" <iris.fischer@blakes.com>	Sheppard, Gregory	Solicitor Client Privileged Litigation Privileged
BLK00001502	A	10/6/2021 4:12 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00001503	P	10/21/2021 4:20 PM	10/21/2021 4:20 PM	Email Message	Anson - Amended SoC / Update		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001504	P	11/8/2021 5:17 PM	11/8/2021 5:17 PM	Email Message	Automatic reply: Subject: RE: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Barrack, Michael" <michael.barrack@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001518	P	12/17/2021 3:38 PM	12/17/2021 3:38 PM	Email Message	RE: Follow-up re. Recommendations		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001519	P	9/19/2021 9:39 PM	9/19/2021 9:39 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Fischer, Iris" <iris.fischer@blakes.com>	Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00001520	A	9/19/2021 9:39 PM	7/17/2018 7:52 PM	Email Message	Aph		"Moez Kassam" <mkassam@ansonfunds.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001521	A	9/19/2021 9:39 PM	4/14/2018 12:07 PM	Email Message	aph calls available		"Sunny Puri" <spuri@ansonfunds.com>		"Nathan Anderson" <nathan@clarityspring.com>		Solicitor Client Privileged Litigation Privileged
BLK00001522	A	9/19/2021 9:39 PM	4/13/2018 8:47 PM	Adobe Portable Document Format	(unspecified)	Business Update Call		(anonymous)			Solicitor Client Privileged Litigation Privileged
BLK00001523	A	9/19/2021 9:39 PM	4/13/2018 8:48 PM	Adobe Portable Document Format	(unspecified)	Q2 2018 Earnings Call		(anonymous)			Solicitor Client Privileged Litigation Privileged
BLK00001524	A	9/19/2021 9:39 PM	4/13/2018 8:49 PM	Adobe Portable Document Format	(unspecified)	Business Update Call		(anonymous)			Solicitor Client Privileged Litigation Privileged
BLK00001525	A	9/19/2021 9:39 PM	3/27/2018 11:58 PM	Email Message	Aphria, Nuuvera deal prompts questions about disclosure rule gap		"Sunny Puri" <spuri@ansonfunds.com>		"Nathan Anderson" <nathan@clarityspring.com>		Solicitor Client Privileged Litigation Privileged
BLK00001526	A	9/19/2021 9:39 PM	3/19/2018 3:10 PM	Email Message	20180130_APH_MA_Call_FS000000002395991618.pdf		"Sunny Puri" <spuri@ansonfunds.com>		"Nathan Anderson" <nathan@clarityspring.com>		Solicitor Client Privileged Litigation Privileged
BLK00001527	A	9/19/2021 9:39 PM	1/31/2018 5:32 PM	Adobe Portable Document Format	(unspecified)	Business Update Call		(anonymous)			Solicitor Client Privileged Litigation Privileged
BLK00001528	A	9/19/2021 9:39 PM	7/8/2018 7:53 PM	Email Message	RE: Canopy What do you think?		"Moez Kassam" <mkassam@ansonfunds.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001529	A	9/19/2021 9:39 PM	3/16/2018 1:42 AM	Email Message	Fwd: The Uncloaking of Aphria International		"Sunny Puri" <spuri@ansonfunds.com>		"CFA CAIA Nathan Anderson" <nathan@clarityspring.com>		Solicitor Client Privileged Litigation Privileged
BLK00001530	A	9/19/2021 9:39 PM	9/19/2021 9:32 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00001531	A	9/19/2021 9:39 PM	7/9/2018 6:19 PM	Email Message	RE: Updates		"Sunny Puri" <spuri@ansonfunds.com>		"Moez Kassam" <mkassam@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001532	A	9/19/2021 9:39 PM	3/22/2018 5:46 PM	Email Message	Short-seller sounds warning over Aphria-Nuuvera deal		"Sunny Puri" <spuri@ansonfunds.com>		"Nathan Anderson" <nathan@clarityspring.com>		Solicitor Client Privileged Litigation Privileged
BLK00001533	A	9/19/2021 9:39 PM	3/26/2018 5:41 PM	Email Message	Fwd: INK Filing Alert :: Aphria Inc. (APH) (Portfolio - CA Portfolio 1)		"Sunny Puri" <spuri@ansonfunds.com>		"CFA CAIA Nathan Anderson" <nathan@clarityspring.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00001534	A	9/19/2021 9:39 PM	3/26/2018 12:21 AM	Email Message	Aphria insiders held shares in takeover target, didn't disclose		"Sunny Puri" <spuri@ansonfunds.com>		"Nathan Anderson" <nathan@clarityspring.com>		Solicitor Client Privileged Litigation Privileged
BLK00001535	A	9/19/2021 9:39 PM	4/30/2018 5:40 PM	Email Message	FW: Invoice		"Sunny Puri" <spuri@ansonfunds.com>		"Tony Moore" <tmoore@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001536	A	9/19/2021 9:39 PM	4/30/2018 4:22 PM	Adobe Portable Document Format		Microsoft Word - 2018.04.27 ClaritySpring Invoice Anson		X			Solicitor Client Privileged Litigation Privileged
BLK00001537	P	10/3/2021 3:55 PM	10/3/2021 3:55 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00001552	P	11/6/2021 11:04 PM	11/6/2021 11:04 PM	Email Message	FW: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwpc.com>		Solicitor Client Privileged Litigation Privileged
BLK00001553	P	10/6/2021 4:12 PM	10/6/2021 4:12 PM	Email Message	Automatic reply: Anson/Stafford litigation - revised claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001554	P	9/16/2021 8:11 PM	9/16/2021 8:11 PM	Email Message	Automatic reply: Facedrive emails 3		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001555	P	11/25/2021 11:01 PM	11/25/2021 11:01 PM	Email Message	Re: Anson - Defamation Matters - Conflict Matter		"Milne-Smith, Matthew" <MMilne-Smith@dwpc.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001563	P	9/14/2021 3:31 PM	9/14/2021 3:31 PM	iCalendar	Accepted: Anson - Doxtator/Stafford litigation		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001566	P	10/29/2021 4:51 PM	10/29/2021 4:51 PM	Email Message	Automatic reply: Costumes??		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001569	P	9/29/2021 8:53 PM	9/29/2021 8:53 PM	Email Message	Automatic reply: Anson/Stafford litigation - revised claim		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001576	P	10/26/2021 1:05 AM	10/26/2021 1:05 AM	Email Message	RE: follow up		"Barrack, Michael" <michael.barrack@blakes.com>		"Moez Kassam" <mkassam@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001587	P	10/4/2021 1:00 PM	10/4/2021 1:00 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00001596	P	9/29/2021 7:21 PM	9/29/2021 7:21 PM	Email Message	touching base		"Moez Kassam" <mkassam@ansonfunds.com>		"Michael Barrack (MICHAEL BARRACK@blakes.com)" <michael.barrack@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001597	A	9/29/2021 7:21 PM	9/29/2021 2:41 AM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00001600	P	12/15/2021 3:17 PM	12/15/2021 3:17 PM	Email Message	RE: Quick Call?		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001602	P	11/8/2021 6:51 PM	11/8/2021 6:51 PM	Email Message	RE: Anson Advisors Inc et al v. Robert Doxtator et al - CV-20-00653410-00CL -- Motion Scheduling		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwpc.com>		Solicitor Client Privileged Litigation Privileged
BLK00001608	P	9/20/2021 8:35 PM	9/20/2021 8:35 PM	Email Message	RE: Anson/Stafford litigation - revised claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>; "Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001609	A	9/20/2021 8:35 PM	9/20/2021 8:23 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00001610	A	9/20/2021 8:35 PM	9/20/2021 8:24 PM	Adobe Portable Document Format		C:\Users\HRI\AppData\Local\Temp\1\Workshare_wmtemp4658_~wtf403E184B.ps					Solicitor Client Privileged Litigation Privileged
BLK00001611	P	11/25/2021 10:00 PM	11/25/2021 10:00 PM	Email Message	Re: Anson - Defamation Matters - Conflict Matter		"Sunny Puri" <spuri@ansonfunds.com>		"Milne-Smith, Matthew" <MMilne-Smith@dwpc.com>		Solicitor Client Privileged Litigation Privileged
BLK00001624	P	11/13/2021 8:16 PM	11/13/2021 8:16 PM	Email Message	RE: Defamation Matter		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001625	P	10/21/2021 11:31 PM	10/21/2021 11:31 PM	Email Message	RE: Anson - Amended SoC / Update		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001627	P	1/10/2023 2:43 AM	1/10/2023 2:43 AM	Email Message	Thank You		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00001630	P	11/11/2021 2:25 PM	11/11/2021 2:25 PM	Email Message	Fwd: Justice McEwen		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001639	P	6/10/2021 6:35 PM	6/10/2021 6:35 PM	Email Message	Update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001644	P	4/16/2021 2:16 PM	4/16/2021 2:16 PM	Email Message	RE: Stockhouse - Notice of Motion		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00001646	P	3/18/2021 2:27 PM	3/18/2021 2:27 PM	Email Message	Automatic reply: Stockhouse letter		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001647	P	2/2/2021 7:48 PM	2/2/2021 7:48 PM	Email Message	RE: Translation		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001648	P	10/9/2020 9:07 PM	10/9/2020 9:07 PM	Email Message	Re: Anson - Follow-up re. FW: Robert Duxtator Background (@BettingBruiser)		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>	Barrack, Michael;Fischer, Iris;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00001649	P	7/7/2021 6:40 PM	7/7/2021 6:40 PM	Email Message	RE: Stockhouse material		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00001650	P	7/15/2021 2:06 AM	7/15/2021 2:06 AM	Email Message	RE: Bruiser Litigation Catch Up		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>; "Laura Salvatori" <l.salvatori@ansonfunds.com>	DiMatteo, Christopher;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00001651	P	11/2/2020 10:46 PM	11/2/2020 10:46 PM	Email Message	RE: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Barrack, Michael" <michael.barrack@blakes.com>; "Mundiya, Tariq" <tmundiya@willkie.com>	Laura Salvatori;Governski, Meryl Conant;Hickey, Michael;Pulfer, Kaley;Moez Kassam;Sunny Puri;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00001652	P	4/8/2021 1:26 AM	4/8/2021 1:26 AM	iCalendar	Accepted: Duxtator defence		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001664	P	12/31/2020 6:21 PM	12/31/2020 6:21 PM	iCalendar	Anson litigation - call with Blakes		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001665	P	7/19/2021 2:16 PM	7/19/2021 2:16 PM	Email Message	Automatic reply: Bruiser Litigation Catch Up		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001666	P	8/10/2021 1:02 PM	8/10/2021 1:02 PM	iCalendar	Anson - Stafford litigation update		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>; "Fischer, Iris" <iris.fischer@blakes.com>; "Pulfer, Kaley" <kaley.pulfer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001667	P	3/2/2021 1:36 AM	3/2/2021 1:36 AM	Email Message	RE: SOL Global Case		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001670	P	12/31/2020 6:22 PM	12/31/2020 6:22 PM	iCalendar	Accepted: Anson litigation - call with Blakes		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001671	P	11/3/2020 8:05 PM	11/3/2020 8:05 PM	Email Message	Just FYI		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001672	P	4/5/2021 2:52 PM	4/5/2021 2:52 PM	Email Message	RE: Stockhouse Post Summary		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001676	P	11/5/2020 12:59 AM	11/5/2020 12:59 AM	iCalendar	Anson / Blakes - Statement of Claim Check-In		"Pulfer, Kaley" <kaley.pulfer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>; "Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00001682	P	10/11/2020 4:37 PM	10/11/2020 4:37 PM	Email Message	Anson Counsel		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Michael Barrack" <michael.barrack@blakes.com>; "Iris Fischer" <iris.fischer@blakes.com>; "Kaley Pulfer" <kaley.pulfer@blakes.com>; "Michael Hickey" <michael.hickey@blakes.com>; "Tariq Mundiya" <tmundiya@willkie.com>; "Meryl Conant Goverski" <MGoverski@willkie.com>	Moez Kassam; Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00001685	P	7/7/2021 9:41 PM	7/7/2021 9:41 PM	iCalendar	Bruiser Litigation Catch Up		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "Laura Salvatori" <l.salvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001686	P	2/11/2021 10:09 PM	2/11/2021 10:09 PM	Email Message	RE: Globe and Mail request, Anson Funds		"Sunny Puri" <spuri@ansonfunds.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Fischer, Iris" <iris.fischer@blakes.com>; "dscott@dscconsulting.ca" <dscott@dscconsulting.ca>	Moez Kassam	Solicitor Client Privileged Litigation Privileged
BLK00001687	P	7/16/2021 5:28 PM	7/16/2021 5:28 PM	Email Message	RE: Bruiser Litigation Catch Up		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>	DiMatteo, Christopher; Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00001691	P	11/5/2020 9:27 PM	11/5/2020 9:27 PM	Email Message	RE: Anson Advisors Inc. / Anson Funds Management LP FIB Coverage		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Pulfer, Kaley" <kaley.pulfer@blakes.com>	Hickey, Michael; Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00001693	P	10/10/2020 2:14 PM	10/10/2020 2:14 PM	Email Message	FW: For the call		"Hickey, Michael" <michael.hickey@blakes.com>		"Pulfer, Kaley" <kaley.pulfer@blakes.com>; "Barrack, Michael" <michael.barrack@blakes.com>; "Fischer, Iris" <iris.fischer@blakes.com>	Laura Salvatori; mkassam@ansonfunds.com; spuri@ansonfunds.com	Solicitor Client Privileged Litigation Privileged
BLK00001694	A	10/10/2020 2:14 PM		HyperText Markup Language (HTML)							Solicitor Client Privileged Litigation Privileged
BLK00001695	A	10/10/2020 2:14 PM		HyperText Markup Language (HTML)							Solicitor Client Privileged Litigation Privileged
BLK00001696	A	10/10/2020 2:14 PM		JPEG Image							Solicitor Client Privileged Litigation Privileged
BLK00001697	A	10/10/2020 2:14 PM	10/5/2020 6:19 AM	Adobe Portable Document Format				DALGRANDEGH1			Solicitor Client Privileged Litigation Privileged
BLK00001715	P	3/9/2021 4:32 PM	3/9/2021 4:32 PM	Email Message	RE: Anson contact info - B. Winson		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001716	P	10/19/2020 6:53 PM	10/19/2020 6:53 PM	Email Message	RE: Anson - Follow-ups / Status Updates		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001722	P	4/16/2021 4:40 PM	4/16/2021 4:40 PM	Email Message	FW: Anson - Documents		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001723	P	11/30/2020 10:46 PM	11/30/2020 10:46 PM	Email Message	RE: Anson - Update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "Tariq Mundiya" <tmundiya@willkie.com>; "Meryl Conant Goverski" <MGoverski@willkie.com>; "Moez Kassam" <mkassam@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>	Barrack, Michael; Hickey, Michael; Pulfer, Kaley; DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00001728	P	1/6/2021 10:08 PM	1/6/2021 10:08 PM	Email Message	Re: Anson Advisors Inc. et al v. Robert Lee Doxtator and Jacob Doxtator et al.		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Sunny Puri; Pulfer, Kaley; DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00001730	P	10/6/2020 7:15 PM	10/6/2020 7:15 PM	Email Message	Re: Anson - Call		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00001731	P	7/7/2021 9:41 PM	7/7/2021 9:41 PM	iCalendar	Anson/Doxtator Action - Discussion re: Next Steps		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>; "Laura Salvatori" <l.salvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001734	P	2/9/2021 12:28 AM	2/9/2021 12:28 AM	Email Message	RE: Doxtator claim - affidavit signing		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Laura Salvatori; Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001738	P	8/23/2021 7:37 PM	8/23/2021 7:37 PM	Email Message	Automatic reply: Bruiser Litigation Catch Up		"Pulfer, Kaley" <kaley.pulfer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001739	P	1/12/2021 6:42 PM	1/12/2021 6:42 PM	iCalendar	Anson/Blakes		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001740	P	7/29/2021 8:21 PM	7/29/2021 8:21 PM	Email Message	Stafford - update		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001741	A	7/29/2021 8:21 PM	7/29/2021 8:21 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00001742	P	12/10/2020 11:34 PM	12/10/2020 11:34 PM	Email Message	RE: Anson - Update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "Governski, Meryl Conant" <MGovernski@willkie.com>; "Mundiya, Tariq" <tmundiya@willkie.com>; "Moez Kassam" <mkassam@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>	Barrack, Michael; Hickey, Michael; Pulfer, Kaley; DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00001750	P	10/8/2020 1:05 AM	10/8/2020 1:05 AM	Email Message	Re: Under Siege		"Moez Kassam" <mkassam@ansonfunds.com>		"Barrack, Michael" <michael.barrack@blakes.com>	Fischer, Iris; Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00001756	P	7/7/2021 6:27 PM	7/7/2021 6:27 PM	Email Message	RE: Stockhouse material		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00001761	P	3/9/2021 7:04 PM	3/9/2021 7:04 PM	Email Message	RE: Anson - new posts		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001774	P	12/10/2020 11:40 PM	12/10/2020 11:40 PM	Email Message	Re: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Governski, Meryl Conant; Mundiya, Tariq; Moez Kassam; Sunny Puri; Barrack, Michael; Hickey, Michael; Pulfer, Kaley; DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00001775	P	3/11/2021 3:40 PM	3/11/2021 3:40 PM	iCalendar	Anson x Blakes - Intro - Funds Discussion		"Hickey, Michael" <michael.hickey@blakes.com>		"McLean, Stacy" <stacy.mclean@blakes.com>; "Davis, Jill" <jill.davis@blakes.com>; "Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001776	P	1/13/2021 8:30 PM	1/13/2021 8:30 PM	iCalendar	Accepted: Anson / Artemis		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001778	P	10/9/2020 7:41 PM	10/9/2020 7:41 PM	Email Message	Robert Doxtator Background (@BettingBruiser)		"Moez Kassam" <mkassam@ansonfunds.com>		"Michael Barrack (MICHAEL.BARRACK@blakes.com)" <MICHAEL.BARRACK@blakes.com>	Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00001780	P	11/5/2020 8:35 PM	11/5/2020 8:35 PM	Email Message	FW: Anson Advisors Inc. / Anson Funds Management LP FIB Coverage		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "Pulfer, Kaley" <kaley.pulfer@blakes.com>	Hickey, Michael; Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00001793	P	10/19/2020 6:37 PM	10/19/2020 6:37 PM	Email Message	RE: Anson - Follow-ups / Status Updates		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001796	P	4/26/2021 7:05 PM	4/26/2021 7:05 PM	Email Message	RE: Presumably Paul Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001797	P	1/8/2021 4:23 PM	1/8/2021 4:23 PM	Email Message	RE: Anson		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00001798	P	4/15/2021 8:52 PM	4/15/2021 8:52 PM	Email Message	Fw: See Attachments		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00001799	A	4/15/2021 8:52 PM	8/21/2020 9:46 PM	Microsoft Word				Josh Owens			Solicitor Client Privileged Litigation Privileged
BLK00001800	A	4/15/2021 8:52 PM	8/21/2020 9:07 PM	Microsoft Word				Josh Owens			Solicitor Client Privileged Litigation Privileged
BLK00001801	A	4/15/2021 8:52 PM	8/21/2020 8:51 PM	Microsoft Word				Josh Owens			Solicitor Client Privileged Litigation Privileged
BLK00001802	A	4/15/2021 8:52 PM	8/21/2020 8:29 PM	Microsoft Word				James Stafford			Solicitor Client Privileged Litigation Privileged
BLK00001803	A	4/15/2021 8:52 PM	8/21/2020 9:58 PM	Microsoft Word				Josh Owens			Solicitor Client Privileged Litigation Privileged
BLK00001804	P	3/22/2021 7:40 PM	3/22/2021 7:40 PM	Email Message	RE: Litigation Financing Disclosure		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Fischer, Iris" <iris.fischer@blakes.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00001810	P	12/31/2020 6:08 PM	12/31/2020 6:08 PM	Email Message	RE: Anson - Update		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "Laura Salvatori" <l.salvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00001816	P	12/1/2020 6:11 PM	12/1/2020 6:11 PM	Email Message	RE: Anson - website registration information		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001817	P	7/29/2021 9:04 PM	7/29/2021 9:04 PM	Email Message	RE: Stafford - update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001818	P	1/20/2021 9:03 PM	1/20/2021 9:03 PM	Email Message	RE: Doxtator -Service Notice of Motion		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	DiMatteo, Christopher; Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00001820	P	10/6/2020 7:17 PM	10/6/2020 7:17 PM	iCalendar	Accepted: Anson Funds - Defamation Discussion		"Moez Kassam" <mkassam@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001821	P	4/7/2021 1:08 AM	4/7/2021 1:08 AM	Email Message	RE: Facedrive claims		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001833	P	3/8/2021 3:18 AM	3/8/2021 3:18 AM	Email Message	Call Tomorrow		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Iris Fischer" <iris.fischer@blakes.com>; "Christopher DiMatteo" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001834	P	12/9/2020 6:49 PM	12/9/2020 6:49 PM	Email Message	RE: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Governski, Meryl Conant" <MGovernski@willkie.com>; "Mundiya, Tariq" <tmundiya@willkie.com>; "Moez Kassam" <mkassam@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>	Barrack, Michael; Hickey, Michael; Pulfer, Kaley; DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00001836	P	5/27/2021 1:29 PM	5/27/2021 1:29 PM	Email Message	RE: Stockhouse motion - Affidavit commissioning		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00001849	P	10/29/2020 8:12 PM	10/29/2020 8:12 PM	Email Message	RE: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Mundiya, Tariq" <tmundiya@willkie.com>; "Governski, Meryl Conant" <MGovernski@willkie.com>; "Barrack, Michael" <michael.barrack@blakes.com>; "Hickey, Michael" <michael.hickey@blakes.com>; "Pulfer, Kaley" <kaley.pulfer@blakes.com>; "Moez Kassam" <mkassam@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001851	P	12/17/2020 9:25 PM	12/17/2020 9:25 PM	Email Message	FW: Request for New Matter for Commercial List		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>; "Moez Kassam" <mkassam@ansonfunds.com>; "Tariq Mundiya" <tmundiya@willkie.com>; "Meryl Conant Governski" <MGovernski@willkie.com>	Barrack, Michael; DiMatteo, Christopher; Pulfer, Kaley; Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00001852	A	12/17/2020 9:25 PM	12/17/2020 9:25 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00001854	P	5/27/2021 1:30 PM	5/27/2021 1:30 PM	Email Message	RE: Stockhouse motion - Affidavit commissioning		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001856	P	12/3/2020 7:33 PM	12/3/2020 7:33 PM	Email Message	RE: Anson - Update*etc		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "Governski, Meryl Conant" <MGovernski@willkie.com>; "Mundiya, Tariq" <tmundiya@willkie.com>; "Moez Kassam" <mkassam@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>	Barrack, Michael; Hickey, Michael; Pulfer, Kaley; DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00001857	A	12/3/2020 7:33 PM	12/3/2020 7:28 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00001859	P	1/5/2021 9:31 PM	1/5/2021 9:31 PM	iCalendar	Anson		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "Laura Salvatori" <l.salvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>; "navin.reddy@artemisrisk.com" <navin.reddy@artemisrisk.com>		Solicitor Client Privileged Litigation Privileged
BLK00001860	P	2/23/2021 5:20 PM	2/23/2021 5:20 PM	Email Message	RE: Question about Broker Warrants		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001861	P	10/29/2020 11:21 PM	10/29/2020 11:21 PM	Email Message	RE: Anson - Update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "Mundiya, Tariq" <tmundiya@willkie.com>; "Governski, Meryl Conant" <MGovernski@willkie.com>; "Barrack, Michael" <michael.barrack@blakes.com>; "Hickey, Michael" <michael.hickey@blakes.com>; "Pulfer, Kaley" <kaley.pulfer@blakes.com>; "Moez Kassam" <mkassam@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00001865	P	2/11/2021 9:52 PM	2/11/2021 9:52 PM	Email Message	RE: Globe and Mail request, Anson Funds		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"dscott@dsconsulting.ca" <dscott@dsconsulting.ca>	Moez Kassam;Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00001867	P	2/10/2021 8:14 PM	2/10/2021 8:14 PM	Email Message	RE: Doxtator service motion -- draft factum		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00001868	P	12/31/2020 6:08 PM	12/31/2020 6:08 PM	Email Message	Automatic reply: Anson - Update		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001872	P	4/26/2021 8:23 PM	4/26/2021 8:23 PM	Email Message	RE: for records - reconnaissance energy africa ltd		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001873	A	4/26/2021 8:23 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00001874	A	4/26/2021 8:23 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00001875	A	4/26/2021 8:23 PM	3/18/2021 4:50 PM	Microsoft Word				Mark Baiwalla			Solicitor Client Privileged Litigation Privileged
BLK00001876	A	4/26/2021 8:23 PM	3/8/2021 1:17 PM	Microsoft Word				Mark Baiwalla			Solicitor Client Privileged Litigation Privileged
BLK00001877	A	4/26/2021 8:23 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00001883	P	4/19/2021 6:18 PM	4/19/2021 6:18 PM	Email Message	RE: Call with Nav / Status of Amended Reply and Statement of Defence		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001884	P	2/11/2021 7:27 PM	2/11/2021 7:27 PM	Email Message	Re: Globe and Mail request, Anson Funds		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"dscott@dsconsulting.ca" <dscott@dsconsulting.ca>	Barrack, Michael;Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00001885	P	7/29/2021 2:43 PM	7/29/2021 2:43 PM	Email Message	RE: Anson - Defamation Matters - Conflict Matter		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001886	P	3/9/2021 4:31 PM	3/9/2021 4:31 PM	Email Message	RE: Anson Funds - Blakes Invoices + Update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001890	P	12/18/2020 9:41 PM	12/18/2020 9:41 PM	Email Message	RE: Request for New Matter for Commercial List		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	Laura Salvatori;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00001891	P	11/6/2020 6:59 PM	11/6/2020 6:59 PM	Email Message	RE: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Barrack, Michael;Mundiya, Tariq;Governski, Meryl Conant;Hickey, Michael;Pulfer, Kaley;Moez Kassam;Sunny Puri;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00001892	A	11/6/2020 6:59 PM	11/6/2020 6:58 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00001894	P	7/7/2021 9:42 PM	7/7/2021 9:42 PM	Email Message	RE: Bruiser Litigation Catch Up		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>;"Laura Salvatori" <l.salvatori@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00001900	P	8/10/2021 9:50 AM	8/10/2021 9:50 AM	Email Message	Re: Stafford - update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00001902	P	1/28/2021 6:29 PM	1/28/2021 6:29 PM	Email Message	Re: Translation		"Navin Reddy" <nnavin.reddy@artemisrisk.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Jolene Watson" <jolene.watson@artemisrisk.com>	Laura Salvatori;Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001903	P	4/6/2021 9:22 PM	4/6/2021 9:22 PM	Email Message	RE: Facedrive claims		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00001906	P	4/28/2021 10:08 PM	4/28/2021 10:08 PM	Email Message	Re: spektor just received attached		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00001907	P	4/26/2021 5:05 PM	4/26/2021 5:05 PM	Email Message	FW: for records - reconnaissance energy africa ltd		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;DiMatteo, Christopher <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001908	A	4/26/2021 5:05 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00001909	A	4/26/2021 5:05 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00001910	A	4/26/2021 5:05 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00001911	P	12/7/2020 6:11 PM	12/7/2020 6:11 PM	Email Message	Automatic reply: Anson - Update		"Pulfer, Kaley" <kaley.pulfer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001912	P	12/7/2020 4:01 PM	12/7/2020 4:01 PM	Email Message	Re: Doxtator materials		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Governski, Meryl Conant	Solicitor Client Privileged Litigation Privileged
BLK00001913	P	12/18/2020 8:16 PM	12/18/2020 8:16 PM	Email Message	RE: Request for New Matter for Commercial List		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Moez Kassam;Sunny Puri;Barrack, Michael;Pulfer, Kaley;DiMatteo, Christopher;Tariq Mundiya;Meryl Conant Governski;Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00001914	P	3/25/2021 5:52 PM	3/25/2021 5:52 PM	Email Message	RE: Stockhouse Follow Up + Statement of Defense		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;DiMatteo, Christopher <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001919	P	4/16/2021 2:05 PM	4/16/2021 2:05 PM	Email Message	RE: Stockhouse - Notice of Motion		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00001920	P	7/28/2021 10:08 PM	7/28/2021 10:08 PM	Email Message	Anson Funds - Blakes Invoice re. Defamation Matters (June 2021)		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;Anthony Rizzo" <arizzo@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00001921	A	7/28/2021 10:08 PM	7/21/2021 2:52 PM	Adobe Portable Document Format				Warren Ly			Solicitor Client Privileged Litigation Privileged
BLK00001927	P	3/16/2021 7:18 PM	3/16/2021 7:18 PM	Email Message	RE: Stockhouse letter		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001935	P	4/28/2021 9:59 PM	4/28/2021 9:59 PM	Email Message	FW: Letter re: Anson Advisors Inc. et al. v. Robert Lee Doxtator - CV-20-006534100-00CL		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	DiMatteo, Christopher;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00001936	A	4/28/2021 9:59 PM	4/28/2021 9:58 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00001938	P	10/2/2020 10:01 PM	10/2/2020 10:01 PM	Email Message	RE: Anson - Defamation Discussions		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001948	P	5/20/2021 5:18 PM	5/20/2021 5:18 PM	iCalendar	Doxtator litigation - Discovery plan		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001949	P	6/1/2021 10:02 PM	6/1/2021 10:02 PM	Email Message	RE: Letter re: Anson Advisors Inc. et al. v. Robert Lee Doxtator - CV-20-006534100-00CL		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	DiMatteo, Christopher;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00001950	A	6/1/2021 10:02 PM	6/1/2021 10:02 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00001951	A	6/1/2021 10:02 PM	6/1/2021 10:02 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00001952	P	2/9/2021 1:18 AM	2/9/2021 1:18 AM	Email Message	RE: Doxtator claim - affidavit signing		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	Laura Salvatori;Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001953	A	2/9/2021 1:18 AM	2/9/2021 1:18 AM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00001954	P	1/6/2021 10:11 PM	1/6/2021 10:11 PM	Email Message	RE: Anson Advisors Inc. et al v. Robert Lee Doxtator and Jacob Doxtator et al.		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Sunny Puri;Pulfer, Kaley;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00001955	P	8/1/2021 8:46 PM	8/1/2021 8:46 PM	Email Message	RE: Stafford - update		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001956	P	7/14/2021 6:09 PM	7/14/2021 6:09 PM	Email Message	RE: Bruiser Litigation Catch Up		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Puffer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00001959	P	1/27/2021 4:51 PM	1/27/2021 4:51 PM	Email Message	Re: Anson - Haris affidavit		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris; Puffer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00001960	A	1/27/2021 4:51 PM	10/5/2020 10:26 AM	Adobe Portable Document Format				Navin Reddy			Solicitor Client Privileged Litigation Privileged
BLK00001975	P	7/7/2021 9:40 PM	7/7/2021 9:40 PM	Email Message	RE: Stockhouse material		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001980	P	6/28/2021 10:38 PM	6/28/2021 10:38 PM	Email Message	RE: RE: RE: RE: RE: Correspondence from Blakes/Anson Funds		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001981	P	5/20/2021 1:23 PM	5/20/2021 1:23 PM	Email Message	Doxtator litigation - discovery plan		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001982	A	5/20/2021 1:23 PM	5/20/2021 1:18 PM	Microsoft Word				DiMatteo, Christopher			Solicitor Client Privileged Litigation Privileged
BLK00001985	P	3/17/2021 4:02 PM	3/17/2021 4:02 PM	iCalendar	Stockhouse		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>; "Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00001986	P	6/8/2021 8:26 PM	6/8/2021 8:26 PM	Email Message	Willkie call		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00001995	P	4/28/2021 10:03 PM	4/28/2021 10:03 PM	Email Message	RE: CV-20-00653410-00CL - Anson Advisors Inc. et al. v. Robert Lee Doxtator		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	DiMatteo, Christopher; Puffer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00001998	P	10/9/2020 8:24 PM	10/9/2020 8:24 PM	Email Message	Anson - Follow-up re. FW: Robert Doxtator Background (@BettingBruiser)		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris; Puffer, Kaley; Barrack, Michael	Solicitor Client Privileged Litigation Privileged
BLK00001999	P	6/9/2021 1:51 PM	6/9/2021 1:51 PM	Email Message	RE: Willkie call		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002000	P	10/19/2020 7:13 PM	10/19/2020 7:13 PM	Email Message	Re: Anson - Follow-ups / Status Updates		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00002001	P	1/5/2021 2:40 AM	1/5/2021 2:40 AM	Email Message	RE: Anson Defamation Matter - Litigation Reserve		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002005	P	3/15/2021 10:23 PM	3/15/2021 10:23 PM	Email Message	Automatic reply: Anson Advisors inc et al v Robert lee Doxtator et al (CV-20-00653410-00CL)		"Puffer, Kaley" <kaley.puffer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002006	P	11/27/2020 2:57 AM	11/27/2020 2:57 AM	Email Message	RE: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Barrack, Michael; Hickey, Michael; Puffer, Kaley; DiMatteo, Christopher; Moez Kassam; Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00002007	P	10/9/2020 8:24 PM	10/9/2020 8:24 PM	Email Message	Automatic reply: Anson - Follow-up re. FW: Robert Doxtator Background (@BettingBruiser)		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002008	P	10/7/2020 8:49 PM	10/7/2020 8:49 PM	Email Message	Under Siege		"Moez Kassam" <mkassam@ansonfunds.com>		"Michael Barrack (MICHAEL BARRACK@blakes.com)" <MICHAEL.BARRACK@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002009	A	10/7/2020 8:49 PM	9/27/2020 11:24 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00002010	P	3/31/2021 9:53 PM	3/31/2021 9:53 PM	Email Message	RE: Correspondence from Blakes/Anson Funds		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002013	P	7/29/2021 3:29 PM	7/29/2021 3:29 PM	Email Message	RE: Anson - Defamation Matters - Conflict Matter		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00002016	P	11/6/2020 7:17 PM	11/6/2020 7:17 PM	Email Message	RE: Anson - Update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Barrack, Michael;Mundiya, Tariq;Governski, Meryl Conant;Hickey, Michael;Pulfer, Kaley;Moez Kassam;Sunny Puri;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00002017	P	7/29/2021 3:22 PM	7/29/2021 3:22 PM	iCalendar	Anson - Defamation Matters - Conflict Matter		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002019	P	12/21/2020 9:56 PM	12/21/2020 9:56 PM	Email Message	RE: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Governski, Meryl Conant" <MGovernski@willkie.com>;"Mundiya, Tariq" <tmundiya@willkie.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	Barrack, Michael;Hickey, Michael;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002020	P	12/30/2020 10:34 PM	12/30/2020 10:34 PM	Email Message	RE: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Sunny Puri;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002021	A	12/30/2020 10:34 PM	12/30/2020 10:33 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00002022	P	1/12/2021 3:26 PM	1/12/2021 3:26 PM	Email Message	RE: Anson		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002024	P	7/29/2021 4:01 PM	7/29/2021 4:01 PM	iCalendar	Accepted: Anson - Defamation Matters - Conflict Matter		"Sunny Puri" <spuri@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002026	P	10/6/2020 2:40 PM	10/6/2020 2:40 PM	Email Message	FW: Anson - Call		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002027	P	2/8/2021 10:09 PM	2/8/2021 10:09 PM	Email Message	RE: Update - Stafford		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002029	P	11/16/2020 10:57 PM	11/16/2020 10:57 PM	Email Message	RE: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Barrack, Michael;Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00002054	P	12/22/2020 5:08 PM	12/22/2020 5:08 PM	Email Message	RE: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Mundiya, Tariq" <tmundiya@willkie.com>	DiMatteo, Christopher;Governski, Meryl Conant;Moez Kassam;Sunny Puri;Barrack, Michael;Hickey, Michael;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002055	P	2/1/2021 9:34 PM	2/1/2021 9:34 PM	Email Message	RE: Translation		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Navin Reddy;Jolene Watson	Solicitor Client Privileged Litigation Privileged
BLK00002057	P	6/28/2021 10:39 PM	6/28/2021 10:39 PM	Email Message	RE: RE: RE: RE: RE: Correspondence from Blakes/Anson Funds		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002058	P	10/11/2020 5:19 PM	10/11/2020 5:19 PM	Email Message	RE: Anson Counsel		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Barrack, Michael" <michael.barrack@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>;"Hickey, Michael" <michael.hickey@blakes.com>;"Tariq Mundiya" <tmundiya@willkie.com>;"Meryl Conant Governski" <MGovernski@willkie.com>	Moez Kassam;Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00002059	P	12/1/2020 6:54 PM	12/1/2020 6:54 PM	Email Message	RE: Anson - website registration information		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002060	P	12/29/2020 8:36 PM	12/29/2020 8:36 PM	Email Message	Re: Anson Defamation Matter - Litigation Reserve		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00002068	P	3/17/2021 4:14 PM	3/17/2021 4:14 PM	iCalendar	Accepted: Stockhouse		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002072	P	4/15/2021 9:20 PM	4/15/2021 9:20 PM	iCalendar	Anson - Call re Defamation Claim		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>; "Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002073	P	12/10/2020 10:47 PM	12/10/2020 10:47 PM	Email Message	RE: Anson - Update		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "Governski, Meryl Conant" <MGovernski@willkie.com>; "Mundiya, Tariq" <tmundiya@willkie.com>; "Moez Kassam" <mkassam@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>	Barrack, Michael; Hickey, Michael; Pulfer, Kaley; DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00002074	A	12/10/2020 10:47 PM	12/10/2020 8:11 PM	Email Message	FW: Jacob Doxtator		"Navin Reddy" <navin.reddy@artemisrisk.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002075	A	12/10/2020 10:47 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00002076	A	12/10/2020 10:47 PM	12/10/2020 7:32 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00002077	A	12/10/2020 10:47 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00002078	A	12/10/2020 10:47 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00002079	A	12/10/2020 10:47 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00002080	A	12/10/2020 10:47 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00002081	A	12/10/2020 10:47 PM	12/10/2020 10:47 PM	Microsoft Word				Laura Salvatori			Solicitor Client Privileged Litigation Privileged
BLK00002082	P	12/16/2020 2:49 PM	12/16/2020 2:49 PM	Email Message	RE: Anson - exhibits for motion and document matters		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002083	P	4/16/2021 4:36 PM	4/16/2021 4:36 PM	Email Message	RE: Stockhouse - Notice of Motion		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00002084	P	10/9/2020 9:11 PM	10/9/2020 9:11 PM	iCalendar	Accepted: Anson - Defamation Discussion - Next Steps		"Moez Kassam" <mkassam@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002086	P	1/20/2021 6:21 PM	1/20/2021 6:21 PM	Email Message	RE: Doxtator -Service Notice of Motion		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	DiMatteo, Christopher; Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002087	P	1/6/2021 10:15 PM	1/6/2021 10:15 PM	Email Message	RE: Anson Advisors Inc. et al v. Robert Lee Doxtator and Jacob Doxtator et al.		"Sunny Puri" <spuri@ansonfunds.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>; "Fischer, Iris" <iris.fischer@blakes.com>	Pulfer, Kaley; DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00002091	P	10/4/2020 5:21 PM	10/4/2020 5:21 PM	iCalendar	Anson - Defamation Discussion		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>; "Pulfer, Kaley" <kaley.pulfer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002092	P	1/27/2021 3:13 PM	1/27/2021 3:13 PM	Email Message	Anson - Haris affidavit		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris; Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002093	A	1/27/2021 3:13 PM	1/27/2021 3:13 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00002094	P	3/9/2021 2:40 PM	3/9/2021 2:40 PM	Email Message	Anson Funds - Blakes Invoices + Update		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002095	A	3/9/2021 2:40 PM	3/2/2021 1:37 PM	Adobe Portable Document Format				Warren Ly			Solicitor Client Privileged Litigation Privileged
BLK00002096	A	3/9/2021 2:40 PM	3/8/2021 7:15 PM	Adobe Portable Document Format				Warren Ly			Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00002097	A	3/9/2021 2:40 PM	3/8/2021 7:12 PM	Adobe Portable Document Format				Warren Ly			Solicitor Client Privileged Litigation Privileged
BLK00002098	P	7/7/2021 9:43 PM	7/7/2021 9:43 PM	Email Message	RE: Bruiser Litigation Catch Up		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>; "Laura Salvatori" <l.salvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Puffer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002101	P	6/29/2021 3:48 PM	6/29/2021 3:48 PM	Email Message	Automatic reply: RE: RE: RE: Correspondence from Blakes/Anson Funds		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002105	P	1/6/2021 10:14 PM	1/6/2021 10:14 PM	Email Message	Re: Anson Advisors Inc. et al v. Robert Lee Doxtator and Jacob Doxtator et al.		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Sunny Puri;Puffer, Kaley;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00002108	P	1/12/2021 7:17 PM	1/12/2021 7:17 PM	Email Message	RE: Anson		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00002115	P	6/4/2021 4:55 PM	6/4/2021 4:55 PM	iCalendar	FW: Motion - ANSON ADVISORS INC. et al v. DOXTATOR et al (CV-20-00653410-00CL)		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002116	P	3/10/2021 2:31 PM	3/10/2021 2:31 PM	iCalendar	Accepted: Anson/Stockhouse		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002127	P	4/8/2021 1:25 AM	4/8/2021 1:25 AM	iCalendar	Doxtator defence		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002146	P	1/18/2021 10:28 PM	1/18/2021 10:28 PM	Email Message	RE: Anson - Follow up Points from Moez		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	DiMatteo, Christopher;Puffer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002149	P	7/7/2021 9:41 PM	7/7/2021 9:41 PM	iCalendar	Canceled: Bruiser Litigation Catch Up		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "Laura Salvatori" <l.salvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002150	P	3/26/2021 9:32 PM	3/26/2021 9:32 PM	Email Message	FW: PNL Request - GE 2019		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Puffer, Kaley" <kaley.puffer@blakes.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00002151	A	3/26/2021 9:32 PM		Comma-Separated Values							Solicitor Client Privileged Litigation Privileged
BLK00002153	P	1/12/2021 3:04 PM	1/12/2021 3:04 PM	Email Message	Re: Anson - Estimated Fees re. Doxtator et al		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002154	P	7/7/2021 10:11 PM	7/7/2021 10:11 PM	Email Message	RE: Stockhouse material		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002156	P	3/7/2021 7:15 PM	3/7/2021 7:15 PM	Email Message	RE: US Audit Response Letter - Quick Question		"Fischer, Iris" <iris.fischer@blakes.com>		"Hickey, Michael" <michael.hickey@blakes.com>; "Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002157	P	4/16/2021 2:28 PM	4/16/2021 2:28 PM	Email Message	RE: Stockhouse - Notice of Motion		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00002159	P	10/4/2020 3:59 PM	10/4/2020 3:59 PM	Email Message	Anson - Call		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Puffer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002160	P	3/17/2021 9:03 PM	3/17/2021 9:03 PM	Email Message	RE: GG Tiki Cups		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002161	A	3/17/2021 9:03 PM	3/17/2021 4:35 PM	JPEG Image							Solicitor Client Privileged Litigation Privileged
BLK00002162	P	10/6/2020 6:34 PM	10/6/2020 6:34 PM	Email Message	RE: Anson - Call		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002172	P	7/7/2021 9:43 PM	7/7/2021 9:43 PM	iCalendar	Accepted: Anson/Doxtator Action - Discussion re: Next Steps		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00002173	P	2/26/2021 8:37 PM	2/26/2021 8:37 PM	Email Message	RE: SOL Global Case		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002174	P	11/2/2020 11:22 PM	11/2/2020 11:22 PM	iCalendar	Anson/Blakes/Wilkie re SOC		"Fischer, Iris" <iris.fischer@blakes.com>		"Barrack, Michael" <michael.barrack@blakes.com>; "Mundiya, Tariq" <tmundiya@willkie.com>; "Governski, Meryl Conant" <MGovernski@willkie.com>; "Hickey, Michael" <michael.hickey@blakes.com>; "Pulfer, Kaley" <kaley.pulfer@blakes.com>; "Moez Kassam" <mkassam@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002175	P	3/25/2021 8:46 PM	3/25/2021 8:46 PM	Email Message	RE: Anson Advisors Inc et al v. Robert Lee Doxtator (CV-20-00653410-00CL)		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Pulfer, Kaley" <kaley.pulfer@blakes.com>	Moez Kassam; Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00002176	P	4/16/2021 4:03 PM	4/16/2021 4:03 PM	Email Message	RE: Stockhouse - Notice of Motion		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00002177	P	5/31/2021 2:14 PM	5/31/2021 2:14 PM	Email Message	Anson - Defamation Matters - Blakes Invoice (March + April)		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002178	A	5/31/2021 2:14 PM	5/20/2021 7:19 PM	Adobe Portable Document Format				Warren Ly			Solicitor Client Privileged Litigation Privileged
BLK00002186	P	6/28/2021 11:00 PM	6/28/2021 11:00 PM	Email Message	RE: RE: RE: RE: RE: Correspondence from Blakes/Anson Funds		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002187	A	6/28/2021 11:00 PM	6/28/2021 11:00 PM	Microsoft Word				Sunny Puri			Solicitor Client Privileged Litigation Privileged
BLK00002190	P	11/16/2020 11:49 PM	11/16/2020 11:49 PM	iCalendar	Accepted: Anson - Statement of Claim Discussion		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002192	P	2/9/2021 1:30 AM	2/9/2021 1:30 AM	Email Message	RE: Doxtator claim - affidavit signing		"Fischer, Iris" <iris.fischer@blakes.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Sunny Puri" <spuri@ansonfunds.com>	Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00002194	P	11/30/2020 10:44 PM	11/30/2020 10:44 PM	Email Message	Re: Anson - Update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002201	P	2/9/2021 12:33 AM	2/9/2021 12:33 AM	Email Message	RE: Doxtator claim - affidavit signing		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Laura Salvatori; Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002202	P	12/18/2020 12:56 AM	12/18/2020 12:56 AM	Email Message	RE: Request for New Matter for Commercial List		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "Sunny Puri" <spuri@ansonfunds.com>; "Moez Kassam" <mkassam@ansonfunds.com>; "Tariq Mundiya" <tmundiya@willkie.com>; "Meryl Conant Governski" <MGovernski@willkie.com>	Barrack, Michael; DiMatteo, Christopher; Pulfer, Kaley; Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00002204	P	7/1/2021 8:01 PM	7/1/2021 8:01 PM	Email Message	Automatic reply: RE: RE: RE: RE: Correspondence from Blakes/Anson Funds		"Wong, Winnie" <winnie.wong@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002212	P	11/5/2020 1:04 PM	11/5/2020 1:04 PM	iCalendar	Accepted: Anson / Blakes - Statement of Claim Check-In		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Pulfer, Kaley" <kaley.pulfer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002213	P	11/3/2020 3:28 AM	11/3/2020 3:28 AM	iCalendar	Accepted: Anson/Blakes/Wilkie re SOC		"Moez Kassam" <mkassam@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00002214	P	1/28/2021 3:30 PM	1/28/2021 3:30 PM	Email Message	Translation		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"navin.reddy@artemisrisk.com" <navin.reddy@artemisrisk.com>;"jolene.watson@artemisrisk.com" <jolene.watson@artemisrisk.com>	Laura Salvatori;Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002227	P	2/4/2021 4:34 PM	2/4/2021 4:34 PM	Email Message	RE: Translation		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002231	P	9/1/2021 2:16 PM	9/1/2021 2:16 PM	Email Message	Automatic reply: Bruiser Litigation Catch Up		"Puffer, Kaley" <kaley.puffer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002232	P	12/14/2020 9:48 PM	12/14/2020 9:48 PM	Email Message	RE: Anson - Update		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"Governski, Meryl Conant" <MGovernski@willkie.com>;"Mundiya, Tariq" <tmundiya@willkie.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	Barrack, Michael;Hickey, Michael;Puffer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002233	P	8/10/2021 1:01 PM	8/10/2021 1:01 PM	Email Message	RE: Stafford - update		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris;Puffer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002240	P	4/15/2021 9:19 PM	4/15/2021 9:19 PM	Email Message	RE: See Attachments		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00002245	P	3/22/2021 10:17 PM	3/22/2021 10:17 PM	Email Message	RE: Litigation Financing Disclosure		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00002249	P	12/31/2020 6:04 PM	12/31/2020 6:04 PM	Email Message	RE: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Sunny Puri;Puffer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002250	P	11/2/2020 11:27 PM	11/2/2020 11:27 PM	iCalendar	Accepted: Anson/Blakes/Wilkie re SOC		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002253	P	3/1/2021 7:36 PM	3/1/2021 7:36 PM	Email Message	RE: SOL Global Case		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002278	P	6/8/2021 3:30 PM	6/8/2021 3:30 PM	iCalendar	Tentative: Anson - Google/Twitter discussion		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002281	P	12/7/2020 6:52 PM	12/7/2020 6:52 PM	Email Message	RE: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Governski, Meryl Conant" <MGovernski@willkie.com>;"Mundiya, Tariq" <tmundiya@willkie.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	Barrack, Michael;Hickey, Michael;Puffer, Kaley;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00002287	P	1/20/2021 6:18 PM	1/20/2021 6:18 PM	Email Message	Re: Anson Funds - Defamation Matters - Blakes Invoice (December 2020)		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002290	P	1/12/2021 6:40 PM	1/12/2021 6:40 PM	Email Message	RE: Anson		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00002291	P	12/31/2020 6:26 PM	12/31/2020 6:26 PM	iCalendar	Accepted: Anson litigation - call with Blakes		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002294	P	1/5/2021 9:25 PM	1/5/2021 9:25 PM	Email Message	RE: Anson litigation - call with Blakes		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00002296	P	6/7/2021 2:34 PM	6/7/2021 2:34 PM	Email Message	Anson - Defamation Matters - Blakes Invoice (May 2021)		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Anthony Rizzo" <arizzo@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002297	A	6/7/2021 2:34 PM	6/7/2021 12:57 PM	Adobe Portable Document Format				Warren Ly			Solicitor Client Privileged Litigation Privileged
BLK00002304	P	12/4/2020 4:40 PM	12/4/2020 4:40 PM	Email Message	Doxatator materials		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Meryl Conant Governski	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00002310	P	12/17/2020 9:29 PM	12/17/2020 9:29 PM	Email Message	RE: Request for New Matter for Commercial List		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002314	P	10/2/2020 9:59 PM	10/2/2020 9:59 PM	Email Message	RE: Anson - Defamation Discussions		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002324	P	4/4/2021 2:58 PM	4/4/2021 2:58 PM	Email Message	RE: Stockhouse Post Summary		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002329	P	7/30/2021 1:50 PM	7/30/2021 1:50 PM	Email Message	RE: Stafford - update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002332	P	5/20/2021 5:12 PM	5/20/2021 5:12 PM	Email Message	RE: Doxtator litigation - discovery plan		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002336	P	6/10/2021 6:35 PM	6/10/2021 6:35 PM	Email Message	RE: Update		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002342	P	12/4/2020 6:38 PM	12/4/2020 6:38 PM	Email Message	Re: Doxtator materials		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Meryl Conant Goverski	Solicitor Client Privileged Litigation Privileged
BLK00002346	P	12/31/2020 8:44 PM	12/31/2020 8:44 PM	Email Message	Re: Anson Defamation Matter - Litigation Reserve		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002348	P	12/7/2020 3:25 PM	12/7/2020 3:25 PM	Email Message	RE: Doxtator materials		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Goverski, Meryl Conant	Solicitor Client Privileged Litigation Privileged
BLK00002349	P	1/27/2021 5:55 PM	1/27/2021 5:55 PM	iCalendar	Accepted: Anson - Haris affidavit discussion		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002350	P	1/16/2021 3:00 PM	1/16/2021 3:00 PM	Email Message	RE: Anson - Follow up Points from Moez		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00002351	P	2/2/2021 7:35 PM	2/2/2021 7:35 PM	Email Message	RE: Translation		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002353	P	4/6/2021 9:20 PM	4/6/2021 9:20 PM	Email Message	Facedrive claims		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002354	A	4/6/2021 9:20 PM	4/6/2021 9:20 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00002355	A	4/6/2021 9:20 PM	4/6/2021 9:20 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00002356	P	2/8/2021 10:10 PM	2/8/2021 10:10 PM	Email Message	RE: Update - Stafford		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002362	P	12/16/2020 3:51 PM	12/16/2020 3:51 PM	Email Message	RE: Anson - exhibits for motion and document matters		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002364	P	2/12/2021 10:26 PM	2/12/2021 10:26 PM	Email Message	Re: Globe and Mail request, Anson Funds		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002375	P	2/18/2021 9:04 PM	2/18/2021 9:04 PM	Email Message	RE: Anson Advisors Inc. - Audit Letter Request		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002378	P	1/21/2021 6:21 PM	1/21/2021 6:21 PM	iCalendar	Anson - Jacob Doxtator Defence		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Fischer, Iris" <iris.fischer@blakes.com>; "Pulfer, Kaley" <kaley.pulfer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002383	P	3/12/2021 3:10 PM	3/12/2021 3:10 PM	Email Message	Automatic reply: Updates		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002386	P	3/25/2021 9:08 PM	3/25/2021 9:08 PM	Email Message	Re: Stockhouse Follow Up + Statement of Defense		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00002391	P	2/9/2021 12:30 AM	2/9/2021 12:30 AM	Email Message	RE: Doxtator claim - affidavit signing		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	Laura Salvatori; Fischer, Iris	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00002396	P	3/12/2021 9:51 PM	3/12/2021 9:51 PM	Email Message	RE: Anson Advisors inc et al v Robert lee Doxtator et al (CV-20-00653410-00CL)		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002397	P	12/31/2020 4:51 PM	12/31/2020 4:51 PM	Email Message	RE: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Sunny Puri;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002399	P	3/17/2021 4:14 PM	3/17/2021 4:14 PM	Email Message	RE: Stockhouse letter		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002400	P	4/7/2021 6:50 PM	4/7/2021 6:50 PM	Email Message	Robert Doxtator counterclaim - reply and statement of defence		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002401	A	4/7/2021 6:50 PM	4/7/2021 6:49 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00002403	P	1/21/2021 11:22 PM	1/21/2021 11:22 PM	Email Message	RE: Anson - Affidavits for service motion		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002404	A	1/21/2021 11:22 PM	1/20/2021 3:29 PM	Adobe Portable Document Format				Navin Reddy			Solicitor Client Privileged Litigation Privileged
BLK00002406	P	10/19/2020 7:11 PM	10/19/2020 7:11 PM	Email Message	RE: Anson - Follow-ups / Status Updates		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002408	P	11/16/2020 10:10 PM	11/16/2020 10:10 PM	Email Message	RE: Anson - Update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Barrack, Michael;Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00002412	P	2/23/2021 1:58 PM	2/23/2021 1:58 PM	Email Message	Service Motion		"Pulfer, Kaley" <kaley.pulfer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00002417	P	5/20/2021 5:14 PM	5/20/2021 5:14 PM	Email Message	Re: Doxtator litigation - discovery plan		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002418	P	12/16/2020 2:53 PM	12/16/2020 2:53 PM	Email Message	RE: Anson - exhibits for motion and document matters		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002419	P	3/7/2021 6:46 PM	3/7/2021 6:46 PM	Email Message	Re: US Audit Response Letter - Quick Question		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002422	P	10/27/2020 7:13 PM	10/27/2020 7:13 PM	Email Message	RE: K2 Intelligence - Preliminary Findings		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Hickey, Michael;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002424	P	3/29/2021 7:53 PM	3/29/2021 7:53 PM	Email Message	Re: Anson - Letter re "John Murphy" account		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002426	P	10/30/2020 7:47 PM	10/30/2020 7:47 PM	Email Message	RE: Anson - Update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Mundiya, Tariq" <tmundiya@willkie.com>;"Governski, Meryl Conant" <MGovernski@willkie.com>;"Barrack, Michael" <michael.barrack@blakes.com>;"Hickey, Michael" <michael.hickey@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00002428	P	10/20/2020 8:58 PM	10/20/2020 8:58 PM	Email Message	RE: K2 Intelligence - Preliminary Findings		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Tariq Mundiya" <tmundiya@willkie.com>; "Governski, Meryl Conant" <MGovernski@willkie.com>; "Barrack, Michael" <michael.barrack@blakes.com>; "Hickey, Michael" <michael.hickey@blakes.com>; "Pulfer, Kaley" <kaley.pulfer@blakes.com>	Moez Kassam; Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00002433	P	4/28/2021 10:00 PM	4/28/2021 10:00 PM	Email Message	RE: spektor just received attached		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	DiMatteo, Christopher; Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002434	P	6/1/2021 10:23 PM	6/1/2021 10:23 PM	Email Message	Re: Letter re: Anson Advisors Inc. et al. v. Robert Lee Doxtator - CV-20-00653410-00CL		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher; Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002437	P	11/30/2020 11:06 PM	11/30/2020 11:06 PM	Email Message	Re: Tax Cases		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002455	P	3/8/2021 3:21 AM	3/8/2021 3:21 AM	Email Message	Re: Call Tomorrow		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Iris Fischer" <iris.fischer@blakes.com>; "Christopher DiMatteo" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002458	P	2/24/2021 5:17 PM	2/24/2021 5:17 PM	Email Message	RE: Market Sounding // Strictly Private & Confidential		"Phillips, Tim" <tim.phillips@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002464	P	10/4/2020 5:17 PM	10/4/2020 5:17 PM	Email Message	RE: Anson - Call		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>	Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002465	P	8/9/2021 10:47 PM	8/9/2021 10:47 PM	Email Message	RE: Stafford - update		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris; Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002466	P	12/18/2020 8:26 PM	12/18/2020 8:26 PM	Email Message	RE: Request for New Matter for Commercial List		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Fischer, Iris" <iris.fischer@blakes.com>	Moez Kassam; Sunny Puri; Barrack, Michael; Pulfer, Kaley; Tariq Mundiya; Meryl Conant; Governski; Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00002475	P	10/4/2020 5:27 PM	10/4/2020 5:27 PM	iCalendar	Accepted: Anson - Defamation Discussion		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002491	P	5/25/2021 4:29 PM	5/25/2021 4:29 PM	Email Message	Re: Stockhouse Norwich application - Sunny's affidavit		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002492	P	12/18/2020 3:47 PM	12/18/2020 3:47 PM	Email Message	RE: Request for New Matter for Commercial List		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>; "Moez Kassam" <mkassam@ansonfunds.com>; "Tariq Mundiya" <tmundiya@willkie.com>; "Meryl Conant Governski" <MGovernski@willkie.com>	Barrack, Michael; DiMatteo, Christopher; Pulfer, Kaley; Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00002493	A	12/18/2020 3:47 PM	12/18/2020 3:47 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00002494	A	12/18/2020 3:47 PM	12/18/2020 3:47 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00002496	P	2/10/2021 8:10 PM	2/10/2021 8:10 PM	Email Message	RE: Doxtator service motion -- draft factum		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris; Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002497	A	2/10/2021 8:10 PM	2/10/2021 8:10 PM	Microsoft Word		Factum for Superior Court of Justice		Care, Alissa			Solicitor Client Privileged Litigation Privileged
BLK00002498	P	10/9/2020 8:55 PM	10/9/2020 8:55 PM	Email Message	Re: Anson - Follow-up re. FW: Robert Doxtator Background (@BettingBruiser)		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>	Fischer, Iris; Pulfer, Kaley; Barrack, Michael	Solicitor Client Privileged Litigation Privileged
BLK00002500	P	5/20/2021 5:10 PM	5/20/2021 5:10 PM	Email Message	Re: Doxtator litigation - discovery plan		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002503	P	12/1/2020 4:19 PM	12/1/2020 4:19 PM	Email Message	Re: Anson Funds - Defamation Matters - Blakes Invoice (Oct 2020)		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00002507	P	11/16/2020 11:39 PM	11/16/2020 11:39 PM	iCalendar	Accepted: Anson - Statement of Claim Discussion		"Laura Salvatori" <laurasalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002513	P	3/25/2021 6:04 PM	3/25/2021 6:04 PM	Email Message	Re: Stockhouse Follow Up + Statement of Defense		"Laura Salvatori" <laurasalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002515	P	12/7/2020 7:57 PM	12/7/2020 7:57 PM	Email Message	RE: Anson Funds - Defamation Matters - Blakes Invoice (Oct 2020)		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <laurasalvatori@ansonfunds.com>	Anthony Rizzo	Solicitor Client Privileged Litigation Privileged
BLK00002520	P	3/25/2021 8:53 PM	3/25/2021 8:53 PM	Email Message	RE: Anson Advisors Inc et al v. Robert Lee Doxtator (CV-20-00653410-00CL)		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <laurasalvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Pulfer, Kaley" <kaley.pulfer@blakes.com>	Moez Kassam; Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00002521	P	7/29/2021 9:58 PM	7/29/2021 9:58 PM	Email Message	FW: Stafford - update		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <laurasalvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002522	P	10/10/2020 12:12 PM	10/10/2020 12:12 PM	Email Message	For the call		"Moez Kassam" <mkassam@ansonfunds.com>		"kaley.pulfer@blakes.com" <kaley.pulfer@blakes.com>; "michael.barrack@blakes.com" <michael.barrack@blakes.com>; "iris.fischer@blakes.com" <iris.fischer@blakes.com>; "michael.hickey@blakes.com" <michael.hickey@blakes.com>	Sunny Puri; Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00002523	A	10/10/2020 12:12 PM		HyperText Markup Language (HTML)							Solicitor Client Privileged Litigation Privileged
BLK00002524	A	10/10/2020 12:12 PM		HyperText Markup Language (HTML)							Solicitor Client Privileged Litigation Privileged
BLK00002525	A	10/10/2020 12:12 PM		JPEG Image							Solicitor Client Privileged Litigation Privileged
BLK00002526	A	10/10/2020 12:12 PM	10/5/2020 6:19 AM	Adobe Portable Document Format				DALGRANDEGI1			Solicitor Client Privileged Litigation Privileged
BLK00002529	P	2/8/2021 10:05 PM	2/8/2021 10:05 PM	Email Message	RE: Doxtator claim - affidavit signing		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Laura Salvatori; Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002532	P	2/24/2021 4:28 PM	2/24/2021 4:28 PM	Email Message	RE: Market Sounding // Strictly Private & Confidential		"Phillips, Tim" <tim.phillips@blakes.com>		"Hickey, Michael" <michael.hickey@blakes.com>; "Laura Salvatori" <laurasalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002533	P	12/4/2020 11:00 PM	12/4/2020 11:00 PM	Email Message	RE: Doxtator materials		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <laurasalvatori@ansonfunds.com>	Governski, Meryl Conant	Solicitor Client Privileged Litigation Privileged
BLK00002534	P	12/18/2020 9:58 PM	12/18/2020 9:58 PM	Email Message	RE: Request for New Matter for Commercial List		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <laurasalvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Moez Kassam; Sunny Puri; Barrack, Michael; Pulfer, Kaley; Tariq Mundiya; Meryl Conant; Governski; Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00002535	P	12/16/2020 4:39 AM	12/16/2020 4:39 AM	Email Message	Anson - exhibits for motion and document matters		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <laurasalvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>	Moez Kassam; Barrack, Michael; Pulfer, Kaley; DiMatteo, Christopher; Hickey, Michael; Meryl Conant; Governski; Tariq Mundiya	Solicitor Client Privileged Litigation Privileged
BLK00002536	A	12/16/2020 4:39 AM	12/16/2020 4:37 AM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00002537	A	12/16/2020 4:39 AM	12/16/2020 4:38 AM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00002538	A	12/16/2020 4:39 AM	12/16/2020 4:37 AM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00002539	A	12/16/2020 4:39 AM	12/16/2020 4:38 AM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00002540	A	12/16/2020 4:39 AM	12/16/2020 4:38 AM	Microsoft Word							Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00002541	A	12/16/2020 4:39 AM	12/16/2020 4:37 AM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00002542	A	12/16/2020 4:39 AM	12/16/2020 4:37 AM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00002543	P	2/4/2021 5:22 PM	2/4/2021 5:22 PM	Email Message	Re: Translation		"Navin Reddy" <navin.reddy@artemisrisk.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>; "Fischer, Iris" <iris.fischer@blakes.com>	Jolene Watson	Solicitor Client Privileged Litigation Privileged
BLK00002544	P	11/4/2020 11:16 PM	11/4/2020 11:16 PM	Email Message	Re: Quick call tomorrow?		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Pulfer, Kaley; DiMatteo, Christopher; Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00002546	P	7/29/2021 3:27 PM	7/29/2021 3:27 PM	iCalendar	Accepted: Anson - Defamation Matters - Conflict Matter		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002548	P	4/28/2021 10:07 PM	4/28/2021 10:07 PM	Email Message	Re: Letter re: Anson Advisors Inc. et al. v. Robert Lee Doxtator - CV-20-006534100-00CL		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher; Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002555	P	2/12/2021 7:07 PM	2/12/2021 7:07 PM	Email Message	RE: Globe and Mail request, Anson Funds		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002556	P	1/12/2021 6:11 PM	1/12/2021 6:11 PM	Email Message	Re: Anson		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00002559	P	3/8/2021 4:32 AM	3/8/2021 4:32 AM	iCalendar	Anson - new posts		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002563	P	6/4/2021 4:49 PM	6/4/2021 4:49 PM	Email Message	West Face Order		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>; "Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002564	A	6/4/2021 4:49 PM	6/4/2021 4:49 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00002567	P	3/11/2021 3:13 AM	3/11/2021 3:13 AM	Email Message	RE: Anson Funds - Blakes Invoices + Update		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002570	P	3/22/2021 6:35 PM	3/22/2021 6:35 PM	Email Message	Litigation Financing Disclosure		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00002581	P	12/7/2020 7:45 PM	12/7/2020 7:45 PM	Email Message	RE: Anson Funds - Defamation Matters - Blakes Invoice (Oct 2020)		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>	Anthony Rizzo	Solicitor Client Privileged Litigation Privileged
BLK00002583	P	6/4/2021 6:23 PM	6/4/2021 6:23 PM	Email Message	RE: West Face Order		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>; "Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002586	P	5/14/2021 9:47 PM	5/14/2021 9:47 PM	Email Message	RE: Doxtator litigation - update		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002587	P	3/25/2021 9:16 PM	3/25/2021 9:16 PM	iCalendar	Doxtator Counterclaim - Anson/Blakes Call		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Pulfer, Kaley" <kaley.pulfer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002588	P	3/17/2021 8:47 PM	3/17/2021 8:47 PM	Email Message	RE: GG Tiki Cups		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00002589	A	3/17/2021 8:47 PM	3/17/2021 4:35 PM	JPEG Image							Solicitor Client Privileged Litigation Privileged
BLK00002590	P	11/2/2020 10:51 PM	11/2/2020 10:51 PM	Email Message	Re: Anson - Update		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Barrack, Michael; Mundiya, Tariq; Goverski, Meryl Conant; Hickey, Michael; Pulfer, Kaley; Moez Kassam; Sunny Puri; DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00002591	P	3/1/2021 8:16 PM	3/1/2021 8:16 PM	Email Message	RE: Good morning, and a quick question		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00002592	P	3/26/2021 9:43 PM	3/26/2021 9:43 PM	Email Message	RE: PNL Request - GE 2019		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Pulfer, Kaley" <kaley.pulfer@blakes.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00002593	P	4/15/2021 1:39 PM	4/15/2021 1:39 PM	Email Message	RE: Stockhouse - Notice of Motion		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002595	P	4/16/2021 4:38 PM	4/16/2021 4:38 PM	Email Message	Anson - Documents		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Navin Reddy" <navin.reddy@artemisrisk.com>	Laura Salvatori; Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002596	A	4/16/2021 4:38 PM	8/21/2020 9:46 PM	Microsoft Word				Josh Owens			Solicitor Client Privileged Litigation Privileged
BLK00002597	A	4/16/2021 4:38 PM	8/21/2020 9:07 PM	Microsoft Word				Josh Owens			Solicitor Client Privileged Litigation Privileged
BLK00002598	A	4/16/2021 4:38 PM	8/21/2020 8:51 PM	Microsoft Word				Josh Owens			Solicitor Client Privileged Litigation Privileged
BLK00002599	A	4/16/2021 4:38 PM	8/21/2020 8:29 PM	Microsoft Word				James Stafford			Solicitor Client Privileged Litigation Privileged
BLK00002600	A	4/16/2021 4:38 PM	8/21/2020 9:58 PM	Microsoft Word				Josh Owens			Solicitor Client Privileged Litigation Privileged
BLK00002604	P	5/27/2021 2:46 PM	5/27/2021 2:46 PM	Email Message	RE: Follow-Up - Anson/Doxtator Litigation		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002612	P	3/12/2021 8:27 PM	3/12/2021 8:27 PM	Email Message	Re: Updates		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "DiMatteo, Christopher" <CHRISTOPHER.DIMATTEO@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002613	P	2/11/2021 7:23 PM	2/11/2021 7:23 PM	Email Message	FW: Globe and Mail request, Anson Funds		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Moez Kassam" <mkassam@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>	Barrack, Michael; Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00002617	P	3/8/2021 4:09 PM	3/8/2021 4:09 PM	Email Message	RE: US Audit Response Letter - Quick Question		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002618	P	3/12/2021 8:29 PM	3/12/2021 8:29 PM	Email Message	Re: Updates		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002620	P	6/10/2021 6:35 PM	6/10/2021 6:35 PM	Email Message	Automatic reply: Update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002631	P	10/19/2020 3:22 PM	10/19/2020 3:22 PM	Email Message	RE: Blakes - Anson - Draft Engagement Letter		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002632	P	5/26/2021 6:29 PM	5/26/2021 6:29 PM	Email Message	RE: Follow-Up - Anson/Doxtator Litigation		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002634	P	3/8/2021 4:06 PM	3/8/2021 4:06 PM	Email Message	RE: US Audit Response Letter - Quick Question		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002635	P	1/28/2021 3:53 PM	1/28/2021 3:53 PM	Email Message	Re: Translation		"Navin Reddy" <navin.reddy@artemisrisk.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Jolene Watson" <jolene.watson@artemisrisk.com>	Laura Salvatori; Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002638	P	1/20/2021 4:11 PM	1/20/2021 4:11 PM	Email Message	Doxtator -Service Notice of Motion		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	DiMatteo, Christopher; Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002639	A	1/20/2021 4:11 PM	1/20/2021 4:11 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00002642	P	10/8/2020 12:17 AM	10/8/2020 12:17 AM	Email Message	RE: Under Siege		"Barrack, Michael" <michael.barrack@blakes.com>		"Moez Kassam" <mkassam@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00002645	P	3/25/2021 7:56 PM	3/25/2021 7:56 PM	Email Message	FW: Anson Advisors Inc et al v. Robert Lee Doxtator (CV-20-00653410-00CL)		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Pulfer, Kaley" <kaley.pulfer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002646	A	3/25/2021 7:56 PM	3/25/2021 7:56 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00002647	P	3/2/2021 2:02 PM	3/2/2021 2:02 PM	Email Message	RE: SOL Global Case		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002652	P	10/20/2020 8:57 PM	10/20/2020 8:57 PM	Email Message	RE: Blakes - Anson - Draft Engagement Letter [revised]		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002653	A	10/20/2020 8:57 PM	10/20/2020 7:35 PM	Adobe Portable Document Format		C:_Users_LDW_AppData_Local_Temp_1_Workshare_wmtemp354_-wtf0304D481.ps					Solicitor Client Privileged Litigation Privileged
BLK00002654	A	10/20/2020 8:57 PM	10/20/2020 7:31 PM	Microsoft Word		Model - Retainer Letter		GRIFFIN, CHARLENE			Solicitor Client Privileged Litigation Privileged
BLK00002657	P	1/27/2021 5:39 PM	1/27/2021 5:39 PM	Email Message	RE: Anson - Haris affidavit		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris; Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002668	P	12/9/2020 5:46 PM	12/9/2020 5:46 PM	Email Message	RE: Anson Funds - Defamation Matters - Blakes Invoice (November 2020)		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Anthony Rizzo	Solicitor Client Privileged Litigation Privileged
BLK00002669	A	12/9/2020 5:46 PM	12/9/2020 4:54 PM	Adobe Portable Document Format				Warren Ly			Solicitor Client Privileged Litigation Privileged
BLK00002670	P	11/26/2020 11:49 PM	11/26/2020 11:49 PM	Email Message	RE: Anson - Update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Barrack, Michael; Hickey, Michael; Pulfer, Kaley; DiMatteo, Christopher; Moez Kassam; Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00002671	A	11/26/2020 11:49 PM	11/26/2020 10:20 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00002672	A	11/26/2020 11:49 PM	11/26/2020 10:21 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00002673	P	2/23/2021 5:21 PM	2/23/2021 5:21 PM	iCalendar	Accepted: Anson Discussion		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002674	P	12/7/2020 2:59 PM	12/7/2020 2:59 PM	Email Message	RE: Doxtator materials		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Governski, Meryl Conant	Solicitor Client Privileged Litigation Privileged
BLK00002682	P	10/6/2020 7:15 PM	10/6/2020 7:15 PM	Email Message	RE: Anson - Call		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002683	P	10/1/2020 11:49 PM	10/1/2020 11:49 PM	Email Message	Re: Anson		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002685	P	1/22/2021 2:06 AM	1/22/2021 2:06 AM	Email Message	Re: Anson - Jacob Doxtator defence		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Iris Fischer; Kaley Pulfer	Solicitor Client Privileged Litigation Privileged
BLK00002686	P	4/19/2021 5:44 PM	4/19/2021 5:44 PM	Email Message	Call with Nav / Status of Amended Reply and Statement of Defence		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002688	P	1/5/2021 9:34 PM	1/5/2021 9:34 PM	iCalendar	Accepted: Anson		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002690	P	7/29/2021 2:29 PM	7/29/2021 2:29 PM	Email Message	RE: Anson Funds - Blakes Invoice re. Defamation Matters (June 2021)		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>; "Anthony Rizzo" <arizzo@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002691	P	3/25/2021 5:48 PM	3/25/2021 5:48 PM	Email Message	Stockhouse Follow Up + Statement of Defense		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002696	P	1/20/2021 5:36 PM	1/20/2021 5:36 PM	Email Message	RE: Doxtator -Service Notice of Motion		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher; Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00002697	P	10/29/2020 8:44 PM	10/29/2020 8:44 PM	Email Message	RE: Anson - Update		"Laura Salvatori" <lusalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Mundiya, Tariq" <tmundiya@willkie.com>;"Governski, Meryl Conant" <MGovernski@willkie.com>;"Barrack, Michael" <michael.barrack@blakes.com>;"Hickey, Michael" <michael.hickey@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002701	P	10/9/2020 9:06 PM	10/9/2020 9:06 PM	Email Message	RE: Anson - Follow-up re. FW: Robert Doxtator Background (@BettingBruiser)		"Hickey, Michael" <michael.hickey@blakes.com>		"Barrack, Michael" <michael.barrack@blakes.com>;"Laura Salvatori" <lusalvatori@ansonfunds.com>	Fischer, Iris;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002705	P	1/9/2021 9:21 PM	1/9/2021 9:21 PM	Email Message	Anson - Estimated Fees re. Doxtator et al		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lusalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002706	A	1/9/2021 9:21 PM	1/9/2021 9:06 PM	Adobe Portable Document Format		24039077-v6-Anson Pricing Estimate.XLSM		MHY			Solicitor Client Privileged Litigation Privileged
BLK00002707	P	4/16/2021 6:04 PM	4/16/2021 6:04 PM	Email Message	RE: Stockhouse - Notice of Motion		"Laura Salvatori" <lusalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00002717	P	4/26/2021 7:07 PM	4/26/2021 7:07 PM	Email Message	RE: for records - reconnaissance energy africa ltd		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Laura Salvatori" <lusalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002718	A	4/26/2021 7:07 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00002719	A	4/26/2021 7:07 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00002720	A	4/26/2021 7:07 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00002722	P	10/10/2020 2:14 PM	10/10/2020 2:14 PM	Email Message	FW: For the call		"Laura Salvatori" <lusalvatori@ansonfunds.com>		"kaley.pulfer@blakes.com" <kaley.pulfer@blakes.com>;"michael.barrack@blakes.com" <michael.barrack@blakes.com>;"iris.fischer@blakes.com" <iris.fischer@blakes.com>;"michael.hickey@blakes.com" <michael.hickey@blakes.com>	Moez Kassam;Sunny Puri;Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00002723	A	10/10/2020 2:14 PM		JPEG Image							Solicitor Client Privileged Litigation Privileged
BLK00002724	A	10/10/2020 2:14 PM	10/5/2020 6:19 AM	Adobe Portable Document Format				DALGRANDEGI1			Solicitor Client Privileged Litigation Privileged
BLK00002726	P	10/27/2020 6:27 PM	10/27/2020 6:27 PM	Email Message	RE: Blakes - Anson - Draft Engagement Letter [revised]		"Laura Salvatori" <lusalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002730	P	10/11/2020 5:20 PM	10/11/2020 5:20 PM	Email Message	Automatic reply: Anson Counsel		"Laura Salvatori" <lusalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002731	P	10/30/2020 11:20 PM	10/30/2020 11:20 PM	Email Message	RE: Your Call		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lusalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002733	P	6/2/2021 9:54 PM	6/2/2021 9:54 PM	iCalendar	Accepted: Anson re Norwich - Twitter/Google		"Laura Salvatori" <lusalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002736	P	12/22/2020 4:10 PM	12/22/2020 4:10 PM	Email Message	RE: Anson - Update		"Laura Salvatori" <lusalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Mundiya, Tariq" <tmundiya@willkie.com>	DiMatteo, Christopher;Governski, Meryl Conant;Moez Kassam;Sunny Puri;Barrack, Michael;Hickey, Michael;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00002737	P	2/11/2021 10:56 PM	2/11/2021 10:56 PM	Email Message	RE: Globe and Mail request, Anson Funds		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"dscott@dscsconsulting.ca" <dscott@dscsconsulting.ca>	Moez Kassam;Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00002741	P	6/14/2021 2:46 PM	6/14/2021 2:46 PM	Email Message	Automatic reply: RE: RE: RE: Correspondence from Blakes/Anson Funds		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002742	P	12/9/2020 6:51 PM	12/9/2020 6:51 PM	iCalendar	Anson SOC		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>	Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00002746	P	11/30/2020 7:50 PM	11/30/2020 7:50 PM	Email Message	RE: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002747	P	3/17/2021 3:12 PM	3/17/2021 3:12 PM	Email Message	RE: Stockhouse letter		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002748	P	7/16/2021 5:16 PM	7/16/2021 5:16 PM	Email Message	Automatic reply: Bruiser Litigation Catch Up		"Pulfer, Kaley" <kaley.pulfer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002749	P	3/17/2021 4:01 PM	3/17/2021 4:01 PM	Email Message	RE: Stockhouse letter		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002751	P	1/18/2021 10:09 PM	1/18/2021 10:09 PM	Email Message	RE: Anson - Follow up Points from Moez		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002752	A	1/18/2021 10:09 PM	12/18/2020 11:27 PM	Email Message	BB messages to Moez 12.18.20		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002753	A	1/18/2021 10:09 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00002754	A	1/18/2021 10:09 PM	1/18/2021 7:09 PM	Email Message	1888bruiser email		"Sunny Puri" <spuri@ansonfunds.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Moez Kassam	Solicitor Client Privileged Litigation Privileged
BLK00002755	A	1/18/2021 10:09 PM	9/5/2018 3:27 AM	Email Message	Cannabis Stocks - Invitation to edit		"Robert Doxtator (via Google Sheets)" <1888bruiser@gmail.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002758	P	11/3/2020 8:10 PM	11/3/2020 8:10 PM	Email Message	RE: Just FYI		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002760	P	10/23/2020 12:00 AM	10/23/2020 12:00 AM	Email Message	RE: K2 Intelligence - Preliminary Findings		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Hickey, Michael;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002761	P	3/26/2021 9:43 PM	3/26/2021 9:43 PM	Email Message	RE: PNL Request - GE 2019		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00002764	P	2/8/2021 9:53 PM	2/8/2021 9:53 PM	Email Message	Update - Stafford		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002765	P	2/4/2021 5:18 PM	2/4/2021 5:18 PM	Email Message	Re: Translation		"Navin Reddy" <navin.reddy@artemisrisk.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>	Jolene Watson	Solicitor Client Privileged Litigation Privileged
BLK00002767	P	10/6/2020 6:21 PM	10/6/2020 6:21 PM	Email Message	RE: Anson - Call		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002768	P	8/3/2021 1:26 AM	8/3/2021 1:26 AM	Email Message	RE: Stafford - update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002769	P	4/1/2021 12:22 AM	4/1/2021 12:22 AM	Email Message	RE: Correspondence from Blakes/Anson Funds		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00002773	P	6/29/2021 4:27 PM	6/29/2021 4:27 PM	Email Message	RE: RE: RE: RE: RE: Correspondence from Blakes/Anson Funds		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002775	P	3/1/2021 10:00 PM	3/1/2021 10:00 PM	Email Message	RE: SOL Global Case		"Laura Salvatori" <lusalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002776	P	2/4/2021 5:26 PM	2/4/2021 5:26 PM	Email Message	RE: Translation		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Navin Reddy" <navin.reddy@artemisrisk.com>;"Laura Salvatori" <lusalvatori@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>	Jolene Watson	Solicitor Client Privileged Litigation Privileged
BLK00002778	P	3/2/2021 2:03 PM	3/2/2021 2:03 PM	Email Message	Automatic reply: SOL Global Case		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lusalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002779	P	3/12/2021 9:46 PM	3/12/2021 9:46 PM	Email Message	FW: Anson Advisors inc et al v Robert lee Doxtator et al (CV-20-00653410-00CL)		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lusalvatori@ansonfunds.com>	DiMatteo, Christopher;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002780	A	3/12/2021 9:46 PM	3/12/2021 9:46 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00002783	P	7/7/2021 9:43 PM	7/7/2021 9:43 PM	Email Message	RE: Bruiser Litigation Catch Up		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Laura Salvatori" <lusalvatori@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002784	P	8/10/2021 1:09 PM	8/10/2021 1:09 PM	iCalendar	Accepted: Anson - Stafford litigation update		"Laura Salvatori" <lusalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002785	P	12/18/2020 8:32 PM	12/18/2020 8:32 PM	Email Message	Re: Request for New Matter for Commercial List		"Laura Salvatori" <lusalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>	Moez Kassam;Sunny Puri;Barrack, Michael;Pulfer, Kaley;Tariq Mundiya;Meryl Conant Governski;Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00002787	P	11/5/2020 12:53 AM	11/5/2020 12:53 AM	Email Message	Re: Quick call tomorrow?		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lusalvatori@ansonfunds.com>	Pulfer, Kaley;DiMatteo, Christopher;Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00002788	P	10/29/2020 11:05 PM	10/29/2020 11:05 PM	Email Message	RE: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lusalvatori@ansonfunds.com>;"Mundiya, Tariq" <tmundiya@willkie.com>;"Governski, Meryl Conant" <MGovernski@willkie.com>;"Barrack, Michael" <michael.barrack@blakes.com>;"Hickey, Michael" <michael.hickey@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002789	P	10/26/2020 1:39 PM	10/26/2020 1:39 PM	Email Message	RE: K2 Intelligence - Preliminary Findings		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lusalvatori@ansonfunds.com>	Hickey, Michael;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002790	P	2/9/2021 12:45 AM	2/9/2021 12:45 AM	Email Message	RE: Doxtator claim - affidavit signing		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00002791	A	2/9/2021 12:45 AM	2/9/2021 12:45 AM	Adobe Portable Document Format		Affidavit of Service Form 16B				DIMATTEO, CHRISTOPHER	Solicitor Client Privileged Litigation Privileged
BLK00002792	P	6/2/2021 7:49 PM	6/2/2021 7:49 PM	Email Message	RE: Anson Advisors Inc. et al. v. Robert Lee Doxtator and Jacob Doxtator et al.		"Laura Salvatori" <lusalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002793	P	11/20/2020 9:55 PM	11/20/2020 9:55 PM	Email Message	RE: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lusalvatori@ansonfunds.com>	Barrack, Michael;Hickey, Michael;Pulfer, Kaley;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00002794	A	11/20/2020 9:55 PM	11/20/2020 9:55 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00002795	A	11/20/2020 9:55 PM	11/20/2020 9:55 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00002796	P	4/28/2021 8:54 PM	4/28/2021 8:54 PM	Email Message	FW: CV-20-006534100-00CL - Anson Advisors Inc. et al. v. Robert Lee Duxtator		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	DiMatteo, Christopher;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002797	A	4/28/2021 8:54 PM	4/28/2021 8:53 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00002799	P	4/7/2021 1:48 PM	4/7/2021 1:48 PM	Email Message	RE: Facedrive claims		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002800	P	5/27/2021 1:31 PM	5/27/2021 1:31 PM	Email Message	RE: Stockhouse motion - Affidavit commissioning		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002803	P	10/31/2020 2:13 PM	10/31/2020 2:13 PM	Email Message	RE: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Mundiya, Tariq" <tmundiya@willkie.com>;"Governski, Meryl Conant" <MGovernski@willkie.com>;"Barrack, Michael" <michael.barrack@blakes.com>;"Hickey, Michael" <michael.hickey@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002808	P	4/16/2021 4:59 PM	4/16/2021 4:59 PM	Email Message	Re: Anson - Documents		"Navin Reddy" <navin.reddy@artemisrisk.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Laura Salvatori;Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002811	P	4/15/2021 10:02 PM	4/15/2021 10:02 PM	iCalendar	Tentative: Anson - Call re Defamation Claim		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002812	P	12/18/2020 7:57 PM	12/18/2020 7:57 PM	Email Message	RE: Request for New Matter for Commercial List		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Moez Kassam;Sunny Puri;Barrack, Michael;Pulfer, Kaley;DiMatteo, Christopher;Tariq Mundiya;Meryl Conant Governski;Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00002813	P	10/14/2020 2:19 PM	10/14/2020 2:19 PM	Email Message	Anson - Follow-ups / Status Updates		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002814	P	1/8/2021 3:06 PM	1/8/2021 3:06 PM	Email Message	RE: Anson		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002815	A	1/8/2021 3:06 PM	10/6/2020 7:22 PM	Adobe Portable Document Format	Letter of Engagement_ ANSON_20201005_2 rev(S2658992-3)			David Danovitch			Solicitor Client Privileged Litigation Privileged
BLK00002830	P	10/6/2020 7:16 PM	10/6/2020 7:16 PM	iCalendar	Anson Funds - Defamation Discussion		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>;"spuri@ansonfunds.com" <spuri@ansonfunds.com>;"mkassam@ansonfunds.com" <mkassam@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002832	P	6/4/2021 7:15 PM	6/4/2021 7:15 PM	Email Message	Re: West Face Order		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002840	P	12/16/2020 7:12 PM	12/16/2020 7:12 PM	Email Message	RE: Anson - Final Comments to SoC		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"Governski, Meryl Conant" <MGovernski@willkie.com>;"Mundiya, Tariq" <tmundiya@willkie.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	Barrack, Michael;Hickey, Michael;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00002841	A	12/16/2020 7:12 PM	12/16/2020 7:10 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00002842	P	12/9/2020 6:52 PM	12/9/2020 6:52 PM	iCalendar	Accepted: Anson SOC		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002843	P	12/14/2020 9:40 PM	12/14/2020 9:40 PM	Email Message	RE: Anson - Update		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"Governski, Meryl Conant" <MGovernski@willkie.com>;"Mundiya, Tariq" <tmundiya@willkie.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	Barrack, Michael;Hickey, Michael;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002845	P	4/5/2021 5:56 PM	4/5/2021 5:56 PM	Email Message	RE: Stockhouse Post Summary		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002847	P	8/10/2021 1:16 AM	8/10/2021 1:16 AM	Email Message	Automatic reply: Stafford - update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002855	P	1/6/2021 10:50 PM	1/6/2021 10:50 PM	Email Message	RE: Anson Advisors Inc. et al v. Robert Lee Doxtator and Jacob Doxtator et al.		"Sunny Puri" <spuri@ansonfunds.com>		"Pulfer, Kaley" <kaley.pulfer@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00002857	P	10/19/2020 7:03 PM	10/19/2020 7:03 PM	Email Message	RE: Anson - Follow-ups / Status Updates		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002858	P	11/16/2020 11:04 PM	11/16/2020 11:04 PM	iCalendar	Anson - Statement of Claim Discussion		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>	Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00002860	P	5/26/2021 6:53 PM	5/26/2021 6:53 PM	Email Message	RE: Follow-Up - Anson/Doxtator Litigation		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002861	P	2/8/2021 10:39 PM	2/8/2021 10:39 PM	Email Message	RE: Doxtator claim - affidavit signing		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	Laura Salvatori;Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002862	P	1/18/2021 5:44 PM	1/18/2021 5:44 PM	Email Message	RE: Anson - Follow up Points from Moez		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	DiMatteo, Christopher;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002863	P	10/27/2020 6:33 PM	10/27/2020 6:33 PM	Email Message	RE: Blakes - Anson - Draft Engagement Letter [revised]		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002868	P	3/26/2021 5:50 PM	3/26/2021 5:50 PM	Email Message	FW: Anson Advisors Inc et al v. Robert Lee Doxtator (CV-20-00653410-00CL)		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Pulfer, Kaley;Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00002869	A	3/26/2021 5:50 PM		Text File							Solicitor Client Privileged Litigation Privileged
BLK00002870	A	3/26/2021 5:50 PM	10/5/2018 5:13 PM	Email Message	Potential Consultant Terms		"Sunny Puri" <spuri@ansonfunds.com>		"Robert Doxtator" <harvestmooncannabisco@gmail.com>	Moez Kassam	Solicitor Client Privileged Litigation Privileged
BLK00002871	P	4/19/2021 6:10 PM	4/19/2021 6:10 PM	Email Message	RE: Call with Nav / Status of Amended Reply and Statement of Defence		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00002875	P	10/9/2020 9:09 PM	10/9/2020 9:09 PM	iCalendar	Anson - Defamation Discussion - Next Steps		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Barrack, Michael" <michael.barrack@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>;"spuri@ansonfunds.com" <spuri@ansonfunds.com>;"mkassam@ansonfunds.com" <mkassam@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002878	P	6/5/2021 8:34 PM	6/5/2021 8:34 PM	iCalendar	Accepted: Motion - ANSON ADVISORS INC. et al v. DOXTATOR et al (CV-20-00653410-00CL)		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002879	P	1/13/2021 8:23 PM	1/13/2021 8:23 PM	iCalendar	Anson / Artemis		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"navin.reddy@artemisrisk.com" <navin.reddy@artemisrisk.com>;"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002881	P	1/27/2021 5:57 PM	1/27/2021 5:57 PM	Email Message	RE: Anson - Haris affidavit		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002882	A	1/27/2021 5:57 PM	1/27/2021 5:57 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00002888	P	11/13/2020 7:37 PM	11/13/2020 7:37 PM	Email Message	Re: Anson - Update		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Barrack, Michael;Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00002889	P	3/25/2021 9:12 PM	3/25/2021 9:12 PM	Email Message	Re: Anson Advisors Inc et al v. Robert Lee Doxtator (CV-20-00653410-00CL)		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher;Pulfer, Kaley;Moez Kassam;Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00002893	P	3/1/2021 8:20 PM	3/1/2021 8:20 PM	Email Message	RE: Good morning, and a quick question		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002894	P	1/27/2021 5:37 PM	1/27/2021 5:37 PM	Email Message	RE: Anson - Haris affidavit		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002899	P	6/28/2021 10:30 PM	6/28/2021 10:30 PM	Email Message	RE: RE: RE: RE: RE: Correspondence from Blakes/Anson Funds		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002903	P	5/20/2021 5:13 PM	5/20/2021 5:13 PM	Email Message	RE: Doxtator litigation - discovery plan		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002906	P	6/11/2021 8:26 PM	6/11/2021 8:26 PM	Email Message	FW: Anson		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002907	A	6/11/2021 8:26 PM	6/11/2021 8:25 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00002908	P	8/1/2021 8:39 PM	8/1/2021 8:39 PM	Email Message	RE: Stafford - update		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002909	A	8/1/2021 8:39 PM	8/1/2021 8:24 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00002911	P	1/12/2021 7:14 PM	1/12/2021 7:14 PM	iCalendar	Accepted: Anson/Blakes		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002916	P	1/6/2021 10:45 PM	1/6/2021 10:45 PM	Email Message	RE: Anson Advisors Inc. et al v. Robert Lee Doxtator and Jacob Doxtator et al.		"Pulfer, Kaley" <kaley.pulfer@blakes.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00002917	P	4/5/2021 8:53 PM	4/5/2021 8:53 PM	Email Message	RE: Stockhouse Post Summary		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00002919	P	8/2/2021 3:25 PM	8/2/2021 3:25 PM	Email Message	RE: Stafford - update		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002920	P	11/30/2020 11:00 PM	11/30/2020 11:00 PM	Email Message	Tax Cases		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002921	P	3/9/2021 6:36 PM	3/9/2021 6:36 PM	Email Message	RE: Anson - new posts		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <CHRISTOPHER.DIMATTEO@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002925	P	3/15/2021 10:40 PM	3/15/2021 10:40 PM	Email Message	RE: Anson Advisors inc et al v Robert lee Duxtator et al (CV-20-00653410-00CL)		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	DiMatteo, Christopher;Pulfer, Kaley;Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00002926	P	2/24/2021 5:00 PM	2/24/2021 5:00 PM	Email Message	Re: Market Sounding // Strictly Private & Confidential		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Phillips, Tim" <tim.phillips@blakes.com>;"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002927	P	4/5/2021 5:49 PM	4/5/2021 5:49 PM	Email Message	RE: Stockhouse Post Summary		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002929	P	4/5/2021 5:55 PM	4/5/2021 5:55 PM	Email Message	RE: Stockhouse Post Summary		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002932	P	10/9/2020 9:04 PM	10/9/2020 9:04 PM	Email Message	RE: Anson - Follow-up re. FW: Robert Duxtator Background (@BettingBruiser)		"Barrack, Michael" <michael.barrack@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Hickey, Michael" <michael.hickey@blakes.com>	Fischer, Iris;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002934	P	11/2/2020 10:38 PM	11/2/2020 10:38 PM	Email Message	RE: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Mundiya, Tariq;Governski, Meryl Conant;Barrack, Michael;Hickey, Michael;Pulfer, Kaley;Moez Kassam;Sunny Puri;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00002942	P	3/9/2021 4:53 PM	3/9/2021 4:53 PM	Email Message	RE: Anson Funds - Blakes Invoices + Update		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002944	P	12/18/2020 7:50 PM	12/18/2020 7:50 PM	Email Message	Re: Request for New Matter for Commercial List		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Moez Kassam;Sunny Puri;Michael Barrack;Kaley Pulfer;Christopher DiMatteo;Tariq Mundiya;Meryl Conant Governski;Michael Hickey	Solicitor Client Privileged Litigation Privileged
BLK00002945	P	11/13/2020 7:10 PM	11/13/2020 7:10 PM	Email Message	RE: Anson - Update		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Barrack, Michael;Mundiya, Tariq;Governski, Meryl Conant;Hickey, Michael;Pulfer, Kaley;Moez Kassam;Sunny Puri;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00002946	A	11/13/2020 7:10 PM	11/13/2020 6:59 PM	Microsoft Word				Laura Salvatori			Solicitor Client Privileged Litigation Privileged
BLK00002947	A	11/13/2020 7:10 PM	11/13/2020 7:02 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00002949	P	12/3/2020 11:45 PM	12/3/2020 11:45 PM	Email Message	RE: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Governski, Meryl Conant" <MGovernski@willkie.com>;"Mundiya, Tariq" <tmundiya@willkie.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	Barrack, Michael;Hickey, Michael;Pulfer, Kaley;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00002953	P	1/12/2021 6:10 PM	1/12/2021 6:10 PM	Email Message	RE: Anson		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002956	P	3/7/2021 6:42 PM	3/7/2021 6:42 PM	Email Message	US Audit Response Letter - Quick Question		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002957	A	3/7/2021 6:42 PM	2/10/2021 3:53 PM	Adobe Portable Document Format		KM_C554e-20190114184453					Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00002960	P	10/16/2020 1:55 PM	10/16/2020 1:55 PM	Email Message	RE: Blakes - Anson - Draft Engagement Letter		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002961	A	10/16/2020 1:55 PM	10/7/2020 4:11 PM	Adobe Portable Document Format				Adam Spears			Solicitor Client Privileged Litigation Privileged
BLK00002964	P	7/9/2021 2:57 PM	7/9/2021 2:57 PM	Email Message	RE: Bruiser Litigation Catch Up		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>; "Laura Salvatori" <l.salvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00002979	P	1/28/2021 6:08 PM	1/28/2021 6:08 PM	Email Message	RE: Translation		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002982	P	2/8/2021 9:34 PM	2/8/2021 9:34 PM	Email Message	Doxtator claim - affidavit signing		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	Laura Salvatori; Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00002983	A	2/8/2021 9:34 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00002984	A	2/8/2021 9:34 PM	9/5/2018 3:27 AM	Email Message	Cannabis Stocks - Invitation to edit		"Robert Doxtator (via Google Sheets)" <1888bruiser@gmail.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00002985	A	2/8/2021 9:34 PM	2/8/2021 9:34 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00002992	P	4/26/2021 7:06 PM	4/26/2021 7:06 PM	Email Message	RE: for records - reconnaissance energy africa ltd		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00002993	A	4/26/2021 7:06 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00002994	A	4/26/2021 7:06 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00002995	A	4/26/2021 7:06 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00002996	P	7/7/2021 5:10 PM	7/7/2021 5:10 PM	Email Message	Automatic reply: Stockhouse material		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003000	P	7/14/2021 6:09 PM	7/14/2021 6:09 PM	Email Message	Automatic reply: Bruiser Litigation Catch Up		"Pulfer, Kaley" <kaley.pulfer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003003	P	4/16/2021 8:23 PM	4/16/2021 8:23 PM	Email Message	Doxtator litigation - amended reply and defence		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003004	A	4/16/2021 8:23 PM	4/16/2021 8:23 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00003008	P	3/15/2021 2:57 PM	3/15/2021 2:57 PM	Email Message	RE: Anson x Blakes - Intro - Funds Discussion		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>; "McLean, Stacy" <STACY.MCLEAN@blakes.com>; "Davis, Jill" <JILL.DAVIS@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003009	A	3/15/2021 2:57 PM	3/3/2021 11:52 AM	Adobe Portable Document Format		Microsoft Word - AIMF Tear Sheet 2.28.2021_New		lmoore			Solicitor Client Privileged Litigation Privileged
BLK00003010	P	5/27/2021 1:28 PM	5/27/2021 1:28 PM	iCalendar	Accepted: Stockhouse motion - call to commission Sunny's affidavit		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003012	P	4/5/2021 5:58 PM	4/5/2021 5:58 PM	iCalendar	Anson/Blakes - Stockhouse and SOD		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003014	P	2/18/2021 8:48 PM	2/18/2021 8:48 PM	Email Message	RE: Anson Advisors Inc. - Audit Letter Request		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003017	P	5/26/2021 8:07 PM	5/26/2021 8:07 PM	Email Message	RE: Stockhouse Norwich application - Sunny's affidavit		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00003021	P	10/9/2020 9:10 PM	10/9/2020 9:10 PM	iCalendar	Accepted: Anson - Defamation Discussion - Next Steps		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003023	P	6/4/2021 1:25 PM	6/4/2021 1:25 PM	Email Message	RE: Anson re Norwich - Twitter/Google		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Fischer, Iris" <IRIS.FISCHER@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003024	A	6/4/2021 1:25 PM	6/2/2021 4:15 PM	Email Message	P&C // Twitter Order		"Governski, Meryl Conant" <MGovernski@willkie.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Mundiya, Tariq	Solicitor Client Privileged Litigation Privileged
BLK00003025	A	6/4/2021 1:25 PM	6/2/2021 4:15 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00003028	P	4/5/2021 5:45 PM	4/5/2021 5:45 PM	Email Message	RE: Stockhouse Post Summary		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003033	P	11/30/2020 10:53 PM	11/30/2020 10:53 PM	Email Message	RE: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003038	P	11/5/2020 6:52 PM	11/5/2020 6:52 PM	Email Message	RE: Anson / Blakes - Statement of Claim Check-In		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "Pulfer, Kaley" <kaley.pulfer@blakes.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00003039	P	11/20/2020 10:09 PM	11/20/2020 10:09 PM	Email Message	RE: Anson - Update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Barrack, Michael; Hickey, Michael; Pulfer, Kaley; DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003040	P	7/27/2021 7:07 PM	7/27/2021 7:07 PM	Email Message	Automatic reply: Bruiser Litigation Catch Up		"Pulfer, Kaley" <kaley.pulfer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003044	P	1/15/2021 3:33 PM	1/15/2021 3:33 PM	Email Message	RE: Anson - Follow up Points from Moez		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003046	P	2/23/2021 4:14 PM	2/23/2021 4:14 PM	Email Message	RE: Question about Broker Warrants		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003050	P	10/6/2020 5:53 PM	10/6/2020 5:53 PM	Email Message	RE: Anson - Call		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003051	P	5/14/2021 5:12 PM	5/14/2021 5:12 PM	Email Message	RE: Doxtator litigation - update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003052	P	3/10/2021 2:27 PM	3/10/2021 2:27 PM	iCalendar	Anson/Stockhouse		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003054	P	2/13/2021 4:25 PM	2/13/2021 4:25 PM	Email Message	Fw: Anson Funds Follow-Up Info		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003055	A	2/13/2021 4:25 PM	1/21/2021 12:21 AM	Adobe Portable Document Format				tmoores			Solicitor Client Privileged Litigation Privileged
BLK00003058	P	10/1/2020 6:23 PM	10/1/2020 6:23 PM	Email Message	RE: Anson		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003062	P	4/5/2021 8:39 PM	4/5/2021 8:39 PM	Email Message	RE: Stockhouse Post Summary		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003066	P	3/17/2021 8:51 PM	3/17/2021 8:51 PM	Email Message	RE: GG Tiki Cups		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003067	A	3/17/2021 8:51 PM	3/17/2021 4:35 PM	JPEG Image							Solicitor Client Privileged Litigation Privileged
BLK00003071	P	7/29/2021 3:06 PM	7/29/2021 3:06 PM	Email Message	RE: Anson - Defamation Matters - Conflict Matter		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>; "Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003082	P	5/26/2021 2:07 PM	5/26/2021 2:07 PM	Email Message	Follow-Up - Anson/Doxtator Litigation		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003083	P	1/14/2021 2:15 AM	1/14/2021 2:15 AM	Email Message	Re: Anson - Outside Counsel Guidelines - 2021 Blakes Rates		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00003084	P	12/31/2020 3:22 PM	12/31/2020 3:22 PM	Email Message	Re: Anson - Update		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Laura Salvatori;Sunny Puri;Puffer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003090	P	3/31/2021 10:13 PM	3/31/2021 10:13 PM	Email Message	RE: Correspondence from Blakes/Anson Funds		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003093	P	6/28/2021 6:56 PM	6/28/2021 6:56 PM	Email Message	RE: RE: RE: RE: RE: Correspondence from Blakes/Anson Funds		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003099	P	3/25/2021 10:34 PM	3/25/2021 10:34 PM	iCalendar	Accepted: Doxtator Counterclaim - Anson/Blakes Call		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003101	P	1/21/2021 10:33 PM	1/21/2021 10:33 PM	Email Message	RE: Anson - Affidavits for service motion		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris;Puffer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003102	A	1/21/2021 10:33 PM	1/21/2021 10:27 PM	Microsoft Word		Affidavit of Service Form 16B		DIMATTEO, CHRISTOPHER			Solicitor Client Privileged Litigation Privileged
BLK00003103	A	1/21/2021 10:33 PM	1/21/2021 10:23 PM	Microsoft Word		Affidavit of Service Form 16B		DIMATTEO, CHRISTOPHER			Solicitor Client Privileged Litigation Privileged
BLK00003109	P	12/31/2020 8:41 PM	12/31/2020 8:41 PM	Email Message	Re: Anson Defamation Matter - Litigation Reserve		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003122	P	1/6/2021 10:19 PM	1/6/2021 10:19 PM	Email Message	RE: Anson Advisors Inc. et al v. Robert Lee Doxtator and Jacob Doxtator et al.		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>;"Laura Salvatori" <l.salvatori@ansonfunds.com>	Puffer, Kaley;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003124	P	3/12/2021 8:08 PM	3/12/2021 8:08 PM	Email Message	RE: Updates		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003136	P	1/28/2021 3:41 PM	1/28/2021 3:41 PM	Email Message	RE: Translation		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"hav in.reddy@artemisrisk.com" <navin.reddy@artemisrisk.com>;"jolene.watson@artemisrisk.com"	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003143	P	3/25/2021 9:16 PM	3/25/2021 9:16 PM	iCalendar	Accepted: Doxtator Counterclaim - Anson/Blakes Call		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003144	P	4/19/2021 7:07 PM	4/19/2021 7:07 PM	Email Message	Re: Call with Nav / Status of Amended Reply and Statement of Defence		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003145	P	7/28/2021 10:32 PM	7/28/2021 10:32 PM	Email Message	Anson - Defamation Matters - Conflict Matter		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"spuri@ansonfunds.com" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003147	P	5/31/2021 5:18 PM	5/31/2021 5:18 PM	Email Message	RE: Anson - Defamation Matters - Blakes Invoice (March + April)		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003151	P	3/12/2021 10:02 PM	3/12/2021 10:02 PM	Email Message	RE: Anson Advisors inc et al v Robert lee Doxtator et al (CV-20-00653410-00CL)		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	DiMatteo, Christopher;Puffer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003153	P	12/31/2020 6:08 PM	12/31/2020 6:08 PM	Email Message	Automatic reply: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003154	P	3/12/2021 8:29 PM	3/12/2021 8:29 PM	Email Message	RE: Updates		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003155	P	3/17/2021 4:10 PM	3/17/2021 4:10 PM	iCalendar	Accepted: Stockhouse		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003156	P	5/27/2021 12:08 PM	5/27/2021 12:08 PM	Email Message	RE: Stockhouse Norwich application - Sunny's affidavit		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003158	P	11/13/2020 7:10 PM	11/13/2020 7:10 PM	Email Message	Automatic reply: Anson - Update		"Puffer, Kaley" <kaley.puffer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003160	P	12/29/2020 9:41 PM	12/29/2020 9:41 PM	Email Message	RE: Anson Defamation Matter - Litigation Reserve		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00003161	P	3/15/2021 8:39 PM	3/15/2021 8:39 PM	Email Message	RE: Anson Advisors inc et al v Robert lee Doxtator et al (CV-20-00653410-00CL)		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	DiMatteo, Christopher;Puffer, Kaley;Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00003162	P	12/1/2020 4:22 PM	12/1/2020 4:22 PM	Email Message	Re: Anson Funds - Defamation Matters - Blakes Invoice (Oct 2020)		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003163	P	3/26/2021 9:21 PM	3/26/2021 9:21 PM	Email Message	RE: Anson Advisors Inc et al v. Robert Lee Doxtator (CV-20-00653410-00CL)		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Puffer, Kaley" <kaley.puffer@blakes.com>	Fischer, Iris;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003164	P	1/20/2021 1:13 AM	1/20/2021 1:13 AM	Email Message	RE: Anson Funds - Defamation Matters - Blakes Invoice (December 2020)		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003165	A	1/20/2021 1:13 AM	1/13/2021 4:55 PM	Adobe Portable Document Format			Warren Ly				Solicitor Client Privileged Litigation Privileged
BLK00003167	P	12/1/2020 4:29 PM	12/1/2020 4:29 PM	Email Message	RE: Anson Funds - Defamation Matters - Blakes Invoice (Oct 2020)		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003171	P	6/10/2021 6:59 PM	6/10/2021 6:59 PM	Email Message	RE: Update		"Fischer, Iris" <iris.fischer@blakes.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003172	P	11/30/2020 4:23 PM	11/30/2020 4:23 PM	Email Message	RE: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Tariq Mundiya" <tmundiya@willkie.com>;"Meryl Conant Governski" <MGovernski@willkie.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	Barrack, Michael;Hickey, Michael;Puffer, Kaley;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003173	A	11/30/2020 4:23 PM	11/30/2020 4:23 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00003174	A	11/30/2020 4:23 PM	11/30/2020 4:23 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00003175	P	6/7/2021 6:30 PM	6/7/2021 6:30 PM	iCalendar	Accepted: Stockhouse - Call to Commission Sunny's Supplementary Affidavit		"Sunny Puri" <spuri@ansonfunds.com>		"Maringola, Jennifer" <jennifer.maringola@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003176	P	12/2/2020 8:35 PM	12/2/2020 8:35 PM	Email Message	RE: Anson - Update*etc		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Governski, Meryl Conant" <MGovernski@willkie.com>;"Mundiya, Tariq" <tmundiya@willkie.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	Barrack, Michael;Hickey, Michael;Puffer, Kaley;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003180	P	10/21/2020 6:10 PM	10/21/2020 6:10 PM	Email Message	RE: Blakes - Anson - Draft Engagement Letter [revised]		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003181	P	10/2/2020 4:52 PM	10/2/2020 4:52 PM	Email Message	RE: Anson		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003183	P	1/6/2021 8:58 PM	1/6/2021 8:58 PM	Email Message	FW: Anson Advisors Inc. et al v. Robert Lee Doxtator and Jacob Doxtator et al.		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>	Puffer, Kaley;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003184	A	1/6/2021 8:58 PM	1/6/2021 8:58 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00003186	P	4/16/2021 5:19 PM	4/16/2021 5:19 PM	Email Message	RE: Stockhouse - Notice of Motion		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003187	P	1/5/2021 3:13 PM	1/5/2021 3:13 PM	Email Message	RE: Anson Defamation Matter - Litigation Reserve		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003191	P	12/18/2020 12:50 AM	12/18/2020 12:50 AM	Email Message	RE: Request for New Matter for Commercial List		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Sunny Puri" <spuri@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"Tariq Mundiya" <tmundiya@willkie.com>;"Meryl Conant Governski" <MGovernski@willkie.com>	Barrack, Michael;DiMatteo, Christopher;Puffer, Kaley;Hickey, Michael	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00003192	P	5/27/2021 1:13 PM	5/27/2021 1:13 PM	Email Message	RE: Stockhouse Norwich application - Sunny's affidavit		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003193	P	4/19/2021 8:15 PM	4/19/2021 8:15 PM	iCalendar	Anson / Artemis - Check in		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>; "Navin Reddy" <navin.reddy@artemisrisk.com>; "Jolene Watson" <jolene.watson@artemisrisk.com>; "Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003194	P	10/19/2020 3:19 PM	10/19/2020 3:19 PM	Email Message	RE: Anson - Follow-ups / Status Updates		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003195	P	12/21/2020 8:17 PM	12/21/2020 8:17 PM	Email Message	RE: Anson - Update		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Fischer, Iris" <iris.fischer@blakes.com>; "Governski, Meryl Conant" <MGovernski@willkie.com>; "Mundiya, Tariq" <tmundiya@willkie.com>; "Moez Kassam" <mkassam@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>	Barrack, Michael; Hickey, Michael; Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003196	A	12/21/2020 8:17 PM	12/21/2020 8:13 PM	Microsoft Word		Affidavit of Service Form 16B		DIMATTEO, CHRISTOPHER			Solicitor Client Privileged Litigation Privileged
BLK00003197	P	7/7/2021 9:48 PM	7/7/2021 9:48 PM	Email Message	RE: Stockhouse material		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003198	P	3/12/2021 9:48 PM	3/12/2021 9:48 PM	Email Message	RE: Anson Advisors inc et al v Robert lee Doxtator et al (CV-20-00653410-00CL)		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher; Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003202	P	5/27/2021 6:14 PM	5/27/2021 6:14 PM	Email Message	FW: The rise of Anson Funds and Moez Kassam		"Moez Kassam" <mkassam@ansonfunds.com>		"Michael Barrack (MICHAEL BARRACK@blakes.com)" <michael.barrack@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003203	P	2/23/2021 3:49 PM	2/23/2021 3:49 PM	Email Message	RE: Service Motion		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>; "Pulfer, Kaley" <kaley.pulfer@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003204	P	7/1/2021 7:37 PM	7/1/2021 7:37 PM	Email Message	RE: Stockhouse material		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003209	P	3/11/2021 3:45 PM	3/11/2021 3:45 PM	iCalendar	Accepted: Anson x Blakes - Intro - Funds Discussion		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003210	P	1/14/2021 12:07 AM	1/14/2021 12:07 AM	Email Message	Anson - Outside Counsel Guidelines - 2021 Blakes Rates		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003211	P	4/26/2021 5:27 PM	4/26/2021 5:27 PM	Email Message	Presumably Paul Update		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003215	P	2/4/2021 5:47 PM	2/4/2021 5:47 PM	Email Message	Re: Translation		"Navin Reddy" <navin.reddy@artemisrisk.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>; "Fischer, Iris" <iris.fischer@blakes.com>	Jolene Watson	Solicitor Client Privileged Litigation Privileged
BLK00003217	P	10/9/2020 9:14 PM	10/9/2020 9:14 PM	iCalendar	Accepted: Anson - Defamation Discussion - Next Steps		"Sunny Puri" <spuri@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003219	P	7/29/2021 3:23 PM	7/29/2021 3:23 PM	iCalendar	Anson - Defamation Matters - Conflict Matter		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003220	P	3/8/2021 12:16 PM	3/8/2021 12:16 PM	iCalendar	Accepted: Anson - new posts		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003221	P	1/21/2021 5:14 PM	1/21/2021 5:14 PM	Email Message	Re: Anson - Jacob Doxtator defence		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris; Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003222	P	6/30/2021 2:30 PM	6/30/2021 2:30 PM	Email Message	RE: Stockhouse material		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003223	A	6/30/2021 2:30 PM	6/29/2021 11:22 PM	Microsoft Excel							Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00003224	P	3/12/2021 3:10 PM	3/12/2021 3:10 PM	Email Message	Updates		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <CHRISTOPHER.DIMATTEO@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003225	P	4/15/2021 9:23 PM	4/15/2021 9:23 PM	iCalendar	Accepted: Anson - Call re Defamation Claim		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003226	P	3/31/2021 1:46 AM	3/31/2021 1:46 AM	Email Message	Re: Correspondence from Blakes/Anson Funds		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003228	P	3/17/2021 8:58 PM	3/17/2021 8:58 PM	Email Message	RE: GG Tiki Cups		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003229	A	3/17/2021 8:58 PM	3/17/2021 4:35 PM	JPEG Image							Solicitor Client Privileged Litigation Privileged
BLK00003232	P	4/15/2021 2:11 PM	4/15/2021 2:11 PM	Email Message	Re: Stockhouse - Notice of Motion		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Sunny Puri;Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003233	P	4/28/2021 10:02 PM	4/28/2021 10:02 PM	Email Message	Re: Letter re: Anson Advisors Inc. et al. v. Robert Lee Doxtator - CV-20-006534100-00CL		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003235	P	6/29/2021 11:22 PM	6/29/2021 11:22 PM	Email Message	Stockhouse material		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003236	A	6/29/2021 11:22 PM	6/29/2021 11:22 PM	Microsoft Excel							Solicitor Client Privileged Litigation Privileged
BLK00003241	P	2/1/2021 9:22 PM	2/1/2021 9:22 PM	Email Message	RE: Translation		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Navin Reddy;Jolene Watson	Solicitor Client Privileged Litigation Privileged
BLK00003243	P	10/12/2020 11:40 AM	10/12/2020 11:40 AM	Email Message	RE: Anson Counsel		"Barrack, Michael" <michael.barrack@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>;"Hickey, Michael" <michael.hickey@blakes.com>;"Tariq Mundiya" <tmundiya@willkie.com>;"Meryl Conant Goverski" <MGoverski@willkie.com>	Moez Kassam;Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00003244	P	6/4/2021 5:45 PM	6/4/2021 5:45 PM	Email Message	RE: West Face Order		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003247	P	3/1/2021 4:32 PM	3/1/2021 4:32 PM	Email Message	RE: Good morning, and a quick question		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003252	P	12/30/2020 7:51 PM	12/30/2020 7:51 PM	Email Message	Automatic reply: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003256	P	3/30/2021 12:14 AM	3/30/2021 12:14 AM	Email Message	Re: Correspondence from Blakes/Anson Funds		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003257	P	3/8/2021 4:04 PM	3/8/2021 4:04 PM	Email Message	RE: US Audit Response Letter - Quick Question		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003258	P	10/27/2020 9:45 PM	10/27/2020 9:45 PM	Email Message	RE: K2 Intelligence - Preliminary Findings		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Hickey, Michael;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003262	P	10/23/2020 5:54 PM	10/23/2020 5:54 PM	Email Message	RE: K2 Intelligence - Preliminary Findings		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Hickey, Michael;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003264	P	5/27/2021 1:27 PM	5/27/2021 1:27 PM	iCalendar	Stockhouse motion - call to commission Sunny's affidavit		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>;"Maringola, Jennifer" <jennifer.maringola@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003268	P	12/18/2020 9:35 PM	12/18/2020 9:35 PM	Email Message	RE: Request for New Matter for Commercial List		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Laura Salvatori	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00003272	P	3/7/2021 6:57 PM	3/7/2021 6:57 PM	Email Message	RE: US Audit Response Letter - Quick Question		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003274	P	12/30/2020 7:51 PM	12/30/2020 7:51 PM	Email Message	Re: Anson - Update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00003277	P	11/3/2020 10:09 AM	11/3/2020 10:09 AM	iCalendar	Accepted: Anson/Blakes/Wilkie re SOC		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003278	P	7/7/2021 7:58 PM	7/7/2021 7:58 PM	Email Message	Automatic reply: Stockhouse material		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003281	P	7/9/2021 1:19 PM	7/9/2021 1:19 PM	Email Message	Automatic reply: Bruiser Litigation Catch Up		"Pulfer, Kaley" <kaley.pulfer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003283	P	3/11/2021 3:59 PM	3/11/2021 3:59 PM	Email Message	Anson x Blakes - Intro		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	McLean, Stacy; Davis, Jill	Solicitor Client Privileged Litigation Privileged
BLK00003288	P	4/28/2021 9:08 PM	4/28/2021 9:08 PM	Email Message	Re: CV-20-006534100-00CL - Anson Advisors Inc. et al. v. Robert Lee Doxtator		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher; Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003289	P	2/26/2021 8:34 PM	2/26/2021 8:34 PM	Email Message	Automatic reply: SOL Global Case		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003292	P	12/30/2020 8:18 PM	12/30/2020 8:18 PM	Email Message	RE: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Sunny Puri; Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003293	P	1/6/2021 10:03 PM	1/6/2021 10:03 PM	Email Message	RE: Anson Advisors Inc. et al v. Robert Lee Doxtator and Jacob Doxtator et al.		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>	Pulfer, Kaley; DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003312	P	3/10/2021 2:10 PM	3/10/2021 2:10 PM	Email Message	RE: Stockhouse		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00003313	P	10/1/2020 5:01 PM	10/1/2020 5:01 PM	Email Message	Anson		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003314	A	10/1/2020 5:01 PM	9/30/2020 7:55 PM	Adobe Portable Document Format		Microsoft Word - Letterhead 2019.2		tmooore			Solicitor Client Privileged Litigation Privileged
BLK00003317	P	5/14/2021 4:26 PM	5/14/2021 4:26 PM	Email Message	RE: Doxtator litigation - update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003327	P	3/26/2021 7:36 PM	3/26/2021 7:36 PM	Email Message	RE: Anson Advisors Inc et al v. Robert Lee Doxtator (CV-20-00653410-00CL)		"Pulfer, Kaley" <kaley.pulfer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris; DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003335	P	10/26/2020 1:24 PM	10/26/2020 1:24 PM	Email Message	Re: K2 Intelligence - Preliminary Findings		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	Hickey, Michael; Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003336	P	6/30/2021 12:58 PM	6/30/2021 12:58 PM	Email Message	RE: Stockhouse material		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003337	P	3/25/2021 9:15 PM	3/25/2021 9:15 PM	Email Message	RE: Anson Advisors Inc et al v. Robert Lee Doxtator (CV-20-00653410-00CL)		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	DiMatteo, Christopher; Pulfer, Kaley; Moez Kassam; Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00003338	P	4/8/2021 12:46 PM	4/8/2021 12:46 PM	Email Message	RE: Robert Doxtator counterclaim - reply and statement of defence		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003339	A	4/8/2021 12:46 PM	4/7/2021 8:36 PM	Email Message	FW: Invoice		"Sunny Puri" <spuri@ansonfunds.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003340	A	4/8/2021 12:46 PM	10/1/2020 5:38 PM	Microsoft Word				robert doc			Solicitor Client Privileged Litigation Privileged
BLK00003341	A	4/8/2021 12:46 PM	4/8/2021 12:43 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00003342	A	4/8/2021 12:46 PM	4/7/2021 9:31 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00003343	A	4/8/2021 12:46 PM	4/7/2021 8:37 PM	Email Message	FW: Invoice		"Sunny Puri" <spuri@ansonfunds.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00003344	A	4/8/2021 12:46 PM	7/23/2019 3:54 PM	Microsoft Word				robert doc			Solicitor Client Privileged Litigation Privileged
BLK00003345	P	3/10/2021 4:11 AM	3/10/2021 4:11 AM	Email Message	Stockhouse		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00003346	P	10/30/2020 9:50 PM	10/30/2020 9:50 PM	Email Message	Your Call		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003347	A	10/30/2020 9:50 PM	7/24/2019 3:23 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00003348	P	2/26/2021 8:34 PM	2/26/2021 8:34 PM	Email Message	SOL Global Case		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003351	P	1/22/2021 2:13 PM	1/22/2021 2:13 PM	iCalendar	Anson - Jacob Doxtator Defence		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003353	P	5/20/2021 5:18 PM	5/20/2021 5:18 PM	iCalendar	Accepted: Doxtator litigation - Discovery plan		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003355	P	3/11/2021 3:40 PM	3/11/2021 3:40 PM	iCalendar	Anson x Blakes - Intro - Funds Discussion		"Hickey, Michael" <michael.hickey@blakes.com>		"McLean, Stacy" <stacy.mclean@blakes.com>;"Davis, Jill" <jill.davis@blakes.com>;"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003361	P	10/7/2020 8:50 PM	10/7/2020 8:50 PM	Email Message	Automatic reply: Under Siege		"Barrack, Michael" <michael.barrack@blakes.com>		"Moez Kassam" <mkassam@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003364	P	12/16/2020 3:56 PM	12/16/2020 3:56 PM	Email Message	RE: Anson - exhibits for motion and document matters		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003365	P	12/1/2020 4:27 PM	12/1/2020 4:27 PM	Email Message	RE: Anson Funds - Defamation Matters - Blakes Invoice (Oct 2020)		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003368	P	12/31/2020 5:24 PM	12/31/2020 5:24 PM	Email Message	RE: Anson - Update		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Sunny Puri;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003377	P	4/15/2021 8:46 PM	4/15/2021 8:46 PM	Email Message	RE: Stockhouse - Notice of Motion		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003379	P	6/30/2021 1:08 PM	6/30/2021 1:08 PM	Email Message	RE: Stockhouse material		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003380	A	6/30/2021 1:08 PM	6/29/2021 11:22 PM	Microsoft Excel							Solicitor Client Privileged Litigation Privileged
BLK00003381	P	1/22/2021 4:37 AM	1/22/2021 4:37 AM	Email Message	RE: Anson - Jacob Doxtator defence		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003383	P	4/26/2021 10:33 PM	4/26/2021 10:33 PM	Email Message	RE: Presumably Paul Update		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003384	P	3/11/2021 2:59 PM	3/11/2021 2:59 PM	Email Message	Re: Anson Funds - Blakes Invoices + Update		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003385	P	1/28/2021 5:19 PM	1/28/2021 5:19 PM	Email Message	RE: Translation		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Navin Reddy" <navin.reddy@artemisrisk.com>;"Jolene Watson" <jolene.watson@artemisrisk.com>	Laura Salvatori;Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003386	A	1/28/2021 5:19 PM	1/28/2021 5:19 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00003387	A	1/28/2021 5:19 PM	1/28/2021 5:19 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00003393	P	10/19/2020 6:29 PM	10/19/2020 6:29 PM	Email Message	RE: Anson - Follow-ups / Status Updates		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00003395	P	4/16/2021 2:37 PM	4/16/2021 2:37 PM	Email Message	RE: Stockhouse - Notice of Motion		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003396	P	1/27/2021 6:00 PM	1/27/2021 6:00 PM	Email Message	RE: Anson - Haris affidavit		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003397	P	2/23/2021 8:50 PM	2/23/2021 8:50 PM	Email Message	RE: Service Motion		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003398	A	2/23/2021 8:50 PM	2/23/2021 4:21 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00003400	P	7/29/2021 3:26 PM	7/29/2021 3:26 PM	Email Message	RE: Anson - Defamation Matters - Conflict Matter		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003405	P	2/1/2021 9:27 PM	2/1/2021 9:27 PM	Email Message	RE: Translation		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Navin Reddy;Jolene Watson	Solicitor Client Privileged Litigation Privileged
BLK00003410	P	8/10/2021 1:16 AM	8/10/2021 1:16 AM	Email Message	RE: Stafford - update		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003411	P	1/21/2021 5:03 PM	1/21/2021 5:03 PM	Email Message	Anson - Jacob Doxtator defence		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003412	A	1/21/2021 5:03 PM	1/21/2021 5:03 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00003413	P	4/8/2021 12:14 PM	4/8/2021 12:14 PM	iCalendar	Accepted: Doxtator defence		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003414	P	10/14/2020 7:34 PM	10/14/2020 7:34 PM	Email Message	Blakes - Anson - Draft Engagement Letter		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003415	A	10/14/2020 7:34 PM	10/14/2020 7:19 PM	Microsoft Word		Model - Retainer Letter		GRIFFIN, CHARLENE			Solicitor Client Privileged Litigation Privileged
BLK00003416	P	7/7/2021 7:58 PM	7/7/2021 7:58 PM	Email Message	Re: Stockhouse material		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Sunny Puri" <spuri@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003417	P	7/29/2021 1:03 PM	7/29/2021 1:03 PM	Email Message	Re: Anson - Defamation Matters - Conflict Matter		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003418	P	6/10/2021 6:59 PM	6/10/2021 6:59 PM	Email Message	Automatic reply: Update		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003421	P	1/5/2021 9:48 PM	1/5/2021 9:48 PM	iCalendar	Tentative: Anson		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003424	P	3/2/2021 12:47 PM	3/2/2021 12:47 PM	Email Message	RE: SOL Global Case		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003427	P	12/31/2020 4:05 PM	12/31/2020 4:05 PM	Email Message	RE: Anson Defamation Matter - Litigation Reserve		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003428	P	2/9/2021 12:35 AM	2/9/2021 12:35 AM	iCalendar	Affidavit		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003429	A	2/9/2021 12:35 AM	2/9/2021 12:33 AM	Adobe Portable Document Format		Microsoft Word - TOR_2528-#24049006-v2-Service_Motion_-_Affidavit_of_Sunny_Puri.docx		HRI			Solicitor Client Privileged Litigation Privileged
BLK00003430	A	2/9/2021 12:35 AM	2/9/2021 12:33 AM	Microsoft Word		Affidavit of Service Form 16B		DIMATTEO, CHRISTOPHER			Solicitor Client Privileged Litigation Privileged
BLK00003432	P	4/28/2021 9:16 PM	4/28/2021 9:16 PM	Email Message	FW: spektor just received attached		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003433	A	4/28/2021 9:16 PM	4/28/2021 9:07 PM	Email Message	Fwd: CV-20-006534100-00CL - Anson Advisors Inc. et al. v. Robert Lee Doxtator		"Allen Spektor" <allenspektor@gmail.com>		"Moez Kassam" <mkassam@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00003434	A	4/28/2021 9:16 PM	4/21/2021 3:27 PM	Adobe Portable Document Format				Trevor Fairlie			Solicitor Client Privileged Litigation Privileged
BLK00003435	A	4/28/2021 9:16 PM	4/28/2021 9:07 PM	Email Message	Fwd: CV-20-006534100-00CL - Anson Advisors Inc. et al. v. Robert Lee Doxtator		"Allen Spektor" <allspektor@gmail.com>		"Moez Kassam" <mkassam@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003436	A	4/28/2021 9:16 PM	4/28/2021 7:16 PM	Adobe Portable Document Format				Trevor Fairlie			Solicitor Client Privileged Litigation Privileged
BLK00003437	P	2/11/2021 8:07 PM	2/11/2021 8:07 PM	Email Message	RE: Globe and Mail request, Anson Funds		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Moez Kassam" <mkassam@ansonfunds.com>;"dscott@dscott@dsconsulting.ca" <dscott@dsconsulting.ca>	Sunny Puri;Barrack, Michael;Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00003438	P	5/18/2021 9:38 PM	5/18/2021 9:38 PM	Email Message	RE: Doxtator litigation - update		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003439	P	3/1/2021 4:34 PM	3/1/2021 4:34 PM	Email Message	RE: SOL Global Case		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003440	A	3/1/2021 4:34 PM	3/1/2021 4:33 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00003442	P	3/26/2021 9:42 PM	3/26/2021 9:42 PM	Email Message	RE: PNL Request - GE 2019		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Puffer, Kaley" <kaley.puffer@blakes.com>	Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00003443	P	4/16/2021 2:18 PM	4/16/2021 2:18 PM	Email Message	RE: Stockhouse - Notice of Motion		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003444	P	1/20/2021 9:47 PM	1/20/2021 9:47 PM	Email Message	RE: Doxtator -Service Notice of Motion		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher;Puffer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003447	P	3/17/2021 7:07 PM	3/17/2021 7:07 PM	Email Message	RE: Stockhouse letter		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris;Sunny Puri	Solicitor Client Privileged Litigation Privileged
BLK00003448	A	3/17/2021 7:07 PM	3/17/2021 7:02 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00003451	P	3/30/2021 9:21 PM	3/30/2021 9:21 PM	Email Message	RE: Correspondence from Blakes/Anson Funds		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003457	P	3/1/2021 3:19 PM	3/1/2021 3:19 PM	Email Message	Good morning, and a quick question		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003458	P	2/8/2021 10:32 PM	2/8/2021 10:32 PM	iCalendar	Anson - Stafford update		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003463	P	5/14/2021 4:22 PM	5/14/2021 4:22 PM	Email Message	Doxtator litigation - update		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003467	P	1/6/2021 9:08 PM	1/6/2021 9:08 PM	Email Message	RE: Anson Advisors Inc. et al v. Robert Lee Doxtator and Jacob Doxtator et al.		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"Sunny Puri" <spuri@ansonfunds.com>	Puffer, Kaley;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003468	P	2/12/2021 10:34 PM	2/12/2021 10:34 PM	Email Message	RE: Globe and Mail request, Anson Funds		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003469	P	2/4/2021 5:11 PM	2/4/2021 5:11 PM	Email Message	RE: Translation		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>	Navin Reddy;Jolene Watson	Solicitor Client Privileged Litigation Privileged
BLK00003470	A	2/4/2021 5:11 PM	2/4/2021 5:11 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00003471	A	2/4/2021 5:11 PM	2/4/2021 5:11 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00003474	P	1/8/2021 4:26 PM	1/8/2021 4:26 PM	Email Message	RE: Anson		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00003475	P	3/30/2021 12:13 AM	3/30/2021 12:13 AM	iCalendar	Stockhouse - Anson litigation		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003476	P	1/28/2021 5:23 PM	1/28/2021 5:23 PM	Email Message	FW: Translation		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003478	P	1/18/2021 11:53 PM	1/18/2021 11:53 PM	Email Message	Re: Anson - Follow up Points from Moez		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003481	P	4/16/2021 4:41 PM	4/16/2021 4:41 PM	Email Message	RE: Anson - Documents		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003494	P	3/1/2021 4:38 PM	3/1/2021 4:38 PM	Email Message	RE: Good morning, and a quick question		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003495	P	6/2/2021 9:53 PM	6/2/2021 9:53 PM	iCalendar	Anson re Norwich - Twitter/Google		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003496	P	7/9/2021 1:39 AM	7/9/2021 1:39 AM	Email Message	RE: Stockhouse material		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003497	A	7/9/2021 1:39 AM		JPEG Image							Solicitor Client Privileged Litigation Privileged
BLK00003498	A	7/9/2021 1:39 AM		JPEG Image							Solicitor Client Privileged Litigation Privileged
BLK00003499	A	7/9/2021 1:39 AM		JPEG Image							Solicitor Client Privileged Litigation Privileged
BLK00003501	P	10/27/2020 8:30 PM	10/27/2020 8:30 PM	Email Message	Re: Blakes - Anson - Draft Engagement Letter [revised]		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003502	P	12/29/2020 9:54 PM	12/29/2020 9:54 PM	Email Message	RE: Anson Defamation Matter - Litigation Reserve		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003504	P	12/9/2020 7:04 PM	12/9/2020 7:04 PM	iCalendar	Accepted: Anson SOC		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003506	P	12/4/2020 8:36 PM	12/4/2020 8:36 PM	Email Message	RE: Doxtator materials		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Governski, Meryl Conant" <MGovernski@willkie.com>		Solicitor Client Privileged Litigation Privileged
BLK00003509	P	2/22/2021 7:24 PM	2/22/2021 7:24 PM	Email Message	Question about Broker Warrants		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003512	P	1/15/2021 9:44 PM	1/15/2021 9:44 PM	Email Message	RE: Anson - Follow up Points from Moez		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003515	P	10/23/2020 7:44 PM	10/23/2020 7:44 PM	Email Message	RE: K2 Intelligence - Preliminary Findings		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Hickey, Michael;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003516	P	10/9/2020 8:55 PM	10/9/2020 8:55 PM	Email Message	Automatic reply: Anson - Follow-up re. FW: Robert Doxtator Background (@BettingBruiser)		"Barrack, Michael" <michael.barrack@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003519	P	6/4/2021 4:59 PM	6/4/2021 4:59 PM	iCalendar	Accepted: FW: Motion - ANSON ADVISORS INC. et al v. DOXTATOR et al (CV-20-00653410-00CL)		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003521	P	5/31/2021 5:13 PM	5/31/2021 5:13 PM	Email Message	RE: Anson - Defamation Matters - Blakes Invoice (March + April)		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003522	P	10/6/2020 5:42 PM	10/6/2020 5:42 PM	Email Message	RE: Anson - Call		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003523	P	2/9/2021 12:40 AM	2/9/2021 12:40 AM	Email Message	RE: Doxtator claim - affidavit signing		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003524	P	3/1/2021 8:03 PM	3/1/2021 8:03 PM	Email Message	RE: Good morning, and a quick question		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003525	P	6/29/2021 1:10 PM	6/29/2021 1:10 PM	Email Message	RE: RE: RE: RE: RE: Correspondence from Blakes/Anson Funds		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00003526	P	5/19/2021 1:50 AM	5/19/2021 1:50 AM	Email Message	RE: Doxtator litigation - update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003527	P	8/3/2021 1:26 AM	8/3/2021 1:26 AM	Email Message	Automatic reply: Stafford - update		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003533	P	4/19/2021 8:14 PM	4/19/2021 8:14 PM	Email Message	RE: Call with Nav / Status of Amended Reply and Statement of Defence		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003535	P	7/29/2021 3:23 PM	7/29/2021 3:23 PM	Email Message	RE: Anson - Defamation Matters - Conflict Matter		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003537	P	2/8/2021 10:10 PM	2/8/2021 10:10 PM	Email Message	RE: Update - Stafford		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003540	P	11/30/2020 5:36 PM	11/30/2020 5:36 PM	Email Message	RE: Anson - Update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003541	P	4/19/2021 6:28 PM	4/19/2021 6:28 PM	Email Message	RE: Call with Nav / Status of Amended Reply and Statement of Defence		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>; "Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003542	A	4/19/2021 6:28 PM	4/19/2021 6:21 PM	Email Message	Anson Advisors Inc. et al. v. Robert Lee Doxtator and Jacob Doxtator et al.		"Care, Alissa" <alissa.care@blakes.com>		"jgroia@groia.com" <jgroia@groia.com>; "tfairlie@groia.com" <tfairlie@groia.com>; "allenspektor@gmail.com" <allenspektor@gmail.com>	Fischer, Iris;Pulfer, Kaley;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003543	A	4/19/2021 6:28 PM	4/19/2021 6:28 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00003544	A	4/19/2021 6:28 PM	4/19/2021 6:28 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00003545	P	12/29/2020 8:23 PM	12/29/2020 8:23 PM	Email Message	Anson Defamation Matter - Litigation Reserve		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003546	P	4/7/2021 1:40 PM	4/7/2021 1:40 PM	Email Message	RE: Facedrive claims		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003547	P	3/29/2021 7:12 PM	3/29/2021 7:12 PM	Email Message	Anson - Letter re "John Murphy" account		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003548	A	3/29/2021 7:12 PM	3/29/2021 7:12 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00003549	P	4/19/2021 6:09 PM	4/19/2021 6:09 PM	Email Message	RE: Call with Nav / Status of Amended Reply and Statement of Defence		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003551	P	3/9/2021 7:52 PM	3/9/2021 7:52 PM	Email Message	Re: Anson - new posts		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003552	P	4/19/2021 8:12 PM	4/19/2021 8:12 PM	Email Message	Re: Call with Nav / Status of Amended Reply and Statement of Defence		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003553	P	12/7/2020 6:10 PM	12/7/2020 6:10 PM	Email Message	Re: Anson - Update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "Governski, Meryl Conant" <MGovernski@willkie.com>; "Mundiya, Tariq" <tmundiya@willkie.com>; "Moez Kassam" <mkassam@ansonfunds.com>; "Sunny Puri" <spuri@ansonfunds.com>	Barrack, Michael;Hickey, Michael;Pulfer, Kaley;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003554	P	12/10/2020 9:53 PM	12/10/2020 9:53 PM	Email Message	Re: Anson Funds - Defamation Matters - Blakes Invoice (November 2020)		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003557	P	2/13/2021 4:23 PM	2/13/2021 4:23 PM	Email Message	Re: Globe and Mail request, Anson Funds		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003558	A	2/13/2021 4:23 PM	2/10/2021 2:54 PM	Email Message	Hedge Fund Anson Goes Big on Retail Trades, Outperforming Peers		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Anson Group Users" <ansongroupusers@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00003559	A	2/13/2021 4:23 PM	2/10/2021 2:46 PM	Adobe Portable Document Format							Solicitor Client Privileged Litigation Privileged
BLK00003560	P	2/10/2021 6:29 PM	2/10/2021 6:29 PM	Email Message	Doxtator service motion -- draft factum		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris;Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003561	A	2/10/2021 6:29 PM	2/10/2021 6:18 PM	Microsoft Word		Factum for Superior Court of Justice		Care, Alissa			Solicitor Client Privileged Litigation Privileged
BLK00003563	P	6/7/2021 6:28 PM	6/7/2021 6:28 PM	iCalendar	Stockhouse - Call to Commission Sunny's Supplementary Affidavit		"Maringola, Jennifer" <jennifer.maringola@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003564	P	12/1/2020 12:00 AM	12/1/2020 12:00 AM	Email Message	Anson Funds - Defamation Matters - Blakes Invoice (Oct 2020)		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003565	A	12/1/2020 12:00 AM	11/30/2020 4:58 PM	Adobe Portable Document Format				Warren Ly			Solicitor Client Privileged Litigation Privileged
BLK00003566	P	10/5/2020 2:38 PM	10/5/2020 2:38 PM	Email Message	RE: Anson - Call		"Pulfer, Kaley" <kaley.pulfer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003569	P	4/26/2021 5:44 PM	4/26/2021 5:44 PM	Email Message	RE: for records - reconnaissance energy africa ltd		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003570	A	4/26/2021 5:44 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00003571	A	4/26/2021 5:44 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00003572	A	4/26/2021 5:44 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00003573	P	3/29/2021 11:55 PM	3/29/2021 11:55 PM	Email Message	Fwd: Correspondence from Blakes/Anson Funds		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Iris Fischer" <iris.fischer@blakes.com>;"Christopher DiMatteo" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003576	P	12/18/2020 9:36 PM	12/18/2020 9:36 PM	Email Message	Re: Request for New Matter for Commercial List		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Moez Kassam;Sunny Puri;Barrack, Michael;Pulfer, Kaley;Tariq Mundiya;Meryl Conant Governski;Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00003578	P	2/12/2021 7:17 PM	2/12/2021 7:17 PM	Email Message	RE: Globe and Mail request, Anson Funds		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003579	P	6/9/2021 1:24 AM	6/9/2021 1:24 AM	Email Message	Re: Willkie call		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003585	P	6/10/2021 8:46 PM	6/10/2021 8:46 PM	Email Message	Re: Update		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003586	P	1/18/2021 3:14 PM	1/18/2021 3:14 PM	Email Message	RE: Anson - Follow up Points from Moez		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003587	P	8/10/2021 1:04 PM	8/10/2021 1:04 PM	iCalendar	Accepted: Anson - Stafford litigation update		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003589	P	3/17/2021 8:37 PM	3/17/2021 8:37 PM	Email Message	GG Tiki Cups		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003590	A	3/17/2021 8:37 PM	3/17/2021 4:35 PM	JPEG Image							Solicitor Client Privileged Litigation Privileged
BLK00003591	P	2/18/2021 8:39 PM	2/18/2021 8:39 PM	Email Message	Anson Advisors Inc. - Audit Letter Request		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003592	A	2/18/2021 8:39 PM	2/18/2021 8:23 PM	Adobe Portable Document Format				Michele Benjamin			Solicitor Client Privileged Litigation Privileged
BLK00003596	P	8/1/2021 8:40 PM	8/1/2021 8:40 PM	Email Message	Automatic reply: Stafford - update		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00003597	P	7/29/2021 3:24 PM	7/29/2021 3:24 PM	Email Message	RE: Anson - Defamation Matters - Conflict Matter		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003599	P	10/27/2020 8:28 PM	10/27/2020 8:28 PM	Email Message	RE: Blakes - Anson - Draft Engagement Letter [revised]		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003600	A	10/27/2020 8:28 PM	10/27/2020 7:53 PM	Adobe Portable Document Format		5 Model - Retainer Letter		GRIFFIN, CHARLENE			Solicitor Client Privileged Litigation Privileged
BLK00003601	P	7/28/2021 10:08 PM	7/28/2021 10:08 PM	Email Message	Automatic reply: Anson Funds - Blakes Invoice re. Defamation Matters (June 2021)		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003602	P	4/16/2021 10:21 PM	4/16/2021 10:21 PM	Email Message	RE: Doxtator litigation - amended reply and defence		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003603	P	1/16/2021 8:32 PM	1/16/2021 8:32 PM	Email Message	RE: Anson - Follow up Points from Moez		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003604	P	7/16/2021 5:16 PM	7/16/2021 5:16 PM	Email Message	Re: Bruiser Litigation Catch Up		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "Sunny Puri" <spuri@ansonfunds.com>	DiMatteo, Christopher; Puffer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003608	P	4/28/2021 10:11 PM	4/28/2021 10:11 PM	Email Message	RE: Letter re: Anson Advisors Inc. et al. v. Robert Lee Doxtator - CV-20-00653410-00CL		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	DiMatteo, Christopher; Puffer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003609	P	3/9/2021 4:54 PM	3/9/2021 4:54 PM	Email Message	RE: Anson Funds - Blakes Invoices + Update		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003612	P	4/28/2021 10:05 PM	4/28/2021 10:05 PM	Email Message	RE: Letter re: Anson Advisors Inc. et al. v. Robert Lee Doxtator - CV-20-00653410-00CL		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	DiMatteo, Christopher; Puffer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003613	P	4/19/2021 8:16 PM	4/19/2021 8:16 PM	iCalendar	Accepted: Anson / Artemis - Check in		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003615	P	1/22/2021 3:30 PM	1/22/2021 3:30 PM	Email Message	RE: Anson - Jacob Doxtator defence		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Puffer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003616	A	1/22/2021 3:30 PM	1/22/2021 2:49 PM	Email Message	FW: Claim and Defence initial response		"Navin Reddy" <nnavin.reddy@artemisrisk.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003617	A	1/22/2021 3:30 PM	1/22/2021 12:35 PM	Microsoft Word				Jolene - ArcticWind			Solicitor Client Privileged Litigation Privileged
BLK00003618	P	6/8/2021 1:11 PM	6/8/2021 1:11 PM	Email Message	Re: Anson - Defamation Matters - Blakes Invoice (May 2021)		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>; "Anthony Rizzo" <arizzo@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003628	P	11/4/2020 10:21 PM	11/4/2020 10:21 PM	Email Message	Quick call tomorrow?		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Puffer, Kaley; DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003630	P	12/16/2020 3:49 PM	12/16/2020 3:49 PM	Email Message	RE: Anson - exhibits for motion and document matters		"Sunny Puri" <spuri@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003633	P	10/6/2020 5:34 PM	10/6/2020 5:34 PM	Email Message	Re: Anson - Call		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Puffer, Kaley" <kaley.puffer@blakes.com>; "Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003636	P	2/13/2021 4:53 PM	2/13/2021 4:53 PM	Email Message	RE: Globe and Mail request, Anson Funds		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003639	P	2/8/2021 10:11 PM	2/8/2021 10:11 PM	Email Message	RE: Update - Stafford		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003640	P	2/23/2021 3:51 PM	2/23/2021 3:51 PM	Email Message	RE: Service Motion		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Puffer, Kaley" <kaley.puffer@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003641	P	6/9/2021 2:00 PM	6/9/2021 2:00 PM	Email Message	RE: Wilkie call		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003645	P	3/12/2021 9:50 PM	3/12/2021 9:50 PM	Email Message	RE: Anson Advisors inc et al v Robert lee Doxtator et al (CV-20-00653410-00CL)		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	DiMatteo, Christopher; Puffer, Kaley	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00003646	P	2/22/2021 11:53 PM	2/22/2021 11:53 PM	Email Message	RE: Question about Broker Warrants		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003647	P	6/28/2021 6:55 PM	6/28/2021 6:55 PM	Email Message	FW: RE: RE: RE: RE: Correspondence from Blakes/Anson Funds		"Sunny Puri" <spuri@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003650	P	5/27/2021 1:20 PM	5/27/2021 1:20 PM	Email Message	Re: Stockhouse Norwich application - Sunny's affidavit		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003651	P	10/27/2020 7:15 PM	10/27/2020 7:15 PM	Email Message	Automatic reply: K2 Intelligence - Preliminary Findings		"Pulfer, Kaley" <kaley.pulfer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003653	P	1/22/2021 2:22 PM	1/22/2021 2:22 PM	iCalendar	Accepted: Anson - Jacob Doxtator Defence		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003658	P	12/18/2020 9:30 PM	12/18/2020 9:30 PM	Email Message	RE: Request for New Matter for Commercial List		"Fischer, Iris" <iris.fischer@blakes.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>; "Laura Salvatori" <lsalvatori@ansonfunds.com>	Moez Kassam; Sunny Puri; Barrack, Michael; Pulfer, Kaley; Tariq Mundiya; Mery Conant Goverski; Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00003662	P	4/21/2021 12:43 PM	4/21/2021 12:43 PM	Email Message	Re: Anson - Documents		"Fischer, Iris" <iris.fischer@blakes.com>		"Navin Reddy" <navin.reddy@artemisrisk.com>	DiMatteo, Christopher; Laura Salvatori	Solicitor Client Privileged Litigation Privileged
BLK00003663	P	10/19/2020 3:16 PM	10/19/2020 3:16 PM	Email Message	RE: Blakes - Anson - Draft Engagement Letter		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003667	P	4/26/2021 11:13 PM	4/26/2021 11:13 PM	Email Message	Re: Stockhouse		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003671	P	2/26/2021 8:37 PM	2/26/2021 8:37 PM	Email Message	RE: SOL Global Case		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003673	P	10/6/2020 3:24 AM	10/6/2020 3:24 AM	Email Message	RE: Anson - Call		"Pulfer, Kaley" <kaley.pulfer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>; "Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003674	P	12/1/2020 6:37 PM	12/1/2020 6:37 PM	Email Message	RE: Anson - website registration information		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003675	A	12/1/2020 6:37 PM	12/1/2020 6:36 PM	Email Message	Figures 2-4 and 6-10 from Report of 28 October 2020		"Navin Reddy" <navin.reddy@artemisrisk.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003676	A	12/1/2020 6:37 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00003677	A	12/1/2020 6:37 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00003678	A	12/1/2020 6:37 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00003679	A	12/1/2020 6:37 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00003681	P	1/19/2021 1:41 AM	1/19/2021 1:41 AM	Email Message	Re: Anson - Follow up Points from Moez		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	DiMatteo, Christopher; Pulfer, Kaley	Solicitor Client Privileged Litigation Privileged
BLK00003682	P	3/25/2021 9:12 PM	3/25/2021 9:12 PM	Email Message	RE: Stockhouse Follow Up + Statement of Defense		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003683	P	3/30/2021 12:12 AM	3/30/2021 12:12 AM	Email Message	RE: Correspondence from Blakes/Anson Funds		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>; "Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003684	P	10/6/2020 7:17 PM	10/6/2020 7:17 PM	iCalendar	Accepted: Anson Funds - Defamation Discussion		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003685	P	4/5/2021 5:59 PM	4/5/2021 5:59 PM	iCalendar	Accepted: Anson/Blakes - Stockhouse and SOD		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003686	P	10/9/2020 9:04 PM	10/9/2020 9:04 PM	Email Message	Automatic reply: Anson - Follow-up re. FW: Robert Doxtator Background (@BettingBruiser)		"Laura Salvatori" <lsalvatori@ansonfunds.com>		"Barrack, Michael" <michael.barrack@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003687	P	6/9/2021 2:08 AM	6/9/2021 2:08 AM	Email Message	RE: Willkie call		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>; "DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00003688	P	2/23/2021 9:19 PM	2/23/2021 9:19 PM	Email Message	Re: Service Motion		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Pulfer, Kaley;Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003689	P	8/14/2021 12:54 PM	8/14/2021 12:54 PM	Email Message	RE: Muskoka ?!		"Barrack, Michael" <michael.barrack@blakes.com>		"Moez Kassam" <mkassam@ansonfunds.com>;"Andrea Barrack" <Andrea.Barrack@td.com>	Marissa Kassam	Solicitor Client Privileged Litigation Privileged
BLK00003690	P	5/14/2021 10:04 PM	5/14/2021 10:04 PM	Email Message	Re: Doxtator litigation - update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003692	P	10/7/2020 8:58 PM	10/7/2020 8:58 PM	Email Message	RE: Under Siege		"Barrack, Michael" <michael.barrack@blakes.com>		"Moez Kassam" <mkassam@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003695	P	9/7/2021 9:46 PM	9/7/2021 9:46 PM	Email Message	Automatic reply: Bruiser Litigation Catch Up		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003696	P	2/23/2021 2:00 PM	2/23/2021 2:00 PM	Email Message	Re: Service Motion		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Pulfer, Kaley" <kaley.pulfer@blakes.com>	Fischer, Iris;DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003701	P	10/6/2020 5:36 PM	10/6/2020 5:36 PM	Email Message	RE: Anson - Call		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003702	P	4/26/2021 6:31 PM	4/26/2021 6:31 PM	Email Message	RE: for records - reconnaissance energy africa ltd		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003703	A	4/26/2021 6:31 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00003704	A	4/26/2021 6:31 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00003705	A	4/26/2021 6:31 PM		Portable Network Graphics (PNG)							Solicitor Client Privileged Litigation Privileged
BLK00003706	P	2/23/2021 5:19 PM	2/23/2021 5:19 PM	iCalendar	Anson Discussion		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Phillips, Tim" <tim.phillips@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003709	P	11/16/2020 9:49 PM	11/16/2020 9:49 PM	Email Message	RE: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Barrack, Michael;Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00003710	P	4/7/2021 8:14 PM	4/7/2021 8:14 PM	Email Message	RE: Robert Doxtator counterclaim - reply and statement of defence		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003711	P	2/8/2021 10:37 PM	2/8/2021 10:37 PM	iCalendar	Accepted: Anson - Stafford update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003712	P	5/26/2021 6:46 PM	5/26/2021 6:46 PM	Email Message	RE: Follow-Up - Anson/Doxtator Litigation		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>;"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003713	P	7/1/2021 7:38 PM	7/1/2021 7:38 PM	Email Message	Automatic reply: Stockhouse material		"Fischer, Iris" <iris.fischer@blakes.com>		"Sunny Puri" <spuri@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003714	P	2/4/2021 4:33 PM	2/4/2021 4:33 PM	Email Message	RE: Translation		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003715	P	4/19/2021 6:06 PM	4/19/2021 6:06 PM	Email Message	RE: Call with Nav / Status of Amended Reply and Statement of Defence		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003716	A	4/19/2021 6:06 PM	4/16/2021 10:21 PM	Email Message	RE: Doxtator litigation - amended reply and defence		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003717	P	3/8/2021 4:32 AM	3/8/2021 4:32 AM	Email Message	RE: Call Tomorrow		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003720	P	11/13/2020 7:44 PM	11/13/2020 7:44 PM	Email Message	RE: Anson - Update		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>;"Pulfer, Kaley" <kaley.pulfer@blakes.com>;"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Barrack, Michael;Hickey, Michael	Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00003726	P	11/5/2020 12:42 PM	11/5/2020 12:42 PM	iCalendar	Accepted: Anson / Blakes - Statement of Claim Check-In		"Sunny Puri" <spuri@ansonfunds.com>		"Pulfer, Kaley" <kaley.pulfer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003728	P	2/23/2021 4:09 PM	2/23/2021 4:09 PM	Email Message	RE: Question about Broker Warrants		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003729	P	1/27/2021 5:41 PM	1/27/2021 5:41 PM	iCalendar	Anson - Haris affidavit discussion		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>,"navin.reddy@artemisrisk.com" <navin.reddy@artemisrisk.com>,"jolene.watson@artemisrisk.com" <jolene.watson@artemisrisk.com>,"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003730	P	1/15/2021 3:42 PM	1/15/2021 3:42 PM	Email Message	RE: Anson - Follow up Points from Moez		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>,"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003732	P	10/14/2020 7:09 PM	10/14/2020 7:09 PM	Email Message	Re: Anson - Follow-ups / Status Updates		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003734	P	3/16/2021 6:56 PM	3/16/2021 6:56 PM	Email Message	Stockhouse letter		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003735	A	3/16/2021 6:56 PM	3/16/2021 6:56 PM	Microsoft Word							Solicitor Client Privileged Litigation Privileged
BLK00003737	P	2/12/2021 6:59 PM	2/12/2021 6:59 PM	Email Message	RE: Globe and Mail request, Anson Funds		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003739	P	5/19/2021 1:33 AM	5/19/2021 1:33 AM	Email Message	Re: Doxtator litigation - update		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003741	P	1/21/2021 6:22 PM	1/21/2021 6:22 PM	iCalendar	Accepted: Anson - Jacob Doxtator Defence		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003744	P	10/27/2020 7:37 PM	10/27/2020 7:37 PM	Email Message	RE: Blakes - Anson - Draft Engagement Letter [revised]		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003745	A	10/27/2020 7:37 PM	10/27/2020 7:35 PM	Adobe Portable Document Format		Model - Retainer Letter		GRIFFIN, CHARLENE			Solicitor Client Privileged Litigation Privileged
BLK00003746	P	3/17/2021 4:02 PM	3/17/2021 4:02 PM	Email Message	RE: Stockhouse letter		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>	Fischer, Iris	Solicitor Client Privileged Litigation Privileged
BLK00003747	P	7/8/2021 6:50 PM	7/8/2021 6:50 PM	Email Message	Re: Stockhouse material		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003748	A	7/8/2021 6:50 PM		JPEG Image							Solicitor Client Privileged Litigation Privileged
BLK00003749	A	7/8/2021 6:50 PM		JPEG Image							Solicitor Client Privileged Litigation Privileged
BLK00003750	A	7/8/2021 6:50 PM		JPEG Image							Solicitor Client Privileged Litigation Privileged
BLK00003753	P	7/29/2021 3:30 PM	7/29/2021 3:30 PM	Email Message	RE: Anson - Defamation Matters - Conflict Matter		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Hickey, Michael" <michael.hickey@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003754	P	3/10/2021 2:27 PM	3/10/2021 2:27 PM	Email Message	RE: Stockhouse		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	Hickey, Michael	Solicitor Client Privileged Litigation Privileged
BLK00003755	P	3/30/2021 2:48 AM	3/30/2021 2:48 AM	iCalendar	Accepted: Stockhouse - Anson litigation		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		Solicitor Client Privileged Litigation Privileged
BLK00003756	P	3/9/2021 4:29 PM	3/9/2021 4:29 PM	Email Message	Anson contact info - B. Winson		"Hickey, Michael" <michael.hickey@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged
BLK00003759	P	4/16/2021 4:27 PM	4/16/2021 4:27 PM	Email Message	RE: Stockhouse - Notice of Motion		"Fischer, Iris" <iris.fischer@blakes.com>		"Laura Salvatori" <l.salvatori@ansonfunds.com>	DiMatteo, Christopher	Solicitor Client Privileged Litigation Privileged
BLK00003762	P	12/7/2020 7:37 PM	12/7/2020 7:37 PM	Email Message	Fw: new tweets		"Laura Salvatori" <l.salvatori@ansonfunds.com>		"Fischer, Iris" <iris.fischer@blakes.com>,"Governski, Meryl Conant" <MGovernski@willkie.com>		Solicitor Client Privileged Litigation Privileged

Doc ID	Parent/Attachment	Parent Date	Document Date	File Type	Subject	Title	From	Author	To	CC name	Privilege Type
BLK00003766	P	12/21/2020 8:18 PM	12/21/2020 8:18 PM	Email Message	Automatic reply: Anson - Update		"DiMatteo, Christopher" <christopher.dimatteo@blakes.com>		"Laura Salvatori" <lsalvatori@ansonfunds.com>		Solicitor Client Privileged Litigation Privileged

Plaintiffs

-and- ROBERT LEE DONATOR et al.
Defendants

Court File No. CV-20-00653410-00CL

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SUPPLEMENTARY AFFIDAVIT OF DOCUMENTS

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Lawyers for the Plaintiffs (Defendants to the Counterclaim), Anson Advisors Inc., Anson Funds Management LP, Anson Investments Master Fund LP and Moez Kassam

TAB 2N

This is **Exhibit “N”** to the Affidavit of **Alexander Mulligan**,
sworn before me this **30th** day of **November, 2023**.

A handwritten signature in blue ink, appearing to read "Paul Kelly", written over a horizontal line.

A Commissioner for Taking Affidavits

LSO# 84488D

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COURT FILE NO. CV-20-00653410-00CL

ONTARIO

SUPERIOR COURT OF JUSTICE

(COMMERCIAL LIST)

B E T W E E N:

ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP,
ANSON INVESTMENTS MASTER FUND LP AND MOEZ KASSAM

Plaintiffs/Defendants to Counterclaim

- and -

JAMES STAFFORD, ANDREW RUDENSKY, ROBERT LEE
DOXTATOR, JACOB DOXTATOR, AND JOHN DOE 1, JOHN
DOE 2, JOHN DOE 3, JOHN DOE 4, AND OTHER PERSONS

UNKNOWN

Defendants/Plaintiffs to Counterclaim

--- This is the Examination for Discovery of
MOEZ KASSAM, taken by Neesons - a Veritext
Company, via Zoom virtual platform, with all
participants attending remotely, on the 20th of
April, 2023.

REPORTED BY: Amy Armstrong, CVR-RVR

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1 -- Upon commencing at 10:03 A.M. --
 2 MOEZ KASSAM: Affirmed.
 3 EXAMINATION BY MR. RICHARD:
 4 1 Q. Good morning, Mr. Kassam. I'm
 5 counsel for Jacob Doxtator and I'm going to
 6 begin with some questions for you. Before I
 7 start with the questions, I just wanted to
 8 confirm that whether you have -- let me ask you,
 9 you've sworn an Affidavit of Documents for this
 10 matter? Do you recall doing that?
 11 A. Sorry, an affidavit?
 12 2 Q. Do you recall swearing an
 13 Affidavit of Documents in this matter?
 14 A. I do.
 15 3 Q. And as of this morning, do you
 16 have any changes to make to that Affidavit of
 17 Documents that you're aware of?
 18 A. I do not.
 19 MR. STALEY: Kevin, I think you know
 20 this, but my recollection was there was more
 21 than one affidavit; there were supplements as
 22 well to the affidavit.
 23 BY MR. RICHARD:
 24 4 Q. Yes.
 25 I'm just using that generically, that

7

1 with any of the Affidavit of Documents that
 2 you've sworn, I just want to know whether you
 3 have any additions or changes that you're aware
 4 of as you sit here today?
 5 MR. STALEY: So if I can just assist,
 6 because I don't know that the witness knows,
 7 there was, I think, the Marchego [phonetic]
 8 Document that was produced on an earlier
 9 examination that through inadvertence wasn't
 10 included in the most recent update to the
 11 Affidavit of Documents.
 12 So that would be the only new document
 13 that should be listed, and we can at some point
 14 in time ensure that the affidavit is updated to
 15 reflect that.
 16 BY MR. RICHARD:
 17 5 Q. Okay. And did mean Maltego,
 18 Mr. Staley?
 19 MR. STALEY: Maltego, yes.
 20 BY MR. RICHARD:
 21 6 Q. Okay.
 22 And, Mr. Kassam, you've had a chance
 23 to read the fresh as Amended Statement of Claim
 24 brought by the plaintiffs in this matter?
 25 A. I have.

8

1 7 Q. Okay. Are you aware of, as
 2 you're here this morning, are you aware of any
 3 changes or amendments to be made to that
 4 document?
 5 A. I don't believe so.
 6 8 Q. Mr. Kassam, do you know who Jacob
 7 Doxtator is?
 8 A. By knowing, you mean personally?
 9 9 Q. Do you know who Mr. Doxtator is?
 10 A. I know him by name.
 11 10 Q. You know him by name, okay.
 12 Have you ever spoken to him?
 13 A. I have not.
 14 11 Q. Have you ever communicated with
 15 him by text or email or any other way?
 16 A. I don't believe so.
 17 12 Q. Did you ever try to reach out to
 18 him at anytime?
 19 A. I don't believe so.
 20 13 Q. Sorry, I couldn't hear that.
 21 A. I don't believe so.
 22 14 Q. So before suing him for
 23 \$111 million, you didn't feel the need for
 24 either you or someone at the plaintiffs' to
 25 reach out to Jacob Doxtator?

9

1 A. I don't know how to answer that
 2 one.
 3 15 Q. Well, I'd ask you to answer it.
 4 A. Do I feel I should have reached
 5 out to him personally?
 6 16 Q. Did you ever -- did you or anyone
 7 at Anson, any of the plaintiffs, ever feel the
 8 need to reach out to Jacob Doxtator for any
 9 reason before suing him for \$111 million?
 10 MR. STALEY: I think you already asked
 11 the question and the witness answered it.
 12 BY MR. RICHARD:
 13 17 Q. I'm sorry, but the witness said,
 14 I don't think I know how to answer that
 15 question. Mr. Staley, that's not really an
 16 answer.
 17 If that's what he's going to stick
 18 with the second time then I'll move on, but I'd
 19 ask him to answer the question.
 20 A. I can't speak for others, but for
 21 me, you know, it's a process and we went with
 22 the process. Nothing about me reaching out to
 23 people individually.
 24 18 Q. Can you tell me who on behalf of
 25 the plaintiffs authorized the commencement of a

<p>10</p> <p>1 claim against Jacob Doxtator? 2 A. Who of the plaintiffs? 3 19 Q. Who on behalf of the plaintiffs? 4 A. Like the lawyer involved? 5 20 Q. No. Who on behalf of the 6 plaintiffs authorized the commencement of the 7 claim against Jacob Doxtator? 8 A. It would have been my general 9 counsel. 10 21 Q. Okay. I take it from that it 11 wasn't you? 12 A. All legal matters within our firm 13 go through legal counsel. 14 22 Q. Okay. My question was: I take 15 it from that that it wasn't you who authorized 16 the commencement of the claim on behalf of the 17 plaintiffs against Jacob Doxtator? 18 A. I believe so. 19 23 Q. Would you agree with me, sir, 20 that the allegations the plaintiffs are making 21 against Jacob Doxtator could be summarized into 22 an allegation that he is behind the -- and I'll 23 just call it "the John Murphy Twitter account". 24 Would you agree that's a fair summary of the 25 allegations against Mr. Doxtator?</p>	<p>12</p> <p>1 Can you tell me, sir, what that 2 investigation was? 3 A. I believe, amongst the different 4 sources and resources used, we had engaged 5 private investigators, private investment firms, 6 you know, people who specialize in 7 understanding, you know, how web trolling works 8 and people behind aliases, et cetera, and who 9 have a specialty in exactly the kind of stuff we 10 were looking for here. 11 27 Q. Okay. And did they provide you 12 any reports, documents, or anything concerning 13 this investigation? 14 MR. STALEY: At this point in time, 15 the plaintiffs are maintaining privilege over 16 any reports that they have received from 17 investigators. We may revisit our position 18 later, but at this point in time that privileged 19 is being maintain. 20 BY MR. RICHARD: 21 28 Q. Mr. Staley, you and I, I think, 22 are always both of the same view, that we don't 23 spend time arguing issues out on a transcript. 24 I think there will be implications if after 25 discoveries the plaintiffs try to lift the</p>
<p>11</p> <p>1 A. I believe we're dealing with a 2 conspiracy, so there are multiple people 3 involved of which Jacob Doxtator seems to be one 4 of them. 5 24 Q. Okay. And tell me, sir, how, I 6 want to know your evidence and your information, 7 how is it that the plaintiffs say Jacob Doxtator 8 is one of them? 9 A. According to our pleadings, which 10 I believe you have, you know, we went about 11 figuring out who was behind the manifesto on the 12 Moez Kassam doctrine, or however you want to 13 refer to it, and our investigation led to the 14 John Murphy account at which point we took steps 15 to figure out who was actually behind the 16 account, and the summary suggests it is Jacob 17 Doxtator. 18 25 Q. Okay. We're going to stop there 19 for a moment. 20 -- OFF-THE-RECORD DISCUSSION -- 21 BY MR. RICHARD: 22 26 Q. Okay. I believe in your previous 23 answer you referred to investigation that the 24 plaintiffs did in terms of who is behind the 25 John Murphy account.</p>	<p>13</p> <p>1 privilege and rely upon documents that they 2 weren't producing at discovery, but we'll deal 3 with that if and when it comes up. 4 Can you tell me, Mr. Kassam, who it 5 was, who this PI firm that you mentioned was? 6 A. I believe the, you know, the one 7 that led to the information that showed the 8 email address and phone number associated with 9 Jacob Doxtator came from a firm called Artemis 10 Risk. 11 29 Q. And when you referred to 12 information about the email and phone number, to 13 your knowledge have you produced any documents 14 at all that came from Artemis Risk in relation 15 to this? 16 A. In the pleading? 17 30 Q. In the documents that were 18 disclosed by the plaintiffs. 19 A. I'm not sure what documents have 20 been disclosed or not. I can go through it -- 21 31 Q. Okay -- go ahead. 22 A. I can go through the pleadings, 23 but I'm not aware of the specifics of what was 24 included and what wasn't. 25 32 Q. And, sorry, you swore the</p>

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1 Affidavits of Documents which actually listed
 2 all of the documents that were being produced.
 3 Are you telling us now that although
 4 you swore the Affidavit of Documents you're not
 5 aware of what documents were actually produced?
 6 A. No. I'm saying at the time I
 7 knew what was in the documents, but, you know,
 8 it's been a number of months since that period.
 9 I'd have to go through the specific documents
 10 again to see what was included and what wasn't.
 11 33 Q. Okay. Well, we're going to get
 12 to a few documents soon, but let me come back to
 13 this, Mr. Kassam, and let me put it to you this
 14 way: If Jacob Doxtator is not an individual
 15 behind the John Murphy Twitter account, if we
 16 leave that aside, do the plaintiffs have any
 17 other allegations that go to Jacob Doxtator's
 18 alleged involvement in this lawsuit -- or in any
 19 of the allegations raised in the lawsuit?
 20 A. You're saying if we exclude the
 21 information associated of who was behind the
 22 John Murphy account, is there any other
 23 information linking Jacob Doxtator to this case?
 24 34 Q. Yes.
 25 A. You know, he happens to be a

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1 related family member and confidant of another
 2 one of the subjects of this investigation.
 3 So, you know, he's not just someone
 4 isolated from just showing up behind the John
 5 Murphy account, but he is also someone who is
 6 associated with someone else in the
 7 investigation.
 8 35 Q. I see. And that would be Robert
 9 Doxtator you're referring to?
 10 A. That's correct.
 11 36 Q. So have the plaintiffs
 12 considered, I don't know, suing Robert
 13 Doxtator's grandparents who are associated and
 14 related to him?
 15 A. We have named the John Does in
 16 the case, and, you know, as we get more
 17 information more people could be potentially
 18 added to that, including anyone, you know, your
 19 example of the grandparents as well.
 20 37 Q. I see. You're not suggesting
 21 that just being a family member to Robert
 22 Doxtator is sufficient grounds for the
 23 plaintiffs to sue someone for \$111 million, are
 24 you?
 25 A. No, I don't believe so.

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1 38 Q. All right. I'm going to bring up
 2 a document, and while I'm bringing it up,
 3 Mr. Staley, this is the AA I think a number of
 4 zeros 14600. So it's what we may call the
 5 Maltego document for lack of a better
 6 description.
 7 MR. STALEY: Yes.
 8 BY MR. RICHARD:
 9 39 Q. And so that should be -- can you
 10 see that document now on the screen? It's one
 11 which has a note in grey and it says "user
 12 existing Twitter" and then a bunch of pictures
 13 after that.
 14 Can you see that, Mr. Kassam?
 15 A. I do.
 16 40 Q. When I was asking you questions
 17 about any documents from Artemis Risk, is this a
 18 document that you say the plaintiffs received
 19 from Artemis Risk?
 20 A. I believe so.
 21 41 Q. You believe so? Sorry, is that
 22 what you said?
 23 A. Yes.
 24 42 Q. And I understand that the
 25 plaintiffs only received this document in

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1 February of 2023; is that correct?
 2 A. I don't know the specific timing.
 3 43 Q. Okay. Well, your counsel advised
 4 us last week that the plaintiffs came into
 5 possession of this document in February of 2023.
 6 Do you have any reason to disagree with your
 7 counsel's statement?
 8 A. I do not.
 9 44 Q. Are you prepared to adopt your
 10 counsel's statement, that this document came
 11 into the possession of the plaintiffs in
 12 February 2023?
 13 A. Yes.
 14 45 Q. Do you agree with me, sir, that
 15 this is the only document that you have that
 16 suggests, and I'll use that word very carefully,
 17 we'll get into the documents in a moment, but
 18 it's the only document that suggests any
 19 possible link between Jacob Doxtator and the
 20 John Murphy account that the plaintiffs have?
 21 A. I believe so.
 22 46 Q. So you agree with me, sir, that
 23 the plaintiffs did not even have this document
 24 at the time that the plaintiffs commenced the
 25 claim against Jacob Doxtator?

18

1 A. I believe this is a formalization
2 of, you know, information that we had gathered
3 previously and I guess like formalized the
4 document putting it in this final format. But
5 we definitely had information, you know, that we
6 believed Jacob Doxtator was behind this attack
7 on myself and my company.
8 47 Q. Okay. So tell me, what
9 information did you have --
10 MR. STALEY: Just to help you --
11 Mr. Richard, if I could just help you, for the
12 purpose of making production, we obtained
13 documents that were not previously in the
14 possession of our client but were in the
15 possession of Artemis for the purpose of making
16 production, but that doesn't mean that our
17 client wasn't aware of information in those
18 documents at the time that your client was named
19 as a defendant in the action, if that assists
20 you.
21 BY MR. RICHARD:
22 48 Q. Okay. Had you ever seen the
23 information in this document before
24 February 2023, Mr. Kassam?
25 A. I hadn't seen the actual

19

1 document, you know, before February '23 because
2 it was produced in February '23, but I had
3 discussions with the principles at Artemis along
4 with my general counsel on the findings that are
5 shown within the document.
6 49 Q. And let me make something clear.
7 That unless I say different, particularly right
8 now, when I say "you", I'm referring to the
9 plaintiffs and not just you as an individual.
10 I'll try to say "the plaintiffs" if I
11 can, but there may be times that I'll say "you",
12 and I want you to presume that I'm talking about
13 "the plaintiffs" and not just you personally.
14 A. Got it.
15 50 Q. Did the plaintiffs at any point
16 prior to February 2023, and I'm asking, see the
17 information that is contained in this document?
18 A. Yes. I have seen it before.
19 51 Q. Okay. And so you saw it. Can
20 you tell me, sir, why it wasn't produced in your
21 productions?
22 MR. STALEY: As we have explained to
23 you --
24 BY MR. RICHARD:
25 52 Q. Or referred to in your

20

1 productions?
2 MR. STALEY: As we've explained, at
3 this point we are maintaining privilege over any
4 reports that our client received from Artemis.
5 And so you can fairly assume that the
6 information that my client had came from that
7 privileged source.
8 BY MR. RICHARD:
9 53 Q. Okay.
10 Who prepared this document, sir? Who
11 at Artemis?
12 I'm presuming it's your evidence that
13 someone at Artemis prepared this document; is
14 that correct?
15 A. I believe so.
16 54 Q. Who prepared it?
17 A. I believe it was done under the
18 workings of the principle, the founder, Naveen.
19 55 Q. Sorry, did you say Naveen?
20 A. Yes.
21 56 Q. And I presume that's a first
22 name?
23 A. Yes.
24 57 Q. Can you give me the full name?
25 A. I don't know his last name off

21

1 the top of my head.
2 58 Q. Okay. Can I have a undertaking
3 that you advise who created this document and
4 when it was created?
5 U/T MR. STALEY: We will do that as well.
6 BY MR. RICHARD:
7 59 Q. Okay.
8 Again, sir, other than there, any
9 information that might be in this document, and
10 we'll come to that information in a moment, but
11 do you agree with me the plaintiffs have no
12 other documents that make any suggestion that
13 Jacob Doxtator is associated in any way with the
14 John Murphy account?
15 A. I believe so, yes.
16 MR. STALEY: I mean, I just want to be
17 clear that we previously indicated -- the
18 witness previously indicated that there are
19 privileged reports that the client has from
20 Artemis. Putting aside anything in those
21 reports.
22 But in term of the documents that have
23 been produced, I believe the witness's answer is
24 directed at that question.
25

22

1 BY MR. RICHARD:
 2 60 Q. Well, and, again, we won't argue
 3 it, Mr. Staley, but certainly my view is the
 4 plaintiffs will be digging a pretty deep hole if
 5 they are purporting to produce this document the
 6 way they did and seeking to potentially spring
 7 some other document that they're claiming
 8 privilege over today but they may try to rely
 9 upon for the purposes of trial, at least as it
 10 pertains to Jacob Doxtator.
 11 I don't believe you can produce a
 12 document like this from Artemis and suggest that
 13 we're going to sit on other information from
 14 Artemis relating to Jacob Doxtator, but we can
 15 argue that at another time.
 16 MR. STALEY: I thought you told me you
 17 weren't going to argue on the record and you
 18 just did that, so.
 19 BY MR. RICHARD:
 20 61 Q. I can't help myself sometimes.
 21 I'll move on.
 22 Sir, when was this document created?
 23 I'm back to what we've been calling the Maltego
 24 document that's on the screen. Can you tell me
 25 when to your knowledge that was created?

23

1 A. I don't know the specific date it
 2 was created.
 3 62 Q. Okay. Can you provide an
 4 undertaking as to when this document was
 5 created?
 6 U/T MR. STALEY: We've already given an
 7 undertaking, it was a prior question, and that
 8 was something that I undertook that we would do.
 9 BY MR. RICHARD:
 10 63 Q. Okay. I wasn't aware that I had
 11 asked when it was created, but that's fine.
 12 Mr. Kassam, in any of your discussions
 13 with Robert Doxtator prior to the commencement
 14 of this litigation, did you ever tell him that
 15 you were going to go after his family in a
 16 lawsuit?
 17 A. I don't believe so.
 18 64 Q. Now, do you have any
 19 understanding as to how this document -- I'll
 20 just call it the Bates number ending 14600 -- do
 21 you have any understanding as to how this
 22 document was created, i.e. what software was
 23 used?
 24 A. I don't.
 25 65 Q. You don't.

24

1 Have you ever heard of a company that
 2 has software -- company by the name of Maltego,
 3 M-A-L-T-E-G-O?
 4 A. I've heard of it in conjunction
 5 with this lawsuit. I had not previously.
 6 66 Q. Okay. Do you have any
 7 understanding as to whether this particular
 8 document that's on the screen was created using
 9 Maltego?
 10 A. I believe it was.
 11 67 Q. Do you have any information as to
 12 the process that was followed for creating this
 13 document?
 14 A. It's a software that, you know,
 15 uses a whole bunch of -- again, I don't know the
 16 technical aspects associated with how the search
 17 and the software runs.
 18 68 Q. Okay. So if I asked you
 19 questions about what transforms were used, for
 20 example, would you have any idea?
 21 A. I would not.
 22 69 Q. Okay. Now, if we scroll down --
 23 actually, even on the first page, I imagine, is
 24 it difficult to read the text?
 25 A. I can read it.

25

1 70 Q. Okay. I'll try to make it a bit
 2 bigger and scroll over.
 3 You'll see now what should sort of be
 4 in the middle of the page under an @ symbol.
 5 There is JA and then a bunch of asterisks, and
 6 then another @ symbol and G and a bunch of
 7 asterisks, and a period and three more
 8 asterisks.
 9 Do you see that?
 10 A. I do.
 11 71 Q. Okay. Can you tell me, why are
 12 those asterisks there?
 13 A. I don't know.
 14 72 Q. Okay. To your understanding,
 15 what do they mean?
 16 A. I believe it's somebody's phone
 17 number.
 18 73 Q. You believe JA and a bunch of
 19 asterisks and then --
 20 A. Right, your cursor is pointing --
 21 the cursor is pointed at the number. You're
 22 looking the email address. The one with the @
 23 sign, I believe that's an email address.
 24 74 Q. Okay. But what do the asterisks
 25 mean?

26

1 A. I believe that would be the rest
2 of the email address associated with the whole
3 name, et cetera.
4 75 Q. Okay. So you think that is the
5 actual email address, just JA and a bunch of
6 asterisks?
7 A. No. I mean the asterisks are
8 masking what the other letters would be in that
9 email address.
10 76 Q. Okay. And what's your basis for
11 that understanding?
12 A. Just my logic telling me as such.
13 77 Q. I see. So no one at Artemis Risk
14 ever told you that? And by "you" I mean ever
15 told the plaintiffs that?
16 A. What the asterisks actually mean?
17 I think it's pretty much assumed that when you
18 see in asterisk, you know, in front of a plus
19 sign or an @ sign, the @ sign would be an email
20 address; the plus would be a phone number.
21 78 Q. Okay. So what did anyone at
22 Artemis Risk tell you about this?
23 U/A MR. STALEY: So I think you're now
24 getting into questions that are directed at the
25 finding and conclusions of the expert which we

27

1 have at this point said we're at least going to
2 take under advisement.
3 BY MR. RICHARD:
4 79 Q. Having privilege --
5 MR. STALEY: You're certainly allowed
6 to ask him about his understanding about the
7 document.
8 BY MR. RICHARD:
9 80 Q. Okay. I disagree but I'll ask
10 my -- are you taking that under advisement or is
11 it a refusal?
12 U/A MR. STALEY: That's under advisement.
13 BY MR. RICHARD:
14 81 Q. Okay.
15 I asked you earlier, Mr. Kassam, about
16 any, I think you said you had no idea what
17 transforms may have been used in the creation of
18 this document.
19 How about "entities", if I use that
20 term; do you have any idea what entities might
21 have been used to create this document?
22 MR. STALEY: What you mean by
23 "entities"? I'm not clear what the question is
24 directed at.
25

28

1 BY MR. RICHARD:
2 82 Q. Well, we'll come to that.
3 "Entities" is a term that is used with the
4 Maltego software.
5 A. I'm not aware of the entities
6 associated with creating the document.
7 83 Q. Okay. Were you aware, sir, that
8 with a Maltego graph that you can delete and add
9 anything to the graph that you may want?
10 A. Again, as I mentioned previously,
11 I'm not aware of how the software system works.
12 84 Q. And I want to make sure I have
13 your understanding, sir. Is it your
14 understanding from this document that an email
15 address associated with -- let me step back.
16 When you see on the page in front of
17 you the "johnmur67039142", can we agree that
18 we'll just call that the John Murphy Twitter
19 account; is that your understanding?
20 A. Yeah, yeah.
21 85 Q. Is it your understanding, sir,
22 that an email address associated with that
23 Twitter account is JA and then a bunch of
24 asterisks and then @ and G and a bunch of
25 asterisks and then a period and then three more

29

1 asterisks?
2 A. I believe so.
3 86 Q. Okay. I think, as you said
4 before, your understanding is that the asterisks
5 is a mask for some other symbol or letter or
6 number that would have been behind it?
7 A. That's correct.
8 87 Q. Okay. So you'd agree with me,
9 sir, that even this document does not say that
10 JacobDoxator@gmail.com is associated with the
11 John Murphy account; correct?
12 A. Not specifically, because as you
13 said, the characters are masked by the
14 asterisks.
15 88 Q. Okay. And if we move next to
16 that JA and a bunch of asterisks email
17 reference, next to that where there's a note
18 that someone typed in that says "last two
19 digits", what's your understanding of that
20 particular symbol or indication on the document
21 that has a bunch of asterisks and then ends in
22 88.
23 What's your understanding of that?
24 A. I believe that is a phone number
25 plus, with another bunch of digits ending in 88.

30

1 89 Q. And what's your understanding of
2 why the asterisks are there?
3 A. Same with the email address; I
4 believe the asterisks are masking the first
5 digits associated with of phone number.
6 90 Q. Okay. And so you agree with me
7 that even this documents on its face does not
8 suggest that Jacob Doxtator's actual cell phone
9 is associated in any way with the John Murphy
10 account; correct?
11 A. Again, it's not a function of
12 just specifically the phone number, but, you
13 know, I can agree with you that it doesn't
14 specifically show the full phone number, yes.
15 91 Q. Sir, do you use Twitter?
16 A. I do.
17 92 Q. Do you have a Twitter account?
18 A. I do.
19 93 Q. Okay. I want to, sticking with
20 the document that's up on the screen, so up at
21 what I'll call more the top left, that's where
22 there's the @ symbol and then it actually says
23 "JacobDoxtator@gmail.com".
24 Do you see that?
25 A. I do.

31

1 94 Q. There's a note above it that
2 someone typed in "user exists in Twitter".
3 Do you have an understanding as to
4 whether Jacob Doxtator has a personal Twitter
5 account?
6 A. I don't know.
7 95 Q. Does the note that's on this
8 document suggest to you that he has a personal
9 Twitter account?
10 A. I believe that the email address
11 JacobDoxtator@gmail.com has an associated
12 Twitter handle.
13 96 Q. Yes. And is it your
14 understanding that that is "_Jacob Doxtator",
15 that's the Twitter handle?
16 A. I don't know.
17 97 Q. Okay. Can you tell me, sir, and
18 I'm going to zoom out so you can see everything
19 on the page. This document does not appear to
20 include Jacob Doxtator's personal Twitter
21 account. Do you agree with me on that?
22 A. I don't know what the green thing
23 on the left is, if that's a Twitter account or
24 not, but aside from that, I don't see his
25 Twitter account specifically mentioned here on

32

1 the first page.
2 98 Q. That you -- and, sorry, let me
3 scroll up. You agree with me that whoever put
4 the note in was indicating that
5 JacobDoxtator@gmail.com exists in Twitter;
6 correct?
7 A. The email address
8 JacobDoxtator@Gmail seems to have a Twitter
9 account associated with it. I don't know what
10 the Twitter handle is with the account; it's not
11 mentioned here.
12 99 Q. Okay. And, sir, as you're
13 familiar with Twitter, you have your own
14 account, are you aware that you can only have an
15 email address associated with one Twitter
16 account at any given time?
17 A. I don't know the specific rules
18 associated with how many accounts can be added
19 with email addresses, et cetera.
20 100 Q. Okay. I'm going to do show you
21 another -- bring up another document.
22 And, counsel, I'll ask the questions
23 but just so you know, it's from a webpage. You
24 can see the information at the bottom of the
25 page. We can go to it live. I simply took this

33

1 screenshot last night. But I wanted to --
2 MR. STALEY: You mean somebody deleted
3 the account?
4 BY MR. RICHARD:
5 101 Q. Excuse me, counsel?
6 MR. STALEY: You say somebody deleted
7 a Twitter account? Is that why you did it last
8 night?
9 BY MR. RICHARD:
10 102 Q. I went -- this is a screenshot
11 from Twitter's Help page. So perhaps you can
12 leave your comments about deleting accounts for
13 someone else, Mr. Staley.
14 If you would prefer we can go to the
15 page live today, but this is a screenshot of
16 Twitter's Help page that I took yesterday, and I
17 just wanted to show you in the middle of the
18 page, sir, that as Twitter says on its Help
19 page:
20 "An email address can only be
21 associated with one Twitter account at
22 a time".
23 Were you aware of that prior to today?
24 A. As I mentioned, I don't know the
25 specifics of how many accounts can put on with

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1 one email address.
 2 103 Q. Okay. Do you have any reason to
 3 disagree with this statement from Twitter's Help
 4 page?
 5 A. Assuming the Twitter Help page is
 6 legit, then I have no reason to disagree, no.
 7 104 Q. Okay. And so would you agree
 8 with me, sir, that based on this, if
 9 JacobDoxtator@gmail.com is used for
 10 Mr. Doxtator's personal Twitter account, it
 11 could not have been used at the same time for
 12 the John Murphy account?
 13 MR. STALEY: Well, you're presenting
 14 him with a document that you pulled up today,
 15 and we don't know whether this policy may have
 16 been in effect at earlier times nor have you put
 17 to the witness when Jacob had his Twitter
 18 account and whether it's contemporaneous with
 19 the John Murphy account.
 20 So all that the witness can answer
 21 today is that this appears to be the current
 22 policy that would be at live on Twitter if you
 23 went to it today.
 24 BY MR. RICHARD:
 25 105 Q. Okay.

35

1 Mr. Kassam, can you tell me, before
 2 the plaintiffs sued Jacob Doxtator for
 3 \$111 million, did anyone at the plaintiffs think
 4 about looking into whether or not an email
 5 address could be associated with more than one
 6 Twitter account?
 7 A. I don't know.
 8 106 Q. I'd ask for an undertaking that
 9 you advise whether anyone at the plaintiffs
 10 considered my last question?
 11 U/A MR. STALEY: I'll take that under
 12 advisement.
 13 BY MR. RICHARD:
 14 107 Q. Okay.
 15 And I'll give you -- sir, your counsel
 16 made a comment and I just want to give you an
 17 understanding, I'm going to ask you whether you
 18 have any understanding one way or the other.
 19 It's my understanding that Jacob
 20 Doxtator, and I believe he has given his
 21 evidence, but it's my understanding that he has
 22 always used JacobDoxtator@gmail.com for his
 23 personal Twitter account.
 24 Do you have any understanding one way
 25 or the other whether that is accurate?

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1 A. You'd have to ask him. I
 2 wouldn't know that.
 3 108 Q. Okay. To your knowledge, would
 4 anyone at the plaintiffs know that?
 5 A. I don't believe so. How would
 6 anyone know what Jacob uses other than himself?
 7 109 Q. So back to the document that we
 8 were looking at earlier, which was the one that
 9 ends in 14600, the Bates number.
 10 I think when I asked you whether this
 11 shows Jacob Doxtator's personal Twitter account,
 12 you said you weren't sure what the green symbol
 13 was and you weren't sure whether that was
 14 Twitter.
 15 When we look on the other side of the
 16 page, you'll see above the johnmur67039142
 17 there's a symbol that I'm going to suggest to
 18 you, sir, that that's the Twitter account
 19 symbol.
 20 Would you agree with that?
 21 A. I don't understand the question.
 22 110 Q. Do you see the blue and white
 23 symbol that's above johnmur67039142?
 24 A. Yes.
 25 111 Q. Do you understand that to be a

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1 Twitter symbol?
 2 A. Yes.
 3 112 Q. Okay. And is it your
 4 understanding that that is in reference to the
 5 johnmur67039142 Twitter account?
 6 A. I believe so, yes.
 7 113 Q. Okay. So if Jacob Doxtator's
 8 personal Twitter account was on this page, would
 9 you expect it to have a similar symbol?
 10 A. Again, I don't know.
 11 114 Q. I see. Okay.
 12 If Jacob Doxtator's personal Twitter
 13 account was on this page, would you expect it to
 14 show the email address that was associated with
 15 that account?
 16 A. I don't know.
 17 115 Q. Okay. One moment.
 18 I'm going to stop sharing this
 19 document for a moment.
 20 Counsel, perhaps if we can just take a
 21 no more than five-minute break. I'm still
 22 within the time; I just want to check a couple
 23 things and I will have a few more questions.
 24 MR. STALEY: Okay. We will take a
 25 brief bio break, five minutes.

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1 -- RECESSED AT 10:46 A.M. --
 2 -- RESUMING AT 10:53 AM --
 3 BY MR. RICHARD:
 4 116 Q. Mr. Kassam, just a couple of
 5 things I'll probably deal with your counsel
 6 first on these, and then I'll come back to you
 7 with some questions.
 8 Mr. Staley, in terms of the screen
 9 print from the Twitter Help page, I'm going to
 10 go out on a limb and suggest you would not agree
 11 to have that marked as an evidentiary exhibit.
 12 If I'm correct, I'll just have it
 13 marked as Exhibit A for identification?
 14 MR. STALEY: It should be marked for
 15 identification.
 16 BY MR. RICHARD:
 17 117 Q. Okay. We'll do that. That will
 18 be marked as Exhibit A.
 19 -- EXHIBIT NO. A: Twitter Help
 20 page.
 21 BY MR. RICHARD:
 22 118 Q. To be cautious, and I know -- in
 23 general I wouldn't mark individual documents,
 24 but this particular one and given the time I
 25 spent on it, the 14600, the end of the Bates

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1 number, I'm going to mark that as Exhibit 1 to
 2 this examination.
 3 MR. STALEY: We in the earlier
 4 examination have taken in the production numbers
 5 as being -- that not being necessary, but I'm in
 6 your hands on this one. Obviously the witness
 7 has identified it.
 8 BY MR. RICHARD:
 9 119 Q. I agree with you, and if I had a
 10 bunch of other when I would follow just with the
 11 Bates numbers, but this one, so that there's no
 12 confusion later, I'll ask to mark that is
 13 Exhibit 1.
 14 -- EXHIBIT NO. 1: Bates Number
 15 ending 14600.
 16 BY MR. RICHARD:
 17 120 Q. And I'm going to ask for an
 18 undertaking that you provide a detailed
 19 description of all the steps that were taken to
 20 create the document that is Exhibit 1, and by
 21 detailed description of all these steps, I mean
 22 every step, every transform that was used, every
 23 entity, and any other steps that were taken to
 24 create the document?
 25 U/A MR. STALEY: I'll take that under

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1 advisement.
 2 BY MR. RICHARD:
 3 121 Q. Okay. Now, Mr. Kassam, I'm about
 4 to show you another document, and as I'm
 5 bringing that up I will confirm that it is a
 6 document I created last night using Maltego. It
 7 is a document that I'll show you in a second,
 8 but so that I can provide this explanation,
 9 there is no doubt in my mind whatsoever that we
 10 will all agree, me, you Mr. Kassam, Mr. Staley,
 11 I'll even speak on behalf of Mr. Kim, we can all
 12 agree that there is no way that Mr. Staley is
 13 behind the John Murphy account.
 14 So when I show you this document, it
 15 is not intended to demonstrate that Mr. Staley
 16 was behind the John Murphy account. It is
 17 something I'm going to ask you a few questions
 18 about as to your knowledge with Maltego and how
 19 to create documents. Okay?
 20 MR. STALEY: Well, I'm not so sure
 21 about that. This is a document that's being
 22 produced for the first time on the examination.
 23 The witness hasn't seen it before.
 24 If you were going to ask the witness
 25 questions about it, it should have been produced

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1 in advance of the examination.
 2 BY MR. RICHARD:
 3 122 Q. I don't agree, Mr. Staley, and in
 4 particular, the document Exhibit 1 was not
 5 produced and not shown to Jacob Doxtator in any
 6 way, and that's a document that you're actually
 7 seeking to rely upon.
 8 This is a document that I will of
 9 course not ask be marked as an evidentiary
 10 exhibit. If we want, it can be Exhibit B after
 11 I deal with it. But given what happened with
 12 Jacob Doxtator, I'm somewhat surprised to hear
 13 that position from the plaintiffs.
 14 MR. STALEY: There were howls of
 15 outrage about what happened, and so I'm simply
 16 giving you back what we got on that, on the same
 17 point.
 18 BY MR. RICHARD:
 19 123 Q. Okay. Now, let me zoom out.
 20 Were you -- and as I said, sir, I created this
 21 document.
 22 Were you aware that in Maltego you
 23 could create a document, you could draw links
 24 from one to the other, one picture --
 25 R/F MR. STALEY: Don't answer the

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1 question. Don't answer the question.
 2 BY MR. RICHARD:
 3 124 Q. Sorry? Mr. Staley, were you
 4 raising an objection?
 5 MR. STALEY: I've already indicated
 6 that the witness is not going to answer
 7 questions about a document that you have --
 8 which we can see a portion of the top page which
 9 he has not seen before and was not produced in
 10 advance of this examination.
 11 BY MR. RICHARD:
 12 125 Q. I'm going to scroll down so you
 13 can see the entirety of the document, sir.
 14 MR. STALEY: That's fine. That's not
 15 going to change the answer you're going to get
 16 today.
 17 BY MR. RICHARD:
 18 126 Q. Okay. Well, I'll still show you.
 19 I'm going to ask you, sir, looking at
 20 this document and given your knowledge of what
 21 we were talking about as Exhibit 1, that Maltego
 22 documents apparently from Artemis Risk, on its
 23 face, would this document suggest that Staley R.
 24 at BennettJones.com is associated with the John
 25 Murphy account?

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1 R/F MR. STALEY: Don't answer the question. It's not a proper question.
 2 question. It's not a proper question.
 3 BY MR. RICHARD:
 4 127 Q. Were you aware, sir, that in
 5 Maltego you could simply insert information and
 6 arrows like this to create a document that, to
 7 my view, appears similar to Exhibit 1?
 8 R/F MR. STALEY: Same answer.
 9 BY MR. RICHARD:
 10 128 Q. Sir, to your knowledge, did
 11 anyone at Artemis Risk simply insert information
 12 into the document that's been marked as
 13 Exhibit 1 as compared to drawing it from a
 14 search somewhere?
 15 MR. STALEY: We have for various
 16 purposes given you an undertaking on the
 17 document. We've also claimed privilege over
 18 what some of the work of the experts. To the
 19 extent we have given you an undertaking, that
 20 undertaking applies.
 21 And beyond that, the witness is not
 22 answering questions about what Artemis Risk did.
 23 BY MR. RICHARD:
 24 129 Q. So you're refusing that question?
 25 MR. STALEY: No. I think I sort of

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1 said we already said we would answer some of it
 2 but not all of it.
 3 BY MR. RICHARD:
 4 130 Q. Well, and I'm asking him whether
 5 he has any understanding as to whether anyone at
 6 Artemis Risk simply added information into the
 7 graph as compared to pulling the information
 8 from a search?
 9 MR. STALEY: I think we've already
 10 told you what we are going to do with that.
 11 BY MR. RICHARD:
 12 131 Q. Okay. I'll take that is a
 13 refusal.
 14 I have your position on the document
 15 that's entitled "New Graph (1).PDF".
 16 In case there's any issue, I would
 17 propose to mark that as Exhibit B, and I
 18 acknowledge it could not be anything more than
 19 marked for identification.
 20 But is there an objection to marking
 21 it as Exhibit B?
 22 MR. STALEY: Can you provide us with a
 23 copy, please? The witness is seeing it for the
 24 first time.
 25

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1 BY MR. RICHARD:
 2 132 Q. Yes.
 3 MR. STALEY: I can't object to it
 4 being marked for identification but I would like
 5 a copy.
 6 BY MR. RICHARD:
 7 133 Q. Yes, I will provide you with a
 8 copy of it. And right now I will ask that it be
 9 marked as Exhibit B.
 10 MR. STALEY: Yes, that's fine.
 11 -- EXHIBIT NO. B: New Graph
 12 (1).PDF.
 13 BY MR. RICHARD:
 14 134 Q. I just have a few questions
 15 concerning the claim and the allegations made
 16 against Jacob Doxtator and at times made against
 17 all of the defendants.
 18 Do you have a copy of the fresh as
 19 amended Statement of Claim, Mr. Kassam?
 20 A. I do.
 21 135 Q. Okay. Can you go to paragraph 2?
 22 MR. STALEY: Just so you know,
 23 Mr. Richard, the witness has in front of him an
 24 entire brief of the pleadings. So that's what
 25 he has in front of him.

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1 BY MR. RICHARD:
 2 136 Q. Okay. That's fine.
 3 I didn't ask this, but while he's
 4 looking at it, I think I didn't explicitly ask
 5 this, but you're all in the same room; correct,
 6 Mr. Staley?
 7 MR. STALEY: We are. You can probably
 8 tell by the ugly artwork, that we have the same
 9 ugly artwork behind us.
 10 BY MR. RICHARD:
 11 137 Q. No one else will call it that.
 12 Do you have paragraph 2 in front of
 13 you, Mr. Kassam?
 14 A. I do, starting with "since at
 15 least"?
 16 138 Q. Yes.
 17 A. Yeah.
 18 139 Q. In terms of Jacob Doxtator, can
 19 you tell me, and excluding anything you've
 20 already told us here today, what other evidence,
 21 any other evidence or documents that the
 22 plaintiffs have that pertains to allegations
 23 made against Jacob Doxtator in relation to this
 24 paragraph?
 25 A. I believe we've already gone

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1 through that, other than the Artemis documents
 2 and whatever is sitting within privilege, and
 3 knowing that Jacob Doxtator is a known affiliate
 4 family member of Robert Doxtator, I believe,
 5 that is our information associated with Jacob
 6 Doxtator.
 7 140 Q. Okay. I'm going to try this on,
 8 then. If I go to -- actually, let's do it in a
 9 couple of quick steps. Hopefully it will be as
 10 fast.
 11 If you can turn to paragraph 22.
 12 Just take a moment just to read
 13 through that quickly to yourself.
 14 A. Yeah, I see it.
 15 141 Q. And if I ask you the same
 16 question, would be the same answer in terms of
 17 what other evidence or documents do you have
 18 that goes to the plaintiffs' allegations as
 19 contained in paragraph 22 against Jacob
 20 Doxtator?
 21 A. I don't understand. I think we
 22 just answered that; right? What does reading
 23 22 give me in regard to changing the answer?
 24 142 Q. No. My first question was about
 25 paragraph 2. So now I'm talking about the

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1 particular allegations made in paragraph 22.
 2 Other than what you've already said,
 3 if I asked you to tell me about any other
 4 evidence or documents that relate to the
 5 allegations against Jacob Doxtator found in
 6 paragraph 22, is there anything else?
 7 A. Other than, I believe, stuff that
 8 is concealed by a privilege, I don't believe
 9 there's anything else.
 10 143 Q. Okay. And I'm going to try this,
 11 so let's give your counsel a second to see if
 12 he, after I raise this question, if he has
 13 anything to add or any issues.
 14 Rather than go to the particular
 15 paragraphs one-by-one, I was going to simply say
 16 paragraphs 25, 26, 27, 28, 30, 53, 54, 64, 65,
 17 69, 74, 81, 82, 83, 84, 85, 89, 90, 91, 92, 103,
 18 105, 107, 108, and 139 to 140, for all of those
 19 paragraphs, if I asked you for any other
 20 evidence or documents that relate to the
 21 allegations just against Jacob Doxtator, I'm
 22 going to ask would your answer be the same, that
 23 other than what you've said and other than what
 24 you've said about privileged documents with
 25 Artemis, that there's nothing else?

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1 U/A MR. STALEY: So you went very quickly
 2 through a bunch of paragraphs and I wasn't able
 3 to get down any of them, so we'll take that
 4 under advisement.
 5 BY MR. RICHARD:
 6 144 Q. Okay.
 7 Let me put it this way, Mr. Staley.
 8 If I take another 30 seconds and give you the
 9 paragraph numbers, are you prepared to give an
 10 undertaking?
 11 MR. STALEY: No, because I think we
 12 would still need to go through and look at them
 13 all. So I think this is probably the most
 14 expedient way to move on from this.
 15 BY MR. RICHARD:
 16 145 Q. Okay. In the interest of time
 17 and other circumstances, I might have gone to
 18 each one and asked the witness. I have a
 19 feeling I would have gotten the same answer, but
 20 I'll leave that as an under advisement.
 21 Subject to what I raised before we
 22 started, those are my questions, but I'm going
 23 to reserve the right to come back within the
 24 time frames that we had agreed to for a couple
 25 I've minutes in the event that we, on behalf of

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1 Jacob Doxtator, have any general questions about
 2 expert reports or findings and opinions or
 3 witness summaries that aren't covered by
 4 Mr. Kim, then we reserve the right just to come
 5 back and ask for a couple of minutes those types
 6 of questions at the end if we felt we needed to.
 7 Otherwise, those are my questions.
 8 MR. STALEY: Very good, thank you.
 9 EXAMINATION BY MR. KIM:
 10 146 Q. Good morning, Mr. Kassam.
 11 A. Good morning.
 12 147 Q. I'm here on behalf of
 13 Mr. Stafford and Mr. Robert Lee Doxtator, and
 14 I'll be asking questions this morning.
 15 I understand that you're the Chief
 16 Executive and Chief Investment Officer for all
 17 of the Anson-related entities; is that correct,
 18 sir?
 19 A. No. I am affiliated with the
 20 Canadian Anson entities, not the U.S. ones.
 21 148 Q. Okay. And may I ask who is
 22 Mr. Winston -- is he the Chief Executive officer
 23 and does he run the U.S. part of the Anson
 24 Group?
 25 A. I believe he is the head of the

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1 U.S. entities affiliated with Anson; correct.
 2 149 Q. And I understand that Anson is
 3 both a long and short fund; is that correct,
 4 sir?
 5 A. Anson itself doesn't exist.
 6 There's Anson Funds, which we basically say is
 7 the aggregate of the different Anson Investment
 8 Fund that exists today.
 9 150 Q. In the interest of saving time,
 10 counsel, may we get an undertaking of a chart
 11 setting out how the various Anson Funds are
 12 related?
 13 U/A MR. STALEY: We will take that under
 14 advisement.
 15 BY MR. STALEY:
 16 151 Q. Now, Mr. Kassam, I understand
 17 that in pursuing both a long and short strategy,
 18 how did -- does Anson have -- who are your
 19 clients?
 20 A. Again, by definition of Anson,
 21 like Anson Funds are run by two investment
 22 managers. Are you talking about clients related
 23 to the fund or are you talking about clients of
 24 the Anson Advisor group? Because --
 25 152 Q. The fund.

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1 A. -- it's a different answer.
 2 153 Q. The fund.
 3 A. The fund specifically to the main
 4 fund, like Anson Investments Master Fund?
 5 Which --
 6 154 Q. Yes.
 7 A. -- one are you referring to?
 8 155 Q. The main fund, the investment
 9 management fund.
 10 A. Anson Investments Master Fund is
 11 a master feeder structure. So there's,
 12 technically they have two clients if you look at
 13 it that way, because it's just a fund that holds
 14 monies from Anson Investments offshore fund and
 15 Anson Investments LP, which is a U.S. domiciled
 16 fund.
 17 156 Q. Now, with regard to your
 18 business, do you take investments from
 19 individuals or is it limited to institutions?
 20 A. We take money from individuals
 21 and institutions.
 22 157 Q. Is there a minimal requirement
 23 for various investors?
 24 A. There is.
 25 158 Q. May I ask what that is?

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1 A. On our marketing presentation,
 2 historically it said quarter million dollars
 3 U.S. would be the minimum investment into the
 4 Anson Investments Master Fund.
 5 159 Q. Even for Canadian investors?
 6 A. That's for any investor coming
 7 into Anson Investments Master Fund.
 8 160 Q. So you would agree with me, then,
 9 your typical investor is a sophisticated
 10 investor?
 11 A. I believe all our investors are
 12 accredited investors, as such, deemed to be
 13 sophisticated investors.
 14 161 Q. So you would agree with me, then,
 15 that your typical investor is somebody who is
 16 conversant with the risks of investing in the
 17 market?
 18 A. Are they -- sorry, if you could
 19 repeat the question.
 20 162 Q. So would you agree with me that
 21 your typical investor is somebody, be it a high
 22 net worth individual or a fund, somebody who is
 23 familiar with the risks of investing in the
 24 capital markets?
 25 A. I believe so.

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1 163 Q. And they are -- you would agree
 2 with me that they would have -- they make their
 3 own decisions in terms of -- they accept the
 4 risks of investing in your funds?
 5 It's not a conservative, like, it's
 6 not an index fund, for example. They accept
 7 that there will be higher degree of risk in
 8 investing in your fund?
 9 A. Again, a higher risk relative to
 10 what? Like, you know, I personally don't
 11 believe that there's an extremely high risk
 12 investing in our fund, but it really depends on
 13 what benchmarks you're using, et cetera.
 14 164 Q. Mr. Kassam, tell me, how does
 15 Anson -- what is the investment strategy
 16 pursuant both long and short strategies, how
 17 does Anson come up with a strategy?
 18 A. Again, are you referring to Anson
 19 Investments Master Fund? Because we have
 20 different funds with different strategies.
 21 165 Q. Yes. The master fund.
 22 A. How do we come up with
 23 strategies?
 24 166 Q. Yeah.
 25 A. The strategies evolve over time.

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1 You know, like, we have two buckets. There's a
 2 long strategy, short strategy, and then from
 3 there there's been other strategies which are
 4 sort of trading strategies and delta trading and
 5 deal strategies, et cetera.
 6 There's just, you know, it's sort of
 7 we go with what works and, you know, if we find
 8 that there's a competitive advantage we have and
 9 we're able to show good performance within a
 10 strategy, we will enhance it grow it.
 11 167 Q. And you're the Chief Investment
 12 Officer?
 13 A. That is correct.
 14 168 Q. And you are the Chief Investment
 15 Officer for all of your entities?
 16 A. As mentioned, I am the Chief
 17 Investment Officer for the fund, but I'm not
 18 affiliated with -- technically affiliated with
 19 the U.S. entities.
 20 169 Q. But you have a whole research
 21 team and a team of analysts who support your
 22 decisions; investment decisions?
 23 A. I do.
 24 170 Q. Okay. May I ask, if you look at
 25 paragraph 11 of your fresh as amended Statement

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1 of Claim. We'll put that up on the screen.
 2 A. Yes, I see it.
 3 171 Q. You plead that:
 4 "Anson does not engage in naked
 5 short selling[...]"
 6 Sir, what is naked short selling?
 7 A. You want me to read the
 8 definition on the page?
 9 172 Q. No. I want to get -- I already
 10 have your pleading. I want to know what your
 11 understanding of naked short selling is?
 12 A. I believe naked short selling
 13 refers to shorting without a reasonable
 14 expectation that you and/or the brokerage firm
 15 where you make the transaction has of settling
 16 the transaction.
 17 173 Q. So when you say you don't engage
 18 in naked short selling, have you ever -- has you
 19 or any of the Anson entities ever engaged in
 20 naked short selling?
 21 A. So us as a regulated entity of
 22 the OSC and of the SEC, we are bound of the
 23 rules set of both, and we never go outside of
 24 those rules.
 25 174 Q. I understand that, sir. But has

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1 Anson, have any of your entities ever engaged in
 2 naked short selling?
 3 A. Again, it's a pretty opaque and
 4 subjective term on how people define naked
 5 shorting.
 6 175 Q. Well, I'm not interested in how
 7 other people define it. I'm interested in your
 8 perspective and your opinions and your facts.
 9 Have you ever nakedly shorted a stock?
 10 A. As mentioned, we are bound by all
 11 the rules set forward to us by the OSC and the
 12 SEC, and as such, we do not engage in anything
 13 untoward or outside of those rules, including
 14 naked shorting.
 15 176 Q. So you have never nakedly shorted
 16 a stock?
 17 A. By the definition that we believe
 18 of naked shorting, we have never nakedly shorted a
 19 stock.
 20 177 Q. Now, do you know, are you aware
 21 of firms that engage in naked short selling in
 22 Canada?
 23 A. I'm not aware of firms that naked
 24 short sell in Canada.
 25 178 Q. So to the best of your knowledge,

58	<p>1 then, there is no such thing as naked short</p> <p>2 selling by reputable firms in Canada?</p> <p>3 A. Again, your definition of</p> <p>4 reputable firms, et cetera, is a little vague.</p> <p>5 179 Q. Well, Anson is a reputable firm;</p> <p>6 correct?</p> <p>7 A. I believe so.</p> <p>8 180 Q. And you've never nakedly shorted</p> <p>9 a stock?</p> <p>10 MR. STALEY: He's already answered</p> <p>11 that question. Move on.</p> <p>12 BY MR. KIM:</p> <p>13 181 Q. Now, if you go to paragraph 12 of</p> <p>14 the fresh as amended Statement of Claim.</p> <p>15 A. I see it.</p> <p>16 182 Q. You plead that:</p> <p>17 "In the ordinary course of</p> <p>18 business, Anson from time-to-time</p> <p>19 discusses its research and investment</p> <p>20 analysis with these and others in the</p> <p>21 industry."</p> <p>22 Do you see that?</p> <p>23 A. I see it, yes.</p> <p>24 183 Q. Now, do you do all of your</p> <p>25 research in-house or do you contact out your</p>	60
59	<p>1 research?</p> <p>2 A. The bulk of our research is done</p> <p>3 in-house, but we do use a wide variety of other</p> <p>4 sources to conduct our diligence.</p> <p>5 184 Q. What are the other varieties?</p> <p>6 A. We use consultants. We talk to</p> <p>7 industry experts. We use expert networks. We</p> <p>8 work with other funds. We discuss it with, you</p> <p>9 know, previous managements.</p> <p>10 You know, we will discuss it with</p> <p>11 anyone that we believe has interesting</p> <p>12 information that could help augment or disprove,</p> <p>13 you know, a current thesis we may have.</p> <p>14 185 Q. So do you share research report</p> <p>15 with other short-sellers?</p> <p>16 A. Do we share research reports?</p> <p>17 186 Q. Do you share research?</p> <p>18 A. We share research, as I</p> <p>19 mentioned, with a wide variety of sources.</p> <p>20 187 Q. Have you shared research with</p> <p>21 Nate Anderson of Hindenburg Research?</p> <p>22 A. I believe we have, yes.</p> <p>23 188 Q. Andrew Left of Citron?</p> <p>24 A. I believe so.</p> <p>25 189 Q. Fraser Perring of Viceroy?</p>	61

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1 investors, including Canadian and American.
 2 202 Q. And you have global investors?
 3 You have investors around the globe?
 4 A. We do.
 5 203 Q. Is the Investment Authority of
 6 Abu Dhabi one of them?
 7 A. The Investment Authority of Abu
 8 Dhabi is not one of them.
 9 204 Q. How about Mubadala?
 10 A. Mubadala is not one of them.
 11 205 Q. You've never taken money from
 12 either entity?
 13 A. I believe we have never taken
 14 money from either entity.
 15 206 Q. Now, sir, does Anson operate
 16 other than in Canada and the United States?
 17 A. Operate, meaning having a
 18 physical office on the ground?
 19 207 Q. No. Operate as in do you use
 20 other -- do you conduct transactions in
 21 jurisdictions other than in Canada and the
 22 United States?
 23 A. We do.
 24 208 Q. Okay. Where would that be?
 25 A. We operate across the globe. I

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1 had an order in Japan this morning, you know.
 2 We'll go where there is opportunity.
 3 209 Q. Now, have you -- do you conduct
 4 what's known as off balance sheet trading
 5 strategies?
 6 A. I don't know what you mean by
 7 "off balance sheet training strategy".
 8 210 Q. We'll get to that.
 9 Now, Mr. Kassam, do you exchange due
 10 diligence in advance with other short selling
 11 firms in advance of them issuing reports?
 12 A. Again, it's a pretty vague
 13 question. We exchange information with a wide
 14 variety of sources, some of which end up in, you
 15 know, people use some of the information that
 16 may end up in a report that makes its way out
 17 online.
 18 211 Q. Now, how do you determine the --
 19 do you ever seek out research that includes
 20 nonpublic information?
 21 A. We specifically never seek out
 22 information that is nonpublic.
 23 212 Q. Is that a policy? Is that a
 24 formal policy?
 25 A. That's a formal policy within our

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1 organization, yes.
 2 213 Q. What about, you work with
 3 freelancers, contractors?
 4 A. All our contracts specifically
 5 say we do not want anyone or do not accept any
 6 information that would be deemed to be material
 7 nonpublic.
 8 214 Q. Do you have a standard engagement
 9 form which sets out the terms of which you would
 10 accept research from third parties?
 11 A. We don't have a specific one.
 12 215 Q. Okay. So how would somebody who
 13 provides you research on a freelance basis know
 14 of your policies?
 15 A. Again, you know, your notion of
 16 freelance versus someone that we actually have a
 17 contractual arrangement with our different,
 18 right.
 19 A freelance guy by definition is
 20 freelance. He is not really working with us.
 21 216 Q. Okay. So let me just -- we'll
 22 get to Robert Lee Doxtator. And for the
 23 purposes of our examination, Mr. Kassam, when I
 24 speak about Mr. Doxtator, I'm going to be
 25 referring to Robert Lee Doxtator because, as you

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1 know, I don't represent Jacob Doxtator. So when
 2 I talk about Mr. Doxtator, it will be about
 3 Mr. Robert Doxtator.
 4 Mr. Kassam, did you enter into a
 5 retainer agreement with Mr. Doxtator?
 6 A. I believe we proposed to enter
 7 into a physical retainer relationship with
 8 Mr. Doxtator, but, you know, the document was
 9 never ratified, and as such, we just had an oral
 10 agreement.
 11 217 Q. So given the fact that you had an
 12 oral agreement with Mr. Doxtator, how would
 13 Mr. Doxtator be aware of your various policies
 14 regarding inside information or nonpublic
 15 information?
 16 A. I believe he had the original
 17 document which would have suggested that we do
 18 not accept or want anyone to seek out material
 19 nonpublic information.
 20 218 Q. Have you produced even the draft
 21 version of the agreement, the retainer
 22 agreement?
 23 A. I don't know.
 24 219 Q. Counsel, I'd like an undertaking
 25 to produce, first of all, the draft retainer

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1 agreement with Mr. Doxtator?
 2 U/A MR. STALEY: I'll take that under
 3 advisement.
 4 BY MR. STALEY:
 5 220 Q. Further to that under advisement,
 6 I would like an undertaking to produce any
 7 retainer agreement, standard form retainer
 8 agreement which sets out Anson Funds, Anson
 9 Group's policy which sets out their policy about
 10 what is any restrictions on the research that
 11 they would be contracting out for?
 12 U/A MR. STALEY: Same answer. We'll take
 13 that under advisement.
 14 BY MR. STALEY:
 15 221 Q. Now, Mr. Kassam, why would --
 16 given the fact that Anson Fund has its own
 17 group, research group, and its own team of
 18 analysts, why do you need to contract out
 19 research from third parties?
 20 A. Again, because we are looking far
 21 and wide, there are unlimited opportunities but
 22 only limited amount of hours within the
 23 employees at Anson. As such, you know, we look
 24 to other industry specialists, experts, to help
 25 with the situations.

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1 Also, given that we are generalists,
 2 you know, we generally, you know, would need
 3 help within looking at specific industries or
 4 circumstance that, you know, requires a specific
 5 skill set.
 6 222 Q. So when you get these -- first of
 7 all, do third parties approach you or do you
 8 identify and approach other parties?
 9 A. Sorry, specifically in what
 10 occasion?
 11 223 Q. So, for example, cannabis. How
 12 do you identify -- how does that work? Do third
 13 parties approach you or do you identify
 14 specialists in that sector to retain them?
 15 A. Using your analogy or example
 16 around cannabis, we would identify people that
 17 we believe could help us. And, you know, as we
 18 make investments or chat around, other people
 19 would hear about what we're doing and some
 20 people will in-bound and offer their services at
 21 the same time.
 22 So it's a bit of both to answer your
 23 question.
 24 224 Q. Now, at this point, Mr. Kassam,
 25 can you tell me how, what is the protocol for

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1 your third-party consultants? How do you --
 2 what is the in-house procedure to make sure that
 3 all of the information being provided by third
 4 parties meet regulatory requirements?
 5 Like, specifically, is there a
 6 standard form policy that you send them on what
 7 Anson, what kind of information Anson would
 8 accept from third parties?
 9 A. Again, the problem with answering
 10 the question is you keep going back between, you
 11 know, anyone we're exchanging diligence with to
 12 someone who actually works on a contract basis
 13 with us, right.
 14 We wouldn't call them -- we would call
 15 them a consultant or, you know, someone that, a
 16 more specific term than anyone that we're
 17 sharing research with, whether that be just
 18 picking up the phone and talking to another
 19 fund, et cetera.
 20 225 Q. Then let's break it down. Do you
 21 have a different protocol for somebody you have
 22 a contract with versus somebody who's a
 23 third-party?
 24 A. Yes, we would.
 25 226 Q. Do you have a different policy

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1 depending on somebody who you have a contract
 2 with versus somebody who is a freelancer?
 3 A. Are you asking whether there's a
 4 written policy or if there's a practice?
 5 227 Q. Well, both. Let's deal with the
 6 written policy.
 7 Mr. Kassam, do you have a standard
 8 form retainer agreement with somebody who you're
 9 in contract with which sets out what kind of
 10 information --
 11 U/A MR. STALEY: We've already taken that
 12 under advisement.
 13 BY MR. KIM:
 14 228 Q. Okay.
 15 What about for people who are ad hoc,
 16 not somebody you are in a contractual
 17 relationship with?
 18 U/A MR. STALEY: I think the one we gave
 19 you covered the same point.
 20 BY MR. KIM:
 21 229 Q. Mr. Kassam, how do you make sure
 22 the third-party information isn't insider
 23 information?
 24 MR. STALEY: Sorry, I just want to be
 25 careful here, that when we're talking about

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1 inside information we're talking about -- are
 2 you talking about material nonpublic information
 3 from a securities law perspective?
 4 BY MR. KIM:
 5 230 Q. Correct.
 6 MR. STALEY: Just so we're talking
 7 about the same thing. As opposed to stuff that
 8 might not be broadly known but isn't material
 9 nonpublic information from a securities law
 10 perspective?
 11 BY MR. STALEY:
 12 231 Q. We're talking about material
 13 nonpublic information.
 14 MR. STALEY: Very good.
 15 Sorry, do you want to repeat the
 16 question?
 17 BY MR. KIM:
 18 232 Q. How do you make sure that the
 19 third-party information isn't nonpublic insider
 20 information?
 21 A. When we're chatting with a
 22 complete third-party?
 23 233 Q. Or somebody you're in contract
 24 with. Is there a vetting process?
 25 A. I don't know what a vetting

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1 process like that would look like. You know, if
 2 I'm having a conversation with you and you tell
 3 me something, you know, how am I supposed to
 4 know what you're saying and where the sources
 5 come from?
 6 But, you know, that's why we have
 7 contracts in place for people that we work with
 8 specifically from a research perspective.
 9 But when one's exchanging diligence
 10 with any other fund or affiliate or member, you
 11 know, you sort of, you know, you have to really
 12 understand, you know, there's no specific way to
 13 know what could be inside information.
 14 234 Q. Okay. Well, Mr. Kassam, given
 15 the fact that you have in-house researchers and
 16 in-house analysts, what could other people offer
 17 that your in-house experts, what kind of
 18 information could they offer that your in-house
 19 group of analysts and research could not offer?
 20 A. As previously mentioned, you
 21 know, we generally are looking, you know, we are
 22 generalists. So, you know, we are looking at a
 23 wide variety of sectors and strategies, and as
 24 such, we'll go to people who have a general
 25 specialty or affiliation with a specific sector

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1 so they can bring something to the table, you
 2 know, experience, history, contacts, everything
 3 around that that we may not have on our own.
 4 235 Q. Now, does Anson Group ever share
 5 their research with other short-sellers?
 6 A. When you mean by research, you're
 7 talking about research that we develop inside,
 8 you know, with our team? Or what do you mean?
 9 236 Q. Yes. First of all, let's deal
 10 with that, your in-house research.
 11 A. Yeah, at times we will share our
 12 diligence with third parties.
 13 237 Q. Do you ever post the diligence on
 14 other forums, like Seeking Alpha, for example?
 15 A. Do we post third-party diligence
 16 on Seeking Alpha?
 17 238 Q. Or in-house, any information --
 18 has Anson ever posted any information in a
 19 public forum like Seeking Alpha?
 20 A. Anson, you mean anyone at Anson,
 21 has anyone posted on Seeking Alpha?
 22 239 Q. Yes.
 23 A. Historically, you know, years and
 24 years ago, I believe we had posted on Seeking
 25 Alpha, but we haven't done that in a long time.

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1 240 Q. Okay. A long time being what
 2 period?
 3 A. Maybe 5, 7 years.
 4 241 Q. Okay. What about Reddit?
 5 A. I don't believe we've ever posted
 6 on Reddit.
 7 242 Q. What about Stockhouse?
 8 A. I don't believe we've ever posted
 9 on Stockhouse.
 10 243 Q. Okay. Why would anyone at Anson
 11 post information on Seeking Alpha?
 12 A. As I mentioned, it hadn't been
 13 done in seven years, but, you know, historically
 14 we had originally posted on Seeking Alpha under
 15 our own pseudonym. "Admiral Anson" was the
 16 handle.
 17 And what we came to realize is there
 18 is a certain risk associated with posting
 19 information to Seeking Alpha or any other
 20 investor medium in that, you know, a lot of the
 21 names that we are opining upon are
 22 retail-oriented names.
 23 And, you know, if we're out there
 24 producing publicly available information but
 25 isn't readily understood, and we post the

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1 information that eventually gets people who
 2 along the stock realize that, you know, they're
 3 not understanding the situation for what it is,
 4 and that certain stock starts to drop in value,
 5 that retail holder doesn't blame the company or
 6 the promoters associated with it but blames us
 7 as the fund who was shining the light to make it
 8 bad. And, as such, there are repercussions.
 9 You know, we've had people threaten
 10 us, whether it be physically, whether it be by
 11 phone, whether it be stalking our houses or
 12 offices. We've had to have security in our
 13 office.
 14 So, you know, we made a determination
 15 or a decision years ago that we would no longer
 16 produce information that could lead to that type
 17 of harm to anyone within our organization.
 18 244 Q. Now, Mr. Kassam, you talked about
 19 Admiral Anson. Were people aware that when you
 20 posted under Admiral Anson, it was, in fact, a
 21 pseudonym for Anson Funds?
 22 A. I believe that when you have the
 23 name of the handle, the name of your
 24 organization, it's readily understood that it's
 25 one and the same.

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1 245 Q. I think that's very much an
 2 issue. For example, you're not the person
 3 behind MoezKassam.com, are you?
 4 A. I am not.
 5 246 Q. Now, in terms of, why would a
 6 firm like yours post anything on Seeking Alpha?
 7 A. I believe at the time that it was
 8 a responsibility of us to be out there to share
 9 the truth, and that promoters and people who
 10 are, you know, creating this euphoria and
 11 hysteria and getting the unsuspecting investor
 12 to buy such companies that really didn't have a
 13 lot of merit to it, that it was a responsibility
 14 or a public good to tell the truth and share
 15 what people were missing on them.
 16 247 Q. Now, in terms of posting on
 17 forums like Seeking Alpha, were there any
 18 individual accounts by other persons related to
 19 Anson that you were aware of?
 20 MR. STALEY: Sorry, I'm not following
 21 the question.
 22 BY MR. KIM:
 23 248 Q. Let me clarify.
 24 MR. STALEY: The question has a false
 25 premise.

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1 BY MR. KIM:
 2 249 Q. Let me clarify.
 3 Other than Admiral Anson, were there
 4 any other posts used by anyone related to Anson
 5 on Seeking Alpha?
 6 A. I believe there was.
 7 250 Q. And can you tell me who or what?
 8 A. The handle?
 9 251 Q. Yes.
 10 A. I believe the handle was "Emperor
 11 Has No Clothes".
 12 252 Q. And whose handle was that?
 13 A. That was one used by our firm.
 14 253 Q. And was that related to -- was
 15 that an issue with a company called Nobilis
 16 Health?
 17 A. I believe so.
 18 254 Q. I understand there was litigation
 19 involving Nobilis Health?
 20 A. Yeah. You were there.
 21 255 Q. Yes, indeed.
 22 Now, may I ask, when you post either
 23 under Admiral Anson or Emperor Has No Clothes,
 24 do you disclose whether Anson had a financial
 25 interest in the companies that Anson posted

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1 about?
 2 A. I believe generally we do, but
 3 there was an occasion where the button wasn't
 4 clicked to say that we were short.
 5 256 Q. And when was that? Which ticker
 6 was that?
 7 A. I believe it may have been this
 8 one. I don't remember. I don't remember
 9 which -- there was one example where we forgot
 10 to click the button that said "short".
 11 257 Q. Mr. Staley, can we get an
 12 undertaking to produce and identify which ticker
 13 that was and the particulars where Anson-related
 14 entities forgot to click the button?
 15 U/A MR. STALEY: It seems to be very far
 16 off of what's the relevant. We'll take it under
 17 advisement.
 18 BY MR. STALEY:
 19 258 Q. Now, Mr. Kassam, is it fair to
 20 say that Anson started off, what, was it
 21 2006-2007?
 22 A. Anson Investments Master Fund
 23 inception date was July 2007.
 24 259 Q. Yes. And what was the dollar
 25 figure of assets under management then?

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1 A. I believe we launched the fund
2 with \$9 million.
3 260 Q. Okay. What is the current figure
4 for assets under management?
5 A. For the firm or Anson Investments
6 Master Fund?
7 261 Q. The master fund?
8 A. I believe it is 1.02 billion U.S.
9 262 Q. By any measure, that's a
10 spectacular rate of growth; would you agree with
11 that?
12 A. Well, yeah. When you agree with
13 a fund you have to look at, in a growth, you
14 have to look at the compounding versus how much
15 money has come in.
16 263 Q. Okay. And do you know what the
17 breakdown is between compounding, results of
18 compounding versus fresh investments?
19 A. Like, again, it gets very
20 complicated when you go down this path, because
21 as people add money and people redeem money, but
22 I know for the firm overall, like what the firm
23 has made investors, but like going specifically
24 on the compounding or how much people, you
25 know -- our annualized return, I can give you

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1 that, but I don't know what figures you're
2 looking for.
3 264 Q. What is your annualized return?
4 A. I believe the annualized return
5 of Anson Investments Master Fund since inception
6 is about 15.2 per cent net.
7 265 Q. Net. Of all expenses?
8 A. All expenses and fees.
9 266 Q. Excluding the master fund, what
10 are the other assets under management of the two
11 other entities?
12 A. I believe in aggregate, you know,
13 Anson investment, the Anson Funds are about
14 1.6 billion U.S.
15 267 Q. So there's roughly \$600 million
16 spread over the two other entities?
17 A. Over the other entities at Anson.
18 268 Q. Now, Mr. Kassam, what would be
19 the --
20 MR. STALEY: Sorry, can we just
21 clarify for the record the 1.02 billion, was
22 that Canadian or U.S. dollars?
23 BY MR. STALEY:
24 269 Q. Oh, sure.
25 A. U.S. dollars.

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1 270 Q. I presume all of the -- given the
2 fact that all of the -- is it fair for me to say
3 that all of the figures are in U.S. dollars,
4 Mr. Kassam?
5 A. Yes.
6 271 Q. Now, Mr. Kassam, if I were to ask
7 you a general question, what's the secret sauce
8 behind Anson's success?
9 A. The secret sauce behind Anson's
10 success? You know, we've got good people.
11 272 Q. Good people. Good research?
12 A. Good research, good diligence,
13 hard-working.
14 273 Q. Good relationships?
15 A. I don't believe that's a secret
16 sauce. I think it's generally the people within
17 the firm.
18 274 Q. Now, Mr. Kassam, if I can move to
19 a little different area.
20 Who is Alan Spektor?
21 A. Alan Spektor was my roommate in
22 college.
23 275 Q. And is he an investor in Anson?
24 A. He is not.
25 276 Q. Is he a former employee of Anson?

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1 A. I believe he referenced himself
2 as one, but he was never an employee of Anson.
3 277 Q. What's his tie with Anson?
4 A. His tie with Anson? He's a good
5 friend of mine.
6 278 Q. How do you communicate with
7 Mr. Spektor?
8 A. I communicate with him using the
9 phone.
10 279 Q. Okay. Is it a professional
11 relationship or is it a friendship?
12 A. It's a friendship.
13 280 Q. Now, have you ever communicated
14 with Mr. Spektor about this lawsuit?
15 A. Have I communicated with him
16 about the lawsuit? Like, are you saying prior
17 to the filing? The pleading? Today?
18 When do you refer?
19 281 Q. Well, I mean, I guess once you
20 saw the -- we're going to get into the allegedly
21 defamatory statements, but have you ever spoken
22 to Mr. Spektor about any of the -- when these
23 statements started popping up on the Internet,
24 did you ever speak to Mr. Spektor?
25 A. You're talking about the

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1 manifesto?
 2 282 Q. Sure.
 3 MR. STALEY: There's a lot of
 4 statements that are identified, Won. Twitter
 5 posts, Stockhouse posts, Defamatory Manifestos.
 6 They were over a long period of time, so you're
 7 going to need to provide some further guidance
 8 as to what time period you're talking about.
 9 BY MR. KIM:
 10 283 Q. I am going to get into more
 11 specific statements.
 12 This isn't a hard question. I'm just
 13 talking generally, Mr. Kassam. Did you ever
 14 talk to Mr. Spektor about when these -- let's
 15 just say negative or defamatory statements
 16 started popping up on the Internet, did you ever
 17 speak to Mr. Spektor?
 18 A. I believe so, yes.
 19 284 Q. And I understand that you have
 20 produced several alleged chat transcripts
 21 between Mr. Doxtator and Mr. Spektor, and
 22 perhaps we can pop these documents up. They are
 23 AAI 511 and AA1 655.
 24 Mr. Kassam, you're familiar with these
 25 alleged transcripts between Mr. Doxtator and

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1 Mr. Spektor?
 2 A. I don't really see a transcript.
 3 285 Q. Here. You're familiar with this
 4 document?
 5 A. I am.
 6 286 Q. Okay. How did you come to
 7 possess these documents?
 8 MR. STALEY: Present them or get them?
 9 BY MR. KIM:
 10 287 Q. How did you get them?
 11 A. I believe I had a conversation
 12 with Alan Spektor when we realized that
 13 Mr. Doxtator was, you know, intimately involved
 14 in the manifesto production and publication.
 15 And I asked him, had he had any conversations
 16 with Robert, and if so, if he could pass on the
 17 conversations.
 18 288 Q. Okay. When you say you realized
 19 that Mr. Doxtator was involved, how did you come
 20 to that realization?
 21 A. Just looking at the information
 22 that presented in the original manifesto. A lot
 23 of it alluded to stuff that, you know, I had
 24 spoken to Robert about or what Robert had
 25 threatened us with, et cetera.

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1 So it was from a deduction basis, you
 2 know, we thought he was involved. As such, we
 3 were trying to triangulate between people he was
 4 speaking to, and we knew based on what was in
 5 the manifesto with Alan Spektor we mentioned
 6 specifically asking Alan to produce these
 7 conversations.
 8 289 Q. Okay. Is it fair to say that you
 9 came to -- you became aware of, or you came to
 10 suspect Mr. Doxtator's alleged involvement in
 11 the -- when did you first realize Mr. Doxtator
 12 was involved with the manifesto?
 13 MR. STALEY: Sorry, hold on, Won. I
 14 think the problem we have here is an issue I've
 15 raised before. There are a number of
 16 manifestoes and then there's a number of other
 17 posts. There's obviously the Betting Bruiser
 18 tweets.
 19 You're asking when did he first know,
 20 what specifically are you referring to that he
 21 first knew of?
 22 BY MR. KIM:
 23 290 Q. Sure, let's break it down.
 24 Mr. Kassam, when did you first begin
 25 to suspect that Mr. Doxtator was spreading

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1 negative information about you, sir?
 2 A. I believe it was well before the
 3 manifesto. You know, he had threatened us and
 4 said information was going to get out there.
 5 And then magically posts started appearing on
 6 Stockhouse and Reddit.
 7 So I'd assumed months prior to this
 8 that he had already been spreading
 9 misinformation and defamatory posts.
 10 291 Q. Now, today are you able to
 11 pinpoint when you first became aware of
 12 Mr. Doxtator spreading negative information
 13 about you, sir?
 14 A. Specifically to the date, no.
 15 292 Q. But fair to say that you became
 16 aware of postings on Reddit and Stockhouse?
 17 A. We became aware, meaning that we
 18 saw them there? Yes.
 19 293 Q. Yes.
 20 Counsel, can I get an undertaking to
 21 identify when Mr. Kassam and/or anyone related
 22 to Anson first became aware of Mr. Doxtator's
 23 alleged spreading of negative information about
 24 either Mr. Kassam and/or Anson entities?
 25 MR. STALEY: The difficulty is that a

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1 lot of stuff that was said, but I think if you
 2 look at the pleading, there's an indication in
 3 the pleading that August 25, 2019, that
 4 Mr. Doxtator began tweeting about Anson Funds
 5 from his Betting Bruiser account, where there
 6 were allegations made about the control of The
 7 Friendly Bear account to manipulate the market.
 8 So I think the sequencing of the event
 9 is pleaded starting with Mr. Doxtator's tweets
 10 through Betting Bruiser.
 11 BY MR. STALEY:
 12 294 Q. Mr. Kassam, you stand by the
 13 dates identified in your fresh as amended
 14 Statement of Claim as being when negative
 15 information about you and Anson entities first
 16 began being circulated on the Internet?
 17 A. I believe so.
 18 295 Q. Now, Mr. Kassam, given the fact
 19 that your investors are sophisticated, do you
 20 think they read Reddit and/or Stockhouse?
 21 A. I don't believe that Stockhouse
 22 and Reddit are limited to people who are
 23 unsophisticated.
 24 296 Q. Okay. But my question is: Do
 25 you think your sophisticated investors, do you

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1 think they pay any attention to what's posted on
 2 Reddit and/or Stockhouse?
 3 A. I think my sophisticated and
 4 unsophisticated investors both pay attention to
 5 what is going on with any of their investments
 6 and the managers associated with them.
 7 297 Q. Fair enough. But who are your
 8 unsophisticated investors?
 9 A. I believe you said sophisticated
 10 based on someone having \$250,000. But, you
 11 know, the notion of sophistication is so
 12 subjective and I don't believe that -- you know,
 13 I understand the regulators deem someone to be
 14 accredited to be sophisticated.
 15 But sophisticated, you know, from an
 16 investment understanding, is very different
 17 than, you know, someone just being rich and
 18 being able to understand the difference between
 19 what is real information or not, right?
 20 Because you go right down the rabbit
 21 hole of fake news and everything else under the
 22 sun.
 23 298 Q. I understand. You know what, I
 24 agree with you. I think that's a fair comment.
 25 But in terms of in your experience, do

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1 sophisticated and high net worth investors, are
 2 they on Stockhouse? Are they reading comments
 3 on Stockhouse? Do they get their information
 4 from Stockhouse?
 5 A. I don't believe people get their
 6 information from Stockhouse, but, you know, time
 7 and time again you'll find something that ends
 8 up on Stockhouse or Reddit or in any other
 9 medium, it will get sent to someone who is
 10 sophisticated or who may not have the time to
 11 read it, and then suddenly it's on their desk,
 12 and because they know the name of the fund or
 13 the individual associated, they pay attention.
 14 And then, you know, they draw
 15 conclusions and inferences for whatever reason.
 16 299 Q. Do you think high net worth
 17 individuals and institutional funds make
 18 investment decisions based on postings on
 19 Stockhouse and/or Reddit?
 20 A. I believe that would be one of a
 21 number of, you know, variables that they would
 22 consider, whether to make or not make or invest
 23 more or divest. And it would be a part of their
 24 decision-making process.
 25 People look at what information is out

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1 there, not only in the most reputable sources,
 2 but any sources.
 3 300 Q. Okay. Well, is Stockhouse and/or
 4 Reddit a reputable source of information that an
 5 investor would rely upon?
 6 A. Again, the problem is, you know,
 7 there are many people who are sophisticated that
 8 post on Reddit, and there's a whole bunch that
 9 are not, right?
 10 So it's very hard to generalize saying
 11 that everything on Reddit is false or misleading
 12 or uninformed people.
 13 301 Q. Mr. Kassam, you would agree with
 14 me that Reddit and/or Stockhouse, it's not a
 15 curated forum; right? It's not moderated?
 16 A. I believe there is some form of
 17 moderation where people can delete it within
 18 their own threads. But, generally speaking,
 19 people can post whatever they want.
 20 302 Q. For example, it's a gossip site?
 21 They trade rumours?
 22 A. No. Again, there's Ph.D.'s and
 23 very sophisticated people who post on Reddit
 24 because that's where a lot of eyeballs are.
 25 It's not just a function of people just posting

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1 rumours.
 2 303 Q. But it's a free forum; right?
 3 You can post anything you want to basically;
 4 right?
 5 A. I believe so.
 6 304 Q. Now, Mr. Kassam, have you ever
 7 met Mr. James Stafford?
 8 A. I don't believe so, no.
 9 305 Q. When did you first hear
 10 Mr. Stafford's name?
 11 A. I believe it was during the
 12 cannabis raise in Canada and, you know, him
 13 owning a website called OilPrice.com.
 14 306 Q. When was that, sir?
 15 A. Maybe 2017-2018.
 16 307 Q. And did you think anything of it?
 17 A. Think anything of what?
 18 308 Q. Sorry, what's the tie between
 19 cannabis and OilPrice.com?
 20 A. I believe it was our
 21 understanding that a lot of or a bunch of some
 22 cannabis companies were using, doing promotion
 23 and advertising through OilPrice.com.
 24 309 Q. Sorry, maybe you can help me out.
 25 What does OilPrice.com have to do with cannabis?

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1 A. OilPrice.com is a website where,
 2 you know, there's a bunch of information and
 3 articles, et cetera.
 4 But the main competitive advantage of
 5 OilPrice.com from my understanding is because
 6 the name is OilPrice, when someone types in
 7 "OilPrice" on a search engine, you know, from a
 8 search engine optimization perspective, it comes
 9 right to the top of the list.
 10 And the people are looking to
 11 understand stuff around OilPrice generally would
 12 have a strong correlation to investing in the
 13 stock market as well, and the people who
 14 generally type and are looking for information
 15 online are looking for more retail-oriented
 16 traffic names.
 17 And, as such, you know, the business
 18 model is that if someone were to advertise on
 19 OilPrice.com, the person reading or clicking on
 20 OilPrice.com would have a propensity to invest
 21 in those same names.
 22 310 Q. Okay. But I still don't
 23 understand the correlation between OilPrice, oil
 24 and/or OilPrice and cannabis?
 25 A. People who speculate on oil or

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1 people who are looking at the OilPrice are
 2 generally looking at whatever is hot in the
 3 market at the time. It's not like a person, an
 4 academic, who is typing in OilPrice. It's
 5 generally someone who is looking at the stock
 6 market.
 7 People who are looking at the stock
 8 market are looking generally at what is the
 9 industry that is most en vogue; at the time, it
 10 was cannabis.
 11 So you'll find, you know, a lot of
 12 cannabis companies advertising through different
 13 forms and mediums because of the investor
 14 exuberance, and one site people were using was
 15 OilPrice.com.
 16 311 Q. And, Mr. Kassam, do you know
 17 Andrew Rudensky?
 18 A. Yes, I believe so.
 19 312 Q. Have you ever met him?
 20 A. I believe so.
 21 313 Q. And how do you know Mr. Rudensky?
 22 A. I believe I first knew Andrew
 23 Rudensky when he was at GMP. I believe he was
 24 affiliated with one of the investment advisor
 25 groups there.

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1 314 Q. And did he work on any of your
 2 deals?
 3 A. I don't know what you mean by
 4 "deals".
 5 315 Q. Did you ever work with
 6 Mr. Rudensky on any transactions?
 7 A. I don't believe we work together
 8 when he was at GMP. We may have had
 9 conversations when he went over to Delavaco.
 10 Delavaco, sorry.
 11 316 Q. What is Delavaco?
 12 A. Delavaco is the investment shop
 13 run by Andy DeFrancesco.
 14 317 Q. Now, can you tell me, did you do
 15 any business with Delavaco?
 16 A. We did business with -- we've
 17 done some deals historically with Andy
 18 DeFrancesco. I'm not sure if it was through
 19 Delavaco. He had a number of different entities
 20 he worked through.
 21 318 Q. Now, did you ever do any
 22 transactions, was Mr. Rudensky involved in any
 23 transaction with you and/or Anson entities while
 24 he was at Delavaco?
 25 A. I don't know specifically.

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1 319 Q. Do you know if --
 2 Counsel, to the extent that there was
 3 any transaction in which Mr. Kassam and/or Anson
 4 entities did with Mr. Rudensky at Delavaco, can
 5 you let us know and produce the details?
 6 MR. STALEY: How is that relevant,
 7 Won?
 8 BY MR. KIM:
 9 320 Q. We need to know what the --
 10 there's an allegation of conspiracy, Mr. Staley.
 11 We want to know what -- we are going to be
 12 exploring what the animus that Mr. Rudensky may
 13 have to join an alleged conspiracy against the
 14 plaintiffs?
 15 U/A MR. STALEY: I'm not sure it's
 16 relevant. We'll take that under advisement.
 17 BY MR. KIM:
 18 321 Q. Thank you.
 19 Now, Mr. Kassam, do you know of any
 20 reason why Mr. Rudensky would engage in
 21 activities against you and/or Anson entities?
 22 A. I believe the relationship with
 23 his firm and ours have soured over the years,
 24 and as such, you know, the firm wasn't really
 25 friendly towards us at the time.

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1 322 Q. Are you talking about
 2 Mr. Rudensky or Delavaco?
 3 A. Well, I'm saying he worked at
 4 Delavaco, and the Delavaco/Anson relationship
 5 had sort of soured at that point. So that could
 6 give him the reason that you're looking for.
 7 323 Q. Maybe, counsel, can I get an
 8 undertaking as to particulars of how and why the
 9 relationship between Delavaco and/or
 10 Mr. Rudensky soured with Mr. Kassam and/or other
 11 members of the plaintiffs?
 12 MR. STALEY: Why don't you just ask
 13 the question?
 14 BY MR. KIM:
 15 324 Q. I'm asking.
 16 MR. STALEY: Why is that an
 17 undertaking?
 18 BY MR. KIM:
 19 325 Q. Mr. Kassam, why do you think your
 20 relationship soured with Mr. Rudensky and/or
 21 Delavaco?
 22 A. I believe multiple fronts, you
 23 know. As the cannabis craze kept going, you
 24 know, we were known to be one with more active
 25 on the short side. And that sort of was against

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1 the strategy of what, you know, Delavaco
 2 effectively morphed or was affiliated with a
 3 large, public company called SOL Global, which
 4 was effectively a cannabis holding company that
 5 Andy DeFrancesco, the head of Delavaco, was also
 6 the head of SOL Global.
 7 And we were an investor in SOL Global,
 8 the public entity, and we were a filer, a large
 9 holder of that vehicle. And as we realized the
 10 shenanigans that we're going on within the
 11 company and its affiliates and rolling in
 12 assets, et cetera, we decided that it wasn't a
 13 good investment and divested of our piece of our
 14 entire investment in SOL Global, which soured
 15 the relationship.
 16 And then the second point is there was
 17 a short report that came out on Aphria which
 18 Andy DeFrancesco was very, you know, involved
 19 with and, you know, used it as part of his brand
 20 that he was one of the founders. And after that
 21 research report came out, it sort of took the
 22 shine off of Aphria but also took the shine off
 23 Andy himself.
 24 326 Q. So is it fair to say that you
 25 were long on SOL Global and/or Aphria? And when

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1 I say "you", the Anson Group.
 2 A. Again, what period of time are
 3 you referring to?
 4 327 Q. Were you ever -- did you have a
 5 position in SOL Global and/or Aphria?
 6 A. Yes. At one point we were long
 7 SOL Global and we were also long Aphria.
 8 328 Q. What was your position? Were
 9 you -- can I ask you what percentage of SOL
 10 Global and/or Aphria? Were you above
 11 10 per cent?
 12 A. We were about 10 per cent in
 13 SOL Global. I believe we were 15 to 17 per cent
 14 at one point.
 15 329 Q. And did you have seats on the
 16 Board?
 17 A. We did not.
 18 330 Q. Now, can you tell me, do you
 19 recall around what date your relationship with
 20 SOL Global and/or Aphria turned? When did you
 21 start going short?
 22 A. I don't believe we ever shorted
 23 SOL Global. On Aphria, our contention was that
 24 the industry as a whole had sort of gone beyond
 25 what we believed was a reasonable valuation, and

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1 as such, we sold our long position.
 2 And eventually, after some time, we
 3 wanted to be short the sector, and Aphria was
 4 one of the largest component. So we were short
 5 all of the large components, the large liquid
 6 public cannabis companies.
 7 331 Q. Now, can you tell me, how many
 8 cannabis companies were you long on, other than
 9 Aphria?
 10 A. Dozens of them. You know, we
 11 were very involved in the sector for a very long
 12 time. So, you know, given it was a 4- or
 13 5-year-period, you know, we were long a whole
 14 bunch of, a whole array of companies.
 15 332 Q. Counsel, I want an undertaking
 16 for the plaintiffs to identify the companies
 17 that Anson Group was long on in the cannabis
 18 space?
 19 R/F MR. STALEY: Yeah, it's not clear to
 20 me, Won, why their long positions in the
 21 cannabis sector are relevant to anything that's
 22 pleaded here.
 23 You can treat that as a refusal.
 24 BY MR. KIM:
 25 333 Q. Your client has clearly advised

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1 that at one time Anson Group and the plaintiffs
 2 were long on cannabis companies, and then
 3 suddenly they had a change in strategy to short
 4 these companies.
 5 So you can refuse that question.
 6 MR. STALEY: Yes, I refuse. To me
 7 that -- the fact that he gave that answer
 8 doesn't mean that it's relevant to anything or
 9 that asking for details of his position is
 10 something I should be doing.
 11 BY MR. KIM:
 12 334 Q. Mr. Kassam, can you tell me,
 13 other than working at Delavaco, why would
 14 Mr. Rudensky have an animus against you and
 15 other plaintiffs?
 16 A. Other than working -- that's the
 17 main point. He worked at the entity that we
 18 sort of had an acrimonious relationship with.
 19 335 Q. Okay. Why wouldn't
 20 Mr. DeFrancesco and/or Delavaco be named as a
 21 defendant?
 22 MR. STALEY: Well, you're asking
 23 questions that may go to matters of
 24 lawyer-client privilege in terms of why some
 25 defendants were named or not named.

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1 They' are obviously some various Does
 2 in the title of proceeding. I'm not sure it's
 3 proper to ask why you've chosen not to name
 4 people or entities who you may believe were also
 5 responsible, at least not having it named them
 6 yet.
 7 BY MR. KIM:
 8 336 Q. To the extent of your knowledge,
 9 did Mr. Rudensky, was he a principal of
 10 Delavaco? Did he have equity shares?
 11 A. I don't know.
 12 337 Q. Okay. Do you know what his role
 13 at Delavaco what?
 14 A. I don't know. You know, it's a
 15 small shop, so there weren't that many people.
 16 They were very involved with all their doings.
 17 338 Q. So other than his posting at
 18 Delavaco, is there any other reason why
 19 Mr. Rudensky would be acting against you and
 20 other plaintiffs?
 21 A. Again, I don't understand the
 22 question. Like, he's at the company, and the
 23 company has a problem with us. That's the main
 24 reason. What other reason could there be?
 25 339 Q. Well, given the fact that --

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1 would you agree with me, it's a reasonable
 2 proposition that you have shorted multiple
 3 companies?
 4 A. In my history?
 5 340 Q. Yes.
 6 A. Yes, that's fine.
 7 341 Q. And would individual members of
 8 those companies, would they have a reason to act
 9 against you?
 10 A. Generally speaking, you know,
 11 most -- sorry.
 12 MR. STALEY: No, go ahead.
 13 THE WITNESS: Generally speaking, most
 14 companies, you know, if you went to short
 15 Microsoft or Apple, they really wouldn't care if
 16 you shorted the company. And the people within
 17 those companies realize that the stock market
 18 will have long players, they'll have short
 19 players, and they realize the efficiency in the
 20 market will win out over time.
 21 When you start to delve in this retail
 22 world of, you know, companies that are acting a
 23 little more untoward, using stock promotion or
 24 trying to obfuscate what's really going on,
 25 those are the people that have a problem with

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1 short sellers.
 2 BY MR. KIM:
 3 342 Q. So what makes Mr. Rudensky
 4 special? Why do you say -- why is he different
 5 from other people?
 6 MR. STALEY: Wait a minute. I'm not
 7 following the question. Are you asking about
 8 special needs or what are you talking about
 9 here?
 10 You're asking three or four times why
 11 Mr. Rudensky may have animus, and the witness's
 12 answer every time is that he was involved in an
 13 entity which is on the other side of some
 14 shorting that was done by Anson.
 15 Is there anything more you're
 16 expecting beyond that that you keep asking
 17 about?
 18 BY MR. KIM:
 19 343 Q. Well, your client just said --
 20 Mark, why was Mr. Rudensky named as a defendant?
 21 MR. STALEY: Are you asking
 22 Mr. Rudensky -- you know, the reason the -- the
 23 facts on which the claim is made against him are
 24 set out in the fresh as amended Statement of
 25 Claim. Presumably it's on the basis of those

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1 facts that he was named.
 2 If you're asking what the litigation
 3 strategies are that result in some parties being
 4 named and not others, at least as of this point,
 5 I think that's privileged.
 6 BY MR. KIM:
 7 344 Q. That's not my question.
 8 Mr. Kassam, why is Mr. Rudensky named
 9 in the Statement of Claim and not Delavaco
 10 and/or Mr. DeFrancesco?
 11 R/F MR. STALEY: That's not a proper
 12 question and I've already told you that.
 13 BY MR. KIM:
 14 345 Q. Now, Mr. Kassam, to the best of
 15 your knowledge, does Mr. Rudensky have a
 16 relationship with Robert Lee Doxtator, James
 17 Stafford, and/or Jacob Doxtator?
 18 A. I believe he does.
 19 346 Q. And what do you say is the
 20 relationship?
 21 A. They are co-conspirators in the
 22 act to defame and bring down my business.
 23 347 Q. Okay. And how do you say they
 24 conspired?
 25 A. I believe it's in the pleading.

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1 348 Q. Do you know in fact whether they
 2 have any ties?
 3 A. I don't understand the question.
 4 349 Q. How is Andrew Rudensky, Robert
 5 Lee Doxtator, James Stafford, and Jacob
 6 Doxtator, how do you know they are connected?
 7 MR. STALEY: Won, the fresh as amended
 8 Statement of Claim sets out the material facts
 9 on which the plaintiff relies, including the
 10 facts that link them in various ways.
 11 And so if you want to witness to take
 12 you through all elements of the claim and
 13 explain that to you or you can just read it?
 14 BY MR. KIM:
 15 350 Q. Well, do you have any
 16 information, Mr. Kassam, that sets out whether
 17 they were, in fact, in touch with each other?
 18 MR. STALEY: Well, again, the
 19 Statement of Claim sets of various ways in which
 20 people were alleged to be in touch with each
 21 other and the basis for that. And there's also
 22 been productions that support elements of the
 23 Statement of Claim.
 24 I do think, Won, you're going to have
 25 to ask him more specific questions than just

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1 basically -- you're asking him to comment over
 2 the entirety of a pleading that's about
 3 200 pages and to give you a general answer to
 4 it, and there's no way to do that efficiently.
 5 BY MR. KIM:
 6 351 Q. Well, other than the facts that
 7 you have pleaded in the fresh as amended
 8 Statement of Claim, Mr. Kassam, are you aware of
 9 any information which ties Mr. Stafford,
 10 Mr. Doxtator, Mr. Rudensky, and Jacob Doxtator?
 11 MR. STALEY: That's not a proper
 12 question, Won. I mean, the claim is based on,
 13 set out in the pleading and there's been
 14 productions to support it. You're trying to
 15 sort of ask a general question in the air that I
 16 don't think is proper.
 17 BY MR. KIM:
 18 352 Q. I'll take that -- I'll stand the
 19 refusal.
 20 R/F MR. STALEY: It's definitely a
 21 refusal. You can take it as that.
 22 BY MR. KIM:
 23 353 Q. Now, if we can move on to
 24 Mr. Doxtator, how did you become acquainted with
 25 Mr. Doxtator?

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1 A. I believe I was introduced
2 through Alan Spektor.
3 354 Q. Okay. And how did Mr. Spektor
4 come to acquaintance with Mr. Doxtator?
5 A. I believe Alan Spektor was very
6 active on Twitter and noticed Mr. Doxtator's
7 Twitter posting a lot of stuff about cannabis
8 during that specific cannabis craze.
9 355 Q. And this would be about August
10 2018?
11 A. I believe so.
12 356 Q. Now, did Mr. Spektor -- how did
13 Mr. Spektor introduce Mr. Doxtator to you?
14 A. I believe he had a call with me
15 to give the background on Robert Doxtator saying
16 that he is an interesting source in the cannabis
17 field and asked if I'd like to be introduced,
18 and I said feel free to introduce me via email.
19 357 Q. Can you tell me, what was the
20 interesting part of Mr. Robert Lee Doxtator?
21 A. I believe I'm talking to Alan's
22 mind. You'd have to check with him.
23 358 Q. Okay. But you took Mr. Spektor's
24 word that he had some specialized knowledge?
25 A. That he was actively involved in

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1 the cannabis industry.
2 359 Q. Okay.
3 A. And chatting about it.
4 360 Q. Okay. And do you know any of the
5 particulars? How was he actively involved?
6 A. I believe if you look at his
7 Twitter, which is probably what I did at the
8 time, and you can see he was actively talking
9 about grow-ops and people affiliated with the
10 industry and opinions on companies that were
11 good and opinions on companies that were bad.
12 361 Q. So you became convinced that
13 Mr. Doxtator possessed some sort of specialized
14 knowledge about the cannabis sector?
15 A. I believe so.
16 362 Q. Did you reach out to
17 Mr. Doxtator, or, with the introduction, he
18 reached out to you?
19 A. I believe Alan introduced me to
20 Mr. Doxtator and I told Mr. Doxtator to give me
21 a call.
22 363 Q. And did he give you a call?
23 A. I believe so.
24 364 Q. Did you communicate through
25 email? WhatsApp? Signal? Telegram? How did

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1 you communicate with him?
2 A. I believe we were on email
3 originally and then we sort of evolved to
4 WhatsApp.
5 365 Q. Now, it is Mr. Doxtator's
6 evidence that you communicated with him also on
7 Signal; is that correct?
8 A. I don't believe so.
9 366 Q. And you've produced all of the
10 communication between you and Mr. Doxtator via
11 email, WhatsApp, Signal, or Telegram?
12 A. I believe so.
13 367 Q. Were there any messages that were
14 either -- are claiming privilege or are you
15 claiming that any of the messages between you
16 and Mr. Doxtator, are they lost?
17 MR. STALEY: There's certainly no
18 privilege that he knows. I think the witness
19 has said he's produced all of the communication
20 of which he's aware. Which is more than your
21 client has done.
22 BY MR. KIM:
23 368 Q. Mr. Staley, we're talking about
24 Mr. Kassam today.
25 Mr. Kassam, to the best of your

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1 knowledge, are there any electronic
2 communications between you and Doxtator that
3 have not been produced for any reason?
4 A. No.
5 MR. STALEY: Sorry, what was the last
6 point you said?
7 BY MR. KIM:
8 369 Q. No, he said he's not aware of any
9 electronic form of communication with
10 Mr. Doxtator.
11 Mr. Kassam, on July 6, 2019, you
12 exchanged what WhatsApp messages with
13 Mr. Doxtator regarding CannTrust, and the chats
14 you produced from July 6 to July 22nd, 2022.
15 Did you speak to Mr. Doxtator between
16 these dates?
17 MR. STALEY: If you're going to refer
18 to documents, can you pull them up and let the
19 witness see them just so he has that context?
20 BY MR. STALEY:
21 370 Q. Sure. The document is
22 AA 00010536.
23 MR. STALEY: Okay. Well, that's the
24 first page. The concern I have, Won, is that
25 the text you're referring to may have content

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1 that speaks to what happened up to that date,
 2 and the witness should see it if you're trying
 3 to use that to contextualize what may have been
 4 shared.
 5 BY MR. KIM:
 6 371 Q. Sure.
 7 Now, Mr. Kassam, you see this
 8 document, you first start -- you exchange
 9 WhatsApp messages with Mr. Doxtator regarding
 10 CannTrust on July 6.
 11 Is this the entirety of the
 12 communication?
 13 A. I believe so.
 14 372 Q. Okay. There's nothing missing?
 15 A. I don't believe so.
 16 373 Q. Mr. Kassam, are there any -- did
 17 you talk to Mr. Doxtator over the phone during
 18 this time?
 19 A. I don't know.
 20 374 Q. Now, Mr. Kassam, how often would
 21 Mr. Doxtator visit you at your offices between
 22 2018 and 2020?
 23 A. I think he visited us twice.
 24 375 Q. In person. And how often were
 25 you in touch with Mr. Doxtator?

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1 A. You know, when he had a new idea
 2 or information, generally all the conversation
 3 happened via WhatsApp.
 4 376 Q. Now, Mr. Kassam, what was your
 5 assessment of Mr. Doxtator? Did he have
 6 important information about the cannabis
 7 industry?
 8 A. I believe that, you know, my
 9 personal opinion was that he was very in the
 10 weeds, no pun intended. So he was very, you
 11 know, around the industry, the people, the
 12 companies, et cetera, that he was sort of living
 13 and breathing the field so, you know, he could
 14 bring, you know, that specific skill set to our
 15 diligence process.
 16 377 Q. Did you ever ask Mr. Doxtator to
 17 seek out insider information on various cannabis
 18 companies?
 19 A. As previously mentioned, you
 20 know, we are bound by both the OSC and SEC
 21 regulation and would never ask for anything
 22 outside of what is publicly available.
 23 378 Q. And so you never asked
 24 Mr. Doxtator to provide any nonpublic
 25 information?

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1 MR. STALEY: Again, if we're using the
 2 same definition we used before, material
 3 nonpublic information from a securities law
 4 perspective, I just want to make sure we're
 5 talking about the same thing here, Won.
 6 BY MR. KIM:
 7 379 Q. Sure.
 8 Did you ever ask Mr. Doxtator to
 9 provide any material nonpublic information about
 10 cannabis --
 11 A. I never asked him to produce any
 12 illegal information.
 13 380 Q. Now, then, what kind of
 14 information would Mr. Doxtator have other than,
 15 to quote you, "in the weeds", what did he have?
 16 Was he a specialist? Was the value of this
 17 information to you and the Anson Group?
 18 A. Again, because we were in a very
 19 specific time of crazy euphoria and new
 20 companies being formed overnight, we couldn't be
 21 everywhere at the same time.
 22 And, you know, he would have the
 23 ability to understand the company, go visit
 24 their facilities, you know, understand what they
 25 were saying versus what they were doing, because

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1 everyone was crawling up from every rock saying
 2 they had a new cannabis company.
 3 So with us it seemed he had sound
 4 judgement when it came to understanding what was
 5 real and what was not, and as such, you know, we
 6 felt that he could provide information on
 7 companies.
 8 You know, we were very up to speed on
 9 some of the larger companies, but the idea was
 10 that some of the companies we just didn't have
 11 the bandwidth for. So he would be able to go
 12 and look at those.
 13 381 Q. Do you know how Mr. Doxtator
 14 gained access to other cannabis companies?
 15 A. What do you mean by "gained
 16 access"?
 17 382 Q. Well, you just said he has access
 18 to facilities and different companies. How
 19 would Mr. Doxtator gain access to companies in
 20 the cannabis space?
 21 A. Well, generally speaking when
 22 you're running a public company, you know, you
 23 have to open up your facilities to investor
 24 tours and site visits, et cetera.
 25 So, you know, he would be able to hop

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1 on any of those site tours or analyst days when
 2 people would go out and meet companies or
 3 participate in a Q&As on calls or have
 4 conversations with people at the companies,
 5 et cetera.
 6 383 Q. Okay. And would he do that in
 7 his personal capacity as Robert Lee Doxtator or
 8 as an emissary from a corporate entity?
 9 A. You would have to ask him.
 10 384 Q. Okay. But you became convinced
 11 that Mr. Doxtator gained access to different
 12 cannabis companies?
 13 A. Again, I said he didn't
 14 necessarily gain access, but for us, we didn't
 15 have the bandwidth to look at all the bigger
 16 companies, medium companies, small companies.
 17 So, you know, we focused on what was
 18 the most scalable stuff for us, and we would
 19 look to industry experts or people who were more
 20 focused on the smaller companies, which
 21 Mr. Doxtator was one of them.
 22 385 Q. And did you direct Mr. Doxtator
 23 to pursue certain companies or did you -- was
 24 the initiative provided by Mr. Doxtator
 25 regarding certain companies?

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1 A. Sorry, could you repeat the
 2 question?
 3 386 Q. How was the information -- did
 4 you direct Mr. Doxtator to investigate certain
 5 companies or was that Mr. Doxtator providing
 6 information of a certain company out of his own
 7 initiative?
 8 A. I believe it was a combination of
 9 the two. You know, at the times, we would hear
 10 about a particular company or see a particular
 11 stock price move, and I would ask him, Hey, do
 12 you know anything about this situation? Or,
 13 maybe it's time to do some work.
 14 At times he would come to me with an
 15 idea that he already had.
 16 387 Q. Now, what was the arrangement
 17 that you had with Mr. Doxtator, what was the
 18 terms of his engagement?
 19 A. I believe, you know, the problem
 20 was he wanted to work on a retainer basis where
 21 we would pay him a fixed dollar amount per
 22 month. And we were more interested in, you
 23 know, a specific relationship on individual
 24 projects.
 25 And, you know, as such, we never

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1 properly got that formal arrangement done
 2 because he wanted X and we wanted Y. So it sort
 3 of just morphed into an ad hoc relationship
 4 where we were paying a success fee based on
 5 outcome.
 6 388 Q. Now, when you talk about an
 7 ad hoc arrangement, was it based on individual
 8 companies?
 9 A. Yeah. I mean, specific. Like,
 10 you know, specific to each subject.
 11 389 Q. So was this agreement ever
 12 written down?
 13 A. I believe we had sent an
 14 engagement letter of what the relationship would
 15 look like and he never signed back. So it
 16 morphed into effectively an oral agreement.
 17 390 Q. Okay. In terms of your written
 18 retainer, have you produced that?
 19 A. I'm not sure.
 20 391 Q. Counsel, I'd like for you to
 21 undertake to produce any draft retainer
 22 agreements between the plaintiffs and Mr. Robert
 23 Lee Doxtator?
 24 U/A MR. STALEY: I'll take that under
 25 advisement.

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1 BY MR. KIM:
 2 392 Q. Now, Mr. Kassam, in terms of --
 3 so is it your position today that you had some
 4 sort of an ad hoc arrangement with Mr. Doxtator?
 5 A. We had an understanding on
 6 working together; correct.
 7 393 Q. What is the understanding?
 8 A. That he would either come with
 9 ideas that we potentially, you know, if we liked
 10 we could potentially pay him a success fee
 11 associated with the name. Or if we wanted him
 12 to go about doing diligence on a specific
 13 company industry theory, that he would go and do
 14 it, and again, success, pay him a research fee
 15 associated with the work.
 16 394 Q. Did Mr. Doxtator know your
 17 particular requirements?
 18 A. What?
 19 395 Q. Well, for example, did you spell
 20 out what exactly was the type of information
 21 that you would be seeking from Mr. Doxtator?
 22 MR. STALEY: At what point in time?
 23 There are obviously a lot of exchanges in a
 24 number of different entities that Mr. Doxtator
 25 was involved in.

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1 BY MR. KIM:
2 396 Q. Well, from the time that
3 Mr. Doxtator did not sign the proffered written
4 agreement, it's your client's evidence that he
5 entered into a series of ad hoc arrangements.
6 Mr. Kassam, did you ever impose on
7 Mr. Doxtator what kind of information you were
8 looking for?
9 A. I believe I gave him an idea of
10 it. It really depended on the situation, like
11 what specific task we were looking at.
12 So, you know, it was generally
13 specific to that particular concept or idea or
14 theory at the time. So it varied.
15 397 Q. Okay. How many engagements on an
16 ad hoc basis did you retain Mr. Doxtator on?
17 MR. STALEY: I'm just concerned,
18 you're talking about engagements and retainer,
19 and those are all loaded words.
20 I think Mr. Kassam has described the
21 nature of arrangement that was there, and I'm
22 just not sure what you're asking him to do or to
23 answer beyond that.
24 BY MR. KIM:
25 398 Q. Given the fact that there was no

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1 written retainer, your client has advised it's
2 his understanding that Mr. Doxtator was retained
3 on an ad hoc basis.
4 I'm asking how many ad hoc assignments
5 he engaged Mr. Doxtator.
6 MR. STALEY: Why don't you ask him
7 what the nature of the arrangement was. I think
8 that would then inform the question that I think
9 you're trying to put to him.
10 Won, we can't hear you if you're
11 talking. We've lost you.
12 -- OFF-THE-RECORD DISCUSSION --
13 BY MR. STALEY:
14 399 Q. Now, Mr. Kassam, you advised that
15 you entered into an arrangement with
16 Mr. Doxtator using a success fee?
17 A. We would pay a research fee
18 associated which, you know, would be, if we were
19 able to -- you know, if we liked the information
20 and we used it towards our eventual thesis and
21 eventually traded a security, we would in fact
22 pay him based on that.
23 400 Q. So it would be contingent then?
24 A. Yeah, it was subject to the
25 variables that I just set out.

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1 401 Q. Okay. So what outcome would
2 entitle Mr. Doxtator to a success fee?
3 A. I just mentioned that. You know,
4 if we liked the information, used it toward our
5 own diligence, if we then traded upon, you know,
6 that particular name and that diligence, you
7 know, was a good contributor of the overall
8 thesis and we made money on the associated name,
9 we would pay him.
10 402 Q. So did Mr. Doxtator understand
11 the terms of his engagement?
12 A. Initially I thought he did, but
13 looking back at a lot of our correspondence, it
14 seemed that he, you know, did whatever suited
15 him best at the time.
16 403 Q. So it's -- as you know,
17 Mr. Doxtator has a position that his
18 compensation depended on the amount of money
19 that Anson made on the information that he
20 provided. Would you agree with that? That was
21 his understanding?
22 A. I don't believe so.
23 404 Q. Okay. So did you ever enter into
24 an agreement with Mr. Doxtator where his success
25 fee depended on how much money Anson made from

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1 using his information?
2 A. I believe we did that on one
3 occasion with General Electric.
4 405 Q. What about the other tickers?
5 A. I believe those were all
6 subjective. It was sort of, you know, depending
7 on the outcome, et cetera. Like you'd see
8 historically we paid him for stuff that didn't
9 involve a process, right. So it wasn't
10 formulaic as suggested.
11 406 Q. So, counsel, I would like an
12 undertaking on Mr. Kassam and/or Anson setting
13 out all of the ad hoc terms for the deals -- for
14 projects that they retained Mr. Doxtator on?
15 U/A MR. STALEY: We'll take that under
16 advisement.
17 BY MR. KIM:
18 407 Q. Mr. Kassam, how much money have
19 you ultimately paid Mr. Doxtator?
20 A. I don't know the specific amount.
21 408 Q. Counsel, I would like an
22 undertaking for an accounting of how much money
23 that Anson?
24 U/T MR. STALEY: We will advise you of the
25 dollar amount that was paid.

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1 BY MR. KIM:
 2 409 Q. Now, Mr. Kassam, you understand
 3 that Mr. Doxtator's position in this litigation
 4 is that you have breached your understanding
 5 and/or deal with Mr. Doxtator that he had a
 6 contingent interest on your profits on certain
 7 stocks that he provided information on; you
 8 understand that?
 9 MR. STALEY: What specifically are you
 10 saying there, Won? Which ones are you saying he
 11 had an interest in?
 12 BY MR. KIM:
 13 410 Q. I'm just asking a general
 14 question, Rob. I'll get into the specific
 15 tickers.
 16 MR. STALEY: Yeah, but I don't think
 17 the witness can answer the question as it's been
 18 framed. You need to tell us what specifically
 19 you say the deal is and the witness will respond
 20 to it.
 21 BY MR. KIM:
 22 411 Q. Now, Mr. Kassam, did Mr. Doxtator
 23 provide you information, research on CannTrust?
 24 A. I believe he had a thesis on
 25 CannTrust, about the facility being shut down.

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1 412 Q. And did you use that information?
 2 A. You know, we wanted to use the
 3 information and it would have resulted in a
 4 successful outcome. Unfortunately, that
 5 happened over a weekend, and then by Monday
 6 morning the company press released that the
 7 facility was, in fact, shut down.
 8 413 Q. So you did not use his
 9 information and subsequently you did not pay
 10 Mr. Doxtator a fee for his research on
 11 CannTrust?
 12 A. I'm not sure how it ended up
 13 working out with the payment to him. I believe
 14 we made a payment, something in regards to him
 15 and CannTrust, but I'm not actually sure
 16 specifically.
 17 414 Q. Counsel, that would be part of
 18 your undertaking?
 19 MR. STALEY: Yes, it would.
 20 BY MR. STALEY:
 21 415 Q. What about GE, Mr. Kassam?
 22 A. I believe we had an arrangement
 23 on GE and we wanted to pay him his share of what
 24 was owed, but he refused to take the money.
 25 416 Q. Can you tell me, what were the

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1 terms, Mr. Kassam, for GE?
 2 A. I don't remember.
 3 417 Q. Counsel, I'd like an undertaking
 4 on what the plaintiffs say is the terms of
 5 engagement for GE, Hexyl, Aphria, GE, TGLD, and
 6 Chronnos?
 7 U/T U/A MR. STALEY: I'll give you one on GE.
 8 I'll take the rest under advisement.
 9 BY MR. KIM:
 10 418 Q. Specifically, the undertaking
 11 that I am asking for is what were the terms the
 12 plaintiffs say were the engagement for
 13 Mr. Doxtator between Mr. Doxtator and the Anson
 14 entities for all of these tickers and whether
 15 the information provided by Mr. Doxtator was
 16 used, and we want whether Mr. Doxtator was paid
 17 for his research?
 18 U/A MR. STALEY: We'll take that under
 19 advisement.
 20 BY MR. KIM:
 21 419 Q. Now, Mr. Kassam, once
 22 Mr. Doxtator provided you with your research,
 23 did you consider that property, were there any
 24 conditions attached to your use of that
 25 information?

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1 A. Sorry, what specific arrangement
 2 are you referring to?
 3 420 Q. For example, if Mr. Doxtator
 4 provided you with research on GE, was that
 5 information for you to -- was it proprietary to
 6 you, or did you have the ability to distribute
 7 that information to other people and their firms
 8 that you were working with?
 9 A. I believe that the information is
 10 ours and we are free to do what we want with it.
 11 421 Q. Okay. Would that be the same
 12 for, once again, CannTrust, GE, Hexyl, Aphria,
 13 TGLD and Chronnos?
 14 A. As per previously stated,
 15 information that was provided to us from Robert
 16 Doxtator was ours to do what we want with it.
 17 422 Q. Okay. What about if you didn't
 18 pay him for it; is it still your information?
 19 MR. STALEY: Sorry, are you speaking
 20 hypothetically or is there a specific context to
 21 this?
 22 BY MR. KIM:
 23 423 Q. Mr. Kassam has provided evidence
 24 that the compensation for Mr. Doxtator was
 25 contingent on whether it was useful or not.

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1 You agree with that? Is that a fair
 2 summary, Mr. Kassam? His compensation depended
 3 on whether you found it useful or not?
 4 A. Again, it depended on the
 5 specific occurrence; right? So in General
 6 Electric, we had an agreement. Even if I didn't
 7 find it useful but still proceeded with the
 8 transaction, he would have been paid regardless.
 9 So it's really specific to the situation.
 10 424 Q. So, see, what I'm trying to
 11 understand is given the fact that you have
 12 advised that his compensation is contingent on
 13 whether you found it useful or not, how do you
 14 reconcile that with your position that once the
 15 information, you were in receipt of the
 16 information, it was yours to do as you see fit?
 17 A. Again, the idea is if the
 18 information is good intel and good information,
 19 then it would be used towards, you know,
 20 something that would yield in -- would
 21 potentially yield in a monetary gain for
 22 Mr. Doxtator. If the information wasn't good,
 23 then we wouldn't do anything with it going
 24 forward.
 25 425 Q. So, for example, if we take --

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1 did Mr. Doxtator provide you information,
 2 research information on Canopy?
 3 A. I believe at one point he sent a
 4 video about some plants dying.
 5 426 Q. And did you use it?
 6 A. We did not use it, but I believe
 7 someone may have sent the video to somebody
 8 else. But, again, the information wasn't
 9 relevant so it didn't go anywhere.
 10 427 Q. And who is "someone"? Someone
 11 within Anson --
 12 A. Sonny Puri.
 13 428 Q. Sonny Puri? And he's a principal
 14 at Anson?
 15 A. At the time he was an associate
 16 portfolio manager.
 17 429 Q. And do you know if Mr. Puri -- do
 18 you know who Mr. Puri sent the video to?
 19 A. I don't know.
 20 430 Q. Counsel, can you make it an
 21 undertaking to identify the persons and/or
 22 entities that Mr. Puri sent the video on canopy
 23 to?
 24 R/F MR. STALEY: No.
 25

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1 BY MR. KIM:
 2 431 Q. Now, do you know if you advised
 3 Mr. Doxtator that the video that he provided on
 4 canopy was forwarded to other parties?
 5 A. I can't recall.
 6 432 Q. Can you find out, please?
 7 U/A MR. STALEY: I'll take it under
 8 advisement.
 9 BY MR. KIM:
 10 433 Q. Now, just to be clear, I'd like
 11 an undertaking to provide all of the documents
 12 and correspondence related to distribution of
 13 information and due diligence on companies and
 14 stocks provided by Mr. Doxtator to Mr. Kassam
 15 and Anson entities?
 16 MR. STALEY: Sorry, what documents are
 17 you talking about?
 18 BY MR. KIM:
 19 434 Q. I'm talking about --
 20 MR. STALEY: -- exactly what you're
 21 asking us for.
 22 BY MR. KIM:
 23 435 Q. I'm asking you to provide all
 24 documents and correspondence related to the
 25 distribution of the information and due

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1 diligence on companies that Mr. Doxtator
 2 provided to the plaintiffs?
 3 R/F MR. STALEY: No.
 4 MR. KIM: Sorry, I didn't hear you,
 5 Mr. Staley.
 6 U/A MR. STALEY: No.
 7 BY MR. KIM:
 8 436 Q. Okay. Did you and/or Anson ever
 9 engage Mr. Doxtator on any general consulting
 10 agreement of any kind?
 11 A. What do you mean by "general
 12 consulting agreement"?
 13 437 Q. I don't mean any specific
 14 tickers, per se, but did you ever have
 15 Mr. Doxtator on like a retainer?
 16 A. I don't believe so.
 17 438 Q. Am I correct in assuming that you
 18 paid \$30,000 to Mr. Doxtator for his CannTrust
 19 information?
 20 A. I believe we made a payment to
 21 him, you know, for a multitude of reasons,
 22 mainly of which we thought, you know, I think he
 23 was getting frustrated that he was doing a lot
 24 of work or what he perceived to be a lot of work
 25 and wasn't getting paid.

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1 So, you know, as a gesture we
 2 forwarded payment to say, hey, keep going,
 3 hopefully you'll find something good. But it
 4 was more a good faith payment than it was
 5 specifically for work on CannTrust.
 6 439 Q. How did you arrive at the \$30,000
 7 number?
 8 A. I don't know specifically how we
 9 came up to the number. It was just sort of, you
 10 know, a negotiation of what would keep him, you
 11 know, actively engaged in the, you know, process
 12 that we were looking to achieve versus him, you
 13 know, just being completely alienated and not
 14 wanting to do any more work.
 15 440 Q. Okay. Counsel, I'd like to call
 16 up document AAI 1000505542.
 17 Now, have you seen this document
 18 before, Mr. Kassam?
 19 A. I believe I have.
 20 441 Q. Okay. And this was the initial
 21 offer to provide Mr. Doxtator with a retainer
 22 and percentage of profits that Anson made on his
 23 due diligence?
 24 A. Yes, I see it.
 25 442 Q. So if you go to the third

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1 paragraph, there's Part A and B. So there would
 2 be, like, you understand that the initial
 3 proposal was that Mr. Doxtator would be paid a
 4 \$15,000 retainer and it would be for the receipt
 5 of information regarding fraud that was
 6 referenced in your last meeting.
 7 And the second tranche would be
 8 related to P&L on capital allocated by you, and
 9 Mr. Doxtator would get a low to mid single digit
 10 percentage of what profit your fund would make.
 11 Do you see that?
 12 A. I do.
 13 443 Q. And it sets out the table?
 14 A. Yes.
 15 444 Q. And then if you look at Part C,
 16 there's also a proposal that Mr. Doxtator would
 17 be provided with an incremental carrot whereby
 18 he would make on said idea, let's say,
 19 15 per cent on the first \$15 million, which
 20 would be \$112,000 payable to Mr. Doxtator. And
 21 you would provide this incremental carrot over a
 22 period of six to 12 months as you continued to
 23 work together on the next retainer?
 24 A. Yes.
 25 445 Q. So it's your evidence that this

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1 document was never agreed to formally?
 2 A. I believe so.
 3 446 Q. And it was sent to Mr. Doxtator
 4 by Mr. Puri?
 5 A. I believe, yes.
 6 447 Q. And Mr. Puri could bind the Anson
 7 Group?
 8 A. Sorry?
 9 448 Q. Mr. Puri could negotiate on
 10 behalf of Anson?
 11 A. Yeah.
 12 449 Q. And did you have any role or
 13 input in this arrangement?
 14 A. I don't remember.
 15 450 Q. But this was sent. Did Mr. Puri
 16 need your approval to send this out or did he
 17 have authority on his own to make this proposal?
 18 A. I believe I would have been
 19 consulted prior to this being sent.
 20 451 Q. And you signed off on this;
 21 correct?
 22 A. I believe so.
 23 452 Q. Now, was this a sort of guidepost
 24 on your engagement terms with Mr. Doxtator? I
 25 understand your evidence is that you had a

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1 series of ad hoc understandings, and your
 2 counsel has provided an undertaking that you
 3 would produce the terms of various ad hoc deals.
 4 But generally, would you agree with me
 5 that there would be some provision of an upfront
 6 retainer and some sort of a contingent interest
 7 depending on the success that you had using
 8 Mr. Doxtator's information?
 9 A. On the initial iteration of our
 10 negotiation, that is correct.
 11 453 Q. Okay. I understand that we'll
 12 get answers to the undertakings, but do you know
 13 if --
 14 MR. STALEY: Just so it's clear, Won,
 15 I believe the witness already said that this
 16 proposal wasn't acceptable to your client and so
 17 things went in a different direction.
 18 BY MR. KIM:
 19 454 Q. Now, Mr. Kassam, generally
 20 speaking, do you recall if other structures,
 21 other deal terms between the Anson entities and
 22 Mr. Doxtator, was there two or three part where
 23 Mr. Doxtator would be provided with the initial
 24 retainer and he would get some sort of a
 25 proportional success fee?

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1 A. I don't know. You'd have to show
2 me the document.
3 455 Q. Well, it's your evidence that
4 they were ad hoc; that's why I'm asking you.
5 What is your recollection?
6 A. If it was ad hoc, it would have
7 been an oral arrangement. You know, like, he
8 didn't want to formalize the contract, which is
9 the one that you showed previously.
10 So, you know, the talk effectively
11 broke down on us having a formal arrangement and
12 it just went on to, you know, an if-and-when
13 arrangement.
14 456 Q. Now, if we can go to the next
15 document, AA 100010559?
16 MR. STALEY: Can I just ask you, Won,
17 we're getting close to lunch. When do you want
18 to take the break?
19 BY MR. KIM:
20 457 Q. I think let's take a break now,
21 because now that we've explored the terms of
22 your relationship I'm going to be talking about
23 when the relationship hit the skids between you
24 and Mr. Doxtator. So why don't we take a break
25 now.

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1 -- RECESSED AT 12:54 PM --
2 -- RESUMING AT 1:47 P.M. --
3 BY MR. KIM:
4 458 Q. Mr. Kassam, if we can go to the
5 document AAI 0010559. Mr. Kassam, this is a
6 document, it's a chat between you and
7 Mr. Doxtator from August 21st, 2019.
8 Do you know this, are you familiar
9 with this document?
10 A. I am.
11 459 Q. And you see that Mr. Doxtator is
12 accusing you of collaborating with Andrew Left
13 on the GE Anson report?
14 Do you see that, sir?
15 A. I don't think he's referring GE
16 to Andrew Left. I think he's talking about --
17 oh, sorry. You're talking about -- that's
18 General Electric. Okay. Anti report means GE
19 positive report.
20 460 Q. And Mr. Doxtator is accusing you
21 of collaborating with Mr. Left; do you see that?
22 A. He's accusing me of
23 collaborating?
24 461 Q. Yes, with Mr. Left.
25 A. Where is he accusing me?

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1 462 Q. Here.
2 A. [Reading].
3 463 Q. Okay. Did you ask Mr. Left to
4 put out the Citron report criticizing
5 Mr. Markopolos' [phonetic] GE report?
6 A. I did not.
7 464 Q. Did you profit from GE Citron
8 report?
9 A. I don't believe so.
10 465 Q. You had a long position on GE;
11 correct?
12 A. We had a short position on GE.
13 466 Q. You had a short position, but you
14 didn't profit on GE?
15 A. A profit on GE was prior to this.
16 467 Q. Okay.
17 A. Prior to Andrew Left putting out
18 a long report.
19 468 Q. Yeah. And you advised
20 Mr. Doxtator that you owed him \$12,000 for his
21 GE due diligence; correct?
22 A. I don't remember the specific
23 number, but it's in the pleading there
24 somewhere.
25 469 Q. Right. And would you agree with

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1 me that your relationship with Mr. Doxtator
2 deteriorated after this argument about GE?
3 A. I believe it was in perpetual
4 decline.
5 470 Q. Yeah, but, would you agree, like
6 if we can pinpoint the first time your
7 relationship started to turn, it was over the GE
8 report?
9 A. No. If you look at the
10 pleadings, he sort of animus against us
11 throughout.
12 471 Q. And why would he have an animus
13 against you given the fact that you were working
14 with him?
15 A. This is the question at hand,
16 right, that we sort of had a relationship,
17 wanting to have a relationship with him but he
18 was, you know, he was immensely volatile. And,
19 as such, it was hard to maintain a relationship.
20 So he would get hot and get cold, and
21 hot and cold, and you can see it throughout the
22 pleadings and the transcripts.
23 472 Q. So is it your information today
24 that your relationship with Mr. Doxtator was hot
25 and cold even when you guys were working

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1 together?
 2 A. Well, in theory, by the
 3 definition, we were working together the whole
 4 time.
 5 473 Q. And when do you say is when your
 6 relationship with Mr. Doxtator turned for the
 7 worse? Do you recall any specific events or
 8 disputes?
 9 A. The worst is, you know, once that
 10 manifesto was made public and our research and
 11 information sort of pointed at him in the
 12 direction, I guess you could characterize that
 13 is the worst point.
 14 474 Q. So it's your recollection today,
 15 then, really the relationship turned when the
 16 manifesto came out?
 17 A. Not turned, but made that the
 18 absolute worst.
 19 475 Q. Well, because you'd agree with me
 20 that Mr. Doxtator was tweeting negative comments
 21 about you and Anson before the manifesto came
 22 out; correct?
 23 A. Yes.
 24 476 Q. But you didn't act on it?
 25 A. What do you mean, "act on it"?

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1 477 Q. Well, did you ever send an email
 2 or call him and say to Mr. Doxtator, what are
 3 you doing? Did you ever ask him, why are you
 4 tweeting negatively about me and/or Anson?
 5 A. I don't believe I had that
 6 conversation, no.
 7 478 Q. Okay. So, but you reached out,
 8 once the manifesto came out, you did reach out
 9 to Mr. Doxtator; right?
 10 A. I believe so.
 11 479 Q. And do you recall, what made you
 12 reach out to Mr. Doxtator? Because there was a
 13 lull between -- there was a lull, you didn't
 14 speak to Mr. Doxtator for a period before the
 15 manifesto came out; correct?
 16 A. I don't recall the specifics of
 17 when I had spoken to him prior to the manifesto
 18 coming out.
 19 480 Q. But so were you talking to
 20 Mr. Doxtator regularly?
 21 A. I don't believe so.
 22 481 Q. So what made you reach out to
 23 Mr. Doxtator when the manifesto came out?
 24 A. You know, I believed that he was
 25 part of the conspiracy, you know, looking to

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1 just defame and discredit me and my
 2 organization. And, as such, I wanted to
 3 understand how vast and wide the conspiracy was.
 4 482 Q. So about October 9, 2020, you
 5 told Mr. Doxtator that your lawyers told you not
 6 to speak to him because his name and
 7 fingerprints were everywhere. Do you recall
 8 that?
 9 A. I do.
 10 483 Q. What do you mean by --
 11 MR. STALEY: Sorry, Won, if you're
 12 going to refer to a document, you should put it
 13 in front of the witness to be fair to the
 14 witness.
 15 BY MR. STALEY:
 16 484 Q. Okay. Well, let's go to
 17 paragraph 19 of the amended Statement of Claim.
 18 Sorry, statement of Defence and Counterclaim.
 19 MR. STALEY: That's not the document.
 20 You referred to a document.
 21 BY MR. KIM:
 22 485 Q. There's two parts, two documents
 23 we can go to.
 24 MR. STALEY: Yeah, well, paragraph 19
 25 of the Amended Statement of Defence and

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1 Counterclaim I understand is a -- it's a
 2 fantasy. But you did refer to a document that
 3 was produced. You were trying to paraphrase it
 4 to the client. If you're going to talk about a
 5 document, you should allow him to put it in
 6 front of him.
 7 BY MR. STALEY:
 8 486 Q. Mr. Kassam, have you reviewed
 9 Mr. Doxtator's defence and counterclaim?
 10 A. I have.
 11 487 Q. And he says you discussed the
 12 defamatory manifesto on or around September 20,
 13 2020. Do you recall that?
 14 A. I recall we had a conversation.
 15 I don't know if that was the date.
 16 488 Q. But Mr. Doxtator advised you that
 17 he didn't write the manifesto; right?
 18 A. Not to what I -- not on my
 19 pleading. This is his pleading.
 20 489 Q. I know. But do you disagree with
 21 this?
 22 A. I do.
 23 490 Q. Did you advise Mr. Doxtator that
 24 you knew that he didn't write the manifesto?
 25 A. Sorry, I alleged to him that we

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1 knew he was a part of it, but there was a wider
 2 conspiracy that involved multiple players and,
 3 as such, offered him an ability to come clean on
 4 the entire conspiracy.
 5 491 Q. So as of September 2020th [sic],
 6 you knew there was a conspiracy?
 7 A. When we first saw the results,
 8 you know, we obviously knew there was something
 9 here. And over time it came to be known to us
 10 that there was a vast and wide conspiracy. Not
 11 specifically September 20th.
 12 492 Q. Mr. Kassam, prior to the first
 13 part of the manifesto being posted on the web,
 14 you ignored Mr. Doxtator's tweets. He posted
 15 negative tweets about you and Anson prior to
 16 that; right?
 17 A. You have to show me the specific
 18 posts to see if they were specifically negative
 19 towards us and the time period.
 20 493 Q. No, but I asked you about
 21 five minutes ago and you said you didn't call
 22 him on any of the negative tweets prior to that
 23 manifesto. I don't think it's controversial.
 24 MR. STALEY: Is that your statement or
 25 you're asking the witness to agree with you?

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1 BY MR. KIM:
 2 494 Q. I'm asking him to agree with my
 3 supposition to him.
 4 MR. STALEY: Well, I think he said
 5 he'd need to look at the tweets to give you an
 6 answer.
 7 BY MR. KIM:
 8 495 Q. But no, no. His answer was,
 9 Mr. Kassam's evidence was that he didn't --
 10 there was no letter, email, or any notice to
 11 Mr. Doxtator taking issue with the tweets.
 12 MR. STALEY: I don't think he said
 13 that. I don't think he said that.
 14 BY MR. KIM:
 15 496 Q. Well, we'll let the record speak
 16 for itself.
 17 MR. STALEY: Yeah.
 18 BY MR. KIM:
 19 497 Q. Now, Mr. Kassam, what was the
 20 turning point -- when we talk about the first
 21 part of the manifesto, what made you change your
 22 mind? What made you reach out to Mr. Doxtator?
 23 MR. STALEY: Sorry, I'm just trying to
 24 understand. The question wasn't clear because
 25 you talked about a turning point and talked

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1 about reaching out.
 2 So could you just state the question
 3 more clearly so we know what the witness is
 4 answering?
 5 BY MR. KIM:
 6 498 Q. So, I mean, we've referred you to
 7 paragraph 19 of the Statement of Defence and
 8 Counterclaim.
 9 MR. STALEY: Yes.
 10 BY MR. KIM:
 11 499 Q. Mr. Kassam, when did you become
 12 convinced that there was a conspiracy?
 13 A. As I previously mentioned, when
 14 we got the initial copy and read the manifesto,
 15 you know, it became -- it became aware to us
 16 over time that there were more and more people
 17 involved and it was a far wider conspiracy than
 18 I initially thought.
 19 500 Q. Okay.
 20 A. As it goes to specifically what
 21 day, I don't know.
 22 501 Q. But in your mind, Mr. Doxtator
 23 was part of the conspiracy?
 24 A. I believe so, yes.
 25 502 Q. Did you know at that time as of

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1 October 9, 2020, who the other conspirators may
 2 have been?
 3 A. I didn't specifically know. You
 4 know, obviously we had a theory on, you know,
 5 who could be involved and was thinking about all
 6 the different possibilities. But we didn't
 7 specifically know, you know, who it was on that
 8 particular day.
 9 503 Q. Okay. Did you have an enemies
 10 list of who the potential conspirators could be?
 11 A. No, there was no specific enemies
 12 list.
 13 504 Q. Did you -- were you aware, did
 14 you know it was Jacob Doxtator, for example?
 15 A. On September 20th?
 16 505 Q. Yeah.
 17 A. Or October 9th?
 18 506 Q. October 9, 2020?
 19 A. I specifically didn't know the
 20 name Jacob Doxtator at the time.
 21 507 Q. Right. You didn't know he
 22 existed; right?
 23 A. I don't recall. I don't think
 24 so.
 25 508 Q. Did you know, did you think it

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1 was James Stafford?
2 A. On October 9th?
3 509 Q. Yes.
4 A. I didn't specifically know who it
5 was. You know, it took us a lot of time, a lot
6 of effort a lot of resources to try to unmask
7 the veil of this grand conspiracy.
8 510 Q. Okay. So you didn't know it was
9 Andrew Rudensky on October 9, 2020?
10 A. As I previously stated, I didn't
11 know who specifically it was on September or
12 October 2020.
13 511 Q. What made you reach out to
14 Mr. Doxtator specifically?
15 A. I just answered that question.
16 You know, I felt that he was a part of the
17 conspiracy but believed there were other people
18 acting as well.
19 And, you know, from our dealings with
20 Mr. Doxtator, you know, we believed that he was
21 acting at the behest or with a bunch of other
22 players. And given we had a historical
23 relationship, I wanted to offer him the ability
24 to come clean and state what actually occurred,
25 why it occurred, and who was involved.

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1 512 Q. Okay. Let's break that down.
2 You firmly did believe Mr. Doxtator was part of
3 a conspiracy; correct?
4 A. Yes, sir.
5 513 Q. Did you think he was the leader?
6 Did he organize the conspiracy?
7 A. You know, as previously
8 mentioned, I didn't know how far and how wide
9 and how effectively it was put together. So I
10 had no idea who the leader was at the time.
11 514 Q. But what would make you -- what
12 would convince you that it wasn't Mr. Doxtator
13 acting alone? What's the reason for suspecting
14 a conspiracy?
15 MR. STALEY: I assume, Won, you're
16 aware that on September 30th/October 1 exchange
17 between Mr. Doxtator and Mr. Kassam,
18 Mr. Doxtator said that Stafford and Rudensky
19 were involved. So wouldn't that suggest there
20 was a conspiracy?
21 BY MR. KIM:
22 515 Q. I'm just asking. We'll get
23 there. I'm just asking Mr. Kassam.
24 A. Again, you know, it's subject --
25 you've seen the pleadings. The information is

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1 there on why we believe the people were in the
2 conspiracy, why they're there.
3 516 Q. So your source of your
4 information of a conspiracy is Mr. Doxtator's
5 chat with you?
6 A. No. That was one of the sources
7 used to ascertain who and how and why this whole
8 thing was put together and the people involved.
9 517 Q. And what were the other sources?
10 A. I think that's privileged.
11 518 Q. No, it's not.
12 What were the other sources?
13 MR. STALEY: There are elements of
14 this, Won, that are based on investigative work,
15 and there's other elements of it that are
16 expressly pleaded. There's a whole raft of
17 reasons why individuals have been identified,
18 and the basis for that is, in considerable
19 measures, set out in the pleading.
20 BY MR. KIM:
21 519 Q. Mr. Staley, I would like an
22 undertaking for you to produce all of the
23 investigation -- first of all, the identity of
24 the investigators and their work product that
25 you're relying on to plead the conspiracy in

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1 this litigation?
2 U/A MR. STALEY: I'll take that under
3 advisement.
4 BY MR. KIM:
5 520 Q. Now, Mr. Kassam, you advised
6 Mr. Doxtator that you couldn't speak to him
7 because his name and fingerprints were
8 everywhere. Do you agree with that?
9 A. You'd have to show me the quote.
10 521 Q. How about we look at document
11 AAI 00010238.
12 So if we got down to 229 at the
13 bottom:
14 "Unfortunately, your name and
15 fingerprints are everywhere".
16 Do you see that?
17 A. I see it.
18 522 Q. Tell me where you see his name
19 and fingerprints. What are his fingerprints?
20 What are you referring to?
21 A. I believe it's an expression
22 associated with, you know, his name and his
23 actings and his involvement keep coming up in
24 all the different ways that we were looking at
25 the original onset of the information, and all

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1 the initial diligence suggested that he was very
2 involved.
3 523 Q. Okay. So you were just using a
4 phrase then, fingerprints. Literally you
5 can't -- can you identify where his name and/or
6 his identifying marks are found on the first
7 volume of the manifesto?
8 A. No, we weren't able to get the
9 original copy and dust for fingerprints, so no.
10 524 Q. No. But you're just using that
11 loose term phrase, then. There was no forensic
12 evidence to point Mr. Doxtator as being the
13 author or conspirator of the first part of the
14 manifesto; right?
15 A. There was no fingerprint testing
16 done to put his actual physical fingerprints on
17 any document, no.
18 525 Q. Okay. But you see that
19 Mr. Doxtator says about four lines down:
20 "My fingerprints"?
21 And he says:
22 "Had nothing to do with me".
23 Do you see that?
24 A. I do.
25 526 Q. And did you believe him?

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1 A. I don't believe so.
2 527 Q. Okay. But you said:
3 "Cool, then you've got nothing to
4 worry about".
5 Do you see that?
6 A. Yeah.
7 528 Q. Okay. So if you didn't believe
8 him, how come you said he's got nothing to worry
9 about? Why didn't you push back?
10 A. I said he said it had nothing to
11 do with me, so I said, If that's the case then
12 you have nothing to worry about.
13 So eventually if he had nothing to do
14 with it, it would have come out that he had
15 nothing to do with it. But unfortunately, the
16 deeper we went into the investigation the more
17 of his theoretical fingerprints ended up on
18 everything.
19 529 Q. Okay. Now, tell me about that.
20 When you went deeper into the investigation,
21 what were his fingerprints that you found that
22 implicated Mr. Doxtator to the manifesto?
23 A. Again, it's all in the pleadings.
24 You know, we've sort of plead to all the
25 different facts of why we believe he was part of

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1 this conspiracy.
2 530 Q. Okay. Now, you've advised that
3 you did your own investigation and you hired
4 outside investigators; correct?
5 A. Correct.
6 531 Q. And your client has taken under
7 advisement my request for the production of the
8 identification of your experts and production of
9 the reports. And we'll deal with that at a
10 future time.
11 But were there any -- what were
12 your -- tell me about your in-house efforts to
13 investigate who was behind the manifesto?
14 A. Our efforts were to dissect the
15 information that was in the manifesto, how it
16 was published, who it was sent to, you know,
17 tweets that sort of seemed similar, language
18 that seemed similar.
19 It was a wide variety of techniques
20 that we used both in-house and externally.
21 532 Q. Okay. Now, can I ask, who were
22 the people at your firm who were part of the
23 investigations?
24 A. Again, this is a loose term,
25 investigation. You know, we sort of took it

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1 upon ourselves to try to figure out as much as
2 we could how of how and why this came about, how
3 it was posted, where it was posted to.
4 The people internally, that would have
5 been, you know, under the workings of my general
6 counsel.
7 533 Q. Now, can I ask you, if I can
8 circle back, when did you first become aware
9 that this manifesto, first part, was posted?
10 Who advised you?
11 A. I believe I got a message that
12 Sunday evening when it was posted from a friend
13 of mine.
14 534 Q. Who was that?
15 A. I believe it was David Cynamon.
16 535 Q. And Mr. Cynamon, is he a social
17 friend or is he an investor in your fund?
18 A. He would be both.
19 536 Q. And what did he tell you?
20 A. He said take a look at this and
21 sent the link.
22 537 Q. Okay. And then did you have a
23 discussion with Mr. Cynamon?
24 A. No, I think I proceeded to click
25 the link and read the manifesto.

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1 538 Q. And what did you do after?
 2 A. I believe I then sent that same
 3 link out to, you know, people within my company
 4 to say, Hey, guys, FYI, take a look.
 5 539 Q. Okay. And did you take it
 6 seriously?
 7 A. Yes. Someone had bought a
 8 website with my name on it and created a
 9 document that was very voluminous and had a lot
 10 of information on there, pictures, allegations,
 11 you know, effectively going at the root and
 12 character of myself and my firm.
 13 So, yes, I took it very seriously.
 14 540 Q. How is that different than, say,
 15 trolling -- you understand that Mr. Doxtator had
 16 posted negative information, I believe, on
 17 Twitter prior to the publication of the first
 18 part of the manifesto.
 19 What was qualitatively different in
 20 your mind about the manifesto versus negative
 21 comments on Twitter?
 22 A. I think it was the intention,
 23 right, where someone like you said was on
 24 Twitter or chatting randomly on Reddit, it's
 25 sort of a little more casual in nature.

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1 Someone went about creating a website
 2 dedicated to effectively, you know, smearing my
 3 name, my character, my firm. Bought a website
 4 with my actual name in it to get the likeness,
 5 et cetera, search engine optimization,
 6 et cetera.
 7 Literally, this was a very thought-out
 8 and contrived plan with the intention of
 9 discrediting and defaming me.
 10 541 Q. Well, you would agree with me
 11 that the information on the first part of the
 12 manifesto is false; right?
 13 A. I'd have to pull up that document
 14 to see which part --
 15 542 Q. We'll get there, but you did
 16 agree with me that, for example, MoezKassam.com,
 17 that's not you?
 18 A. I'm not following.
 19 543 Q. You're not the person behind
 20 MoezKassam.com; right?
 21 A. No, but I'm the subject of
 22 MoezKassam.com.
 23 544 Q. Okay. But you'd agree with me,
 24 your view is that all of the comments on
 25 Defamatory Manifesto part 1, they're false?

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1 A. I believe for the most part
 2 they're false, yes.
 3 545 Q. No, what you mean, "for the most
 4 part"? What part is correct?
 5 A. I don't know if he had, my agent
 6 was right, it would be correct. I can't say
 7 every single word in there is incorrect.
 8 MR. STALEY: I think as you'll
 9 appreciate, Won, the specific elements that are
 10 alleged to be defamatory are pleaded. Obviously
 11 it's a long document and, you know, if it said
 12 that Mr. Kassam was with Anson Funds, that's
 13 probably true and it's not defamatory; right?
 14 So I think you've got to parse it a
 15 bit more than that.
 16 BY MR. KIM:
 17 546 Q. I know. Thanks for doing my job,
 18 Mr. Staley, but let me ask you, Mr. Kassam --
 19 MR. STALEY: I'm always happy to do
 20 that for you, as you know.
 21 BY MR. KIM:
 22 547 Q. I know. You're a good man.
 23 Mr. Kassam, why did you offer
 24 Mr. Doxtator immunity?
 25 A. You know, I believed at the time,

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1 given the information I had that, you know,
 2 there were other characters involved. And it
 3 would be harder to, you know, instead of me
 4 continuing on with the investigation myself, it
 5 would be easier to ascertain that information by
 6 offering Mr. Doxtator an opportunity to come
 7 clean on what he had actually done and who he
 8 had worked with and how it specifically came to
 9 be. And that at the end of the day, you know,
 10 that would lead to this whole thing being
 11 accelerated for us to figure out the end of the
 12 story.
 13 548 Q. Why would Mr. Doxtator need
 14 immunity when he advised you he had nothing to
 15 do with the document?
 16 A. Well, if you read the pleadings
 17 and the chat history, he specifically said that
 18 he was affiliated with this situation. But, you
 19 know, and alluded to who the other people were.
 20 So naturally he was already hinting in
 21 the direction of don't look at me, look at them.
 22 So, you know, using that, you know, where he was
 23 going with it, offered him an opportunity to, if
 24 he could effectively bring out the other
 25 co-conspirators, give the information, you know,

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1 of how it came to be, where they did it, why
 2 they did it, et cetera, that at the end of the
 3 day even though he was a co-conspirator, you
 4 know, we would for the sake of our business and
 5 the sake of pushing everything forward look the
 6 other way when it came to him. If he were to
 7 comply with all those measures.
 8 549 Q. I'd like an undertaking, counsel,
 9 where Mr. Doxtator acknowledged that he was a
 10 co-conspirator?
 11 U/A MR. STALEY: I'll take it under
 12 advisement.
 13 BY MR. KIM:
 14 550 Q. Mr. Kassam, you told Mr. Doxtator
 15 that you would pay him the arrears. What
 16 arrears are you referring to?
 17 MR. STALEY: Hold on, Won. You're
 18 going to have to pull up the transcript here.
 19 BY MR. KIM:
 20 551 Q. Okay. The document is -- we're
 21 going to go back to AA 100010238.
 22 MR. STALEY: Yeah, you need to give
 23 the witness a chance to read the document.
 24 BY MR. KIM:
 25 552 Q. Sure. No problem.

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1 Mr. Kassam, do you see the post about
 2 halfway down at 2:29 p.m., it says:
 3 "I'm going to pay you the
 4 arrears".
 5 A. I see that.
 6 553 Q. What arrears were you referring
 7 to?
 8 A. Again, he believed that he wasn't
 9 rightfully paid for the work he did, and we
 10 obviously knew that to be false. But for the
 11 sake of getting where we wanted to be, I was
 12 happy to offer him a form of appeasement.
 13 554 Q. Okay. But, so you didn't agree
 14 that you owed him anything but you agreed to pay
 15 him the arrears. Is that negotiating?
 16 A. If you read above, it says:
 17 "If you are going to pay what was
 18 owed, and then we can go after these
 19 clowns".
 20 So naturally I had to say, okay, I
 21 will take care of what was owed in his mind.
 22 555 Q. Okay. But in your mind, you
 23 didn't know him anything?
 24 A. I don't remember when the GE
 25 thing was, whether it was before or after, but

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1 we owed him the GE amount still.
 2 556 Q. Okay. So is that what you're
 3 talking about, then? Is it GE?
 4 A. No, I don't believe that, because
 5 he just said he didn't want that payment. I
 6 believe it was what he thought he was owed for
 7 all the other stuff, you know.
 8 557 Q. Okay. So when you're talking
 9 about paying him the arrears, you don't know
 10 what you're agreeing to then?
 11 A. Correct.
 12 558 Q. You were just getting to -- so
 13 you're basically negotiating with him, appeasing
 14 him with a promise of payment so that he could
 15 talk about these clowns?
 16 A. As I previously mentioned, we
 17 believed he was part of this conspiracy, and he
 18 already alluded to the fact that he had
 19 information on who specifically was more behind
 20 it and how it all went together.
 21 And so for the sake of moving the
 22 whole process forward, I offered to pay him and
 23 offered him amnesty if he were to bring all the
 24 other information together.
 25 559 Q. Okay. Now, when you say -- it's

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1 not true to say Mr. Doxtator was part of a
 2 conspiracy; right? Like, at no point did
 3 Mr. Doxtator ever tell you that he was part of
 4 any conspiracy?
 5 A. Specifically he showed
 6 information going back and forth with the other
 7 affiliates or other codefendants or however you
 8 want to identify them, so clearly he was a part
 9 of it.
 10 560 Q. Okay. But that's --
 11 MR. STALEY: Won, I think you're
 12 trying to sort of use -- the technical legal
 13 phrase "conspiracy" as opposed to evidence that
 14 would suggest there wasn't a conspiracy without
 15 using the word.
 16 I think that's a distinction you're
 17 trying to draw here. I think the witness is
 18 telling you the basis of which he concluded that
 19 Mr. Doxtator was part of the conspiracy, and
 20 you're looking for the word to be used.
 21 BY MR. KIM:
 22 561 Q. No, I'm just asking for
 23 Mr. Kassam's -- I just want Mr. Kassam to
 24 address the point. He keeps saying Mr. Doxtator
 25 was part or knew about the conspiracy. That's

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1 qualitatively different.
 2 I want to get his position on did
 3 Mr. Doxtator ever tell you he was part of a
 4 conspiracy?
 5 A. I believe according to the
 6 pleadings that we have set forth it shows that
 7 Robert Doxtator was part of the conspiracy.
 8 562 Q. Well, no. My question is -- I
 9 know that's what you allege.
 10 My question is: Did Mr. Doxtator ever
 11 tell you he was part of a conspiracy?
 12 A. Again, it's objective. Because
 13 if you look at the transcripts from him to me,
 14 he effectively shows that he was working with
 15 the other people in conjunction with this
 16 report, which to me identifies him and
 17 incriminates him as being part of the
 18 conspiracy.
 19 Did he specifically say to me in
 20 specific words, I'm part of the conspiracy? No,
 21 he didn't say that specifically.
 22 563 Q. Counsel, I would like an
 23 undertaking to advise and produce which portion
 24 of any of the transcripts where Mr. Doxtator
 25 admits that he is part of a conspiracy?

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1 U/A MR. STALEY: I'll take it under
 2 advisement.
 3 BY MR. KIM:
 4 564 Q. Now, I want to take a look at
 5 another document here. I want to take you to
 6 the fresh as amended Statement of Claim.
 7 Paragraph 69.
 8 MR. STALEY: 69?
 9 BY MR. KIM:
 10 565 Q. 69, yeah. Now, Mr. Kassam --
 11 MR. STALEY: Sorry, I'm just getting
 12 it in front of the witness. Sorry, just give me
 13 a second here.
 14 Yes, I've got it.
 15 BY MR. KIM:
 16 566 Q. Okay. Mr. Kassam, what is the
 17 basis of this allegation that Stafford and
 18 Rudensky, Mr. Robert Doxtator, and Jacob
 19 Doxtator and other unknown defendants wrote or
 20 contributed to the Defamatory Manifesto?
 21 What's the source of your information?
 22 MR. STALEY: Well, Won, I think this
 23 is a summary paragraph, and the basis for it is
 24 set out in considerable detail in the balance of
 25 the pleading.

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1 BY MR. KIM:
 2 567 Q. I know. I want to get your
 3 client's evidence. I understand your summary.
 4 MR. STALEY: I'm sure he would adopt
 5 the answer I just gave you, which is you're
 6 referring to a summary paragraph and the detail
 7 is otherwise in the Statement of Claim.
 8 BY MR. KIM:
 9 568 Q. Now, Mr. Kassam, do you know if
 10 Mr. Stafford, Rudensky, Robert and Jacob
 11 Doxtator, and other unknown people -- in fact,
 12 do you know in fact they published or
 13 disseminated or publicized the Defamatory
 14 Manifesto?
 15 A. I believe according to if you
 16 read the rest of our pleadings here, you know
 17 numbers 1 through 68 and number 70 onwards, it
 18 sort of explains to you that yes, they were part
 19 of a conspiracy and were involved in all aspects
 20 of it.
 21 569 Q. What is the evidence that you
 22 have that Stafford, Rudensky, Robert, Jacob, and
 23 others, what's the evidence that you have that
 24 they published or disseminated or publicized the
 25 Defamatory Manifesto?

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1 MR. STALEY: Won, the evidence is all
 2 set out in considerable detail throughout the
 3 pleadings; right?
 4 BY MR. KIM:
 5 570 Q. There are allegations --
 6 MR. STALEY: When it was published --
 7 well, the basis of it is all set out there,
 8 right.
 9 BY MR. KIM:
 10 571 Q. Are you admitting to pleading
 11 evidence in your pleading or is it allegations,
 12 Mr. Staley?
 13 MR. STALEY: I know, it's shocking,
 14 isn't it? But the basis for -- thankfully you
 15 defended and didn't move to strike for pleading
 16 evidence, so I appreciate that.
 17 It's all set out there, Won, in terms
 18 of what the basis of it is and the various
 19 elements that link the various defendants to the
 20 statements, including the publication. In some
 21 cases, you know, we have Mr. Doxtator re-tweeted
 22 one of the manifestoes, the coordination of your
 23 client's post before of the manifesto goes up
 24 containing the same material after he threatened
 25 that something was coming. Like, it's all set

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1 out in painful detail.
 2 But to ask him to say what's behind 69
 3 when it's all set out, I'm not sure what purpose
 4 that serves.
 5 BY MR. KIM:
 6 572 Q. Well, my question to Mr. Kassam
 7 is: These are allegations founded on
 8 speculation. You don't know for a fact; right?
 9 It's a speculation?
 10 MR. STALEY: I don't know what you
 11 mean by don't know for a fact. The evidence --
 12 it's a fact that Betting Bruiser re-tweeted or
 13 tweeted a link to the Defamatory Manifesto.
 14 That's not that allegation.
 15 BY MR. KIM:
 16 573 Q. Well, there you go --
 17 MR. STALEY: Your client admitted it.
 18 BY MR. KIM:
 19 574 Q. That is an answer, for example,
 20 that Betting Bruiser did, in fact, link to the
 21 manifesto. That is one instance.
 22 I'm asking about the other instance.
 23 MR. STALEY: But the point is that the
 24 pleading sets out that type of information in
 25 fairly painful detail.

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1 BY MR. KIM:
 2 575 Q. I'm asking Mr. Kassam --
 3 MR. STALEY: I'm not sure we're going
 4 to get any better than this, Won.
 5 BY MR. KIM:
 6 576 Q. Okay. I'm just asking -- my
 7 question to Mr. Kassam stands, and I'd like an
 8 undertaking breaking down what you say are the
 9 roles played by the individuals: Mr. Stafford,
 10 Mr. Rudensky, Mr. Robert Lee Doxtator, and
 11 Mr. Jacob Doxtator in the conspiracy.
 12 What were their roles?
 13 R/F MR. STALEY: We're not giving you
 14 anything beyond what's set out in painful detail
 15 in the Statement of Claim
 16 BY MR. STALEY:
 17 577 Q. Now, I want to take you to
 18 another document, Mr. Kassam, AAI 00010130.
 19 September 28th, 2020. Sorry, bear with us.
 20 We're trying to pull it up for you.
 21 -- OFF-THE-RECORD DISCUSSION --
 22 BY MR. KIM:
 23 578 Q. That's document AAI 00010130.
 24 This is an email between you and Mr. Ben Mogil?
 25 A. Yes.

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1 579 Q. Who is Mr. Ben Mogil?
 2 A. He's an investor in our fund.
 3 580 Q. Okay. Are you familiar with this
 4 document?
 5 A. I am.
 6 581 Q. Okay. If we go down, you say
 7 that as for investors, right, it says:
 8 "The returns have never been
 9 higher, same with our asset base".
 10 What do you mean by the statement?
 11 A. Specifically what statement?
 12 582 Q. If you go to the third paragraph:
 13 "As for investors, returns have
 14 never been higher, same with our asset
 15 base".
 16 A. I think it means as it says. At
 17 the time when I wrote this, you know, this had
 18 just started to percolate and I had to show a
 19 brave face to our investors.
 20 So I said, you know, the natural
 21 thing, is that returns are very good right now
 22 and our assets had never been higher. So there
 23 was no issue, you know, at the time that he
 24 should be worried about.
 25 583 Q. Mr. Kassam, why do you need to

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1 put a brave face when, in fact, returns had
 2 never been higher, same with your asset base?
 3 Are you lying to an investor?
 4 A. The facts are the returns have
 5 never been higher, had never been higher, and
 6 the asset base had never been higher.
 7 What I was trying to do was get him
 8 off the topic of this smear campaign against us
 9 because it was doing exactly what it was set out
 10 to do, which was disrupt our business and harm
 11 our reputation.
 12 And because of all the damage that I
 13 had to deal with, you know, it literally started
 14 at this point, you know, a couple of days after
 15 the post and, you know, it grew in its
 16 intensity.
 17 And so at this point, my objective is
 18 to try and pacify, to say, you know, obviously
 19 that there's no merit to it, but the damage at
 20 that point was done and it started to roll from
 21 that point onwards.
 22 584 Q. Yeah, but, in fact, sir, what
 23 were your returns as at this time, September 28,
 24 2020?
 25 A. What do you mean by returns?

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1 Like the return on that month? On that year?
 2 585 Q. That year. That month and that
 3 year.
 4 A. I believe we were up in the 30s
 5 and that point on the year.
 6 586 Q. Right. And, in fact, so is it
 7 true, returns had never been higher?
 8 A. Correct.
 9 587 Q. And your asset base grew; right?
 10 And it had never been higher?
 11 A. Correct.
 12 588 Q. So if you go to the next
 13 paragraph, you say:
 14 "Business as usual. Clearly
 15 you're doing some good work. Let's
 16 pull the party for some pump and dump
 17 artists".
 18 So did you think it was sour grapes by
 19 the pump and dump artists?
 20 A. I believe that at the time on
 21 September 9 at 10:44 a.m., that the people
 22 behind it would have something to do with being
 23 on the long side of something that we had done
 24 historically or had created animosity towards.
 25 589 Q. But given the fact that -- I

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1 mean, you seem to be indicating to your
 2 investor, Mr. Mogil, that you're doing better
 3 than ever. And clearly whatever was written
 4 didn't damage you at all, financially anyway?
 5 A. Sure, but if you look at the date
 6 associated with the email, that was just after
 7 the report had come out, right. These things,
 8 you know, we're still dealing with the fallout
 9 of that manifesto till today. Right?
 10 On September 29th, it was just
 11 literally the first inning of what was a very
 12 tough period for us dealing with, you know, the
 13 fallout this manifesto.
 14 590 Q. Okay. Now let's go down, further
 15 down. Right? Is it your position today, did
 16 the manifesto in fact hurt your business?
 17 A. That is categorically true, yes.
 18 591 Q. Okay. And how has it affected
 19 your business?
 20 A. You know, it's affected our
 21 reputation. We've lost investors. We've had to
 22 lose potential affiliates that we've worked
 23 with. It had a whole host of negative
 24 consequences for us.
 25 592 Q. Okay. Expand on your answer,

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1 please. Who did you lose? How did it affect
 2 your reputation?
 3 A. You know, anytime, you know, our
 4 whole contention here is this manifesto of fake
 5 news was published far and wide and it got to a
 6 lot of people. And, you know, as you mentioned
 7 previously, the notion of sophisticated or
 8 unsophisticated doesn't really apply, right?
 9 When people see a manifesto, hundreds
 10 of pages of allegations, people naturally
 11 believe where there is smoke there is fire, and
 12 that someone would say, ah, even if one per cent
 13 of this is true, this sounds like a bad person.
 14 Or this sounds like a bad fund. Or this sounds
 15 like a bad firm.
 16 And since perception is reality,
 17 people hear about something being bad and they
 18 don't take the time to independently verify if
 19 it's true or not. That stench just goes with
 20 you from that point.
 21 593 Q. What you just said, have you
 22 hired a professional party or entity to
 23 determine that your reputation in the
 24 marketplace has, in fact, been hurt?
 25 A. Sorry, could you repeat the

173

1 question?
 2 594 Q. What you just said about your
 3 reputation being hurt, have you hired a
 4 professional party or an entity to, in fact,
 5 measure how the manifesto, if and how your
 6 reputation has been hurt by the publication of
 7 the manifesto?
 8 MR. STALEY: I think you're
 9 potentially asking for a potential expert. I
 10 think you need to be more specific, Won, about
 11 what you're asking here.
 12 Let me just say, if you're asking have
 13 you hired a PR firm to help you or that
 14 something like that, that's one question. But
 15 if you're actually asking about potentially
 16 getting experts or assistance to prove losses,
 17 that's a separate issue.
 18 BY MR. KIM:
 19 595 Q. Mr. Kassam --
 20 MR. STALEY: I don't really know what
 21 you're asking him.
 22 BY MR. KIM:
 23 596 Q. How do you know your reputation
 24 has been hurt? How do you know people haven't
 25 laughed this off?

174

1 A. You know, by the -- look at the
 2 email you just pulled up. We're getting emails
 3 from sophisticated people that we know. Imagine
 4 the people we don't know.
 5 You know, these are people that know
 6 us very well and they're asking questions.
 7 Imagine what people who don't know us do. And
 8 so we heard from numerous parties; it wasn't
 9 just investors, but people we work with. And
 10 still today we're dealing with it.
 11 So we know because we know from the
 12 cause and effect. The effect is we're asked all
 13 the time about allegations within this document
 14 that was published. And, you know, we had to
 15 hire, you know, people to help in regards to PR
 16 and publishing and SEO and the like, you know.
 17 But you're saying specifically can you
 18 point to a numerical number of how it hurt us?
 19 How is one supposed to do that? It's
 20 subjective.
 21 597 Q. It's subjective. So you can't
 22 say today that somehow numerically you've
 23 suffered a loss today?
 24 A. I can definitely show you that,
 25 right? We've lost investors. That's empirical

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1 data. We've had partnerships that have
 2 dissolved as a function of this fallout. We've
 3 had people say they don't want to work with us
 4 as a function of this manifesto.
 5 So all of those are real facts, right?
 6 But there are a lot of intangibles that we've
 7 had to deal with that you can't put a number on.
 8 598 Q. Mr. Kassam, can you tell us which
 9 investors did you lose, who actually left
 10 because of the manifesto?
 11 A. I can't tell you off the top of
 12 my head, but there's a list of investors that
 13 because of the investigation, because of the
 14 manifesto that was put together we, you know,
 15 had to deal with people who were leaving the
 16 fund. And then people who were about to invest
 17 in the fund say, sorry, I'm not investing
 18 anymore.
 19 599 Q. Okay. I'd like a production of
 20 that list, please of the investors who left
 21 because of the publication?
 22 R/F MR. STALEY: I'm not prepared to give
 23 you the list, but we are prepared to identify
 24 the investors. No.
 25

176

1 BY MR. KIM:
 2 600 Q. Now, Mr. Kassam, you pointed to
 3 September 28, the date of the email from
 4 Mr. Mogil.
 5 Has your fund grown in assets under
 6 management since September 28, 2020?
 7 A. I believe we have.
 8 601 Q. And have your returns, can you
 9 tell me, do you correlate that, has your return
 10 suffered since the publication of the manifesto?
 11 A. Again, I don't know how to define
 12 "suffered", right. We've had positive returns,
 13 but what would the returns have been had our
 14 entire focus been on making money as opposed to,
 15 you know, dealing with a PR calamity.
 16 How much extra would have come in if
 17 there was no stain around our otherwise pristine
 18 reputation and everything that we'd done
 19 specifically in the marketplace.
 20 I don't know how to even quantify a
 21 number like that.
 22 602 Q. So you can only speculate; right?
 23 A. I can't -- there's no way other
 24 than the investors who have left and what their
 25 number would have been. Aside from that, all

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1 that's specifically mentioned, you know, that
 2 our numbers are staggering.
 3 603 Q. No, but you can only speculate.
 4 You can't identify. You don't know
 5 quantitatively what would have happened but for
 6 the publication of the manifesto. You can only
 7 speculate?
 8 A. Correct.
 9 604 Q. Okay. Now, I understand that
 10 shortly thereafter, September 30th, you
 11 exchanged an email with Daniel Silwin and Adam
 12 Spear and that document is AAI 00010124. And I
 13 suspect this is what Mr. Staley would be
 14 producing.
 15 Now, did you produce this to support
 16 your position that you lost investors because of
 17 the manifesto?
 18 MR. STALEY: I'm sorry, can you ask
 19 the question again?
 20 BY MR. KIM:
 21 605 Q. Is this -- first of all, let's
 22 break this down. Who is Mr. Silwin, Daniel
 23 Silwin?
 24 A. Daniel Silwin and Sam Silwin were
 25 investors in our fund.

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1 606 Q. Right. And he requests to
2 withdraw all funds in Anson?
3 A. That's correct.
4 607 Q. Did that go through?
5 A. It did.
6 608 Q. And did Mr. Silwin withdraw funds
7 from Anson because of the manifesto?
8 A. Yes, he specifically told me
9 that.
10 609 Q. Or did he withdraw because he was
11 buying a ski lodge?
12 A. That's someone else he's talking
13 about. Mark Gordon is another investor.
14 610 Q. Okay. But did Mr. Silwin
15 specifically say that they were withdrawing
16 funds because of the publication of the
17 manifesto?
18 A. They said specifically it was
19 because of the manifesto and they didn't want
20 any risk associated with their money.
21 611 Q. Where does it say that in the
22 email?
23 A. It was in a conversation, a phone
24 conversation.
25 612 Q. It was in a phone conversation?

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1 Did you memorialize that? Did you send an email
2 trying to talk him out of it?
3 A. At the time, I called him and he
4 said we just can't have this type of risk in our
5 investment portfolio. Thank you so much for the
6 returns you've given me up till now, but we can
7 no longer be an investor in your fund.
8 613 Q. What was the risk that he was
9 talking about?
10 A. The risk was the allegations,
11 right. You talk about the people being
12 sophisticated. Sam Silwin runs one of the most
13 successful medical practices in Canada. So you
14 would imagine him being a sophisticated
15 investor. But unfortunately, sophisticated is
16 not a function of one's net worth and one's
17 business interests.
18 For him, seeing that manifesto was
19 enough that he said, I don't need to be invested
20 in this fund anymore.
21 614 Q. Do you recall, what was the
22 specific allegation that he pointed to for
23 withdrawing his funds?
24 A. It was simply the manifesto as a
25 whole. That was my point, right, that I tried

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1 to talk to him. I said, Hey, I can talk to you
2 about every allegation within here and show you
3 how this whole thing is false and misleading.
4 But at the end of the day, you know, we were a
5 victim of fake news and a conspiracy
6 unfortunately had its effect.
7 615 Q. Okay. Have you produced all of
8 the documents related to Mr. Silwin? Silwin and
9 Athletic Knit's investment in Anson?
10 MR. STALEY: So when you say all
11 documents, are you talking about materials
12 relating to their initial investment or just
13 about their decision to withdraw based upon the
14 Defamatory Manifesto?
15 BY MR. KIM:
16 616 Q. Well, I'd like for you to produce
17 any documents which specifically go to Silwin
18 and Athletic Knit's withdrawing of the funds
19 because of related to the publication of the
20 manifesto?
21 U/T MR. STALEY: So I believe we have done
22 that, but we'll just confirm that.
23 BY MR. KIM:
24 617 Q. Now, Mr. Kassam, you write this
25 email to Mr. Spears?

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1 A. Yeah.
2 618 Q. Okay. Why did you write this to
3 Mr. Spears?
4 A. I believe he was very close with
5 the Silwin family. Adam and I had previously
6 worked together. So I thought it would, you
7 know, before having a conversation with the
8 Silwins, you know, I was basically asking him
9 what advice would he have or does he think it's
10 even worth while having a conversation with
11 them, you know, about this whole thing.
12 619 Q. So what do you mean by "Adam
13 Spears legacy assets"?
14 A. These were investors who Adam had
15 helped bring in while he was at Anson.
16 620 Q. And did any other legacy assets
17 request to leave the fund?
18 A. I don't know.
19 621 Q. If you do, can you please provide
20 us a list of clients who left who were related
21 to -- who fall under the legacy assets?
22 U/T MR. STALEY: Yes.
23 BY MR. KIM:
24 622 Q. Thank you.
25 And who is Mr. Spears?

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1 A. Adam Spears was my partner at
 2 Anson from 2010 or '11 through 2017.
 3 623 Q. And why did he leave Anson?
 4 A. He had decided that he had made
 5 enough money and didn't want all the headache
 6 around running a public fund anymore.
 7 624 Q. And did he go on to serve on the
 8 Zenabis board?
 9 A. Yes. I believe after he decided
 10 to just trade his own book, he eventually ended
 11 up on the Zenabis board; correct.
 12 625 Q. Did Mr. Spears provide any
 13 information about Zenabis?
 14 A. Sorry?
 15 626 Q. As a result of being on the
 16 board?
 17 A. Did he provide any more -- I
 18 don't know what you mean by provide any more
 19 information.
 20 627 Q. Did he provide any information
 21 about -- he was on the board. Did he provide
 22 you or Anson with any information about Zenabis?
 23 A. When he was on the board of
 24 Zenabis, we had conversations regarding what was
 25 going on on publicly available stocks. You

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1 know, we would have conversations with him and
 2 other board members all the time.
 3 628 Q. Did Anson have a position on
 4 Zenabis?
 5 A. I believe we were one of the
 6 original investors from the onset when they did
 7 a convertible preferred round.
 8 629 Q. And did Anson ever short Zenabis?
 9 A. I don't believe we were ever
 10 short overall, but we had positions that we were
 11 delta short at times.
 12 630 Q. What do you mean by delta short?
 13 A. It means when you have a
 14 convertible preferred, you know, you're a senior
 15 on the capital structure. So you're long here,
 16 you short stock here, you know, you are
 17 technically still long overall but you have a
 18 short position, it's just not a net short
 19 position.
 20 So overall if the company went up, it
 21 would be better for us than if the company went
 22 down.
 23 631 Q. I'd like for you to produce
 24 trading records where Anson had positions on
 25 both long and short on Zenabis?

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1 U/A MR. STALEY: I'll take that under
 2 advisement.
 3 BY MR. KIM:
 4 632 Q. Okay.
 5 Now, did Anson lose any financial
 6 partners? I don't mean investors, but trading
 7 partners or relationships with other financial
 8 institutions as a result of the Defamatory
 9 Manifesto being published?
 10 A. I believe at the onset of the
 11 publication we had several firms who paused
 12 trading with us. And subject to internal
 13 investigations, you know, eventually were able
 14 to turn the relationships back on.
 15 But, again, goes to show, like even
 16 people who were in the investment business took
 17 the manifesto seriously.
 18 633 Q. But in net terms, you didn't lose
 19 any relationships with any financial firms?
 20 A. I believe we lost one
 21 relationship. But, again, I can't specifically
 22 point to it being because of the manifesto.
 23 634 Q. Okay. And who is that, sir?
 24 A. It was Canaccord.
 25 635 Q. Okay. And can you tell me when

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1 Canaccord, when the relationship suffered with
 2 Canaccord?
 3 A. Again, it didn't end. It just,
 4 they changed the terms of engagement with us.
 5 So we weren't allowed to short there anymore.
 6 636 Q. Did Canaccord, anyone at
 7 Canaccord advise you that it was because of the
 8 publication of the manifesto that they changed
 9 the position?
 10 A. As I previously mentioned, it was
 11 a host of reasons but it was named as one of
 12 them.
 13 637 Q. Counsel, I'd like production of
 14 any correspondence from Canaccord which sets out
 15 the change in terms of the working relation due
 16 to the publication of the manifesto if they
 17 exist?
 18 U/A MR. STALEY: I'll take it under
 19 advisement.
 20 BY MR. KIM:
 21 638 Q. Now, so you provided a
 22 presentation to investors in September 2022.
 23 I'm going to ask you to turn to document
 24 AAI 0000562.
 25 This is a presentation deck for

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1 investors dated September 20, 2022; correct?
 2 A. Yeah.
 3 639 Q. And who prepared this deck?
 4 A. I don't know specifically who
 5 prepared the deck.
 6 640 Q. And who was it presented to?
 7 A. This specific one, I don't know
 8 who it was presented to.
 9 641 Q. But presumably it was to your
 10 investors; correct?
 11 A. This would go out to prospective
 12 partners, prospective investors, et cetera.
 13 I don't think we would send a
 14 marketing deck to an existing investor.
 15 642 Q. Now I'd like to turn to page 12
 16 of this document.
 17 Okay. If we're at -- sorry, page 13.
 18 Do you see that, sir?
 19 A. I see it.
 20 643 Q. It's the master fund monthly
 21 performance increase to 44.5 per cent in 2020
 22 and 45.5 per cent in 2021.
 23 Do you see that, sir?
 24 A. I don't see that on the graph
 25 you're showing me, but I believe it.

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1 644 Q. Yeah. Are these accurate? Is
 2 that accurate?
 3 A. They're accurate. That's
 4 correct.
 5 645 Q. Okay. So you would agree with me
 6 that the first so-called statements were
 7 published in around July 2020, and Defamatory
 8 Manifesto part 1 was published in September
 9 2020?
 10 A. Yes.
 11 646 Q. You agree with me, sir, those
 12 dates?
 13 A. Yes.
 14 647 Q. And you would agree with me that
 15 according to your presentations to investors, at
 16 least through this document, that, in fact, your
 17 monthly performance increased by 44.5 per cent
 18 in 2020 and 45.5 per cent in 2021?
 19 A. Sorry, just to be specific, the
 20 bulk of the gains in 2020 was pre- the period
 21 you're asking about.
 22 648 Q. Okay. But what about 2021?
 23 That's after the publication of the defamatory
 24 statements. In fact, you're doing better than
 25 ever.

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1 A. Yeah, there's no doubt the LPs
 2 have done very well from their investments in
 3 the fund.
 4 My contention is a performance of a
 5 company is not just the earnings in the company
 6 but the goodwill associated. and the goodwill
 7 within our organization was severely tarnished
 8 as a result of the manifesto.
 9 649 Q. Okay. So where in this document
 10 would you account for the loss in goodwill?
 11 A. Again, what you're looking at
 12 here is an investor's return. The investors
 13 aren't invested in the operations in the
 14 company, right. This is an Anson Investments
 15 Master Fund return.
 16 650 Q. Yes?
 17 A. So the Anson Investments Master
 18 Fund had great performance yes, but Anson
 19 Investments -- Anson Advisors Inc., which is the
 20 op-co, has taken a substantial hit in regards to
 21 the goodwill, right.
 22 It's not just the function of the
 23 capital but the reputation and the harm done
 24 throughout this process severely lowers the
 25 value and perception of my company.

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1 651 Q. Now, Mr. Kassam, is the loss in
 2 goodwill, is that reflected in your annual
 3 statements?
 4 A. Which annual statement are you
 5 referring to.
 6 652 Q. For the three funds.
 7 A. Again, the funds don't represent,
 8 don't talk about goodwill. They just talk about
 9 assets and funds, like a nav, and the nav
 10 increasing and decreasing. They don't look at
 11 goodwill.
 12 653 Q. So where would you account for
 13 the loss in goodwill?
 14 A. The loss in goodwill is, again,
 15 it can't be shown on this sheet, right. This is
 16 an investor's return. So the investor puts in,
 17 you know, X dollars and this is what X dollars
 18 would have become.
 19 654 Q. Where would I find that -- sorry,
 20 go ahead.
 21 A. We're not running a public
 22 company, right. If you had a public company,
 23 you would be able to derive the difference
 24 between the goodwill and the physical assets.
 25 But on a private company and a

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1 professional manager, integrity is what's most
2 important. And, you know, the manifesto was
3 actively hitting at the integrity of myself and
4 the organization.
5 And, yes, you can't show it by looking
6 at the individual investor line. But you can
7 argue that a lot of time and effort and money
8 was spent on it, and what would have that return
9 have happened in 2020. What would have happened
10 in '21.
11 You know, we can never really know.
12 655 Q. But, sir, if you look at from
13 2018 on, in fact, 2018 the master fund returned
14 19.2 per cent; 2019, 10.1 per cent; 2022,
15 44.5 per cent; 2021, 45.5 per cent.
16 Sir, you would agree with me that at
17 least in terms of returns, in fact, you've never
18 done better?
19 MR. STALEY: I mean, Won, I think the
20 witness has now tried to say this about 15
21 times, that that shows how well he has done as
22 an investor and the benefits achieved by
23 investors.
24 It doesn't deal with the implications
25 on the business of the defamatory statements,

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1 including obviously loss of goodwill and
2 customers pulling their money out of the fund.
3 BY MR. KIM:
4 656 Q. But your client cannot account
5 for it.
6 Where would I find that information,
7 Mr. Kassam? Where do I find the loss in
8 goodwill and -- in fact, assets under management
9 has only grown since the publication of the
10 manifesto; right?
11 MR. STALEY: I'm sorry, you've asked
12 two questions there. So you need to --
13 BY MR. KIM:
14 657 Q. So give me two answers.
15 MR. STALEY: Well, no. We're going
16 not going to do compound questions.
17 BY MR. KIM:
18 658 Q. Okay. Mr. Kassam, you would
19 agree with me that the assets under management
20 has grown over from 2018, 2019, 2020, 2021 and
21 2022?
22 A. The assets have grown, like on an
23 asset-based perspective. But that's a function
24 of compounding, right. We've taken the money
25 that's in the fund and then grown it.

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1 It hasn't been through a lot of third
2 parties adding money. And that is a direct
3 result of what we've dealt with within this
4 manifesto and conspiracy.
5 659 Q. Mr. Kassam, I'd like for you to
6 provide us with a document evidencing your
7 financial statements for the three entities for
8 years 2018 through present?
9 U/A MR. STALEY: I'll take that under
10 advisement.
11 BY MR. KIM:
12 660 Q. Now, if I could move on,
13 Mr. Kassam. Actually, it's been about an hour
14 and 10 minutes. Could we take a five-minute
15 break?
16 -- RECESSED AT 2:55 PM --
17 -- RESUMING AT 3:04 P.M. --
18 BY MR. KIM:
19 661 Q. Mr. Kassam, now I'm going to turn
20 to another document, AAI 00010136.
21 Sir, have you seen this document
22 before?
23 A. I have.
24 662 Q. Who is Ebrahim El Kalza?
25 A. Ebrahim El Kalza is a media and

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1 PR expert who is a good friend of mine from
2 college.
3 663 Q. And where does?
4 A. He work he works for a large
5 media company based in Chicago.
6 664 Q. And did you retain -- can you
7 tell me what firm that is?
8 A. He's changed a couple of times
9 over the years. I can't remember the specific
10 name, but he wasn't engaged; he was just helping
11 out as a friend.
12 665 Q. Okay. So if you go to this
13 email, sir, you say on the second paragraph, it
14 says:
15 "I was speaking to a few PR guys
16 last night. They said we need a
17 response, but it can't be to the
18 letter itself. There's too much grey
19 as we're in somebody's position",
20 et cetera.
21 Do you see that, sir?
22 A. I do.
23 666 Q. So, first of all, what do you
24 mean, "grey"?
25 A. Grey means subjective. Like the

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1 notion was when you look at PR is that there's
 2 two forms of responses to matters like this.
 3 One is taking the letter and
 4 dissecting it line by line, and the second is
 5 just taking an overall, you know, 30,000-foot
 6 view of the situation.
 7 667 Q. But if you look at this paragraph
 8 here, you say, first of all, you were speaking
 9 to a few PR guys last night. Who were those PR
 10 guys?
 11 A. Again, after this came out,
 12 because it was so vast and had such effect, you
 13 know, people were in-bound, and right away. Not
 14 just people curious about it, but people saying
 15 could they help.
 16 So random PR people were calling and
 17 saying they could offer services. Friends of
 18 mine who obviously knew we were under attack and
 19 under siege were saying hey, happy to help if
 20 you just want to use me as a springboard.
 21 This was such a vast and troubling
 22 conspiracy out there that it literally attracted
 23 attention in far reaches of the globe, all over.
 24 And, you know, so I took the time to listen to
 25 whoever would call or offer advice, and I would

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1 take that under consideration and reflection.
 2 668 Q. And who were the PR guys?
 3 A. I just mentioned, people came
 4 from far and wide. I don't specifically
 5 remember who and how, but like, you know, old
 6 friends who were in PR would reach out, and
 7 randoms who were trying to get business would
 8 reach out. I don't know specifically who it was
 9 that I'm referring to.
 10 669 Q. I'd like an undertaking to
 11 identify who the PR guys were?
 12 U/A MR. STALEY: We'll take it under
 13 advisement.
 14 BY MR. KIM:
 15 670 Q. The PR people said you needed a
 16 response but it can't be to the letter. They're
 17 talking about the manifesto, right? The letter
 18 is the manifesto?
 19 A. I believe so.
 20 Q. "There's too much grey, as we
 21 were in some of these positions".
 22 So what do you mean by that? What do
 23 you mean too much grey as you were in some of
 24 these positions. Is part of it true?
 25 A. No.

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1 MR. STALEY: Hold on, hold on, hold
 2 on. Is a part of it true, that's not a fair
 3 question.
 4 BY MR. KIM:
 5 671 Q. I'm not here to be fair; right?
 6 MR. STALEY: That's fine, but that's
 7 my job is to make sure that you don't get to ask
 8 unfair questions. So it's fair to ask him what
 9 he meant by there's too much and in some of the
 10 positions. That's a fair question.
 11 BY MR. KIM:
 12 672 Q. Okay. Well, let's go with
 13 Mr. Staley's interpretation of my question.
 14 You were in some of these positions.
 15 What do you mean by that, sir?
 16 A. If someone had said that you were
 17 short ABCD or Microsoft or something that we
 18 weren't in, it's an easy thing to say we weren't
 19 in these things as completely, you know
 20 preposterous.
 21 But some of the companies that were
 22 mentioned in the manifesto we are around. Not
 23 that it wasn't some of it was true, just the
 24 fact that we're there.
 25 So it becomes too complicated in a

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1 PR-type response to respond to the individual
 2 allegations in the names.
 3 673 Q. Right. So it wasn't a
 4 black-and-white situation. Anson did have
 5 position, short positions, in some of these
 6 companies; correct?
 7 A. It doesn't say short positions.
 8 It says we have positions, that we were, you
 9 know, had positions both long and short in some
 10 of the names here.
 11 674 Q. So it wasn't just, like you said,
 12 I take you at your word, it's grey; it's not
 13 black-and-white?
 14 A. It's grey, meaning it's too hard
 15 to respond to, you know, a massive document
 16 unless you go line by line. If you weren't
 17 involved in any of the names then, yes, that's
 18 what it means by black-and-white. Not
 19 black-and-white whether to the allegations were
 20 true or not.
 21 675 Q. Now, when you say, again, you
 22 reiterate that the firm's doing fine, then
 23 reference that you're at the highest point in
 24 regard to asset levels and returns. Right?
 25 A. Correct.

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1 676 Q. That's true; right? You're at
2 the highest point in asset levels and returns.
3 A. As of September 30, 2020, at
4 9:09 a.m., that was in fact the truth, yes.
5 677 Q. Yeah. Now, Mr. Kassam, can you
6 identify which of the positions that -- can you
7 go through part 1 of the manifesto and identify
8 which of these positions Anson is in?
9 MR. STALEY: You need to take him
10 through and ask him which ones.
11 BY MR. KIM:
12 678 Q. Well, actually, I did try asking
13 before lunch and your position was that it was
14 all set out in the pleadings. So in an effort
15 to save time --
16 MR. STALEY: That's not true. You
17 took the one paragraph of the pleading and you
18 asked him details and I said it's in the
19 pleading.
20 If you're asking him to go to the
21 Defamatory Manifesto and what positions are
22 there, then it's fair to go to the manifesto and
23 identify the various stocks discussed and you
24 can ask him what his position was.
25

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1 BY MR. KIM:
2 679 Q. Mr. Kassam, can I ask you, not
3 today and not now, but can you go through the
4 Defamatory Manifesto part 1 and identify what
5 you say are the truth and what are false?
6 MR. STALEY: There's no chance that's
7 happening. He's here to be examined. You can
8 ask him the questions.
9 BY MR. KIM:
10 680 Q. Now, with regard to
11 September 30th, you released -- we'll first show
12 response to manifesto. I'm going to take a
13 document, AAI 000854.
14 A. Yeah?
15 681 Q. Did Ms. Salvatore draft this
16 statement?
17 A. I believe so.
18 682 Q. And you approved of the
19 statement?
20 A. I believe so.
21 683 Q. Now I'm going to take you to the
22 second paragraph. You say:
23 "No serious investor is swayed by
24 these personal attacks. We, like our
25 limited partners, are focused on value

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1 creation based on facts, and the facts
2 are that Anson is at the highest level
3 of assets under management in our
4 history and we are generating record
5 returns in a very challenging market".
6 Do you agree with that statement, sir?
7 A. Based on the timeline, I agree
8 with the statement, yes.
9 684 Q. And, in fact, we've covered a lot
10 of this, but do you have any proof that any
11 serious investor was swayed by the personal
12 attacks in any of the other allegations in the
13 part 1 of the manifesto?
14 MR. STALEY: Apart from what he's
15 already told you where he had people pulling
16 out?
17 BY MR. KIM:
18 685 Q. Well, Mr. Kassam has always taken
19 issue of me asking him about his investors.
20 What do you mean by "serious
21 investor"?
22 A. We're trying to -- you know, this
23 is a PR thing. So we're trying to say that no
24 serious person would take this seriously at the
25 time. You know, you're trying to minimize the

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1 damage.
2 At the end of the day, as you saw in
3 the stuff you pulled up, serious investors were
4 taking it seriously. But the objective at this
5 time was to minimize the damage and outflow of
6 funds. So we have to show a brave face.
7 You know, so on September 30 when we
8 wrote this, you know, we were saying no serious
9 investor was swayed, but knowing that there are
10 people that, you know, would come to show that
11 took out their money.
12 686 Q. But, in fact, no part of this
13 statement denies the truth of the Defamatory
14 Manifesto part 1, but instead you say you stand
15 by Anson's position. What --
16 MR. STALEY: Hold on, hold on, hold
17 on. Won, the premise of the question we're not
18 going to let you get away with. If you want to
19 ask a question about what's on here. But you're
20 stating as a premise that it doesn't deny and
21 then you asked the question and that's not
22 right.
23 BY MR. KIM:
24 687 Q. Okay. Let's break it down.
25 Let's go to the last sentence of the big

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1 paragraph. It says:
 2 "The fact is that we always
 3 conduct ourselves with utmost
 4 integrity and in compliance with legal
 5 and regulatory requirements".
 6 Is that true?
 7 MR. STALEY: Which one might
 8 reasonably think is denying what's in the
 9 Defamatory Manifesto; right?
 10 BY MR. KIM:
 11 688 Q. Yes, I know, but my question is:
 12 Is that true, Mr. Kassam?
 13 A. I believe so.
 14 689 Q. Do you always comply with the
 15 legal and regulatory requirements?
 16 A. We try to, yes.
 17 690 Q. Are you currently under
 18 investigation by OSC or SEC or the DOJ in the
 19 United States?
 20 MR. STALEY: I just want to say this,
 21 Won, that there are, as you might understand,
 22 there are times there are limitations on what
 23 one can say about matters because of statutory
 24 confidentiality obligations.
 25 So any answer that the witness gives

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1 will be subject to that qualification.
 2 BY MR. KIM:
 3 691 Q. I think that was the same, my
 4 position, when you asked Mr. Doxtator. So, yes,
 5 I accept the premise of that.
 6 Within those limitations --
 7 MR. STALEY: I don't think it was, but
 8 at least in this context, I'm telling you before
 9 the witness answers, I'm giving you that as
 10 context.
 11 Why don't you break it down, Won? Why
 12 don't you break it down?
 13 BY MR. KIM:
 14 692 Q. Are you under any legal and/or
 15 regulatory investigations by the OSC?
 16 A. I don't believe we are.
 17 693 Q. I'm talking all of the Anson
 18 entities.
 19 A. That's correct.
 20 694 Q. What about is any of the Anson
 21 entities under investigation by the Securities
 22 and Exchange Commission?
 23 A. You know, given the size and
 24 scope of the fund and what we do, you know,
 25 there are -- you know, we are always -- you

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1 know, we're big player here and in the
 2 North American market, and as such, we get
 3 inquiries from time-to-time about from whole
 4 multitude of investigators and people and the
 5 like.
 6 It's just a matter of, you know, in
 7 terms of we get inquiries from time-to-time.
 8 695 Q. Okay. That's an answer to a
 9 question, not to my question.
 10 Are you or any of the Anson entities
 11 under investigation by the Securities and
 12 Exchange Commission?
 13 MR. STALEY: I believe he has answered
 14 the question.
 15 BY MR. KIM:
 16 696 Q. It's a yes-or-no.
 17 MR. STALEY: I believe he's answered
 18 the question.
 19 BY MR. KIM:
 20 697 Q. If yes, I'd like particulars of
 21 what the allegations are?
 22 U/A MR. STALEY: We will take that under
 23 advisement.
 24 BY MR. KIM:
 25 698 Q. Are you or any of the Anson

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1 entities under investigation by the Department
 2 of Justice?
 3 A. I don't believe we are the target
 4 of any investigation by the Department of
 5 Justice.
 6 699 Q. Are you or any of the Anson
 7 entities under investigation by the Ontario
 8 Securities Commission?
 9 MR. STALEY: He's already answered
 10 that question.
 11 BY MR. KIM:
 12 700 Q. And what was the answer?
 13 A. I don't believe we are.
 14 701 Q. Were you -- if you are under
 15 investigation by the SEC, would you be
 16 communicating that to your limited partners?
 17 R/F MR. STALEY: You've got a premise in
 18 there that I'm not sure that I agree with, so
 19 I'm not going to let the witness answer the
 20 question as it's phrased.
 21 BY MR. KIM:
 22 702 Q. Have you notified your --
 23 MR. STALEY: Won, I just want to also
 24 just caution you on one thing here, which is, as
 25 you know, any Examination for Discovery is

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1 subject to the statutory now implied
 2 undertaking, which seems like an oxymoron, but
 3 that's what it is. And I am mindful of who is
 4 listening to this call.
 5 So I'm just going to caution you that
 6 if anything from this examination is disclosed
 7 to any third-party or ends up in any sort of
 8 publication or post, we will know where it came
 9 from and we will deal with it accordingly.
 10 BY MR. KIM:
 11 703 Q. Thank you for the caution.
 12 That's always been the case as far, as long as
 13 you and I have been practicing, and I'm not here
 14 to --
 15 -- SIMULTANEOUS SPEAKERS --
 16
 17 MR. STALEY: I understand. This is
 18 not directed at you, but I am mindful of the
 19 names who are watching this and in whose
 20 confidence I do not have the same confidence in
 21 them, Won, as I do you personally.
 22 BY MR. KIM:
 23 704 Q. We are not here to carry water
 24 for anybody else other than our clients, and our

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1 clients have been advised about the implied
 2 undertaking rule which has been codified under
 3 the statute. We have always -- there's nothing
 4 that we have done that should give you any
 5 caution.
 6 What gets filed here will stay within
 7 the confines of this lawsuit, Mr. Staley. As
 8 you know, I take my obligation seriously as
 9 counsel. You of all people should know that,
 10 actually.
 11 MR. STALEY: As I said, it's not
 12 directed at you, but there are a number of
 13 manifestos and other things out there which
 14 would suggest people don't -- people act in a
 15 matter that they shouldn't, and so I'm just
 16 giving you that caution on the record --
 17 BY MR. KIM:
 18 705 Q. I note it.
 19 MR. STALEY: -- so that if there's
 20 anything later happens, anybody who is listening
 21 to this will be fully alert to what I've said.
 22 BY MR. KIM:
 23 706 Q. I understand. Subject to that
 24 caution, my question stands.
 25 MR. STALEY: I think we've answered

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1 it.
 2 BY MR. KIM:
 3 707 Q. No, you haven't answered it,
 4 because you interfered.
 5 MR. STALEY: I think I objected to the
 6 question as it was phrased.
 7 BY MR. KIM:
 8 708 Q. Okay. Well, here's a new
 9 iteration of the question.
 10 Mr. Kassam, have you had occasion to
 11 notify your limited partners that you and/or
 12 Anson entities were under investigation of the
 13 Security and Exchange Commission?
 14 R/F MR. STALEY: I have already objected
 15 to the question as it was phrased.
 16 BY MR. KIM:
 17 709 Q. Okay. Well, you didn't object to
 18 this one.
 19 Go ahead.
 20 MR. STALEY: I did. It's the same
 21 question you just asked a minute ago that I
 22 objected to.
 23 BY MR. KIM:
 24 710 Q. Mr. Kassam, have you received any
 25 notice of investigation from the Securities and

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1 Exchange Commission from 2018 to the current
 2 date?
 3 R/F MR. STALEY: The same; I'm objecting
 4 to the question.
 5 BY MR. KIM:
 6 711 Q. You can object.
 7 Would there be -- have you received
 8 any redemption request from your investors
 9 because of a pending investigation or a current
 10 investigation from the SEC?
 11 R/F* MR. STALEY: Again, the premise of the
 12 question is one that I'm not going to let the
 13 witness address because it's implied -- I've
 14 objected to questions on that subject in it
 15 would require the witness to respond to the
 16 question to answer the question as it's now
 17 phrased.
 18 BY MR. KIM:
 19 712 Q. Okay. Thank you.
 20 Now, Mr. Kassam, you produced emails
 21 from "birchstreet@gmail.com" and the Defamatory
 22 Manifesto tip line and that a document is found
 23 at AAI 00001245.
 24 Mr. Kassam, are you familiar with this
 25 document?

210	<p>1 A. I am not.</p> <p>2 713 Q. All right. Let me ask you a</p> <p>3 general question. Have you or anyone at Anson</p> <p>4 entities write to the Defamatory Manifesto tip</p> <p>5 line?</p> <p>6 A. I don't believe we have.</p> <p>7 714 Q. Is that belief based on fact or</p> <p>8 just your belief? Do you know?</p> <p>9 A. I don't think anyone at Anson</p> <p>10 contacted the Capital Markets Investigation</p> <p>11 email.</p> <p>12 715 Q. You didn't try to out people by</p> <p>13 sending emails under an alias in an effort to</p> <p>14 root them out?</p> <p>15 A. Not someone within our</p> <p>16 organization, which was your question.</p> <p>17 716 Q. Do any entities employed by you</p> <p>18 or contracted by you, have they made efforts to</p> <p>19 reach out to the tip lines to establish a</p> <p>20 connection?</p> <p>21 A. No.</p> <p>22 717 Q. No?</p> <p>23 A. Not an entity controlled by me or</p> <p>24 a consultant paid by me, no.</p> <p>25 718 Q. Okay. Do you know if anyone</p>	212	<p>1 within Anson begin investigating the Bosnian</p> <p>2 developers?</p> <p>3 A. I believe the same firm that we</p> <p>4 had worked with on the Jacob Doxtator matter,</p> <p>5 Artemis, they were piggybacking the Bosnia</p> <p>6 investigation.</p> <p>7 725 Q. Now, they are arm's-length.</p> <p>8 They're a firm for hire; correct?</p> <p>9 A. I believe so, yes.</p> <p>10 726 Q. How did they make their way to</p> <p>11 the Bosnian developers? Do you know?</p> <p>12 A. Sorry, can you repeat the</p> <p>13 question?</p> <p>14 727 Q. Do you know how they made a</p> <p>15 connection to Bosnian developers?</p> <p>16 A. I can't recall the specifics of</p> <p>17 how they got down that path of the Bosnian</p> <p>18 developers.</p> <p>19 728 Q. Now, your counsel has agreed to</p> <p>20 produce, or take under advisement to be</p> <p>21 accurate, and I want to be accurate, to produce</p> <p>22 all of the expert reports by entities hired by</p> <p>23 you, and so a lot of my questions will have to</p> <p>24 wait on production or at least a position on</p> <p>25 those documents.</p>
211	<p>1 who's otherwise -- do you know if anyone else --</p> <p>2 do you know anyone or entities or persons who</p> <p>3 have written to the tip lines in order to make a</p> <p>4 connection?</p> <p>5 A. Yes. A friend of mine reached</p> <p>6 out to them at one point to try and see if he</p> <p>7 could snuff out who was behind this.</p> <p>8 719 Q. Who was that?</p> <p>9 A. His name is Luigi Calabrese.</p> <p>10 720 Q. Is Mr. Calabrese the person</p> <p>11 behind birchstreet@gmail.com?</p> <p>12 A. I believe so.</p> <p>13 721 Q. Can you produce -- did he get any</p> <p>14 answers in reply from the tip hotline?</p> <p>15 A. I believe he did.</p> <p>16 722 Q. Did you produce those documents?</p> <p>17 A. I'm not sure.</p> <p>18 723 Q. Can you check and --</p> <p>19 U/T MR. STALEY: My understanding, Won, we</p> <p>20 did, but we can give you an undertaking to</p> <p>21 confirm that.</p> <p>22 BY MR. KIM:</p> <p>23 724 Q. Thank you.</p> <p>24 Now, let's go on to the Bosnian</p> <p>25 developers. Mr. Kassam, when did you or persons</p>	213	<p>1 But, Mr. Kassam, with regard to the</p> <p>2 Bosnian entities, did you or anyone at Anson do</p> <p>3 independent investigations other than leaving it</p> <p>4 to Artemis?</p> <p>5 A. About what?</p> <p>6 729 Q. About --</p> <p>7 A. About specifically Bosnian or --</p> <p>8 730 Q. The accuracy of the information</p> <p>9 about the Bosnian developers.</p> <p>10 MR. STALEY: So I just want to</p> <p>11 confirm, this is just about the Bosnian</p> <p>12 developers; that's what it's directed at?</p> <p>13 BY MR. KIM:</p> <p>14 731 Q. Yes.</p> <p>15 A. Sorry, so you're asking did we</p> <p>16 independently find the same conclusion or did we</p> <p>17 try to corroborate the information or --</p> <p>18 732 Q. No.</p> <p>19 A. -- what specifically are you</p> <p>20 asking?</p> <p>21 733 Q. Let me simplify. You relied on</p> <p>22 the investigation and conclusions from Artemis.</p> <p>23 You didn't do any independent investigation</p> <p>24 other than rely on Artemis to identify?</p> <p>25 A. I believe we used multiple</p>

214	<p>1 sources to, you know go down the path of this</p> <p>2 investigation. So it wasn't solely relying on</p> <p>3 Artemis.</p> <p>4 But as I previously mentioned, we did</p> <p>5 our own work and we hired multiple firms to try</p> <p>6 and figure out where the conspiracy started and</p> <p>7 came from.</p> <p>8 734 Q. Who were the other firms?</p> <p>9 A. I think we've already answered</p> <p>10 that, that's subject to privilege or also an</p> <p>11 undertaking.</p> <p>12 U/A MR. STALEY: We'll take under</p> <p>13 advisement, Won, but I don't believe any of the</p> <p>14 work was simply confined to Artemis.</p> <p>15 BY MR. KIM:</p> <p>16 735 Q. You will advise me.</p> <p>17 Tell me, to the best of your</p> <p>18 knowledge, once the work product from Artemis</p> <p>19 was received, were you satisfied that you got</p> <p>20 pristine documents or that these documents get</p> <p>21 worked on by various entities?</p> <p>22 MR. STALEY: Sorry, what documents are</p> <p>23 you referring to? I mean, obviously there's</p> <p>24 been information --</p> <p>25</p>	216	
215	<p>1 -- SIMULTANEOUS SPEAKERS --</p> <p>2</p> <p>3 MR. STALEY: -- that have not been</p> <p>4 produced.</p> <p>5 BY MR. KIM:</p> <p>6 736 Q. We can talk about -- okay. Let's</p> <p>7 start --</p> <p>8 MR. STALEY: Let me just say this to</p> <p>9 you, Won. That in the course of making my</p> <p>10 client's productions, there were documents that</p> <p>11 my client obtained from Artemis that were</p> <p>12 produced as part of the productions. There was</p> <p>13 obviously one that we intended to produce but</p> <p>14 produced late.</p> <p>15 So are documents that have been</p> <p>16 produced that were sourced through Artemis.</p> <p>17 Obviously, there was also reporting received</p> <p>18 from Artemis. And I'm just trying to understand</p> <p>19 what specifically you're referring to in your</p> <p>20 question.</p> <p>21 BY MR. KIM:</p> <p>22 737 Q. I am hampered by the fact that</p> <p>23 you have not produced a report. You have</p> <p>24 selectively produced certain documents. So I</p> <p>25 can go down --</p>	<p>1 MR. STALEY: We produced the source</p> <p>2 documents but not the reporting. So that's what</p> <p>3 we've done.</p> <p>4 BY MR. KIM:</p> <p>5 738 Q. Have you -- first of all, I'm</p> <p>6 going to leave my questions until we get the</p> <p>7 report.</p> <p>8 The specific undertakings that you</p> <p>9 produce the report, all of your investigation</p> <p>10 report, in full?</p> <p>11 MR. STALEY: And we have not agreed to</p> <p>12 do that; we've said we'd take it under</p> <p>13 advisement. But you shouldn't hold your breath</p> <p>14 expecting them to be given to you.</p> <p>15 BY MR. KIM:</p> <p>16 739 Q. That's why I will save my</p> <p>17 questions regarding those documents for another</p> <p>18 day.</p> <p>19 Now, Mr. Kassam, I'm going to get to a</p> <p>20 person name "PresumablyPaul" who is</p> <p>21 "PresumablyPaul"?</p> <p>22 A. I believe he is a lawyer who is</p> <p>23 in Toronto.</p> <p>24 740 Q. I'm going to take you to a</p> <p>25 document, AAI 0000590.</p>	217

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1 A. I reached out to him on Twitter.
 2 747 Q. Okay. And did you share
 3 identifying information?
 4 A. Sorry, did I share who I was?
 5 748 Q. I mean did you share your contact
 6 information.
 7 A. Yes, I believe I told him to give
 8 me a shout.
 9 749 Q. Okay. And did he give you a
 10 shout?
 11 A. He did.
 12 750 Q. Through phone?
 13 A. I can't remember.
 14 751 Q. Can you find out how he reached
 15 out to you?
 16 U/A MR. STALEY: I'll take that under
 17 advisement.
 18 BY MR. KIM:
 19 752 Q. And also as part of that, I want
 20 production of his phone number or email address
 21 if you have it?
 22 U/A MR. STALEY: I'll take it under
 23 advisement.
 24 BY MR. KIM:
 25 753 Q. Now, is Mr. Roth the person

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1 behind TheHeavensAbove@ProtonMail.com?
 2 A. I believe so.
 3 754 Q. Do you know what ProtonMail is,
 4 Mr. Kassam?
 5 A. I do.
 6 755 Q. And why would somebody use
 7 ProtonMail?
 8 A. I believe someone would use
 9 ProtonMail to try and ensure anonymity.
 10 756 Q. Okay. Given the fact that
 11 Mr. Roth used ProtonMail, why would he then drop
 12 the anonymity and talk do you directly?
 13 A. Sorry, I think the time line is
 14 off here. We chatted before ProtonMail became
 15 part of the conversation.
 16 757 Q. Okay. When did you start
 17 chatting? After April 6, 2021?
 18 A. Correct.
 19 758 Q. Have you produced all of the
 20 communications between you and "PresumablyPaul"?
 21 A. I believe we have, yes.
 22 759 Q. Including all of the text
 23 messages, emails, and social media messages?
 24 A. I believe we produced everything.
 25 760 Q. Now, when did you send your

220

1 "PresumablyPaul" chats to your lawyers?
 2 R/F MR. STALEY: Well, that's a privileged
 3 question.
 4 BY MR. KIM:
 5 761 Q. No.
 6 When?
 7 MR. STALEY: It doesn't matter. His
 8 communications with his lawyers are privileged.
 9 BY MR. KIM:
 10 762 Q. Okay. If we go down, when he
 11 says:
 12 "Hello, Moez. I'm not surprised
 13 that you've seen my tweets. I realize
 14 they have caught the attention of a
 15 handful of people over time."
 16 Did he expand on that?
 17 A. You have to ask him.
 18 763 Q. Okay. Now, let me ask you, who
 19 did he provide information on?
 20 A. What do you mean?
 21 764 Q. Well, first of all -- sorry, let
 22 me take a step back.
 23 You offered Paul indemnity and some
 24 confidentiality in exchange for information;
 25 correct?

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1 A. I don't remember about indemnity.
 2 The idea was he alluded to knowing about the
 3 conspiracy and, you know, the people involved
 4 with it and had evidence to corroborate such
 5 information. So, you know, I was keen to get
 6 that information.
 7 765 Q. Okay. Let's go to document
 8 AAI 0000596.
 9 So here you say:
 10 "I understand completely where
 11 you're coming from. My interest is
 12 simply gaining some perspective on
 13 recent tweets and particularly on
 14 links to Andy" --
 15 Excuse me, is that Andy DeFrancesco?
 16 A. I believe so.
 17 Q. "Also happy to be completely
 18 candid about who I am, what we do,
 19 et cetera. I think there's strange
 20 stuff out there. Want to know where
 21 I'm coming from, my plans going
 22 forward, happy to in person or on
 23 phone. Let me know what's best for
 24 you".
 25 Sir, what made you -- what did Paul

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1 tell you about information about Andy
2 DeFrancesco?
3 A. At least at the onset when we
4 first had a phone conversation, he was very
5 reticent about sharing information with me
6 because he believed because I was a sole global
7 filer that I was effectively affiliated with
8 Andy DeFrancesco.
9 766 Q. Okay. And what gave him comfort
10 for him to talk to you?
11 A. I explained that we had sold the
12 position down, that we were no longer doing
13 business with Andy DeFrancesco, and how I
14 believed that this manifesto, you know, also
15 amongst all the other -- amongst other
16 conspirators involved Andy DeFrancesco and the
17 Delavaco group employees.
18 767 Q. Now, did Paul advise you how he
19 knew, how we got this information?
20 A. Sorry, we haven't gotten to that
21 information yet.
22 768 Q. Okay. What did Paul tell you?
23 What did he advise you?
24 A. He told me that he knew about
25 this conspiracy far before it actually hit

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1 publication and that there were individuals out
2 there who were trying to, you know, crowd-source
3 information by, you know, starting with a draft
4 and a hotline, et cetera, and trying to get
5 further information to prove out whatever they
6 were trying to prove out.
7 769 Q. So there were drafts of the
8 manifesto then?
9 A. I believe we have pled those,
10 yes.
11 770 Q. Okay. And how would Paul be in a
12 position to know about all of this?
13 A. I believe that he is a friendly
14 or works with or affiliated with a website
15 called Deep Dive.
16 771 Q. And what is Deep Dive website?
17 A. I believe Deep Dive is a website
18 that sort of does or talks about cannabis
19 companies. And he said that Deep Dive was
20 approached or people within the Deep Dive were
21 approached by the manifesto conspiracy club to,
22 you know, take a look at their draft to see if
23 they could add anymore.
24 772 Q. Now, did Paul identify certain
25 individuals other than Andy DeFrancesco?

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1 A. I believe at the beginning it was
2 talking about Andy DeFrancesco and then also
3 mentioned the Betting Bruiser handle as being
4 involved.
5 773 Q. Anybody else?
6 A. I can't recall.
7 774 Q. Why did you not add Andy
8 DeFrancesco and Paul as defendants?
9 MR. STALEY: You're asking questions
10 that touch on lawyer-client privilege as to why
11 we may or may not have added people as
12 defendants as of now.
13 BY MR. KIM:
14 775 Q. Let me ask you, going back,
15 what's your relationship with Mr. DeFrancesco?
16 A. We don't have a relationship.
17 776 Q. You did at one time?
18 A. We did, yes.
19 777 Q. Okay. So when did you first meet
20 Andy DeFrancesco?
21 A. I think I've known
22 Mr. DeFrancesco for 15 years plus.
23 778 Q. Okay. How did you meet him?
24 A. In the normal course of the
25 business. He was a guy who puts together

225

1 companies; we're a group that invest in
2 companies. So, you know, we had a natural
3 symbiotic relationship in regards to the
4 investment world.
5 779 Q. And has Anson ever invested in a
6 company owned or operated by Andy DeFrancesco?
7 A. Yes.
8 780 Q. And where were they?
9 A. We've done numerous deals
10 together. Dozens of deals together over the
11 years.
12 781 Q. Would Aphria be one of them?
13 A. Aphria was one of them.
14 782 Q. What are the others?
15 A. As I mentioned, we're talking
16 about dozens over the years. Like, I don't have
17 them off the top of my head here.
18 783 Q. Can you undertake to let us know
19 the companies that you've shared interest with
20 Mr. DeFrancesco?
21 U/A MR. STALEY: I'll take that under
22 advisement. The relevance of that is not
23 apparent to me, but we'll take it under
24 advisement.
25

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1 BY MR. KIM:
 2 784 Q. Now, have you or anyone related
 3 to you spoken to Mr. DeFrancesco about the
 4 allegedly unlawful statements in this lawsuit?
 5 A. Sorry, are you referring to the
 6 manifesto?
 7 785 Q. Yes.
 8 A. I don't believe we have.
 9 786 Q. Why not?
 10 A. Again, we're spending a lot of
 11 time and with counsel and this, and we thought
 12 the best approach is the approach we've taken.
 13 787 Q. But you just said you don't have
 14 a relationship with Mr. DeFrancesco. What
 15 happened?
 16 A. Well, as a result of the
 17 publication and us believing that he's a part of
 18 it, we just haven't spoken.
 19 788 Q. If you're a part of it, why isn't
 20 he part of the lawsuit?
 21 R/F MR. STALEY: That question has already
 22 been refused.
 23 BY MR. KIM:
 24 789 Q. Is that the reason why you no
 25 longer speak to Mr. DeFrancesco?

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1 A. I believe so.
 2 790 Q. It's got nothing to with him
 3 being upset at you for destroying his cottage?
 4 A. I had rented his cottage years
 5 before. We had probably five to 10 deals after
 6 I rented had his cottage. So I don't think it
 7 had anything to do with the cottage.
 8 791 Q. So it's your information, then,
 9 your relationship with Mr. DeFrancesco turned on
 10 your suspicion that he had something to do with
 11 the manifesto?
 12 A. Sure.
 13 792 Q. Any other reason?
 14 That's a "no"?
 15 A. No. Sorry.
 16 793 Q. Okay. Now, I'm going to ask you
 17 to turn to a document, AAI 0000601.
 18 Now, you see that -- you say:
 19 "Let's chat now".
 20 Do you recall talking to Paul?
 21 A. I believe so.
 22 794 Q. And do you recall what the
 23 conversation was about?
 24 A. I believe we just went through
 25 that; right? That I was trying to convince him

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1 and to portray that we were not affiliated with
 2 Andy, but he didn't want to have anything to do
 3 with him.
 4 So, you know, if he realized that we
 5 were independent, he'd be a little more
 6 forthcoming with information.
 7 795 Q. Okay. And was he more
 8 forthcoming?
 9 A. I believe so, yeah.
 10 796 Q. What did he advise you?
 11 A. As we previously stated, that
 12 there was a conspiracy before the whole thing
 13 came to the conclusion, and he was affiliated
 14 with a group that was asked to opine on a draft
 15 publication of what ended up being the
 16 manifesto.
 17 797 Q. How was he affiliated? What was
 18 the group?
 19 MR. STALEY: I think he already told
 20 you that in answer to the question.
 21 BY MR. KIM:
 22 798 Q. Sorry, I must have missed it.
 23 What was --
 24 A. Deep Dive.
 25 799 Q. Deep Dive, okay.

229

1
 2 -- SIMULTANEOUS SPEAKERS --
 3
 4 MR. STALEY: -- to look at a draft.
 5 That was what Mr. Kassam previously testified
 6 to.
 7 BY MR. KIM:
 8 800 Q. And you previously advised that
 9 "PresumablyPaul" had identified Betting Bruiser
 10 and Andy DeFrancesco. Did he identify anybody
 11 else?
 12 A. I don't recall.
 13 801 Q. Can you check your records to see
 14 if he identified anybody other than Betting
 15 Bruiser and Andy DeFrancesco? You'll let me
 16 know?
 17 U/A MR. STALEY: I'll take it under
 18 advisement.
 19 BY MR. KIM:
 20 802 Q. Did you offer indemnity to
 21 Mr. Roth?
 22 A. I don't believe I did. He never
 23 alluded to doing anything wrong, just that they
 24 were approached to take a look at the draft
 25 publication.

230

1 803 Q. Did he advise you, did he, in
2 fact, look at the drafts?
3 A. I believe so. That's how he knew
4 what was inside.
5 804 Q. And did he say, was it accurate
6 or inaccurate? What did he advise you?
7 A. He advised -- sorry --
8 MR. STALEY: I think the witness has
9 already testified to whether or not the issue of
10 the accuracy or lack thereof of the drafts.
11 If you're asking him what he was told
12 by the witness, by this "PresumablyPaul", that's
13 a different question. But I want to make sure
14 that we're not asking the witness to validate
15 the truthfulness of statements that are alleged
16 to be defamatory where he's testified to that
17 already.
18 BY MR. KIM:
19 805 Q. Now, if we go to another
20 document, AAI 612.
21 Are you familiar with this chat,
22 Mr. Kassam?
23 A. I see that.
24 806 Q. Now, this is from April 12th.
25 Sometime between April 7th and April 12th, all

231

1 of a sudden we see the name "Stafford".
2 Do you see that? Stafford worked with
3 Bruiser?
4 A. Yeah.
5 807 Q. How did Stafford's name pop up in
6 your conversation? Because previously it was
7 only Bruiser and Andy DeFrancesco?
8 A. I believe I said at the onset the
9 argument was that he was tweeting at Andy
10 DeFrancesco and Betting Bruiser. That's how we
11 knew about the fact that he wasn't, you know,
12 working with them or was calling out what was
13 going on.
14 But I believe James Stafford didn't
15 have a Twitter, or one that we knew about, so I
16 didn't have any understanding of the
17 relationship between "PresumablyPaul" and
18 Stafford.
19 808 Q. Okay. So, in fact, it was you
20 that introduced the name Stafford to
21 "PresumablyPaul"; correct?
22 A. No, I don't think that's the
23 case. This is after a conversation with him.
24 You know, he was very reticent about giving
25 information. The more I could give him comfort

232

1 that we were an independent party and trying to
2 help decide that, you know, he, you know,
3 speaking on behalf of retail investors and not
4 getting duped by all the promoters, you know, he
5 was more forthcoming with information on the
6 calls.
7 And eventually, you know, he knew
8 specifically about Stafford, you know, working
9 on a conspiracy with both Betting Bruiser and
10 the Delavaco guys.
11 809 Q. Okay. You're going to have to
12 take me back, because between April 7, 2021, and
13 April 12th, do you recall, when did Stafford
14 name come up? Because it's the first time we
15 see -- sorry?
16 A. I believe the first time it came
17 up was on one of -- we had a bunch of calls,
18 right. It wasn't just -- it was one call to
19 introduce myself, one call to get him, one call
20 to ask if we could meet and he said we couldn't.
21 And then, you know, in all those calls
22 he would give up little nuggets of information.
23 And he had mentioned originally about
24 Bruiser and Andy, then added about Stafford,
25 then added about the Word documents. You know,

233

1 all that type of stuff.
2 It slowly came out, and that's when I
3 was trying to press him to send me the actual
4 documentation associated.
5 810 Q. Did he tell you how he came to be
6 in possession of these call transcripts?
7 A. Yeah. I went through that
8 already. I believe he is affiliated with people
9 or the website, the Deep Dive, and the Deep Dive
10 people were sent the Word document directly from
11 the co-conspirators.
12 811 Q. That's what he advised you?
13 A. I believe so.
14 812 Q. Now, when you told
15 "PresumablyPaul" that you had Excel sheets from
16 Bosnia -- do you see that at the top of this
17 chat?
18 A. I see it.
19 813 Q. What Excel sheet are you talking
20 about?
21 A. I believe that would be in the
22 pleadings, you know, the information that came
23 from the guys who were working on the Bosnia
24 angle where the Excel sheet was produced.
25 814 Q. And that came from your

234

1 investigators?
 2 A. Yeah.
 3 815 Q. Do you have any more Excel sheets
 4 related to Bosnia?
 5 A. I don't believe we have. I
 6 believe everything was pled unless it's subject
 7 to privilege.
 8 816 Q. Now, did "PresumablyPaul" mention
 9 the name Andy Rudensky or Jacob Doxtator?
 10 A. I don't believe he did.
 11 817 Q. And please check the records and
 12 make sure to --
 13 U/A MR. STALEY: We'll take that under
 14 advisement.
 15 BY MR. STALEY:
 16 818 Q. Okay.
 17 Now, if we go to the next document,
 18 615, he says he can't help you due to the
 19 inability of being completely anonymous.
 20 Why do you think he was helping you,
 21 first of all, on any basis?
 22 A. I believe, by just watching his
 23 Twitter handle, that he is about a fair and
 24 functioning market, and he believed that the
 25 actions of the individuals that we are alleging

235

1 are part of the conspiracy are, you know, acting
 2 in a way that is detrimental to the market as a
 3 whole.
 4 And, you know, I don't think he was
 5 trying to help me, but, you know, I didn't
 6 really know him before this, but he was just
 7 trying to have a fair and fluid market.
 8 819 Q. Now, all of that, you don't know
 9 that for a fact; right? That's your guess; your
 10 speculation? He never told you --
 11 A. That's based on --
 12 820 Q. Go ahead.
 13 A. That's based on what he told me.
 14 That's why he thought originally I was part of
 15 that world too, that we were in that world
 16 because we were affiliated or associated with
 17 some of the names and Andy himself, et cetera.
 18 So, you know, once he realized that
 19 we, in fact, were not cut from the same cloth,
 20 you know, he was more forthcoming with
 21 information.
 22 821 Q. So you didn't have a relationship
 23 before you reached out to him in early April?
 24 A. Right.
 25 822 Q. Did you ever pay Mr. Roth?

236

1 A. No.
 2 823 Q. Did you ever provide indemnity or
 3 any other benefit?
 4 A. No.
 5 824 Q. Do you know, is he a practising
 6 lawyer?
 7 A. I don't know.
 8 825 Q. Have you ever met him?
 9 A. I have not.
 10 826 Q. Did he know that you would be
 11 using transcripts that he provided in this
 12 lawsuit?
 13 A. I don't believe so.
 14 827 Q. Did he provide the transcript
 15 through email?
 16 A. I believe it came through
 17 ProtonMail.
 18 828 Q. From ProtonMail. And did you
 19 produce the ProtonMail that included the
 20 transcripts?
 21 A. I believe so.
 22 829 Q. Did you produce all of the emails
 23 from "PresumablyPaul"?
 24 A. I believe so.
 25 830 Q. If you check your records and you

237

1 haven't, undertake to produce everything that
 2 you received from "PresumablyPaul"?
 3 MR. STALEY: I understand we produced
 4 it all, Won.
 5 BY MR. KIM:
 6 831 Q. Now, if we can go to the next
 7 document, 631.
 8 Sir, this is June 16th. Do you see
 9 that?
 10 A. Yes.
 11 832 Q. You're asking Paul to ask his
 12 buddies for help one more time; right?
 13 A. That's what it looks like, yeah.
 14 833 Q. Did you speak to Paul anytime
 15 between April 22nd, the last chat, and
 16 June 16th?
 17 A. I don't know.
 18 834 Q. Can you check?
 19 U/A MR. STALEY: We will take that under
 20 advisement.
 21 BY MR. KIM:
 22 835 Q. Now, who are Paul's buddies
 23 you're referring to?
 24 A. The Deep Dive crew.
 25 836 Q. Okay. And what information did

238

1 you think the buddies had?
 2 A. Again, I'm confused on dates
 3 here. What was the date of the ProtonMail
 4 versus this conversation?
 5 837 Q. This conversation is June 16. I
 6 think the ProtonMail was April 7th, I believe.
 7 A. I believe, you know, obviously I
 8 passed on the information that came in from
 9 Proton, and obviously it would have been better
 10 if we got it from directly with someone who
 11 would come forward and explain the whole
 12 situation.
 13 So the idea was, since we already had
 14 the source document, you know, would the Deep
 15 Dive guys or him -- I thought he -- you know,
 16 he's affiliated, I didn't understand to the
 17 extent what the affiliation was -- but would
 18 they be interested in, you know, explaining the
 19 document and how they helped, how they got it,
 20 et cetera.
 21 And then obviously I understood there
 22 reticence to be obviously -- it looks pretty
 23 strange how they have this document. So, you
 24 know, maybe they had worked on it and maybe they
 25 hadn't. Our care wasn't about them because we

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1 knew they were just, you know, an online source
 2 of information, but who it is that they were
 3 working with and how.
 4 So I offered to, you know -- offered
 5 confidentiality as best as I could, and if they
 6 were worried about legal liability, offered them
 7 an indemnity just to be able to have a more
 8 forthright conversation.
 9 838 Q. Okay. Did you offer them formal
 10 indemnity?
 11 A. This was the only indemnity that
 12 I infer too. We never had a full conversation.
 13 I never had a direct conversation with anyone
 14 else in that group other than Paul himself.
 15 839 Q. So you're saying that Paul,
 16 you've never met Paul in person?
 17 A. Correct.
 18 840 Q. So you're saying he took your
 19 word from a chat to produce these key documents
 20 then? He trusted you?
 21 A. Again, it all depends on your
 22 definition of "trust". I was asking to meet in
 23 person. He said no. I was asking him to send
 24 and meet with the guys directly from Deep Dive.
 25 That didn't happen. The only thing I got was

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1 that one email with the documents attached.
 2 So I guess there's a level of trust.
 3 I definitely wouldn't think it's full trust.
 4 841 Q. Okay. So you don't know in fact
 5 who TheHeavensAbove@Proton; right?
 6 A. By technical definition, no. I
 7 don't know who's behind them.
 8 842 Q. Yeah. I mean, for example, it
 9 could be me?
 10 A. It could be you. But, like I
 11 said, with deductive reasoning, I had a
 12 conversation. He said, I can't help you but
 13 check out -- look on your email.
 14 And then magically two minutes later
 15 the email shows up, I wouldn't think it would be
 16 you.
 17 843 Q. Okay. I thank you for that.
 18 But, in fact, you don't know if
 19 HeavensAbove is Paul?
 20 A. It could be literally from the
 21 heavens above.
 22 844 Q. Okay. Now, do you know who -- do
 23 you believe the transcripts? Do you think
 24 they're authentic?
 25 A. I have no reason to believe

241

1 they're not authentic.
 2 845 Q. But you have no reason to believe
 3 they are; right?
 4 A. Well, you know, all our work
 5 before this had suggested exactly what was
 6 presented within this document. So, you know,
 7 I'm presuming that, you know, the stuff in the
 8 document is accurate.
 9 846 Q. So did Paul tell you, other than
 10 getting it from Deep Dive, do you know who
 11 recorded the conversations?
 12 A. I don't know, no.
 13 847 Q. Do you know if there are
 14 underlying recordings?
 15 A. I don't know.
 16 848 Q. Like, you only have the
 17 transcripts; there's no underlying -- you don't
 18 have the recordings?
 19 A. I don't have any audio or video
 20 recording, no.
 21 849 Q. So given the fact that you
 22 received these transcripts from a Proton account
 23 of which you don't know who the owner is, what
 24 gives you confidence that there's anything
 25 authentic about any of this?

242

1 MR. STALEY: I think he's already
 2 answered that question, Won. You're asking it
 3 again, but he's already explained himself.
 4 BY MR. KIM:
 5 850 Q. Well, I want to get that answer.
 6 I think I didn't ask it exactly --
 7 MR. STALEY: You've already got it.
 8 You may not like the answer, but you've got it.
 9 BY MR. KIM:
 10 851 Q. No, I didn't get it. That's the
 11 problem, why I'm asking.
 12 R/F MR. STALEY: Well, you can take this
 13 as a refusal, but you go back and see the
 14 transcript and you will find that he did answer
 15 it.
 16 BY MR. KIM:
 17 852 Q. Okay.
 18 Now, Mr. Kassam, have you or anybody
 19 else edited the transcripts? No?
 20 MR. STALEY: Hold on a second. You
 21 can ask him whether he or anyone to his
 22 knowledge has edited the transcripts. He
 23 doesn't know what happened to the transcripts
 24 before he got them; right?
 25

243

1 BY MR. KIM:
 2 853 Q. Right. He doesn't know. But
 3 since, from the time --
 4 MR. STALEY: So I think the question
 5 you can ask him is whether at any point in time
 6 from the time they were received were they
 7 edited to his knowledge.
 8 BY MR. KIM:
 9 854 Q. That's my question exactly.
 10 Mr. Kassam, from the time --
 11 MR. STALEY: It wasn't, but he can
 12 answer that one.
 13 BY MR. KIM:
 14 855 Q. Okay.
 15 Mr. Kassam, from the moment you got
 16 these transcripts from ProtonMail, have you or
 17 anybody known to you edited these documents?
 18 A. I don't believe so, no.
 19 856 Q. Now, have you spoken to
 20 "PresumablyPaul" since June?
 21 A. June of what?
 22 857 Q. June of 2021.
 23 A. I don't believe so, but I can't
 24 be sure.
 25 858 Q. And you have already undertaken

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1 to produce any and all communication you may
 2 have had, whichever format?
 3 MR. STALEY: Whatever undertaking
 4 we've already given we will comply with.
 5 THE WITNESS: Can I get a five-minute
 6 break?
 7 MR. KIM: Sure. No problem.
 8 -- RECESSED AT 4:05 P.M. --
 9 -- RESUMING AT 4:14 P.M. --
 10 BY MR. KIM:
 11 859 Q. Mr. Kassam, I understand that
 12 you've produced four different transcripts from
 13 HeavensAbove@ProtonMail.com?
 14 A. I believe so.
 15 860 Q. And when and how did you discover
 16 the metadata on the documents?
 17 A. I don't recall the specifics of
 18 how I discovered the metadata.
 19 861 Q. Okay. But you take no issue with
 20 the fact that the metadata shows that the
 21 document has been edited?
 22 The metadata speaks for itself; right?
 23 MR. STALEY: It speaks for itself.
 24 I'm not sure the witness knows what that shows.
 25

245

1 BY MR. KIM:
 2 862 Q. Did you or did anyone at Anson or
 3 Artemis Risk Consulting edit the documents?
 4 MR. STALEY: I think he's already
 5 given you an answer to that; right?
 6 BY MR. KIM:
 7 863 Q. No, he didn't.
 8 MR. STALEY: He did, actually.
 9 BY MR. KIM:
 10 864 Q. The answer is?
 11 MR. STALEY: I think he indicated that
 12 once the transcripts were received they were not
 13 edited to his knowledge.
 14 BY MR. KIM:
 15 865 Q. But the metadata shows that they
 16 have been edited.
 17 MR. STALEY: I think he's -- we've
 18 given you an answer.
 19 BY MR. KIM:
 20 866 Q. All right. Okay.
 21 Now, Mr. Kassam --
 22 MR. STALEY: When documents are maybe
 23 transferred for production, it may change the
 24 metadata. But in terms of whether the
 25 transcripts were edited, he's answered that

246

1 question.

2 BY MR. KIM:

3 867 Q. You and I of all people should

4 not be talking about metadata, Mr. Staley.

5 Let's leave it to our experts.

6 MR. STALEY: But I'm happy if you want

7 to rely on your people.

8 BY MR. KIM:

9 868 Q. I have coopted you into technical

10 midget along with me and a bunch of other people

11 I know. So let's just leave it there.

12 Now, Mr. Kassam, with regard to the

13 transcripts one, two, three, and four, they

14 refer to a CM, TM, and an insider.

15 Do you know who the CM, TM, and

16 insider are?

17 A. CM, TM, and insider?

18 869 Q. Yeah.

19 A. I don't know. I didn't write it.

20 870 Q. Okay. And these were -- after

21 you got them from Proton, where did you send

22 them?

23 A. I believe I sent it to my general

24 counsel.

25 871 Q. And what did your GC do with

247

1 them?

2 MR. STALEY: That's privileged.

3 BY MR. KIM:

4 872 Q. No.

5 What did Ms. Salvatore do with them?

6 A. I don't know what she did with

7 them.

8 873 Q. Do you know if she sent them to

9 your outside counsel?

10 MR. STALEY: Now you're getting into

11 stuff that's clearly privileged.

12 BY MR. KIM:

13 874 Q. I am. That's to illustrate

14 what -- the first question was not privileged.

15 All right. Let's move on. Let's move

16 on here.

17 Now, Mr. Kassam, do you know, how did

18 you learn of the second Defamatory Manifesto?

19 A. I don't recall the specific

20 instance of how I learned about it.

21 875 Q. Well, we know that you got an

22 email from Mr. Cynamon about the first part.

23 Did somebody send you an email about the second

24 part?

25 A. I'm sure multiple people did. I

248

1 just can't remember who sent it first.

2 876 Q. Did you hear from banks and

3 brokerages?

4 A. I can't remember the specifics of

5 who inbounded after it number two.

6 877 Q. So was out there and you've heard

7 from a bunch of people, a bunch of different

8 people; correct?

9 A. Yes.

10 878 Q. Okay. Did you get any investors

11 pull their fund because of the second Defamatory

12 Manifesto?

13 A. I don't know the specifics of who

14 pulled out after the second manifesto, but we

15 definitely continued to have calls and people

16 asking questions.

17 879 Q. But you answered their questions,

18 and did anyone leave?

19 A. I can't recall.

20 880 Q. Can you find out?

21 A. I can't recall.

22 881 Q. Okay. Now, did any --

23

24 -- SIMULTANEOUS SPEAKERS --

25

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1 BY MR. KIM:

2 882 Q. I understand you're a major

3 philanthropist in Toronto; correct?

4 A. I wouldn't say major, but I

5 definitely like to contribute back.

6 883 Q. Yes. And so does your wife?

7 A. My wife at the time was doing it

8 as a profession.

9 884 Q. Now, did any philanthropic

10 organization decline to work with you or anybody

11 related to you because of the publication of the

12 second manifesto?

13 A. I believe we had -- I definitely

14 had conversations in regards to philanthropic

15 organizations I was affiliated with, both from

16 advisory, being on boards, and also in my

17 giving, that there were definitely questions

18 raised regarding the manifestos.

19 885 Q. Did you have to resign any

20 position or were any of your donations refused

21 as a result of the publication of part 2?

22 A. I didn't have to resign, per se,

23 but I definitely had to do a lot of handholding

24 and questioning and talking to members of both

25 boards that I was affiliated with at the time.

250

1 MR. STALEY: And, Won, I just want to
 2 clarify. Your question was directed at what may
 3 have happened as a result of this second version
 4 or the second Defamatory Manifesto. I'm not
 5 sure if the witness is speaking to him having to
 6 deal with these organizations generally or just
 7 specific to the second one.
 8 So I just want to be clear on that.
 9 BY MR. KIM:
 10 886 Q. Let me ask for an undertaking.
 11 Mr. Kassam, could you advise us if any
 12 philanthropic organization that you and anyone
 13 related to you at Anson, including your spouse,
 14 had to resign or had their donations refused as
 15 a result of the publication of these manifestos,
 16 please?
 17 MR. STALEY: Well, I'm not going to
 18 give you an undertaking.
 19 I think he was trying to answer that
 20 question. I just was concerned that you had
 21 tied it to the second one, and I didn't believe
 22 that it was tethered to the second one in
 23 particular.
 24 BY MR. KIM:
 25 887 Q. All right. Now, did anyone ask

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1 you if any part of the second part of the
 2 manifesto was true? Did they ask you if any
 3 part of it was true?
 4 MR. STALEY: Won, I think we've
 5 covered this ground before. There's a fair bit
 6 of background in these things that doesn't
 7 appear to be inaccurate in terms of Mr. Kassam
 8 is with Anson Funds and stuff like that. The
 9 issue is sort of the overall thrust of that and
 10 whether it contains statements that are clearly
 11 false and defamatory.
 12 So I think we're going down a --
 13 you're trying to take him down a path we've
 14 already covered because --
 15 BY MR. KIM:
 16 888 Q. I've got your pleading. I'm
 17 content to move on here because we have
 18 tomorrow.
 19 But I'm going to play for you a
 20 recording that we have, the ROB 19 recording.
 21 A. Okay.
 22 889 Q. Okay.
 23 [Audio played].
 24 Now, is that you on the recording,
 25 Mr. Kassam?

252

1 A. I believe it is.
 2 890 Q. And you're speaking to Mr. Robert
 3 Doxtator on the call?
 4 A. I believe so.
 5 891 Q. This call was around
 6 September 30th, 2020?
 7 A. I don't know the specific date.
 8 892 Q. Okay. Well, check your records,
 9 and if it's not September 30th, 2020, let me
 10 know?
 11 MR. STALEY: We will.
 12 THE WITNESS: I think we asked for
 13 your client to confirm when this recording was
 14 taken because it's not evident from what's been
 15 produced when it was taken.
 16 BY MR. KIM:
 17 893 Q. Sorry, I didn't get that.
 18 MR. STALEY: We can move on, Won,
 19 that's fine.
 20 BY MR. KIM:
 21 894 Q. Okay. Now, when you say you
 22 don't care who did it or why they did it, you're
 23 talking about Defamatory Manifesto part 1?
 24 MR. STALEY: Well, if it's
 25 September 30, 2020, then it would have to be

253

1 just based on the matter of timing; right?
 2 BY MR. KIM:
 3 895 Q. Yeah --
 4 MR. STALEY: Because that would have
 5 been three days after that.
 6 BY MR. KIM:
 7 896 Q. That's right.
 8 MR. STALEY: So your client took a
 9 recording and can tell us when it was, and that
 10 would clearly date the conversation.
 11 BY MR. KIM:
 12 897 Q. So it would be Defamatory
 13 Manifesto part 1; correct?
 14 MR. STALEY: That's correct, if it was
 15 September 30, 2020, it would have to be.
 16 BY MR. KIM:
 17 898 Q. So, Mr. Kassam, you say:
 18 "From a perception basis, I have
 19 to go hard the way Newton Glassman did
 20 it to everyone. I have to go scorched
 21 earth".
 22 What do you mean by this?
 23 A. I mean we have to take this
 24 seriously. And people are saying, don't worry
 25 about it, just shrug it off, not a big deal.

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1 You know, people just trying to pacify you to
 2 move forward saying that at the end of the day,
 3 you know, you can recover from this.
 4 I felt that the strategy had to be
 5 that this kind of tactic is not acceptable to us
 6 and that anyone who is going to act in this type
 7 of manner in regards to the vitriol and
 8 animosity shown towards us, we have to take this
 9 seriously and irrespective of the outcome.
 10 At that point, we didn't know what the
 11 outcome was going to be. So, yeah, at that
 12 time, three days later, you know, we thought
 13 everything would be eventually okay, but we
 14 didn't know what was to cascade from that point.
 15 899 Q. So when you reference Mr. Newton
 16 Glassman, you're talking about the CEO of
 17 Catalyst?
 18 A. Former CEO, yes.
 19 900 Q. Yes, you were talking about what
 20 happened with Catalyst and West Face litigation?
 21 A. Amongst other litigations, yes.
 22 901 Q. And Anson was sued as part of
 23 that litigation; right?
 24 A. We were.
 25 902 Q. And what did you learn from your

255

1 involvement in the Catalyst litigation?
 2 MR. STALEY: Well, I'm not sure that's
 3 a proper question, what he learned. I'm not
 4 sure that that's relevant to anything at issue.
 5 BY MR. KIM:
 6 903 Q. Clearly the reference --
 7 -- SIMULTANEOUS SPEAKERS --
 8
 9
 10 MR. STALEY: Well, that fair. It's
 11 fair to ask what the reference means, but to ask
 12 what he learned in the litigation, I'm not sure
 13 that's a relevant question.
 14 BY MR. KIM:
 15 904 Q. Well, when you reference the way
 16 that Newton Glassman did it, what do you mean by
 17 that?
 18 A. I mean that, you know, he hired
 19 investigators, he hired multiple counsels, he,
 20 you know, irrespective of whether he was guilty
 21 or not, he came out guns-a-blazing.
 22 905 Q. Yeah. And you've adopted that
 23 playbook?
 24 A. At the time, the idea was we were
 25 going to make noise saying that, you know, we

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1 are not accepting of what happened, and saying
 2 and showing to the market and to market's
 3 constituents that we are taking this incredibly
 4 seriously, we're hiring as many experts as we
 5 can, we're hiring counsel. You know, we are
 6 going to get to the bottom of this and to figure
 7 out how and why this occurred.
 8 906 Q. So when you say "at the time",
 9 have your goals changed?
 10 A. Well, like we just said, at the
 11 time, three days later we didn't realize the
 12 ramifications of what we were dealing with,
 13 right.
 14 I thought at that point there was a
 15 chance that it would just blow over. I didn't
 16 realize that, you know, three years later we
 17 would still be dealing with the fallout of that
 18 situation.
 19 907 Q. What is the fallout? Your assets
 20 under management and your revenues have never
 21 been higher. What's the fallout?
 22 A. We're going to go back down the
 23 rabbit hole. It's not a function of just profit
 24 and loss, right.
 25 There is your standing in the

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1 community. There is the way you are proceed.
 2 There's the way you hire employees. The way you
 3 deal with retention.
 4 Everything took a hit other than the
 5 financial aspect of what you're referring to.
 6 Everything, you know, diminished as a result of
 7 this attack on us.
 8 908 Q. Well, have you made a calculation
 9 of which part of any diminishment in your
 10 standing or Anson's standing stems from the
 11 manifestos versus the publication of the
 12 information that you and Anson are under SEC
 13 investigation?
 14 R/F MR. STALEY: Well, hold on a second
 15 here.
 16 The premise of the question is not one
 17 that we accept. And if you're asking for a
 18 breakdown of damages, we will eventually produce
 19 a damages analysis for purpose of trial.
 20 But I'm not going to let the witness
 21 answer the question as framed.
 22 BY MR. KIM:
 23 909 Q. Well, thank you for that, but my
 24 question was more general in nature.
 25 Have you at this time separated the

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1 fallout from the manifestos verses the fallout
 2 that you may have experienced as a result of the
 3 public dissemination of the information that you
 4 are under investigation by the SEC?
 5 R/F MR. STALEY: Same answer. It's not a
 6 proper question.
 7 BY MR. KIM:
 8 910 Q. When you say you can afford it,
 9 you don't care, "we have to flex, I'm going to
 10 be flexing hard", what do you mean by that
 11 statement?
 12 A. I mean we are going to use all
 13 our power and all our resources to get to the
 14 bottom of this conspiracy.
 15 911 Q. And who are your audience for
 16 your flexing?
 17 A. The court of public opinion, to
 18 our partners, to our investors, to our
 19 employees, to the market in general.
 20 912 Q. Okay. Is part of this you're
 21 flexing to prevent future criticism of Anson?
 22 A. I don't necessarily think it's a
 23 function of future criticism, but it should act
 24 as a deterrent towards anyone trying to put
 25 false and malicious information out about us.

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1 You know, if someone wants to have a
 2 proper, mature dialogue about what we do and how
 3 we do it, I'm always up for that. But to have
 4 anonymous manifestos posted with false and
 5 completely misleading information, that's what
 6 we are trying to get rid of.
 7 913 Q. Mr. Kassam and counsel, it's
 8 4:30. I happen to pride myself on being a man
 9 of my word. So can we agree to pick up tomorrow
 10 and Mr. Staley can go to his social event and
 11 Mr. Kassam can get a well-deserved glass of
 12 wine, as will I.
 13 -- ADJOURNED AT 4:29 P.M. --
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1 REPORTER'S CERTIFICATE
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 3
 4 I, Amy Armstrong, CVR-RVR, Realtime
 5 Verbatim Reporter, certify;
 6 That the foregoing proceedings were
 7 taken before me at the time and place therein
 8 set forth at which time the witness was put
 9 under oath by me;
 10 That the testimony of the witness and
 11 all objections made at the time of the
 12 examination were recorded by oral stenography by
 13 me and were thereafter transcribed;
 14 That the foregoing is a true and
 15 accurate transcript of my shorthand notes so
 16 taken. Dated this 28th day of April, 2023.
 17 
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 19
 20 PER: AMY ARMSTRONG
 21 REALTIME VERBATIM REPORTER #7305
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[word - zoom]

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TAB 20

This is **Exhibit “O”** to the Affidavit of **Alexander Mulligan**,
sworn before me this **30th** day of **November, 2023**.

A handwritten signature in blue ink, appearing to read "Paul Kelly", written over a horizontal line.

A Commissioner for Taking Affidavits

LSO #84488D

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Court File No. CV-20-00653410-00CL

ONTARIO

SUPERIOR COURT OF JUSTICE

(COMMERCIAL LIST)

B E T W E E N:

ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP,

ANSON INVESTMENTS MASTER FUND LP AND MOEZ KASSAM

Plaintiffs/Defendants to Counterclaim

- and -

JAMES STAFFORD, ANDREW RUDENSKY, ROBERT LEE

DOXTATOR, JACOB DOXTATOR, AND JOHN DOE 1,

JOHN DOE 2, JOHN DOE 3, JOHN DOE 4,

AND OTHER PERSONS UNKNOWN

Defendants/Plaintiffs to the Counterclaim

--- This is the Continued Examination for
Discovery of MOEZ KASSAM, taken by Neesons - a
Veritext Company, via Zoom virtual platform, with
all participants attending remotely, on the 21st
day of April, 2023.

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1	
2	A P P E A R A N C E S:
3	ROBERT STALEY, Esq., for the Plaintiffs/
4	DYLAN YEGENDORF, Esq., Defendants by
5	DOUGLAS A. FENTON, Esq., Counterclaim, Anson
6	& Advisors, Anson Funds,
7	ANDREW CARLSON, Esq., Anson Investments,
8	MAURA O'SULLIVAN, Esq., Moez Kassam
9	
10	WON J. KIM, Esq., for the Defendant/
11	ALEX MULLIGAN, Esq., Plaintiff by
12	MEGAN McPHEE, Esq., Counterclaim, James
13	NICOLE KELLY, Esq., Stafford
14	
15	BETHANIE PASCUTTO, Esq., for the Defendants/
16	Plaintiffs by
17	Counterclaim, Jacob
18	Doxtator
19	
20	ALSO PRESENT: James Stafford, Sunny Puri
21	
22	REPORTED BY: Deana Santedicola, RPR, CRR, CSR
23	
24	
25	Job No. ON5843445

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1	I N D E X
2	(Cont'd)
3	
4	I N D E X OF REFUSALS
5	The questions/requests refused are noted by R/F and
6	appear on the following pages: 266:15, 270:15,
7	284:22, 287:24, 288:7, 301:24, 307:20, 310:11,
8	316:19, 325:14, 332:3, 333:9, 335:13, 337:8,
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10	370:11, 373:10, 373:18, 375:4, 378:16, 379:7,
11	380:11, 384:9, 384:20, 385:2, 385:10, 394:1,
12	397:14, 401:11, 406:19, 407:10, 409:25, 410:11,
13	410:16, 410:20, 410:24, 411:4, 411:12, 411:16,
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17	I N D E X OF UNDERTAKINGS
18	The questions/requests undertaken are noted by U/T
19	and appear on the following pages: 311:10, 359:11,
20	426:8
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1	I N D E X
2	
3	WITNESS: MOEZ KASSAM
4	PAGES
5	EXAMINATION BY MR. KIM (Cont'd)..... 266 - 428
6	EXAMINATION BY MS. PASCUTTO..... 429 - 430
7	
8	**The following list of undertakings, advisements
9	and refusals is meant as a guide only for the
10	assistance of counsel and no other purpose**
11	
12	
13	I N D E X OF ADVISEMENTS
14	The questions/requests taken under advisement are
15	noted by U/A and appear on the following pages:
16	267:3, 271:10, 273:21, 274:16, 275:21, 276:6,
17	276:12, 276:21, 277:3, 278:2, 285:8, 287:8, 297:16,
18	315:13, 316:12, 340:10, 350:23, 358:17, 360:23,
19	370:3, 371:2, 372:1, 373:4, 374:3, 374:9, 383:15,
20	383:22, 391:9, 391:15, 394:23, 395:9, 395:21,
21	401:20, 402:1, 402:7, 402:13, 402:18, 402:23,
22	403:3, 403:8, 403:13, 403:18, 403:23, 404:3,
23	404:18, 405:7, 408:4, 408:13, 409:20, 413:9,
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3	WITNESS: MOEZ KASSAM	
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7		
8	**The following list of undertakings, advisements	
9	and refusals is meant as a guide only for the	
10	assistance of counsel and no other purpose**	
11		
12		
13	I N D E X OF ADVISEMENTS	
14	The questions/requests taken under advisement are	
15	noted by U/A and appear on the following pages:	
16	267:3, 271:10, 273:21, 274:16, 275:21, 276:6,	
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23	404:18, 405:7, 408:4, 408:13, 409:20, 413:9,	
24	413:21, 425:24, 426:13, 426:21, 427:5, 427:12,	
25	427:18, 427:24, 428:4, 429:1, 429:11, 429:24	

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1 -- Upon commencing at 10:00 a.m.
2
3 MOEZ KASSAM; UNDER PRIOR AFFIRMATION.
4 EXAMINATION BY MR. KIM (CONT'D):
5 914 Q. Good morning, Mr. Kassam.
6 Have you or Anson ever submitted
7 a whistleblower complaint to the OSC?
8 MR. STALEY: Sorry, about what?
9 MR. KIM: About any companies. It is a
10 general question.
11 MR. STALEY: Well, I am not sure that
12 question is relevant based on the pleadings.
13 MR. KIM: Well, we'll get to that. Are
14 you refusing to answer that question?
15 R/F MR. STALEY: We are. I don't believe
16 the question as framed is relevant.
17 BY MR. KIM:
18 915 Q. Okay. Have you ever submitted a
19 whistleblower complaint to either the OSC, SEC or
20 any other securities regulator or DOJ about Aphria?
21 A. I don't believe we have.
22 916 Q. Okay, you don't believe. Do you
23 know?
24 A. I don't believe we have, as far as
25 I can recall.

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1 917 Q. Okay. Could you check your
2 records to see if you have?
3 U/A MR. STALEY: We'll take it under
4 advisement, Won. It isn't apparent to me from the
5 pleadings why any complaints that may or may not
6 have been filed by Anson with the regulator about
7 any issue are relevant. I'll let the witness
8 answer that question, but you may have to educate
9 me going forward as to why that is relevant based
10 on the pleadings.
11 BY MR. KIM:
12 918 Q. We can come back to these
13 questions, okay. So why don't we go through the
14 individual tickers, and then we'll come back to
15 these questions.
16 Mr. Kassam, you advised us yesterday
17 that Anson shares research with a variety of
18 sources and firms. You specifically advised us
19 yesterday that Anson shares research with several
20 specific individuals, including Nate Anderson and
21 Andrew Left; is that correct, sir?
22 A. I believe so.
23 919 Q. And would you have shared research
24 or information with Nate Anderson about Aphria?
25 A. As I mentioned yesterday, I

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1 believe historically we had chatted about Aphria.
2 920 Q. Okay, could we go to document 550,
3 AAI550.
4 Madam Reporter, could you enable
5 screensharing, please.
6 BY MR. KIM:
7 921 Q. So if you go to the -- you are
8 familiar with this document?
9 A. The Manifesto?
10 922 Q. Yes.
11 A. Yes, I am familiar with it.
12 923 Q. Okay, you see this paragraph
13 starting with:
14 "According to sources close to
15 Kassam's dealings, the morning the
16 Hindenburg report came out Moez was
17 calling all the banks, brokerages,
18 and everyone with a serious position
19 to tell them the stock would never
20 open again as it was under
21 investigation by the fraud squad and
22 a host of other lies that he knew
23 could cause serious damage."
24 Is that true, sir?
25 MR. STALEY: Sorry, is what true?

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1 BY MR. KIM:
2 924 Q. Did you call banks and brokerages
3 on the morning that the -- the morning when the
4 Hindenburg report came out?
5 A. I did not.
6 925 Q. So you didn't call anybody else to
7 tell them that the stock would never open again,
8 Aphria stock?
9 A. I did not.
10 926 Q. Could we go to -- you are aware,
11 sir, that Nate Anderson through Hindenburg
12 published a short report on Aphria on or about
13 December 3rd, 2018?
14 A. I believe so.
15 927 Q. And would you have shared any
16 information with Mr. Anderson about Aphria?
17 A. I believe, as I stated previously
18 and in our pleadings, we were long Aphria at the
19 time of the report, so it is not logical that we
20 would work together on a report and I would be long
21 the security at the time of the report.
22 928 Q. Right, and there is no -- maybe we
23 could put up the report. It is document 14703.
24 Sir, you are familiar with this document?
25 A. I am.

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1 929 Q. Right, and would you have shared
2 any of the information in this report with
3 Mr. Anderson or anyone at Hindenburg?
4 A. Again, I would have to go through
5 line by line to see what is included and what isn't
6 included, but as I mentioned to you, we did not
7 work together on this report. We were long the
8 security at the time of publication.
9 930 Q. Counsel, I would like an
10 undertaking to ask Mr. Kassam or anyone at Anson if
11 they knew of any information about the Hindenburg
12 Aphria report prior to the report's publication, if
13 they knew of any of the information in this report
14 prior to the report's publication?
15 R/F MR. STALEY: We won't do that, because
16 if you look at the report, it is 69 pages that
17 says, for example, that it is listed on the NYSE,
18 which they would have known about. So I think you
19 are going to have to be a bit more specific in your
20 question, because we are not going to fact-check
21 everything and say whether they knew it or didn't
22 know it.
23 BY MR. KIM:
24 931 Q. I would like an undertaking for
25 Mr. Kassam and anyone at Anson to produce any

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1 communication with Mr. Anderson which includes any
2 information that made it to this report?
3 MR. STALEY: So I think -- I believe
4 the witness has indicated he doesn't believe there
5 was any information shared that went into the
6 report.
7 MR. KIM: I accept that that is his
8 belief. I just want you to check so that the
9 belief becomes fact.
10 U/A MR. STALEY: Okay, well, we'll take
11 that under advisement.
12 BY MR. KIM:
13 932 Q. Thank you. Now, Mr. Kassam, the
14 Defamatory Manifesto that we were at claims that
15 you received inside information from management and
16 then fed it to Nate Anderson. Are you aware of
17 that allegation in the Defamatory Manifesto?
18 A. You would have to show me the --
19 933 Q. It is Part 3, sir. It is Part 3.
20 We'll put it up.
21 Sir, are you familiar with this
22 document? It is Part 3 of the Manifesto?
23 A. Yes, somewhat.
24 934 Q. Yes, and this report says:
25 "Anson worked alongside with

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1 Gabriel Grego and Quintessential
2 Capital to put out the December 3rd,
3 2018, Hindenburg short report on
4 Aphria." [As read.]
5 A. I see that.
6 935 Q. Okay. Who is Mr. Grego?
7 A. I believe he is an individual in
8 the U.S. who does work on the short side and
9 produces short reports.
10 936 Q. And he is -- is he at
11 Quintessential Capital?
12 A. I am not sure.
13 937 Q. Okay. Did you communicate with
14 anyone at Quintessential Capital or Hindenburg on
15 the December 3rd, 2018 report on Aphria?
16 A. As previously stated, we were long
17 Aphria. And to this report, we did not work
18 together at all.
19 938 Q. What was Anson's position on
20 Aphria prior to the publication of the Hindenburg
21 December 2018 report?
22 A. We were long the -- we were long
23 Aphria.
24 939 Q. Did you have any --
25 A. So we suffered damages. We

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1 suffered as a result of the report.
2 940 Q. Did you have any short positions
3 in any of your sub funds on Aphria?
4 A. No, we have -- you know, we always
5 have -- you know, during the cannabis craze, we
6 were always worried about borrows on names, so we
7 had borrows on all the securities, but we were net
8 long Aphria at the time of publication.
9 941 Q. Oh, I understand that, sir. You
10 have been clear. But I am interested in what were
11 your short positions, your hedge positions on
12 Aphria?
13 A. I don't know the numbers off the
14 top of my head, but as stated, there is no sub fund
15 that was short Aphria at all. It was all -- we
16 were long in every fund, net long.
17 942 Q. Net long, but what about could you
18 give us an accounting of your short positions prior
19 to the publication of the December 3rd, 2018
20 report?
21 U/A MR. STALEY: We'll take it under
22 advisement. You understand by saying "net long"
23 meant that they were not helped by having their
24 overall position if the stock price went down,
25 right?

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1 BY MR. KIM:
 2 943 Q. Yes, I understand that,
 3 Mr. Staley.
 4 Now, did Anson profit off the Aphria
 5 report -- sorry, the Hindenburg report?
 6 A. I just stated that we lost money
 7 off that report because we were long the security.
 8 944 Q. I understand, but did you make any
 9 money on your short positions?
 10 A. No, we were long the security
 11 overall, so if the stock goes down, we lose money.
 12 945 Q. Okay. Mr. Staley, we would like
 13 production of all of the records related to Anson's
 14 positions, holdings, profits, and/or losses on
 15 Aphria for the years 2018 and 2019?
 16 U/A MR. STALEY: We'll take it under
 17 advisement.
 18 BY MR. KIM:
 19 946 Q. Sir, are you aware that Nate
 20 Anderson published an earlier report on Aphria on
 21 March 21st, 2018?
 22 A. I am aware that, now that you
 23 mention it, there were multiple reports.
 24 947 Q. Right. And Mr. Anderson published
 25 a report critical of Aphria on SeekingAlpha.com

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1 called "Could Rampant Red Flags Drown Aphria's
 2 Proposed Nuuvera Acquisition?" Are you familiar
 3 with that?
 4 A. You would have to show it to me.
 5 948 Q. Okay, we'll call it up.
 6 MR. STALEY: What production number is
 7 this? Oh, it is 14703?
 8 BY MR. KIM:
 9 949 Q. Yes. Are you familiar with this
 10 document, sir?
 11 A. I am.
 12 950 Q. All right. So did Anson provide
 13 Mr. Anderson or anyone at Hindenburg with research
 14 about Aphria prior to the publication of this
 15 report?
 16 A. I don't believe we had anything to
 17 do with the issues around Nuuvera and Aphria, but I
 18 can't be sure of what specifically was said or not.
 19 951 Q. Can you check, please, and produce
 20 anything you have?
 21 U/A MR. STALEY: We'll take it under
 22 advisement.
 23 BY MR. KIM:
 24 952 Q. Now, Mr. Kassam, this may be a
 25 question for Mr. Staley. Your Schedule B shows

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1 that between March 16th and March 27th, 2018, Sunny
 2 Puri emailed Nate Anderson about Aphria six times,
 3 on the 16th, 19th, 22nd, 26th and 27th. Can you
 4 tell me, Mr. Staley, what is the basis for this
 5 privilege?
 6 U/A MR. STALEY: We'll take it under
 7 advisement.
 8 BY MR. KIM:
 9 953 Q. Okay. I want an undertaking to
 10 produce the original emails on the basis that the
 11 originals are not privileged.
 12 U/A MR. STALEY: We are clearly not going
 13 to give you that undertaking, but we will take it
 14 under advisement.
 15 BY MR. KIM:
 16 954 Q. I want a further undertaking for
 17 production of all of the invoices and records of
 18 payment from Anderson, Anson or Mr. Kassam
 19 personally to Nate Anderson, Hindenburg Research or
 20 ClaritySprings Inc.?
 21 U/A MR. STALEY: The same answer, under
 22 advisement.
 23 BY MR. KIM:
 24 955 Q. Okay. I want an undertaking for
 25 you to produce all of the communications passing

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1 between Mr. Kassam and/or Anson with Mr. Nate
 2 Anderson and Hindenburg during the material time?
 3 U/A MR. STALEY: We are clearly not going
 4 to give -- we will take it under advisement, but we
 5 are clearly not going to give you any
 6 communications that don't relate to names that are
 7 relevant in the proceeding.
 8 BY MR. KIM:
 9 956 Q. Okay. Now, we can go back to my
 10 earlier questions then, Mr. Kassam. Have you or
 11 Anson ever submitted a whistleblower complaint to
 12 the OSC, SEC or any other regulator about Aphria?
 13 MR. STALEY: He has already provided
 14 you with an answer to that question.
 15 BY MR. KIM:
 16 957 Q. You did not --
 17 A. I don't believe we have.
 18 958 Q. You refused --
 19 A. Correct.
 20 959 Q. Okay.
 21 A. We did not.
 22 960 Q. Okay. But you have also
 23 undertaken to check your records because, Mr.
 24 Kassam, for purposes of today, I would like
 25 something more concrete than your belief. I would

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1 like for you to check your records, okay.
 2 U/A MR. STALEY: We have taken that under
 3 advisement.
 4 BY MR. KIM:
 5 961 Q. Now, Mr. Kassam, does Anson have a
 6 relationship with any of Aphria's management from
 7 2017 to present?
 8 A. It depends on your definition of
 9 "relationship".
 10 962 Q. Well, business.
 11 A. Yeah, we would speak with
 12 management from time to time.
 13 963 Q. And who would that be, which
 14 individuals?
 15 A. Vic Neufeld who was the CEO or
 16 President and CEO. We would speak with him. And
 17 we would speak with Cole Cavallini, I believe his
 18 name is, who was the head of the grow op or
 19 operations.
 20 964 Q. And given your long position on
 21 Aphria and your relationships with management, did
 22 you ever receive material non-public information?
 23 A. As previously stated, we go out of
 24 our way to make sure that we never trade or act on
 25 anything material non-public, so you know --

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1 965 Q. Sir, I am not --
 2 A. -- we were specific when talking
 3 with management that they not give us any
 4 information that was material non-public.
 5 966 Q. Okay, there is two parts to that
 6 answer. I understand that you have already -- that
 7 you have maintained that you have never traded on
 8 material non-public information, but due to your
 9 relationship with the management of Aphria from
 10 2017 to present, did you in fact -- were you ever
 11 made aware of material non-public information?
 12 A. I don't believe so.
 13 967 Q. Would that not be in the normal
 14 course, given the fact that you were a large holder
 15 of Aphria during this period; correct?
 16 A. We weren't a filer on Aphria. As
 17 such, we weren't considered to be, you know,
 18 affiliated or an insider, et cetera. We were
 19 always -- you know, Aphria was a big company, you
 20 know, fairly early on, and at that point we were
 21 sort of an immaterial investor on a percentage
 22 basis.
 23 968 Q. What kind of volume did you have
 24 in Aphria's stock from 2017 on?
 25 MR. STALEY: Are you talking volume as

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1 in the amount of trading --
 2 MR. KIM: Number of stocks.
 3 MR. STALEY: -- or in the position?
 4 THE WITNESS: Sorry, number of stocks?
 5 BY MR. KIM:
 6 969 Q. Yes, what was your position in
 7 Aphria from 2017 on?
 8 A. We traded in and out of it a whole
 9 bunch of times. I wouldn't be able to tell you off
 10 the top of my head.
 11 [Court Reporter intervenes for
 12 clarification.]
 13 BY MR. KIM:
 14 970 Q. Mr. Kassam, you are aware that the
 15 Defamatory Manifesto claims that Anson was friendly
 16 with Aphria management and used your relationship
 17 to get inside information? Are you aware of that?
 18 MR. STALEY: Do you want to show him
 19 where it says that?
 20 BY MR. KIM:
 21 971 Q. Sure. It is Part 1. I believe it
 22 is document 164.
 23 A. I see it, yes.
 24 972 Q. Okay, is that true? First of all,
 25 are you a large -- were you a large holder of

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1 Aphria stock?
 2 A. No, as I just mentioned, we
 3 were -- you know, Aphria was a multi-billion dollar
 4 company. We were a very small percentage of that.
 5 973 Q. Were you friends with management?
 6 A. I believe we were friendly, but I
 7 wouldn't say that we were like we would go on
 8 vacation together, but friendly for sure.
 9 974 Q. And you had shared meals with
 10 them?
 11 A. On occasion, we went out for
 12 dinner, I believe twice maybe.
 13 975 Q. But you had access to management,
 14 right? You could call them and they would take
 15 your calls?
 16 A. I believe so.
 17 976 Q. And you could ask them questions
 18 about the operation?
 19 A. I would ask questions about how
 20 business was going, yes.
 21 977 Q. Right, and what would be -- when
 22 you were asking about how the business was going,
 23 would you be asking about revenues?
 24 A. No, just about, you know, growth
 25 and potential plans and, you know, how they were

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1 viewing things and thoughts on competitors, et
 2 cetera, just normal course questions.
 3 978 Q. And would that kind of information
 4 be available to a regular shareholder, a retail
 5 shareholder?
 6 A. I believe so.
 7 979 Q. So why would you need to call the
 8 management then? Why couldn't your analysts review
 9 company disclosures?
 10 A. Again, it is divide and conquer
 11 when you do work, right. Sometimes I have
 12 access -- I am sitting with someone and I can ask
 13 the questions, as opposed to having an analyst go
 14 and call and call up on his own or look at a
 15 disclosure. When you are looking at a disclosure,
 16 it is usually past-looking. I am understanding
 17 forward-looking, or as I mentioned, I am asking
 18 about competitors or landscape, et cetera, and that
 19 doesn't show up in disclosures.
 20 980 Q. So when you talk about forward
 21 prospects, are you talking about upcoming
 22 contracts, sales, that kind of information?
 23 A. No. No, it is more about how they
 24 are viewing the industry, you know, perceptions,
 25 what are people saying and hearing out there, you

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1 know, just general industry talk.
 2 981 Q. So tell me what is -- did you ever
 3 ask them about any of financial information about
 4 the company?
 5 A. It is a pretty broad statement.
 6 982 Q. Did you ever --
 7 A. I don't know what financial
 8 information.
 9 983 Q. Would you have asked management
 10 about sales?
 11 A. I can't recall.
 12 984 Q. Did Anson ever buy put options,
 13 puts?
 14 MR. STALEY: On what?
 15 BY MR. KIM:
 16 985 Q. Pre and post the Hindenburg
 17 report.
 18 MR. STALEY: Sorry, I didn't -- I
 19 missed that.
 20 BY MR. KIM:
 21 986 Q. Did Anson buy put options in
 22 Aphria pre the publication of the Hindenburg
 23 report?
 24 A. As I previously stated, we were
 25 not involved in that publication. We were long the

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1 stock, so it is highly unlikely that I would have
 2 put options. It would be against the trade we had.
 3 We were long the stock. We lost money as a result
 4 of the publication.
 5 987 Q. What about post publication of the
 6 report?
 7 A. Like post publication until today?
 8 I don't know.
 9 988 Q. Can you check?
 10 MR. STALEY: It is not clear to me
 11 based on the pleadings how that is relevant, Won.
 12 I mean, the premise of the argument I think you are
 13 making is that somehow Anson benefitted from the
 14 Hindenburg report. You have been told that is not
 15 true, so I am not sure where this is --
 16 MR. KIM: Well, we are --
 17 MR. STALEY: I am not sure where this
 18 is all going given the answer you have got, but you
 19 seem to be pressing on it pretty hard.
 20 MR. KIM: Well, we have pleaded truth
 21 as a defence.
 22 R/F MR. STALEY: Yeah, but when you have
 23 been told that he is long the stock, then the whole
 24 premise of this line of questions falls away.
 25 BY MR. KIM:

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1 989 Q. I have your position, Mr.
 2 Stafford, so the answer is no, and so I am content
 3 to move on.
 4 Now, I would like for you to produce
 5 all of the records of any communication you may
 6 have had with Aphria management, and when I say
 7 "you", it is you and other members of Anson Funds?
 8 U/A MR. STALEY: We'll take that under
 9 advisement.
 10 BY MR. KIM:
 11 990 Q. Sir, you are aware that the
 12 Defamatory Manifesto claims that Anson leaked
 13 inside information about Aphria management to Nate
 14 Anderson to use in the short report?
 15 MR. STALEY: Do you want to show us
 16 where that is?
 17 BY MR. KIM:
 18 991 Q. Sure.
 19 A. I see it.
 20 992 Q. Sir, did you provide any
 21 information -- first of all, before we get to
 22 sensitive insider information, did you provide
 23 information to Mr. Anderson or anyone at Hindenburg
 24 about Aphria?
 25 A. I don't know the specifics.

286	<p>1 Again, around the time of the report, you know, we</p> <p>2 had nothing to do with or knowing about the report.</p> <p>3 We were long the stock at the time, so it wouldn't</p> <p>4 be us who would have been providing the</p> <p>5 information.</p> <p>6 993 Q. Sir, I would like an undertaking</p> <p>7 for you to provide any financing deals or share</p> <p>8 purchase agreements that either you or Anson</p> <p>9 entered into with Aphria management.</p> <p>10 MR. STALEY: Sorry? What are you</p> <p>11 talking about, Won, share purchase agreements?</p> <p>12 BY MR. KIM:</p> <p>13 994 Q. Yes. Did you, for example -- Mr.</p> <p>14 Kassam, let me take a step back. Mr. Kassam, did</p> <p>15 you have founder stock in Aphria?</p> <p>16 A. I don't believe we did, no. We</p> <p>17 had -- we were -- the initial -- we did the initial</p> <p>18 financing round for Aphria, and I believe as part</p> <p>19 of the arrangement, the sponsor who brought the</p> <p>20 company public shared some of his founder shares</p> <p>21 with all the participants. So we received some of</p> <p>22 the initial shares from the onset, but we never had</p> <p>23 any direct founder shares from the company.</p> <p>24 995 Q. But would that be Mr. DeFrancesco?</p> <p>25 A. I believe so, yes.</p>	288
287	<p>1 1000 Q. Okay. So I would like to know,</p> <p>2 are you going to produce the -- I would like</p> <p>3 records of Mr. Kassam and/or Anson's purchase of</p> <p>4 founder stock from Mr. DeFrancesco. I want to know</p> <p>5 exactly how many stocks he bought at 15 cents and</p> <p>6 the date?</p> <p>7 R/F MR. STALEY: It is not at all clear any</p> <p>8 element of this is relevant given the witness's</p> <p>9 evidence that he was long, which undermines the</p> <p>10 entire foundation of all of these questions.</p> <p>11 MR. KIM: I'll take that as a no.</p> <p>12 MR. STALEY: That is fair. It is a no.</p> <p>13 BY MR. KIM:</p> <p>14 1001 Q. Now, Mr. Kassam, did you ever</p> <p>15 discuss Aphria with Mr. Left at Citron Research?</p> <p>16 A. I believe so.</p> <p>17 1002 Q. Around this time, 2018?</p> <p>18 A. I believe it was after the</p> <p>19 Hindenburg publication.</p> <p>20 1003 Q. Right. And I understand that you</p> <p>21 paid, that Anson paid Citron for a positive Aphria</p> <p>22 piece; is that correct, sir?</p> <p>23 A. That is incorrect.</p> <p>24 1004 Q. Can we look at the document 10559.</p> <p>25 Sir, are you familiar with this document?</p>	289
287	<p>1 996 Q. And the founder stock, did you buy</p> <p>2 it personally or was that Anson?</p> <p>3 A. That was at Anson.</p> <p>4 997 Q. And I understand it was for 15</p> <p>5 cents?</p> <p>6 A. I don't know the price.</p> <p>7 998 Q. Can you check, please?</p> <p>8 U/A MR. STALEY: We'll take it under</p> <p>9 advisement.</p> <p>10 BY MR. KIM:</p> <p>11 999 Q. I understand that the founder</p> <p>12 stock was priced at 15 cents when the stock had a</p> <p>13 trading volume at -- that the value assigned to it,</p> <p>14 the face value was \$2.50. Could you check?</p> <p>15 MR. STALEY: As of when? The value as</p> <p>16 of when?</p> <p>17 MR. KIM: When he bought the founder</p> <p>18 stock -- when Anson bought the founder stock priced</p> <p>19 at 15 cents.</p> <p>20 MR. STALEY: I am just not clear where</p> <p>21 you are going with this, Won, as to how it is</p> <p>22 relevant to anything. Can you help me?</p> <p>23 MR. KIM: Well, you have my question.</p> <p>24 R/F MR. STALEY: And you have my response.</p> <p>25 BY MR. KIM:</p>	289

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1 on or about December 7th, 2018, Citron Research
 2 published a tweet about Aphria stock?
 3 A. Can you show the tweet?
 4 1010 Q. Sorry, it has been -- sorry, we
 5 are advised that it has been deleted.
 6 Sir, you are aware that Citron Research
 7 published a report on Aphria on December 18 called
 8 "Everything Has Changed: The Big 5 Canadian
 9 Cannabis Companies Have Achieved 'Platform
 10 Status"; are you aware of that?
 11 A. Can you pull it up?
 12 MR. STALEY: Yes, can you show it to
 13 us, please.
 14 MR. KIM: Sure.
 15 MR. STALEY: Is this a production?
 16 MR. KIM: We are going to have to mark
 17 it for identification because we found this using
 18 the Wayback Machine. It has been deleted by
 19 Citron.
 20 MR. STALEY: So you aren't producing a
 21 document for the first time on an examination, are
 22 you, after all of the whining we heard about --
 23 MR. KIM: Oh, no, we produce documents
 24 that are not a "gotcha" document, Mr. Staley. This
 25 is a background document. I don't think it is --

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1 even your witness would admit that there is nothing
 2 "gotcha" about it.
 3 MR. STALEY: Could you please provide
 4 us with a complete copy of the document.
 5 MR. KIM: We will.
 6 MR. STALEY: I would like to have it in
 7 front of me before the witness is asked any
 8 questions about it.
 9 MR. KIM: Sure. Now, the only
 10 reason -- first of all, we would like to mark this
 11 as Exhibit A.
 12 EXHIBIT A (FOR IDENTIFICATION):
 13 Citron Research report dated December
 14 18, 2018, titled "Everything Has
 15 Changed: The Big 5 Canadian Cannabis
 16 Companies Have Achieved 'Platform
 17 Status".
 18 MR. STALEY: Could you send us a copy
 19 of the document, please. Send us a copy of the
 20 full document.
 21 MR. KIM: Okay, what we are going to do
 22 is we are going to -- this is my team saying this.
 23 We are going to put it in the chat and apparently
 24 you can check the URL. I don't even know what that
 25 means.

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1 MR. STALEY: I don't know either,
 2 although I think Mr. Doxtator understood that when
 3 we examined him.
 4 MR. KIM: Yeah, well, this is above my
 5 pay grade here.
 6 MR. STALEY: I won't touch that with a
 7 10-foot pole, Won.
 8 Okay, we have it.
 9 BY MR. KIM:
 10 1011 Q. Okay, I am going to ask general
 11 questions, Mr. Kassam, and your counsel can
 12 consider them.
 13 Sir, did Anson provide any research or
 14 input which ended up in this report?
 15 A. As previously stated, I believe
 16 Andrew had called us regarding our thoughts on
 17 Aphria, so I believe we would have provided him
 18 some diligence that could have ended up in the
 19 report. But again, Andrew does and writes and
 20 publishes all his own material.
 21 1012 Q. And, sir, you agree with me that
 22 as you were long on Aphria and Mr. Anderson's
 23 report had caused a drop in price, it is in your
 24 interests to work with other people to release
 25 positive information on the market; would you agree

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1 with that?
 2 A. You know, as I mentioned
 3 previously, we work with a wide variety of sources,
 4 and you know, we are not out there to try and
 5 affect stock price movement. You know, our job is
 6 if we believe a security is undervalued or
 7 overvalued, you know, we will share our relevant
 8 thesis or theories with anyone, you know, multiple
 9 people within the marketplace, brokers --
 10 1013 Q. Agreed, so I --
 11 A. -- other research, hedge funds, et
 12 cetera, et cetera.
 13 1014 Q. I understand that as a general
 14 principle, sir, but if you -- talking about Aphria,
 15 for example, given the fact that you were long and
 16 Mr. Anderson's report had caused a quick fall in
 17 price, wouldn't it be in your interests to work
 18 with people to release some known positive news out
 19 there?
 20 A. Again, we don't work with him in
 21 regards to him publishing his report. You know, we
 22 had shared diligence with him that, you know, he
 23 eventually put out a report.
 24 But you know, to answer or simplify
 25 your question, is it good that a long report comes

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1 out and the stock goes up? Yes.
 2 1015 Q. Now, I understand what you have
 3 said about Mr. Left. He is independent?
 4 A. I believe so.
 5 1016 Q. So even if you called him and
 6 said, Hey, we need something positive out there, he
 7 would make up his own mind, right? He would do his
 8 own analysis?
 9 A. That's correct.
 10 1017 Q. Did Anson ever pay Mr. Left to
 11 write any report or publish any tweets about
 12 Aphria?
 13 A. We have never paid Andrew for
 14 anything associated with Aphria.
 15 1018 Q. Have you paid Mr. Left on any
 16 matters, any tickers other than -- excluding
 17 Aphria?
 18 A. We have never paid Andrew on any
 19 matter.
 20 1019 Q. Is it a peer cooperation,
 21 peer-to-peer cooperation?
 22 A. As I mentioned, we work with a
 23 wide variety of guys, including Andrew, sharing
 24 research and diligence, yes.
 25 1020 Q. Okay, so has Mr. Left or Citron

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1 ever paid Anson or you for any information that you
 2 provided?
 3 A. No.
 4 1021 Q. So when you say --
 5 A. I -- go on.
 6 1022 Q. Sorry, I didn't want to interrupt
 7 you.
 8 A. No, Andrew has never paid us for
 9 anything associated with diligence or research.
 10 1023 Q. Okay. So when you say you worked
 11 with Andrew Left and Citron, given the fact that
 12 there is no money going or funds flowing either
 13 way, what do you mean by "worked together"?
 14 A. I said worked together as in we
 15 work with a wide variety of sources as in we share
 16 research and diligence.
 17 1024 Q. Now, has Mr. Left ever tipped you
 18 off to any of his publications or tweets before it
 19 is public?
 20 A. I don't understand what you mean
 21 by "tipped off".
 22 1025 Q. Has he ever told you, Hey, I am
 23 going to come out with a positive or a negative
 24 piece about a stock?
 25 A. You know, Andrew, we work with

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1 Andrew from time to time and, you know, sharing
 2 diligence and notes, but he doesn't call
 3 specifically to say, Hey, I am coming out with
 4 this. But you know, you can sort of understand,
 5 you know, from reading the tea leaves, you know,
 6 when someone is working on something, how far along
 7 they are in their diligence and what they are going
 8 to do. But generally speaking, we don't know, you
 9 know, what he is doing and when.
 10 1026 Q. Right. You sort of, though, do
 11 get a flavour? You know which way the wind is
 12 blowing, right? You know if it is going to be a
 13 positive or a negative report on something?
 14 A. Well, again, the contention is
 15 that I know when it is coming. You know, so I
 16 believe he is working -- you know, using your
 17 example on Aphria, if he is talking about Aphria
 18 being oversold and aka undervalued, generally
 19 speaking, you would think, yeah, it is a positive
 20 report, but in regards to when he actually does it
 21 or what he writes in it or when it is coming, you
 22 know, that is anyone's guess.
 23 1027 Q. Now, Counsel, I would like you to
 24 produce all of the communications that Anson or Mr.
 25 Kassam has had with Andrew Left and Citron about

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1 Aphria?
 2 MR. STALEY: Why is that relevant, Won?
 3 MR. KIM: Well, there is a clear -- we
 4 plead a defence, Rob, and there is an allegation
 5 that the Defamatory Manifesto clearly sets out the
 6 premise that they worked together.
 7 MR. STALEY: So I don't know that I
 8 agree with that, but that doesn't mean you get
 9 every single piece of paper that passed between
 10 them. He has already acknowledged --
 11 BY MR. KIM:
 12 1028 Q. About Aphria. I am not interested
 13 in social chats. I am interested in any
 14 communication that Anson and/or Mr. Kassam had with
 15 Mr. Left and Citron Research about Aphria.
 16 U/A MR. STALEY: We'll take it under
 17 advisement.
 18 BY MR. KIM:
 19 1029 Q. Now, Mr. Kassam, we talked about,
 20 just a little bit, we touched briefly yesterday on
 21 Anson's trading strategies?
 22 A. Yes.
 23 1030 Q. But you are both long and short;
 24 is that fair, sir?
 25 A. We have strategies both on the

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1 long side and short side, yes.
 2 1031 Q. And sometimes both at the same
 3 time?
 4 A. Well, you can't really have that,
 5 right. You either are net long or -- you are net
 6 long or you are net short.
 7 1032 Q. I know, but that means -- when you
 8 say you are net long or you are net short, that
 9 means you have both short and long positions on
 10 some stocks at the same time?
 11 A. Yes.
 12 1033 Q. Okay. Now, you advised us
 13 yesterday that Anson never nakedly shorts a stock;
 14 correct, sir?
 15 MR. STALEY: I think, Won, there was a
 16 lot of time spent going through that issue. You
 17 are trying to paraphrase back as a premise to a
 18 question something the witness didn't say, and I
 19 think it would be much -- it would be in everyone's
 20 interest to save a lot of time if you asked your
 21 question and don't try to paraphrase incorrectly
 22 something that was a discussion that took place
 23 over about 10 or 15 minutes.
 24 MR. KIM: No, no, it is your position
 25 in the pleading that Anson has never nakedly

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1 shorted a stock, and Mr. Kassam has sworn an
 2 affidavit in the Rudensky default judgment saying
 3 he has never nakedly shorted a stock. Fair?
 4 MR. STALEY: Again, I invite you to ask
 5 your question in a way that doesn't make us cover
 6 the ground from yesterday.
 7 BY MR. KIM:
 8 1034 Q. But you would agree with me, sir,
 9 Anson shorts stocks all the time?
 10 A. As previously mentioned, we have a
 11 bunch of short strategies, so you know, we are
 12 shorting, buying long, covering, et cetera.
 13 1035 Q. Does Anson's decision to short a
 14 company change depending on the cap size of that
 15 company?
 16 A. Sorry, the what size?
 17 1036 Q. The cap size.
 18 A. The market cap?
 19 1037 Q. Yes.
 20 A. Does it change like as in like
 21 dynamic, like once we are in a name, if the market
 22 cap increases or decreases?
 23 1038 Q. Yeah, for example, do you have a
 24 different strategy for a large cap versus a small
 25 cap?

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1 A. I don't understand the question.
 2 1039 Q. Okay. Do you have different
 3 strategies for companies that are large cap
 4 companies? Like you said, for example, this
 5 morning that Aphria, by the time you started buying
 6 Aphria, it was a large cap company?
 7 A. Well, I was saying that in regards
 8 to us not being a large percent owner of the
 9 company, that it was a big company.
 10 1040 Q. Okay. My question today is do you
 11 have a different strategy for large cap companies
 12 versus small cap companies?
 13 A. If you are going to pin that
 14 thing, no. I don't know where you are going with
 15 that. I don't -- like we have strategies for
 16 securities.
 17 1041 Q. No, okay, so let me ask you. Do
 18 you have different strategies for companies with
 19 illiquid stock versus liquid stock?
 20 A. Well, if we are in a name that is
 21 illiquid, you know, the trading or size, you know,
 22 we are obviously cognizant of, you know, not being
 23 too big of that position. But you know, I wouldn't
 24 say that is a strategy. It is just sort of a rule
 25 of thumb.

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1 1042 Q. Okay, so maybe I am asking for
 2 some trade craft information but, Mr. Kassam, how
 3 do you decide on the size of an investment and your
 4 timing of a short position? How do you decide
 5 that?
 6 MR. STALEY: Won, I am happy to have
 7 you get an education in trading, but it is not at
 8 all clear to me how these questions --
 9 MR. KIM: Well, I am trying to learn.
 10 MR. STALEY: Well, and you know what,
 11 there may well be an opportunity for that, but it
 12 is not at all apparent to me how these questions
 13 relate to any matter at issue in the proceeding,
 14 and I think you need to help me out there.
 15 MR. KIM: Well, you know, Rob, the law
 16 thing is not working out for me. I am thinking
 17 maybe I should follow in the footsteps of some of
 18 the short sellers. They seem to be doing a lot
 19 better than you and me, so I am just asking and I
 20 am just trying to educate myself.
 21 MR. STALEY: You could probably arrange
 22 for a private tutorial on --
 23 MR. KIM: I can't afford it.
 24 R/F MR. STALEY: Well, I am not sure you
 25 can afford this because, Won, I just don't think

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1 the question is relevant to anything as it has been
2 framed.
3 BY MR. KIM:
4 1043 Q. So can you tell me under what
5 circumstances would you buy a put option instead of
6 taking a short position?
7 A. Why would I buy a put option
8 instead of taking a short position?
9 1044 Q. Yeah.
10 A. Just in general, like why --
11 1045 Q. Yes.
12 A. -- if I was like taking a class,
13 what would be the reason to do so?
14 1046 Q. Yes.
15 A. You know, if you wanted to
16 minimize your risk to a particular name, if you buy
17 a put, you are limited to the amount of money put
18 into that put option. And if you are short a
19 security, in theory, there is infinite risk as that
20 stock continues to rise. So from a safety
21 perspective, someone would, you know, argue that
22 buying a put is better than shorting a stock.
23 1047 Q. Okay. So if we can go to the
24 second Defamatory Manifesto.
25 MR. STALEY: And you are going to pull

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1 it up for the witness?
2 MR. KIM: Yes.
3 MR. STALEY: Okay.
4 BY MR. KIM:
5 1048 Q. Sir, you are familiar with this
6 passage?
7 A. I am familiar with the passage in
8 this report.
9 1049 Q. Right. Do you know, like, is that
10 you? Did you make that statement?
11 A. I don't believe I did.
12 1050 Q. So is that recording a fake?
13 A. I believe so.
14 1051 Q. But even putting that aside, do
15 you agree with that statement? Do you buy, if you
16 know stuff is going to go down, you'll buy puts; is
17 that right?
18 A. Generally, our strategy is to
19 avoid puts when we are in a short.
20 1052 Q. Okay. But what if you know like
21 the stock is going to go down, do you buy puts?
22 A. As previously mentioned, our
23 strategy is the actual opposite, is to avoid put
24 buying if we are shorting a position because,
25 again, I told you, academically speaking, it is

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1 better to buy puts, but you know, that is an
2 academic theory. But in the world of, you know,
3 practice and industry focus, for us we think it is
4 better risk/reward to be short a security than to
5 buy puts.
6 1053 Q. When you short a security, Mr.
7 Kassam, is it just simply -- do you buy any other
8 types of derivatives instruments?
9 A. I don't understand the question.
10 1054 Q. How do you -- tell me, how do you
11 short stock? Is there like one way, or do you do
12 it in multiple ways?
13 A. Generally speaking, you are just
14 shorting a security when you are in -- when you are
15 dealing with North American markets, you know, you
16 are going to a brokerage and you are placing an
17 order, and it goes through and you are short the
18 underlying equity or stock.
19 1055 Q. But do you do it using
20 derivatives?
21 A. Derivatives meaning, you know, I
22 told you there is options. In theory there could
23 be swap arrangements. In theory there is sometimes
24 CFDs, single stock futures. There is a whole wide
25 variety of ways to trade or short securities.

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1 1056 Q. And does Anson use all of the
2 options?
3 A. Generally speaking, we are just
4 short security, just shorting stock.
5 1057 Q. Okay, but what about like there
6 are instances where you will use exotic instruments
7 to short stocks; correct?
8 A. Generally, that is not a North
9 American thing. It is when you are shorting in
10 other markets that either don't allow, you know,
11 you to short the stock itself, or from a tax
12 perspective it is easier to be on swap.
13 But in North America it is I can pretty
14 much always, you know, for the most -- always that
15 you are basically shorting stock or you are buying
16 options. There is really no other way to trade a
17 stock or the way we do in North America.
18 1058 Q. But you operate globally, though?
19 A. We do, but I am saying in regards
20 to anything in the Manifesto, it is all
21 North American related. Unless you are looking for
22 an education on shorting in other parts of the
23 world, I am happy to walk you through it.
24 1059 Q. Well, you know, I asked for
25 education, and Mr. Staley stopped my learning.

306	<p>1 Well, I guess we'll have to pick the education for</p> <p>2 another day.</p> <p>3 But, Mr. Kassam, what about Europe? Do</p> <p>4 you use derivatives and exotic instruments in</p> <p>5 Europe to short stocks?</p> <p>6 A. I believe we have shorted on swap</p> <p>7 in Europe, but we don't really -- or we have used</p> <p>8 puts, but there is no other -- I don't believe we</p> <p>9 have done any other type of exotic instrument in</p> <p>10 Europe.</p> <p>11 1060 Q. Did you ever use Europe to short</p> <p>12 any of the North American stocks?</p> <p>13 A. I don't believe we have ever done</p> <p>14 that.</p> <p>15 1061 Q. Okay, so in Europe, do you operate</p> <p>16 on European stocks or Asian stocks?</p> <p>17 MR. STALEY: So, Won, I have let you go</p> <p>18 very far afield, but this seems very far afield to</p> <p>19 anything that is pleaded and relevant. So can you</p> <p>20 help me understand where you are going with this,</p> <p>21 or we are going to shut this down.</p> <p>22 MR. KIM: Sure. Rob, Mr. Kassam has</p> <p>23 advised that they use other exotic techniques in</p> <p>24 non-North American settings.</p> <p>25 MR. STALEY: Well, that is fine, but</p>	308
307	<p>1 the entire line of inquiry is probably not relevant</p> <p>2 to anything, and the fact that I let him answer an</p> <p>3 irrelevant question doesn't mean that you are going</p> <p>4 to ask another ten minutes of irrelevant questions.</p> <p>5 So I think you still have to tell me</p> <p>6 what this relates to as a matter at issue in the</p> <p>7 proceeding.</p> <p>8 MR. KIM: Well, you will see. So I am</p> <p>9 going to screenshare Part 5, just to -- of the</p> <p>10 Manifesto.</p> <p>11 MR. STALEY: Sorry, Won.</p> <p>12 MR. KIM: Yes?</p> <p>13 MR. STALEY: Is this in the</p> <p>14 productions?</p> <p>15 MR. KIM: This is Part 5 of the</p> <p>16 Manifesto?</p> <p>17 MR. STALEY: Yeah, is this in the</p> <p>18 productions?</p> <p>19 MR. KIM: No.</p> <p>20 R/F MR. STALEY: Okay, so there is no way,</p> <p>21 Won, that you are going to pull up a document and</p> <p>22 ask the witness about it for the first time in his</p> <p>23 examination for discovery in this matter. That is</p> <p>24 not going to happen.</p> <p>25 So if you want to produce that document</p>	309

306	<p>1 to us, we will consider what we do with it, but</p> <p>2 this is exactly the thing that people were</p> <p>3 complaining about, and it has happened now for the</p> <p>4 second time.</p> <p>5 MR. KIM: I was --</p> <p>6 MR. STALEY: You were whining -- you</p> <p>7 were the one who whined about it when it happened</p> <p>8 on Jacob Doxtator's examination. You objected</p> <p>9 first, so this is not on.</p> <p>10 MR. KIM: Rob --</p> <p>11 MR. STALEY: If you want to produce</p> <p>12 that --</p> <p>13 MR. KIM: Rob --</p> <p>14 MR. STALEY: Yes.</p> <p>15 MR. KIM: -- in your pleading, you take</p> <p>16 issue with all market fraud articles. That is</p> <p>17 in your pleadings, so I guess are you saying</p> <p>18 that --</p> <p>19 MR. STALEY: Sorry, I can't hear you.</p> <p>20 What did you just say?</p> <p>21 MR. KIM: You plead in your pleading,</p> <p>22 you take issue with all market fraud articles.</p> <p>23 MR. STALEY: Yes, but you have to</p> <p>24 produce it, Won.</p> <p>25 MR. KIM: Okay.</p>	308
307	<p>1 MR. STALEY: You don't get to just pull</p> <p>2 it up at the examination --</p> <p>3 MR. KIM: I presumed you would have</p> <p>4 produced it, so I guess this Part 5 is off the</p> <p>5 table then, right?</p> <p>6 MR. STALEY: I don't believe that Part</p> <p>7 5 is pleaded specifically in --</p> <p>8 MR. KIM: I understand.</p> <p>9 MR. STALEY: -- the Statement of Claim.</p> <p>10 MR. KIM: I understand when it came. I</p> <p>11 understand when it came out.</p> <p>12 MR. STALEY: I think this is March of</p> <p>13 2023. Yeah, it is March of 2023.</p> <p>14 MR. KIM: Yes.</p> <p>15 MR. STALEY: So this is a matter that</p> <p>16 is not covered in the pleadings.</p> <p>17 MR. KIM: I understand.</p> <p>18 [Court Reporter intervenes for</p> <p>19 clarification.]</p> <p>20 [Discussion Off The Record.]</p> <p>21 -- RECESSED AT 10:55 A.M.</p> <p>22 -- RESUMED AT 11:02 A.M.</p> <p>23 BY MR. KIM:</p> <p>24 1062 Q. If we could go back to Part 5 of</p> <p>25 the Manifesto, Mr. Staley, I have been advised that</p>	309

310	<p>1 your office has graciously put the document into</p> <p>2 production, Part 5. The reference number is 14726.</p> <p>3 MR. STALEY: Hold on.</p> <p>4 Okay, we are good.</p> <p>5 BY MR. KIM:</p> <p>6 1063 Q. Okay. So I would like production</p> <p>7 of all of the derivatives Anson has bought for any</p> <p>8 of the companies mentioned in the Manifestos or</p> <p>9 market fraud articles?</p> <p>10 R/F MR. STALEY: Well, the problem, Won, is</p> <p>11 we have not pleaded -- there is no pleading</p> <p>12 surrounding the last Manifesto. If it has been</p> <p>13 produced, it has been produced. And I think you</p> <p>14 are going to have to go through names that are</p> <p>15 relevant based on the pleadings and ask your</p> <p>16 questions as opposed to asking one in the air like</p> <p>17 that.</p> <p>18 BY MR. KIM:</p> <p>19 1064 Q. Well, you have my question then.</p> <p>20 I am going to move on.</p> <p>21 Mr. Staley, if we go to paragraph 55 of</p> <p>22 the Fresh as Amended Statement of Claim.</p> <p>23 MR. STALEY: Yes.</p> <p>24 MR. KIM: You refer to all further</p> <p>25 unlawful statements at paragraph 112 and you refer</p>	312
311	<p>1 to further posts on MarketFrauds.to; do you see</p> <p>2 that, sir?</p> <p>3 MR. STALEY: I have the pleading in</p> <p>4 front of me.</p> <p>5 BY MR. KIM:</p> <p>6 1065 Q. Can I get an undertaking for you</p> <p>7 to identify all of the unlawful statements you</p> <p>8 intend to pursue at trial?</p> <p>9 U/T MR. STALEY: I think that is a fair</p> <p>10 question, and we will give you that.</p> <p>11 BY MR. KIM:</p> <p>12 1066 Q. Thank you. Now, Mr. Kassam, can</p> <p>13 you advise us of all of the related Anson sub</p> <p>14 funds?</p> <p>15 MR. STALEY: Sorry, what do you mean</p> <p>16 related Anson funds?</p> <p>17 BY MR. KIM:</p> <p>18 1067 Q. Do you have any funds that you</p> <p>19 work closely with that are -- other than the Master</p> <p>20 Fund?</p> <p>21 A. Does Anson have other funds, hedge</p> <p>22 funds in its portfolio other than the Master Fund?</p> <p>23 1068 Q. Yes.</p> <p>24 A. Yes, we do.</p> <p>25 1069 Q. And what are they?</p>	313
	<p>1 A. There is -- you obviously know</p> <p>2 about Anson Investments Master Fund. There is</p> <p>3 Anson Opportunities Master Fund. There is Anson</p> <p>4 East Master Fund. There is Anson North Star.</p> <p>5 There is Anson Arch Tactical REIT Fund. I believe</p> <p>6 that is it.</p> <p>7 1070 Q. Now, Mr. Kassam, what purposes</p> <p>8 does sub funds play in your overall investment</p> <p>9 strategy?</p> <p>10 A. They are -- you know, the main</p> <p>11 fund is the flagship fund that has the bulk of the</p> <p>12 assets that does a lot of the trading. The others</p> <p>13 are more specialized or nuanced depending on the</p> <p>14 strategies that they pursue.</p> <p>15 1071 Q. Does the Master Fund ever trade or</p> <p>16 borrow from the sub funds?</p> <p>17 A. Does the Master Fund ever trade or</p> <p>18 borrow from the funds?</p> <p>19 1072 Q. Yeah, does it trade stocks or does</p> <p>20 it borrow stocks?</p> <p>21 A. No.</p> <p>22 1073 Q. Does it borrow funds from sub</p> <p>23 funds?</p> <p>24 A. No, no.</p> <p>25 1074 Q. Do you ever split short positions</p>	
	<p>1 across your funds?</p> <p>2 MR. STALEY: Sorry, just, Won, how is</p> <p>3 this relevant based on the pleading? I have been</p> <p>4 sort of letting you go again a little bit, but you</p> <p>5 have to show me how this is relevant to anything.</p> <p>6 MR. KIM: Well, I think if you look at</p> <p>7 the Defamatory Manifesto, there is an allegation</p> <p>8 that Anson takes long positions in one fund and</p> <p>9 larger short positions in another, for example,</p> <p>10 Zenabis.</p> <p>11 MR. STALEY: Well, you need to show me</p> <p>12 where that is.</p> <p>13 MR. KIM: Okay, let's take Mr. Staley</p> <p>14 to that.</p> <p>15 MR. STALEY: Again, I mean, I think we</p> <p>16 have had this discussion, but I think what Mr.</p> <p>17 Kassam has told you is they are either net long or</p> <p>18 net short in a particular name, and whether they do</p> <p>19 well or poorly depends on whether they are net long</p> <p>20 or net short and then how the stock compares in</p> <p>21 relation to their net position.</p> <p>22 BY MR. KIM:</p> <p>23 1075 Q. I understand. I am going to be</p> <p>24 asking my questions, Mr. Staley.</p> <p>25 Do you see this paragraph, sir?</p>	

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1 A. Yes.
 2 1076 Q. It says:
 3 "Anson Funds came to the rescue
 4 here, dangling cash in front of
 5 Zenabis, with some dangerous
 6 invisible strings attached."
 7 Do you see that?
 8 A. I see it.
 9 1077 Q. Was it true? Did Anson offer cash
 10 to Zenabis?
 11 A. We did provide the company money.
 12 I don't know if I would call it dangling cash with
 13 invisible strings.
 14 1078 Q. Okay, well, it provided money to
 15 Zenabis?
 16 A. As mentioned previously, we
 17 were the initial investor in the financial
 18 instrument that, you know, was -- became Zenabis,
 19 and we did also participate in a follow-on
 20 financing.
 21 1079 Q. And did Anson or any of the sub
 22 funds short Zenabis?
 23 A. As also mentioned, we were always
 24 long Zenabis.
 25 1080 Q. So was it net -- it may have been

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1 net long, but did you ever short Zenabis?
 2 A. I don't believe we were ever
 3 short, again, by my definition of "short". We may
 4 have had positions underlying trading around the
 5 convertible security which we discussed yesterday.
 6 1081 Q. Okay. Sir, I am talking about my
 7 definition of "short". I understand your
 8 definition, sir. My question is much more simple
 9 and not complex. Did Anson ever short Zenabis?
 10 A. I don't know.
 11 1082 Q. Can you undertake to find out?
 12 U/A MR. STALEY: We'll take it under
 13 advisement.
 14 BY MR. KIM:
 15 1083 Q. My next question is --
 16 MR. STALEY: You appreciate, Won, that
 17 the paragraph you have highlighted talks about
 18 Anson having a much larger short position, and he
 19 has clearly told you that is not true.
 20 So I am just not sure where all this is
 21 going, which is why I haven't agreed to answer the
 22 question.
 23 BY MR. KIM:
 24 1084 Q. No, no, you have taken that under
 25 advisement. My question is simple, Rob. Did Anson

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1 ever short Zenabis? It is a simple question. The
 2 follow-up -- and you have taken that under
 3 advisement.
 4 My next question is did Anson short
 5 Zenabis while they were long on Zenabis?
 6 A. Are you asking me, or that is an
 7 advisement?
 8 1085 Q. No, I am asking you, Mr. Kassam.
 9 A. I don't know.
 10 1086 Q. Can you find out?
 11 U/A MR. STALEY: We'll take it under
 12 advisement.
 13 BY MR. KIM:
 14 1087 Q. My next question is can you
 15 produce your trading records and your positions,
 16 all of your trades involving Zenabis, whether it be
 17 long or short?
 18 R/F MR. STALEY: No.
 19 MR. KIM: I didn't hear you.
 20 MR. STALEY: I said no.
 21 BY MR. KIM:
 22 1088 Q. Now, do you ever split short
 23 positions across your funds, your sub funds?
 24 A. Again, I don't understand the
 25 definition of "split short positions".

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1 1089 Q. Okay. Now, your sub funds, are
 2 they all run independently of each other?
 3 A. Again, you are calling them sub
 4 funds but they are all independent funds.
 5 1090 Q. But you are the Chief Investment
 6 Officer for all of the funds?
 7 A. I am the Chief Investment Officer
 8 for the advisory firm that advises the funds, but
 9 the funds have their own Portfolio Managers and
 10 strategies.
 11 1091 Q. Okay. But you are the overarching
 12 Chief Investment Officer for the Advisory Firm?
 13 A. That's correct.
 14 1092 Q. And the Advisory Firm, is it fair
 15 to say, coordinates strategy for all of the
 16 Anson-branded sub funds?
 17 MR. STALEY: Well, he has already said
 18 they are not sub funds, so I think you need to use
 19 a different word going forward.
 20 BY MR. KIM:
 21 1093 Q. Is it fair to say, sir, that as
 22 Chief Investment Officer for the Advisory Firm, all
 23 of the independent sub funds you would coordinate
 24 strategies?
 25 MR. STALEY: Sub funds again, Won. He

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1 said they are not sub funds.
 2 BY MR. KIM:
 3 1094 Q. Related Anson Funds.
 4 A. I am technically the Chief
 5 Investment Officer of the Advisory Firm, and as
 6 such, I am, you know, privy or involved in the
 7 strategy for each of the funds.
 8 1095 Q. Have you ever used multiple
 9 Anson-related funds to take opposite positions?
 10 A. No, I don't believe we have.
 11 1096 Q. So you always -- so, for example,
 12 when Anson is net long or net short on a stock,
 13 obviously do you spread the different positions
 14 amongst different Anson-related entities?
 15 A. When I say "net short" or "net
 16 long", that is within the same fund. I am not
 17 using trickery that one fund is short and one fund
 18 that is long. That means within the same fund we
 19 have a long position and a short position. We as a
 20 rule don't allow for one fund to have a conflicting
 21 direction with another fund.
 22 1097 Q. Mr. Kassam, I am not trying
 23 to -- like I know you are not trying to trick me,
 24 and I am not trying to trick you. I am just
 25 asking. Maybe it reflects my wanting to find out

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1 how everything works here.
 2 Mr. Kassam, has Anson ever traded on
 3 alternative trading systems?
 4 A. I don't know what an alternative
 5 trading system is.
 6 1098 Q. So-called the dark pool exchanges?
 7 A. The dark -- there is no such thing
 8 as a dark pool exchange.
 9 1099 Q. Okay, what about -- then am I
 10 wrong when we talk about dark pool exchanges in
 11 Europe? Are you aware --
 12 MR. STALEY: How is this relevant to
 13 anything, Won? Again, I have given you a fair bit
 14 of latitude to allow the witness to educate you --
 15 MR. KIM: Well, I --
 16 MR. STALEY: -- on how trading works,
 17 but I believe we need to have --
 18 MR. KIM: Well, we'll get the reference
 19 here.
 20 MR. STALEY: Okay, that would be good.
 21 BY MR. KIM:
 22 1100 Q. Talking about dark pools, these
 23 are Bruiser tweets about the -- let's look at the
 24 document, 442. This is a tweet about Twitter
 25 stock. Have you seen this, sir?

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1 A. I haven't seen it.
 2 1101 Q. So do you know what Mr. Doxtator
 3 here is talking about, "huge dark pool"?
 4 A. I think he is talking
 5 about -- again, the "dark pool" is a term, but it
 6 is not an exchange, right. Now, liquidity in the
 7 markets happens in like algorithmic trading which
 8 includes what is called dark pools, but there is no
 9 separate exchange for dark pools.
 10 1102 Q. So you understand what he is
 11 talking about then --
 12 A. The problem is --
 13 1103 Q. -- when he refers to it?
 14 A. -- his tweet doesn't match -- his
 15 tweet doesn't match the ledger because he is
 16 talking about loading up puts. So I am saying he
 17 is buying puts, but then his sheet here is talking
 18 about equities. So I am a little confused.
 19 1104 Q. So, sir, I am talking about
 20 theoretical. Like I am just trying to educate
 21 myself. These dark pools, they could theoretically
 22 be used to conceal a short position because they
 23 allow investors to trade anonymously without
 24 reporting holdings, right, theoretically?
 25 A. No, no, no, that is not -- dark

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1 pools is just a function of liquidity. It is not
 2 about masking identities at all. It is just if you
 3 wanted to buy 100,000 shares and I wanted to sell
 4 100,000 shares, you don't want to go out in the
 5 market and show that you want 100,000 and I don't
 6 want to go out in the market saying I want to sell
 7 100,000, and so the dark pool puts, you know,
 8 people -- it matches buyers and sellers together.
 9 There is nothing untoward about it or
 10 anything that happens on a different exchange. It
 11 is the same exchange, same trading, you know,
 12 whether it be through TD Bank or anywhere else.
 13 1105 Q. But, okay, so then the point about
 14 dark pools is you can conceal your identity?
 15 A. No, I just said that. It is not
 16 about concealing identity. It is about matching
 17 liquidity.
 18 1106 Q. Okay, but does dark pools
 19 potentially -- can you potentially trade
 20 anonymously, like without identifying yourself?
 21 A. But every trade you make doesn't
 22 identify yourself. That is why a dark pool has
 23 nothing to do with anonymity. It is just
 24 liquidity.
 25 1107 Q. But theoretically speaking, could

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1 trading houses use dark pools to hide their
2 position, whether they are holders or not?
3 A. No. Again, dark pools is just a
4 function of liquidity. You can hide -- there is no
5 mechanism, depending on what exchange you are on.
6 This is the U.S. exchange. When you trade a U.S.
7 security, there is no identification of who buys
8 and who sells, unless you want to purposely put it
9 out there.
10 1108 Q. So then why is there a dark pool
11 versus the open exchange?
12 A. Again, because on a dark pool it
13 matches -- if I want to buy 100,000 Twitter, I
14 don't want to scare the market by posting a 100,000
15 buy order. It will just naturally go up. And you
16 don't want to post your 100,000 Twitter sell
17 position because it will naturally go down. So in
18 this dark pool, the magic happens and it matches
19 the buyer and seller and then, boom, the trade goes
20 out.
21 1109 Q. Okay. Against that explanation
22 then, has Anson ever traded in the dark pools?
23 A. Our trades go through the dark
24 pool every day.
25 1110 Q. Okay, why is that, sir?

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1 A. Everybody's does. 50 percent of
2 the trades in the world now in the U.S. exchanges
3 are in dark pool.
4 1111 Q. So it is a daily fact of life for
5 Anson?
6 A. For everybody.
7 1112 Q. Okay. Now, can you confirm which
8 exchanges Anson -- sorry, Madam Reporter, I'll slow
9 down. Can you confirm which exchanges Anson has
10 traded the various tickers mentioned in the -- I'm
11 sorry, I am hearing a noise here.
12 THE COURT REPORTER: Yes, there is
13 audio interference from somewhere.
14 MR. STALEY: We are not hearing it
15 here.
16 [Discussion Off The Record.]
17 BY MR. KIM:
18 1113 Q. So could we pull up document 562.
19 Sir, are you familiar with this
20 document?
21 A. I have to see the whole document,
22 but it looks like our marketing deck.
23 1114 Q. Okay, and who would this document
24 be sent to?
25 A. Sorry?

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1 1115 Q. Who would this -- it is a
2 marketing document. You would send it to your
3 unitholders and potential unitholders?
4 A. As previously mentioned, we
5 generally wouldn't send the marketing document to
6 an existing holder. It would go to our partners,
7 and it would go to potential investors.
8 1116 Q. So --
9 MR. STALEY: Sorry, is this 562 or 652?
10 MR. KIM: 562. Do you have it?
11 MR. STALEY: Somehow I have got it
12 saying 652.
13 BY MR. KIM:
14 1117 Q. Okay. Now, Mr. Kassam, does this
15 document set out accurately your various trading
16 strategies?
17 A. I believe it gives an overview of
18 some strategies we have, yes.
19 1118 Q. Okay. And can you tell me --
20 first of all, before we got to this document, I
21 would ask, Mr. Staley, can you confirm which
22 exchanges Anson has traded for the tickers
23 mentioned in the unlawful statements -- sorry, in
24 the Manifesto?
25 MR. STALEY: No.

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1 BY MR. KIM:
2 1119 Q. Which exchanges that Anson has
3 traded in --
4 MR. STALEY: No.
5 MR. KIM: -- for Aphria, Facedrive,
6 HEXO, ReconAfrica?
7 MR. STALEY: How is that relevant?
8 MR. KIM: Talking about, like Mr.
9 Kassam says, he gave evidence that Anson trades in
10 the dark pools every day. I just want to know
11 which exchanges Anson conducted business on for the
12 five tickers I just mentioned.
13 R/F MR. STALEY: Yeah, it is not at all
14 apparent to me how any of that is relevant to
15 anything, so I am going to refuse the question.
16 BY MR. KIM:
17 1120 Q. Mr. Kassam, does Anson trade via
18 arbitrage accounts?
19 A. Sorry, what?
20 1121 Q. Does Anson ever trade via
21 arbitrage?
22 A. We do take arbitrage positions,
23 yes.
24 1122 Q. Okay. Now, so when we go to the
25 Defamatory Manifesto where it that says Anson

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1 appears long in stocks while actually shorting
 2 it -- can we pull that up?
 3 A. I see it.
 4 1123 Q. So it says:
 5 "Again, the game was to take a
 6 visible long position in Zenabis and
 7 a much larger [...] secret short
 8 position."
 9 Do you agree with that?
 10 MR. STALEY: Hold on. He has already
 11 told you that that is not true.
 12 BY MR. KIM:
 13 1124 Q. No, no, I said the allegation; do
 14 you see that, sir?
 15 A. I see the line.
 16 MR. STALEY: Well, you are asking if it
 17 is true. He has already told you that is false.
 18 BY MR. KIM:
 19 1125 Q. No, no, we already have the -- I
 20 already have your position, Mr. Staley, on
 21 production of Zenabis trading records which you
 22 have taken under advisement.
 23 Now, I want to know, Mr. Kassam, the
 24 Defamatory Manifesto says you will appear long on
 25 stock while you are actually shorting it. Is it

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1 theoretically possible to achieve that by using --
 2 MR. STALEY: Sorry, where does it say
 3 that?
 4 MR. KIM: It says:
 5 "Again, the game was to take a
 6 visible long position in Zenabis and
 7 a much larger [...] secret short
 8 position."
 9 MR. STALEY: That is about one stock,
 10 and he has already told you that is not true.
 11 MR. KIM: I said that is what the
 12 Manifesto says.
 13 MR. STALEY: That's right, and I have
 14 said to you -- you have tried to generalize the
 15 statement in the Manifesto. The statement in the
 16 Manifesto refers to a specific security, and he has
 17 already told you that is not true.
 18 BY MR. KIM:
 19 1126 Q. Now, Mr. Kassam, I am talking in
 20 general. When you make a trade -- when you
 21 arbitrage a stock, theoretically is it possible to
 22 hide a short position theoretically?
 23 MR. STALEY: What do you mean "hide a
 24 short position"?
 25 BY MR. KIM:

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1 1127 Q. When you arbitrage an account, it
 2 means the trader does not have to mark the trade as
 3 a short; correct?
 4 MR. STALEY: What do you mean
 5 "arbitrage an account"?
 6 BY MR. KIM:
 7 1128 Q. Mr. Kassam, what do you mean when
 8 you say you engage in arbitrage?
 9 A. Arbitrage is not this. But I can
 10 give you a lesson on arbitrage now if you want.
 11 1129 Q. Sure. Sure.
 12 A. Okay, so arbitrage means you are
 13 taking advantage of a discrepancy in pricing
 14 between, you know, one company buying another
 15 company. That is called, you know, the traditional
 16 arbitrage, so you know, Company A is buying Company
 17 B and you can short one and long the other, and
 18 eventually they pair out together. That is one
 19 form of arbitrage. That is what we are referring
 20 to in the marketing presentation.
 21 The second form of arbitrage is capital
 22 structure arbitrage which is you take a long
 23 position if you have a convertible position, so you
 24 have a bond that converts into stock, like that was
 25 in Zenabis, and you have a short position against

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1 it.
 2 But if your short position was ever
 3 bigger than your long position, that is not
 4 arbitrage.
 5 1130 Q. Okay, but when you say -- would it
 6 be fair to say when you say you are net long, that
 7 is a form of an arbitrage?
 8 A. That would be capital structure
 9 arbitrage, assuming you have a convertible long
 10 position and an underlying short position.
 11 1131 Q. So --
 12 A. But again, a little more on the
 13 lesson front, you said about marking -- every time
 14 you short a security, you have to mark it as a
 15 short, even if you are long or -- any time you
 16 short, it is marked as a short. There is no way of
 17 hiding the short.
 18 1132 Q. But when you comment, for example,
 19 do you always claim you are net long or do you say
 20 you are long?
 21 A. When are you referring to?
 22 1133 Q. So for example, let's go to
 23 Zenabis. You were net long?
 24 A. To me net long and long is the
 25 same thing.

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1 1134 Q. Okay, to you, but technically when
2 you are net long, that means you can hide a short
3 position, right?
4 A. Hide from whom?
5 1135 Q. No, I mean, like when you are net
6 long, implicitly you are short on some of the
7 stock; you have a short position?
8 A. If I say I'm net long, generally
9 that means there is multiple derivatives or
10 securities or, you know, strategies within that one
11 position. But overall, you know, if you are net
12 long something, you make more money as it goes up,
13 and if you are net short something, you lose money
14 if it goes up.
15 1136 Q. Okay.
16 A. But there is no hiding. I don't
17 know what you infer by hiding.
18 1137 Q. No, I am not trying to infer
19 anything. I am just asking like a theoretical
20 question here. Now, can you tell me, were
21 you -- did you have -- on Aphria, you were net long
22 on Aphria?
23 A. I believe so, yes.
24 1138 Q. What about Facedrive?
25 A. We were never long Facedrive.

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1 1139 Q. You were always short?
2 A. Are you asking about net
3 positions? Because we never had a convertible
4 security in Facedrive.
5 1140 Q. So you were just short on
6 Facedrive?
7 A. At what period are you referring
8 to?
9 1141 Q. Okay, we'll get to Facedrive.
10 What about HEXO?
11 A. What is the question?
12 1142 Q. Were you net long or were you net
13 short?
14 MR. STALEY: Won, I want to be careful
15 for the witness's sake here that if their position
16 changed over time, the answer has to fairly reflect
17 that.
18 So for all of these, he needs -- the
19 witness needs to at least understand what period
20 you are talking about, and if it is the entire
21 time, that is a separate question.
22 BY MR. KIM:
23 1143 Q. Well, from 2018 then, Mr. Staley,
24 I would like for the five tickers production of
25 Anson's positions on Aphria, Zenabis, ReconAfrica,

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1 HEXO and Facedrive?
2 R/F MR. STALEY: You'll have to show me how
3 that is relevant. I don't believe it is based on
4 the pleadings, to produce all of that.
5 BY MR. KIM:
6 1144 Q. Now, Mr. Kassam, who is the prime
7 broker for Anson Master Fund?
8 A. We have several prime brokers.
9 1145 Q. Who are they?
10 A. Are you asking current, right now?
11 1146 Q. From 2018.
12 A. Like at 2018 until today, or
13 who --
14 1147 Q. Yes.
15 A. -- was our prime broker in 2018
16 only?
17 1148 Q. 2018 to today.
18 A. Again, we dynamically shift prime
19 brokers, so I don't know if you want to know every
20 prime broker we have had, or are you saying who
21 were our prime brokers then and who are our prime
22 brokers now?
23 1149 Q. Sure, let's go from 2018. Who was
24 your prime broker in --
25 MR. STALEY: What is the relevance of

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1 the question, Won? Because I am concerned if it is
2 going right up until today, you are going farther
3 afield than you should. Why is this relevant to
4 anything?
5 MR. KIM: Well, because there is an
6 allegation in the Manifesto that Anson has nakedly
7 shorted stock such as Facedrive.
8 R/F MR. STALEY: Okay, but he answered
9 questions about that yesterday, so that establishes
10 to me that this question isn't relevant.
11 BY MR. KIM:
12 1150 Q. Rob, my question is relevant.
13 I'll take that as a refusal.
14 Can you tell me, Mr. Kassam, who was
15 your -- do you deal with one prime broker relating
16 to a particular stock, or do you have multiple
17 prime brokers?
18 A. We have multiple prime brokers.
19 1151 Q. For each stock that -- and what is
20 the role of a prime broker?
21 A. A role of a prime broker is where
22 you custody your assets within a fund. They are
23 also responsible for, you know, delivery and
24 settlement of your trades. They are, you know,
25 responsible for issuing you your NAV statements

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1 that go to your administrator. They are also
 2 sometimes involved with sourcing borrow. They are
 3 also involved with capital market introduction, so
 4 introducing you around. They are also involved in
 5 facilitating research with their underlying bank or
 6 brokerage division. I believe that is pretty much
 7 it of the role of the prime broker.
 8 1152 Q. So you would agree with me a prime
 9 broker is very important to your business?
 10 A. I believe so, yes.
 11 1153 Q. They are a partner?
 12 A. They are a partner.
 13 1154 Q. And do prime brokers lend you
 14 stock? Do they let you borrow?
 15 A. Prime brokers, you know, have, you
 16 know, affiliates. Like usually the prime broker
 17 has a division that does, you know, there is a
 18 derivatives group; there is a securities lending
 19 group; there is, you know, a futures group, a
 20 commodity group, et cetera.
 21 1155 Q. And the prime broker can also tap
 22 its own network to provide you with stock if you
 23 require it; correct?
 24 A. Stock if you are required to
 25 short, you mean?

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1 1156 Q. Yes.
 2 A. They can help facilitate borrow,
 3 yes.
 4 1157 Q. Okay. Has Anson ever entered into
 5 a trade without reasonable certainty that it could
 6 settle the trade?
 7 A. As previously mentioned, we are
 8 bound by the SEC rules and OSC rules and we have
 9 always made our best attempts to adhere to those
 10 rules, and I don't believe we have stepped out of
 11 bounds in regards to our short positions.
 12 R/F MR. STALEY: And, Won, this was covered
 13 yesterday. I didn't object, although I guess I
 14 should have, but we are not going to cover the same
 15 ground that we covered ad nauseam yesterday.
 16 MR. KIM: We didn't talk about prime
 17 brokers yesterday.
 18 MR. STALEY: No, but that wasn't the
 19 question that he just answered. It had nothing to
 20 do with prime brokers.
 21 MR. KIM: I know, the fact that your
 22 client does not answer my question of today does
 23 not change my position. I am asking questions
 24 about prime brokers now. It is Mr. Kassam --
 25 MR. STALEY: But the question you just

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1 asked was not about prime brokers which is why it
 2 was more problematic, but it is not clear how any
 3 of these prime broker questions are relevant to
 4 anything.
 5 BY MR. KIM:
 6 1158 Q. Well, we can go back to the
 7 Manifesto and the Fresh as Amended Statement of
 8 Claim.
 9 Mr. Kassam, has Anson ever made a sale
 10 or a trade knowing that the security cannot or
 11 there is not enough float out there?
 12 A. I don't understand the question.
 13 1159 Q. Has Anson ever made a trade
 14 without having certainty that there was liquidity
 15 to cover the position?
 16 A. You are not making technical sense
 17 for like trading-wise, strategy-wise. I don't
 18 understand the question.
 19 1160 Q. The question is exactly that. Has
 20 Anson ever made a trade without having adequate
 21 backups with the --
 22 MR. STALEY: What do you mean "adequate
 23 backups"?
 24 BY MR. KIM:
 25 1161 Q. Without having your prime broker,

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1 or without assurances that they could be covered,
 2 the short position could be covered?
 3 A. I don't know what you mean by
 4 "covered". Like I am going to cover the security?
 5 1162 Q. Yes. My question stands as
 6 drafted, as asked.
 7 R/F MR. STALEY: Well, it is
 8 unintelligible, so we are not going to answer it.
 9 BY MR. KIM:
 10 1163 Q. Okay. So from 2018, have you ever
 11 lost or has a prime broker of yours ever terminated
 12 a relationship with you?
 13 A. Like have we ever -- have we -- do
 14 we have any relationships today that don't exist
 15 from 2018?
 16 1164 Q. Yes.
 17 A. From a prime broker perspective?
 18 1165 Q. Yes.
 19 A. I am sure we have turned over
 20 numerous prime brokers. We always, you know, high
 21 grade because we don't want to have too many, so
 22 every year or two we sort of go through our list
 23 and either add and drop a few a year, or every
 24 couple of years. So I am sure there has been some
 25 turnover from 2018 to today.

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1 1166 Q. Was Canaccord a prime broker that
2 Anson used?
3 A. Canaccord was not a prime broker,
4 no.
5 1167 Q. They were never a prime broker?
6 A. I don't believe so, no.
7 1168 Q. From 2018, has any prime broker
8 terminated a relationship with Anson claiming any
9 controversy as a result of either the publication
10 of the Manifesto or the publication of the news
11 that Anson was under investigation by the SEC?
12 Have you lost any relationship because of either
13 event?
14 A. Specifically have we lost a
15 relationship as a result of the Manifesto and/or
16 the SEC inquiry?
17 1169 Q. Yes.
18 A. Is that what your question is?
19 1170 Q. Yes.
20 A. Have we lost a prime broker?
21 Again, you are talking about prime broker, or you
22 are talking about relationships?
23 1171 Q. Both.
24 A. I don't believe as a direct, that
25 someone said directly as a result of, you know, an

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1 investigation or the Manifesto have we lost a prime
2 broker relationship, no.
3 1172 Q. What about the SEC investigation?
4 A. I don't believe we have lost a
5 prime broker as a result of the SEC inquiry.
6 1173 Q. Have you lost any relationship
7 with other investment houses or banks that do
8 clearing because of either the publication of the
9 various parts of the Manifesto or the news of the
10 SEC investigation?
11 A. As I previously mentioned, we had
12 a few relationships go on pause as a result of the
13 Manifesto, and those relationships were turned back
14 on, but none of them were permanently impaired as a
15 result of the Manifesto.
16 The same in regards to the SEC inquiry.
17 We had conversations with numerous counterparties,
18 but none of them have left as a result of the SEC
19 inquiry.
20 1174 Q. So when you say relationships were
21 interrupted, who were they?
22 A. I believe after the Manifesto, we
23 had pauses in relationships with Canaccord. As we
24 mentioned yesterday, we also had a relationship
25 pause with Eight Capital, and we also had a

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1 relationship pause with Echelon Capital.
2 1175 Q. Is it your information today that
3 those relationships have been restored?
4 A. I believe so, yes.
5 1176 Q. Do you have any correspondence?
6 Did any of the three entities write letters to you
7 or emails or any written form of communication
8 announcing the pause in the relationship?
9 U/A MR. STALEY: We are going to take that
10 under advisement.
11 BY MR. KIM:
12 1177 Q. Can we go to the IIROC Notice
13 22-0130.
14 We need to mark this as an exhibit.
15 MR. STALEY: Has it been produced?
16 MR. KIM: No, it is a public document,
17 Rob.
18 MR. STALEY: It doesn't matter, Won.
19 We are not doing this.
20 MR. KIM: Are you --
21 R/F MR. STALEY: We are not doing this. We
22 made a point of producing, including public
23 documents that we intended to refer to or may refer
24 to in examination. There is no chance that you are
25 going to be pulling up a document now for the first

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1 time that the witness has not reviewed and ask him
2 questions about it if it is not part of your
3 production or part of a production. This is not
4 going to happen.
5 BY MR. KIM:
6 1178 Q. Okay, let me ask you a general
7 question, Mr. Kassam. Have the regulators in
8 Ontario provided new guidance on short selling in
9 the past 12 months?
10 A. I believe so.
11 1179 Q. And what are they, generally?
12 A. I believe they are specific -- you
13 are talking about the OSC rules, like IIROC OSC
14 rule?
15 1180 Q. Yes.
16 A. I believe they have now determined
17 that as of I believe late summer of last year that
18 you need now to affirmatively have a borrow in your
19 hands prior to taking a short position.
20 1181 Q. Now, prior to that, what was the
21 practice in the industry?
22 A. It is my understanding the
23 practice was the onus or responsibility was on the
24 underlying brokerage or lending brokerage or
25 trading house to facilitate and determine that

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1 enough borrow was available for any trades that
 2 took place there.
 3 1182 Q. Okay, so prior to August of 2022
 4 then, was the obligation on Anson or your prime
 5 broker to make sure that there was reasonable
 6 borrow to settle all of the trades?
 7 A. I believe the responsibility prior
 8 to this publication was on the underlying brokerage
 9 to determine if they were willing to take and
 10 facilitate the trade.
 11 1183 Q. So that would be you or your prime
 12 broker?
 13 A. That would be the broker.
 14 1184 Q. And who is that?
 15 A. Whoever you are using to put on
 16 the trade.
 17 1185 Q. Okay, but it wouldn't be Anson?
 18 It wouldn't be an obligation on Anson?
 19 A. I don't believe so.
 20 1186 Q. So technically, the person, the
 21 entity that would facilitate the technical naked
 22 shorting would be the brokerage, not Anson?
 23 MR. STALEY: Hold on. I mean, what do
 24 you mean by "facilitate the technical naked
 25 shorting"? That is --

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1 MR. KIM: The obligation --
 2 MR. STALEY: Well, that is a loaded
 3 question, because the premise of the question
 4 is not --
 5 MR. KIM: Well, according to --
 6 MR. STALEY: Hold on. Stop, stop,
 7 stop. The premise of the question is not one that
 8 anyone is going to agree to. You are going to have
 9 to ask a question that doesn't talk about a naked
 10 short in answering the question -- in asking the
 11 question. He has already told you they don't do
 12 naked shorts.
 13 MR. KIM: Well, I understand that is
 14 his -- Mr. Kassam has been consistent in his
 15 evidence. I am just asking --
 16 R/F MR. STALEY: So I am not going to let
 17 him answer a question that has that as a premise.
 18 BY MR. KIM:
 19 1187 Q. Mr. Kassam, prior to August '22,
 20 where was the onus to make sure that there
 21 were -- where was the onus placed on whether, with
 22 an entity, a broker could settle a trade when
 23 shorting? Would it be --
 24 MR. STALEY: Sorry, he has already told
 25 you. He has already told you that. He said it was

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1 on --
 2 MR. KIM: It would be on the brokers.
 3 MR. STALEY: He has already told you
 4 that.
 5 BY MR. KIM:
 6 1188 Q. So prior to August 2022, Mr.
 7 Kassam, it was within the broker's -- it was the
 8 broker's obligation. Would individual brokers use
 9 discretion to allow a firm such as Anson to short a
 10 stock when it didn't possess the -- like you
 11 would -- technically speaking, you would borrow
 12 stock from your brokers when you short it, right,
 13 if you didn't have it within your possession?
 14 MR. STALEY: That is a compound
 15 question where the premise is not one that we would
 16 agree with, so you'll need to rephrase it in a way
 17 that is intelligible.
 18 BY MR. KIM:
 19 1189 Q. Prior to the change in the IIROC
 20 guidance, Mr. Kassam, did Anson borrow stock from
 21 the various brokers when it shorted?
 22 A. Sorry, I am not understanding the
 23 question.
 24 1190 Q. Prior to August 2022, did Anson
 25 only short stocks that it had -- did you ever have

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1 to borrow stocks from your brokers to conduct a
 2 short position, to obtain a short position?
 3 A. I am not -- again, it is not
 4 really clear what you are asking. Do I
 5 have -- have I ever borrowed a security before?
 6 1191 Q. Yes.
 7 A. Yes, I have borrowed a security
 8 before.
 9 1192 Q. And you would borrow securities
 10 from your brokers to engage in shorting?
 11 A. That is generally what you are
 12 borrowing for, yes.
 13 1193 Q. And it would be on the -- it would
 14 be -- the onus would be on your brokers to make
 15 sure that they had reasonable certainty that they
 16 could settle a trade when there was a short
 17 transaction?
 18 A. The onus would be on the
 19 underlying brokerage to settle that transaction,
 20 correct.
 21 1194 Q. Okay. Now, does that mean there
 22 is -- so you would borrow stock from various
 23 brokerages when you conducted a trade if you did
 24 not have adequate stock within your holdings;
 25 correct?

346	<p>1 A. Sorry, what?</p> <p>2 1195 Q. You would have to borrow stock</p> <p>3 from -- you would have to obtain the cooperation of</p> <p>4 various brokerages; for example, if you shorted a</p> <p>5 stock and you did not have enough positions to</p> <p>6 cover, you would have to borrow from a broker?</p> <p>7 A. Generally speaking, when you are</p> <p>8 trading a name, when you are borrowing a security,</p> <p>9 you ask the broker for, you know, shares to borrow,</p> <p>10 correct.</p> <p>11 1196 Q. Okay, and how does -- tell me, can</p> <p>12 you walk me through the mechanics? What is</p> <p>13 required? Is it based on relationship trust, or</p> <p>14 are there documents?</p> <p>15 A. I don't understand. What do you</p> <p>16 mean "relationship trust" or "documents"?</p> <p>17 1197 Q. How do you borrow a stock from</p> <p>18 your broker?</p> <p>19 A. You ask the broker for the</p> <p>20 relevant security and the amount of shares you</p> <p>21 want.</p> <p>22 1198 Q. Okay. And what is the</p> <p>23 corresponding document? Is it done through -- is</p> <p>24 it done orally? Is it done through a written</p> <p>25 request? How do you --</p>	348
347	<p>1 A. It really depends on the broker.</p> <p>2 Some of them have, you know, automated systems</p> <p>3 where you input the symbol and the amount you want</p> <p>4 and it auto-populates "approved". Sometimes you</p> <p>5 are asking the broker over the phone. Sometimes</p> <p>6 you are asking the broker over Bloomberg chat.</p> <p>7 Sometimes you are asking over email. It really</p> <p>8 depends on the situation and what firm you are</p> <p>9 using.</p> <p>10 1199 Q. Okay. You have used Canaccord?</p> <p>11 A. Sorry?</p> <p>12 1200 Q. Since 2018, you have used</p> <p>13 Canaccord?</p> <p>14 A. I used Canaccord to do what?</p> <p>15 1201 Q. To facilitate a short position, a</p> <p>16 borrow?</p> <p>17 A. I believe at times we have used</p> <p>18 Canaccord to trade and facilitate borrow, yes.</p> <p>19 1202 Q. What about CIBC?</p> <p>20 A. No.</p> <p>21 1203 Q. What about TD?</p> <p>22 A. Yes.</p> <p>23 1204 Q. What about RBC?</p> <p>24 A. No.</p> <p>25 1205 Q. What about Bank of Nova Scotia?</p>	349

350	<p>1 Canaccord -- they had no restrictions on you being 2 long? 3 A. I don't believe so, no. 4 1218 Q. Now, have you ever shorted a 5 company whose stock would be considered hard to 6 borrow or illiquid? 7 A. And/or, or are they two separate 8 questions? 9 1219 Q. Or. Separate questions. 10 A. Yes. 11 1220 Q. Okay, would Facedrive be one of 12 them? 13 A. I believe at times when we 14 were -- at times when we were trading Facedrive, at 15 times it was a hard-to-borrow security, yes. 16 1221 Q. Okay, and did you in fact borrow 17 securities on Facedrive? 18 A. I believe so. 19 1222 Q. Who did you borrow from? 20 A. I can't recall. 21 1223 Q. Can you find out? 22 U/A MR. STALEY: We'll take it under 23 advisement. It is not clear why who they borrowed 24 from is relevant. 25 BY MR. KIM:</p>	352
351	<p>1 1224 Q. Well, let me put it this way. 2 Sir, what does it mean when a stock is illiquid? 3 A. When a stock is illiquid means 4 there generally is not a lot of volume underlying 5 on a day-to-day basis. 6 1225 Q. So is it risky for you to short a 7 stock that is illiquid? 8 A. Generally speaking, when liquidity 9 is less, it is -- it generally means that the stock 10 will be more volatile both up and down. 11 1226 Q. And when it comes time to settle, 12 whose obligation is it to find adequate stock, you 13 or your broker? 14 A. Sorry, you were talking about 15 liquidity, and then now you jumped back to 16 securities lending. 17 1227 Q. Yeah, I am just talking about 18 when -- talking about an illiquid stock, when it 19 comes to settle the trade, whose obligation is it 20 to come up with the stock, you or your broker? 21 A. Again, this is -- my problem with 22 the question is liquidity and settling the trades 23 have nothing to do with one another. 24 1228 Q. Okay, I am just talking about 25 settling of the trade.</p>	353

1 A. When you settle a trade, the
 2 responsibility of settling the trade relies on the
 3 underlying broker.
 4 1229 Q. Now, have you -- has Anson ever
 5 failed to deliver its securities within the
 6 settlement period.
 7 A. We are not a registered
 8 broker/dealer, so we technically can't be the one
 9 failing to deliver shares.
 10 1230 Q. Okay. Has any of your affiliated
 11 brokers, have they ever failed to deliver a
 12 security for one of your trades during a settlement
 13 period?
 14 A. I don't know. I am not privy to
 15 their settlement process.
 16 1231 Q. Have you heard back ever? Has
 17 anyone said, Hey, we have problems covering?
 18 A. Covering?
 19 1232 Q. Has any of the banks or brokerage
 20 houses gotten back to you saying, You know, we have
 21 problems finding enough stock to cover one of your
 22 trades?
 23 A. You mean settling one of the
 24 trades?
 25 1233 Q. Yes.

1 A. I don't know.
 2 1234 Q. Now, Mr. Kassam, the Defamatory
 3 Manifesto claims that you get favours from banks
 4 and brokerage houses to avoid getting margin called
 5 when your naked shorts go badly. That is what it
 6 says on the Manifesto.
 7 MR. STALEY: Okay, show it to us.
 8 MR. KIM: We'll show it to you.
 9 MR. STALEY: Show it to us, Won.
 10 BY MR. KIM:
 11 1235 Q. Do you see that, sir?
 12 A. I see it, yes.
 13 MR. STALEY: Are you talking about the
 14 portion that is highlighted? Is that what you are
 15 looking at?
 16 BY MR. KIM:
 17 1236 Q. Yes. In the fall of 2018 did you
 18 have meetings with your prime broker to -- did you
 19 have a liquidity crisis?
 20 A. I don't know what you mean by
 21 "liquidity crisis".
 22 1237 Q. Were you short certain stocks?
 23 A. We are always short certain
 24 stocks.
 25 1238 Q. Okay. Were you short funds to

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1 settle your accounts?
 2 A. No, I don't believe we, you know,
 3 were short on money to cover our funds.
 4 1239 Q. Okay. So did you ever meet with
 5 any of your prime brokers to discuss raising
 6 capital to hold on to your short positions as at
 7 the fall of 2018?
 8 A. Asking the brokers to lend me
 9 capital? No.
 10 1240 Q. To hold off a capital call?
 11 A. To hold off -- no, there is no
 12 time where I have asked the broker to hold off a
 13 capital call. If they have a capital call, they
 14 have a capital call.
 15 1241 Q. Was TD a prime broker you were
 16 working with in the fall of 2018?
 17 A. TD was a prime broker of ours and
 18 continues to be a prime broker of ours.
 19 1242 Q. Okay. As at the fall of 2018, did
 20 you receive any correspondence from TD advising
 21 that they would be pulling your lines?
 22 A. No.
 23 1243 Q. Did you receive any correspondence
 24 from TD during the fall of 2018 to say you have to
 25 inject fresh capital into your -- to backstop your

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1 positions?
 2 A. I don't believe so.
 3 1244 Q. You don't believe so. Do you
 4 know?
 5 A. It is ambiguous what you are
 6 saying. So we have correspondence with all our
 7 prime brokers all the time, but them asking me to
 8 deposit money to cover, to backfill, whatever you
 9 said, that is a no.
 10 1245 Q. Let me ask a more general
 11 question. Did you receive any -- were you -- did
 12 TD express any concerns as at the fall of 2018
 13 about your position with the bank, about you - and
 14 when I say "you", you and/or the Anson entities -
 15 with the bank?
 16 A. As mentioned, we have
 17 correspondence all the time regarding the
 18 strategies and positions we have and how much
 19 positions and concentration continuously with our
 20 banks. So I am sure in 2018 and I am sure, you
 21 know, in the last month we have had discussions
 22 like that.
 23 1246 Q. Okay. I would like you to produce
 24 any correspondence you received from TD from 2018
 25 to today.

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1 R/F MR. STALEY: No.
 2 MR. KIM: I can't hear you.
 3 MR. STALEY: No. It is not relevant.
 4 MR. KIM: It is not relevant? Isn't it
 5 part of the Defamatory Manifesto which you say is
 6 wrong?
 7 MR. STALEY: The Defamatory Manifesto
 8 refers to a particular period of time and very
 9 particular allegations the witness has said are not
 10 true. You have just asked for everything over a
 11 period of time that covers five years, which I
 12 would --
 13 MR. KIM: Well, let me ask you --
 14 MR. STALEY: I would get fired if I
 15 agreed to do that, which I don't want to do.
 16 BY MR. KIM:
 17 1247 Q. I am trying my best to get you
 18 fired. But let me ask you, Mr. Kassam, could you
 19 produce any correspondence you received from the
 20 summer to the end 2018 from TD, please? I will
 21 reduce my request.
 22 R/F MR. STALEY: No. He has already told
 23 you that there is nothing out there that
 24 corresponds to the request that you are making.
 25 BY MR. KIM:

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1 1248 Q. So when you say you talk to your
 2 brokers all the time, has your broker ever brought
 3 you in to talk about any particular short position
 4 in the past since 2018?
 5 A. I don't believe any broker has
 6 brought me in to discuss short positions since
 7 2018.
 8 1249 Q. What about have they brought you
 9 in to talk about liquidity concerns since 2018?
 10 A. I don't believe so, no.
 11 1250 Q. Now, would you agree with -- the
 12 Defamatory Manifesto claims that you get favours
 13 from banks and brokerages to avoid getting margin
 14 calls. Do you agree with that?
 15 A. I don't.
 16 1251 Q. Okay. You don't get favours
 17 from -- you have a relationship, though, with banks
 18 and brokerage houses?
 19 A. I have a working relationship with
 20 banks and brokerages, yes.
 21 1252 Q. Okay. Now, Anson took a position
 22 on Tilray?
 23 A. I believe so.
 24 1253 Q. You were short on Tilray?
 25 A. We have been short Tilray on and

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1 off since awhile, yes.
 2 1254 Q. Did you ever get a margin call on
 3 Tilray?
 4 A. I believe at one point we had -- I
 5 don't know if you would say by definition a margin
 6 call, but we were made aware that, from a liquidity
 7 perspective, we had a certain concentration that
 8 made the underlying bank, you know, have pause and
 9 they said we should take steps to, you know, reduce
 10 that concentration.
 11 1255 Q. Which bank was that?
 12 A. I believe it was TD.
 13 1256 Q. Can you produce the documents that
 14 you received from TD with regard to your position
 15 on Tilray?
 16 U/A MR. STALEY: We'll take that under
 17 advisement.
 18 BY MR. KIM:
 19 1257 Q. Now, could we look at document
 20 10179. So you are familiar with this portion of
 21 the Manifesto, Mr. Kassam?
 22 A. I am.
 23 1258 Q. It says that the allegation is
 24 that Anson got RECO shares through a bought-deal
 25 financing to get more borrow through brokers. Is

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1 that accurate or is that false?
 2 A. Sorry, can you repeat the
 3 question? Did we get a borrow through -- did we
 4 get a fill through MMCap?
 5 1259 Q. No, did Anson get RECO shares
 6 through a bought-deal financing?
 7 A. I don't know.
 8 1260 Q. Can you check?
 9 A. Sure.
 10 U/T MR. STALEY: Yes.
 11 BY MR. KIM:
 12 1261 Q. And did you short -- so you
 13 shorted ReconAfrica stock; correct?
 14 A. At what period?
 15 1262 Q. Say around 2021, the spring of
 16 2021.
 17 A. I believe we had a short position
 18 at times during the spring of 2021.
 19 1263 Q. Okay. And you worked with MMCap?
 20 A. No.
 21 1264 Q. No? Who did you work with?
 22 A. I don't believe we -- in regards
 23 to ReconAfrica?
 24 1265 Q. Yes.
 25 A. I don't believe we worked with any

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1 hedge fund on ReconAfrica.
 2 1266 Q. So you never -- who is MMCap? Do
 3 you know who they are?
 4 A. MMCap is a hedge fund with offices
 5 in Vancouver and Toronto.
 6 1267 Q. Did you ever work with them on any
 7 short sells, short transactions?
 8 A. I don't believe we have ever
 9 worked together on a short transaction, no.
 10 1268 Q. Now, where did you get your stock
 11 for ReconAfrica?
 12 A. Get my stock? What do you mean?
 13 1269 Q. Where did you get your borrow?
 14 A. I believe wherever we have settled
 15 our trades.
 16 1270 Q. And where was that?
 17 A. I can't recall off the top of my
 18 head.
 19 1271 Q. Counsel, I would like an
 20 undertaking to produce where Anson got their
 21 borrow?
 22 U/A MR. STALEY: We'll take it under
 23 advisement.
 24 BY MR. KIM:
 25 1272 Q. Mr. Kassam, what is Anson's

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1 standard margin requirement?
 2 A. I don't understand the question.
 3 1273 Q. What collateral does Anson have to
 4 post to cover your margin calls, margin accounts?
 5 A. Generally speaking, it is a mix of
 6 stock and cash and securities.
 7 1274 Q. Okay, is there a proportion? Is
 8 there a minimum?
 9 A. I think it varies by the
 10 underlying brokerage, but you know, it really
 11 depends on what names you are in, et cetera.
 12 1275 Q. Okay. Now, let's take TD. What
 13 is your standard margin requirement for TD?
 14 A. I don't believe there is a
 15 standard margin requirement. It is just depending
 16 on what is in your portfolio, they will ascribe a
 17 percent of margin or leverage that you can take
 18 based on the underlying securities and cash.
 19 1276 Q. Okay. What would be a standard
 20 percentage?
 21 A. Honestly, there is no such thing
 22 anymore. Like it is all formulaic and done by
 23 computer. Like every day changes.
 24 1277 Q. Is it done by computer or is it
 25 done through relationships with your broker?

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1 A. No, it is all computer.
 2 1278 Q. And if the values fluctuate, do
 3 you adjust once a month, once a week? How does
 4 that work?
 5 A. We don't make any adjustments. It
 6 is the bank or the underlying brokerage that makes
 7 the adjustments, right. So you know, you have a
 8 mix, a portfolio of cash of securities, and you
 9 know, depending on if it goes up or down or you
 10 move to certain securities or in and out of them,
 11 the margin requirement associated with the overall
 12 portfolio is dynamic and shifts.
 13 1279 Q. Okay. My question is more simple,
 14 I guess, reflecting my understanding of this. How
 15 often are you required to adjust the margins?
 16 MR. STALEY: So, Won, can you tell me
 17 this is relevant to anything?
 18 MR. KIM: Well, I am --
 19 R/F MR. STALEY: I have given you some
 20 considerable latitude, but it is not clear that
 21 this is relevant to anything at all.
 22 BY MR. KIM:
 23 1280 Q. Well, this is all part of the
 24 allegation that Anson manipulated their -- well,
 25 we'll get into it.

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1 Now, has Anson ever taken steps to
 2 inflate the value of your margin account?
 3 A. I wouldn't even know how to do
 4 that.
 5 1281 Q. So for example, revisiting TD's
 6 call on you in the spring of 2021. What was TD's
 7 request? For you to put in more cash, or what was
 8 it?
 9 A. TD's request was to either add
 10 more cash or more securities or reduce some of the
 11 existing securities within the portfolio. There
 12 really is no mechanism to artificially increase
 13 your margin, right. Like it is all formulaic by a
 14 computer, right. So I can't say, Oh, I think this
 15 is worth more than what you are giving me. There
 16 is no subjectivity on their side. Like, you know,
 17 they say this is your margin; this is what we think
 18 you owe or this is what we need.
 19 1282 Q. So other than Tilray, Mr. Kassam,
 20 has Anson received any margin calls or buy-ins from
 21 your brokers for the companies listed in the
 22 Defamatory Manifesto?
 23 A. Sorry, you asked two different
 24 questions there. You are asking about margin calls
 25 associated with having those -- within those

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1 securities within our portfolio, and then you asked
 2 about buy-ins. They are two very different things.
 3 1283 Q. Margin calls.
 4 A. Never.
 5 1284 Q. Never, well, except for, say,
 6 Tilray, right?
 7 A. Well, you said aside from Tilray.
 8 You asked about the other securities.
 9 1285 Q. So you have never had a margin
 10 call?
 11 A. I don't believe we have had a
 12 margin call associated with the other securities
 13 that you listed.
 14 1286 Q. What about buy-ins?
 15 A. How do you define buy-ins?
 16 1287 Q. For example, have the banks ever
 17 asked you to raise more capital or inject more
 18 capital?
 19 A. Other than that Tilray situation,
 20 I don't think we have had an issue with margin
 21 calls, you know, that I can recall.
 22 1288 Q. Has Anson ever participated in a
 23 private financing of a company?
 24 A. We have.
 25 1289 Q. Which ones?

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1 A. Thousands.
 2 1290 Q. Thousands. Was Anson involved in
 3 raising capital for any of the companies listed in
 4 the Defamatory Manifesto?
 5 MR. STALEY: Which companies are those?
 6 You need to give me a list. There is lots of
 7 companies.
 8 MR. KIM: Well, we know the companies,
 9 right.
 10 MR. STALEY: Well, no, I don't work
 11 like that. There is lots of companies mentioned,
 12 so...
 13 BY MR. KIM:
 14 1291 Q. Now, you would agree with me that
 15 private placements often -- they can often be a
 16 good deal. You can get stock at below market
 17 price?
 18 A. Yeah, at times you are able to buy
 19 stocks below market price, but then they come with,
 20 you know, a hold period, so that sort of is the pro
 21 and con associated with a private placement.
 22 1292 Q. Right. And how does Anson
 23 typically get presented with these opportunities?
 24 A. A wide variety of the sources,
 25 right. We get it sometimes from brokerages,

366	<p>1 sometimes from the company itself, sometimes from</p> <p>2 independent people, sometimes from our investors.</p> <p>3 We are shown deals every day from a host of</p> <p>4 varieties.</p> <p>5 MR. STALEY: Won, can you sort of help</p> <p>6 me how any of this is relevant to anything, how</p> <p>7 they end up making private investments?</p> <p>8 MR. KIM: Well, there is an allegation</p> <p>9 in the Defamatory Manifesto, Rob, that Anson gets</p> <p>10 private placements to get insider information and</p> <p>11 then uses that to short the company.</p> <p>12 MR. STALEY: Okay, well, why don't you</p> <p>13 take him to that.</p> <p>14 MR. KIM: Well, we are here.</p> <p>15 MR. STALEY: Well, no, but you are</p> <p>16 asking him how he gets into private placements. It</p> <p>17 is not that question.</p> <p>18 Could I also just -- like how are you</p> <p>19 moving along? How are you progressing through your</p> <p>20 questions?</p> <p>21 MR. KIM: I am progressing.</p> <p>22 MR. STALEY: Do you have any idea as to</p> <p>23 how much longer you are going to be?</p> <p>24 MR. KIM: Well, no. I mean, we'll have</p> <p>25 the lunch break, and we have got some questions to</p>	368
367	<p>1 ask. I mean, but I am making good time.</p> <p>2 MR. STALEY: Okay, no, that is fine.</p> <p>3 BY MR. KIM:</p> <p>4 1293 Q. I'll do my best, Rob. As you</p> <p>5 know, I always do my best.</p> <p>6 Mr. Kassam, so if we can look at this</p> <p>7 document, you would agree with me that you often</p> <p>8 get -- do you get material non-public information</p> <p>9 through participating in a private placement?</p> <p>10 A. Generally speaking, no. You know,</p> <p>11 why would you get material non-public information</p> <p>12 for participating in a placement?</p> <p>13 1294 Q. But you would be able to -- if</p> <p>14 not, why would there be a corresponding hold?</p> <p>15 A. The hold is a regulatory hold</p> <p>16 associated with private placements, that if you</p> <p>17 don't have the underlying shares registered, it</p> <p>18 generally takes in Canada four months for those</p> <p>19 shares to come to the market.</p> <p>20 1295 Q. Okay, so --</p> <p>21 A. It is not a function of MNPI.</p> <p>22 1296 Q. Is the hold really to -- -- is</p> <p>23 that the price you pay for getting a favourable</p> <p>24 price on a stock?</p> <p>25 A. It is just part of the contract,</p>	369
	<p>1 right. So generally speaking, in order to entice</p> <p>2 an investor to participate in a deal where he has</p> <p>3 to hold the shares for four months, they generally</p> <p>4 have to offer you some type of incentive, and the</p> <p>5 incentive is by offering a reduced price for that</p> <p>6 underlying security.</p> <p>7 1297 Q. Now, has Anson ever shorted stocks</p> <p>8 that it participated -- for which it participated</p> <p>9 in private placements?</p> <p>10 A. Sorry, can you repeat the</p> <p>11 question?</p> <p>12 1298 Q. Has Anson ever shorted any stocks</p> <p>13 that it participated in the private placement</p> <p>14 round?</p> <p>15 A. So have we bought a private</p> <p>16 placement and then subsequently shorted the same</p> <p>17 security?</p> <p>18 1299 Q. Yes.</p> <p>19 A. Yes.</p> <p>20 1300 Q. And which are those?</p> <p>21 A. Thousands.</p> <p>22 1301 Q. Okay, what about did you</p> <p>23 participate in a private placement round for</p> <p>24 Facedrive?</p> <p>25 A. I don't believe we did.</p>	
	<p>1 1302 Q. ReconAfrica?</p> <p>2 A. I mentioned previously I don't</p> <p>3 recall, but I don't believe we did.</p> <p>4 1303 Q. HEXO Corp.?</p> <p>5 A. I believe we played HEXO deals,</p> <p>6 but I don't know if they were private placements.</p> <p>7 I believe HEXO was a large company and was</p> <p>8 operating through a shelf, so those were</p> <p>9 free-trading securities.</p> <p>10 1304 Q. What about Tilray?</p> <p>11 A. The same thing.</p> <p>12 1305 Q. What about Zenabis?</p> <p>13 A. Zenabis we participated in a</p> <p>14 convertible security and a subsequent financing</p> <p>15 that they did.</p> <p>16 1306 Q. Okay, what about Aphria?</p> <p>17 A. Again, I believe Aphria was a very</p> <p>18 large company, so they would have operated on a</p> <p>19 shelf, so most of their deals would have been</p> <p>20 free-trading securities, which we participated in a</p> <p>21 bunch.</p> <p>22 1307 Q. What about Harvest Health?</p> <p>23 A. Harvest Health?</p> <p>24 1308 Q. Yes.</p> <p>25 A. I don't know.</p>	

370	<p>1 1309 Q. Can you check?</p> <p>2 U/A MR. STALEY: We'll take it under</p> <p>3 advisement.</p> <p>4 BY MR. KIM:</p> <p>5 1310 Q. Now, for all of the tickers that</p> <p>6 we just named, I would like particulars of those;</p> <p>7 for those where Anson participated, I would like</p> <p>8 terms of the participation and the subsequent short</p> <p>9 positions?</p> <p>10 R/F MR. STALEY: No. It is not relevant.</p> <p>11 BY MR. KIM:</p> <p>12 1311 Q. So you are aware, sir, that the</p> <p>13 Defamatory Manifesto claims that Anson took a naked</p> <p>14 short position with Facedrive in 2020, if we could</p> <p>15 call that up? You are familiar with this passage</p> <p>16 in the Manifesto?</p> <p>17 A. I see it here, yes.</p> <p>18 1312 Q. How big was Anson's short position</p> <p>19 in Facedrive?</p> <p>20 A. I believe our largest position,</p> <p>21 short position in Facedrive was 400,000 shares.</p> <p>22 1313 Q. And where did you borrow the</p> <p>23 shares?</p> <p>24 A. I don't know.</p> <p>25 1314 Q. Can you find out?</p>	372
371	<p>1 U/A MR. STALEY: We'll take it under</p> <p>2 advisement.</p> <p>3 BY MR. KIM:</p> <p>4 1315 Q. And at any time -- I understand</p> <p>5 that prior to the change in guidance from IIROC,</p> <p>6 you would agree with me that nakedly shorting</p> <p>7 stocks was technically not offside regulations in</p> <p>8 Ontario?</p> <p>9 A. Well, again, if the premise of</p> <p>10 naked short, I wouldn't call it "naked short". I</p> <p>11 would just call it a short.</p> <p>12 1316 Q. Right, but I am just saying that</p> <p>13 did you have -- your biggest position was 400,000</p> <p>14 for Facedrive?</p> <p>15 A. I believe so, yes.</p> <p>16 1317 Q. And you are going to tell me who</p> <p>17 you borrowed the shares from.</p> <p>18 A. If that was the undertaking you</p> <p>19 asked.</p> <p>20 1318 Q. Yeah, Counsel, I would like an</p> <p>21 undertaking for all of the records of all positions</p> <p>22 taken on Facedrive across all of the Anson Funds,</p> <p>23 including records of where Anson obtained the</p> <p>24 borrow to cover its short position?</p> <p>25 U/A MR. STALEY: We'll take it under</p>	373

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1 1329 Q. Can you find out?
2 U/A MR. STALEY: I'll take it under
3 advisement.
4 BY MR. KIM:
5 1330 Q. And we would also like production
6 of all of the training records for all of the
7 Anson-related entities on Facedrive?
8 U/A MR. STALEY: We'll take it under
9 advisement.
10 BY MR. KIM:
11 1331 Q. Mr. Kassam, has Anson ever held
12 any positions in ReconAfrica?
13 A. Held positions meaning long
14 positions?
15 1332 Q. Long or short.
16 A. We have been short ReconAfrica,
17 yes.
18 1333 Q. Okay. It has never been long on
19 ReconAfrica?
20 A. I don't believe so, no.
21 1334 Q. How did you acquire your short
22 position on Recon?
23 A. I believe with the underlying
24 brokerages.
25 1335 Q. And who are they?

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1 A. I don't recall.
2 1336 Q. Can you find out?
3 R/F MR. STALEY: Again, it is not clear to
4 me how that is relevant to anything, Won, so I
5 would take it as a refusal.
6 BY MR. KIM:
7 1337 Q. I am going to produce Market
8 Fraud's article 10179. Are you familiar with this
9 article, sir?
10 A. I am.
11 1338 Q. And it says that Anson
12 participated in ReconAfrica's bought deal on May
13 5th, 2021?
14 A. I believe it says we didn't
15 participate.
16 1339 Q. No, no, it says "ReconAfrica
17 announced" -- sorry, let me correct that:
18 "On May 5th, 2021, ReconAfrica
19 announced a bought-deal financing
20 deal."
21 A. I see that.
22 1340 Q. So at this time, was Anson in
23 relationships with RBC, TD, CIBC and National Bank
24 with regard to ReconAfrica stock?
25 MR. STALEY: Sorry, what do you mean by

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1 be in relationship?
2 BY MR. KIM:
3 1341 Q. Did you have a relationship with
4 RBC, TD, CIBC, and National Bank with regard to the
5 ReconAfrica stock?
6 A. I don't understand the question.
7 Did I have a relationship at the time when this
8 deal was announced?
9 1342 Q. Did you have any transactions with
10 RBC, TD, CIBC and the National Bank on ReconAfrica
11 stock?
12 A. During what period?
13 1343 Q. During this period, around May of
14 2021.
15 A. I don't know off the top of my
16 head.
17 1344 Q. I know. I am asking you to check
18 your records and advise us back?
19 MR. STALEY: Well, I am not sure that
20 is -- I mean, the issue is -- the relationship in
21 itself is not relevant to anything.
22 If you are talking about whether or not
23 they are entities through which the company might
24 have facilitated a short position, that is
25 different, but he has already told you that some of

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1 these are not entities for which they were a prime
2 dealer or prime broker, so --
3 MR. KIM: Rob, the articles --
4 MR. STALEY: -- I think --
5 MR. KIM: Look, this is a Defamatory
6 Manifesto with which your client has major -- they
7 issued a lawsuit regarding the Defamatory
8 Manifesto. So it is clear that your client has had
9 a short position with ReconAfrica. All I am asking
10 is were they dealing with RBC, TD, CIBC and the
11 National Bank on ReconAfrica stock.
12 MR. STALEY: But I think the problem
13 was you have to figure out what it means, which is
14 not all that intelligible, to say they are
15 leveraged, that they used the shares as leverage
16 with various banks, and it is premised upon --
17 MR. KIM: I am not --
18 MR. STALEY: No, no, no, stop
19 interrupting me. The reporter won't like it.
20 The premise of the question is based
21 upon taking down and trying to -- obtaining a
22 direct fill and not getting it and then getting it
23 somewhere else, which the witness has already
24 answered, and then that they are going to do
25 something with shares they didn't get.

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1 So like I don't quite know where you
2 think this is taking you other than it seems to be
3 entirely wrong.
4 MR. KIM: Just answer my question.
5 MR. STALEY: I think you -- no, I agree
6 with that, but I think the premise of the
7 question -- the question is based on a bunch of
8 premises that the witness has already answered that
9 are incorrect.
10 BY MR. KIM:
11 1345 Q. There is no premise to my
12 question. Did Anson deal with RBC, TD, CIBC,
13 and/or National Bank on ReconAfrica stock as at May
14 of 2021?
15 R/F MR. STALEY: It is not a relevant
16 question. It is not what you think is -- what is
17 set out in the statement, in the document.
18 BY MR. KIM:
19 1346 Q. Mr. Kassam, how did you acquire
20 your position on ReconAfrica?
21 A. Sorry, acquire my position?
22 1347 Q. Yes.
23 A. "Position" infers long. Like you
24 are asking about a long position now?
25 1348 Q. No, your short position. Who lent

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1 you the stock?
2 A. Well, I can't recall off the top
3 of my head.
4 1349 Q. Mr. Staley, I would like an
5 undertaking.
6 R/F MR. STALEY: No.
7 BY MR. KIM:
8 1350 Q. Now, Mr. Kassam, did you
9 collaborate with Viceroy Research on ReconAfrica?
10 A. I believe we had conversations
11 with the Viceroy people.
12 1351 Q. I am going to pull up document
13 14699. Are you familiar with this document?
14 A. Yes, I am familiar.
15 1352 Q. Did you share information with
16 Viceroy Research about ReconAfrica?
17 A. I believe we had conversations in
18 regards to ReconAfrica, yes.
19 1353 Q. And what were those conversations
20 about?
21 A. I believe we exchanged diligence,
22 just, you know, looking at the press releases and
23 the people associated with the company and its
24 financials and discussing the merits of the
25 underlying company.

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1 1354 Q. And did your diligence make its
2 way onto this report?
3 A. I believe some of the stuff we
4 discussed is definitely mentioned in the report,
5 yes.
6 1355 Q. Counsel, I would like an
7 undertaking from Mr. Kassam and people at Anson to
8 find out which portion of this report is from
9 diligence provided to Viceroy Research?
10 R/F MR. STALEY: I am not going to do that.
11 You can ask the witness what he recalls sharing.
12 He is here. He can answer your question.
13 BY MR. KIM:
14 1356 Q. Mr. Kassam, generally do you
15 recall your discussions with Viceroy Research about
16 ReconAfrica?
17 A. I believe they were already
18 looking at ReconAfrica, and you know, because of
19 all the noise in the chat boards and everywhere
20 that we were involved and being short, they came to
21 us to ask us if we had any further information
22 other than, you know, their thesis.
23 1357 Q. And why did they come to you?
24 A. I just said, you know, that, you
25 know, our name was all over the chat boards,

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1 Stockhouse and Reddit, et cetera, that we were
2 short ReconAfrica, and so I guess as part of their
3 diligence process, they reviewed the posts, saw our
4 name. And you know, we historically have shared
5 diligence on other names, So they came to us to
6 say, Hey, you know, this is our theory; what do you
7 think?
8 1358 Q. So it is your evidence that
9 Viceroy learned of your position from reading
10 Stockhouse and Reddit?
11 A. I believe they knew or, you know,
12 had a theory that we were involved or being short
13 because they saw our name online. Otherwise, I
14 don't know why they would have randomly come to us,
15 but I can't answer for them.
16 1359 Q. What is your relationship with
17 Viceroy Research?
18 A. We -- you know, they are another
19 short selling outfit out there, so we at times
20 exchange information on, you know, companies that
21 are out there.
22 1360 Q. And when you agreed to share
23 research, do you pay each other? Did they pay you
24 for your research?
25 A. They did not pay us for the

382	<p>1 research here, no.</p> <p>2 1361 Q. Have they ever paid you for any of</p> <p>3 your research?</p> <p>4 A. I don't believe they have paid us</p> <p>5 for our research, no.</p> <p>6 1362 Q. Have you ever paid Viceroy</p> <p>7 Research for any research?</p> <p>8 A. We have not paid Viceroy Research,</p> <p>9 Viceroy for any research.</p> <p>10 1363 Q. So then when you agreed to work</p> <p>11 together with Viceroy, there is an understanding</p> <p>12 that you would both benefit from the release of</p> <p>13 your research reports?</p> <p>14 A. No. The purpose of having a</p> <p>15 relationship with someone else who does, you know,</p> <p>16 underlying work is to share that intelligence and</p> <p>17 both of us end up smarter after the intelligence</p> <p>18 has been shared.</p> <p>19 1364 Q. But there is an understanding that</p> <p>20 you both hold positions and you would benefit from</p> <p>21 the release of your report?</p> <p>22 A. I didn't have any report.</p> <p>23 1365 Q. I know, but there is an</p> <p>24 understanding that you held positions in</p> <p>25 ReconAfrica that would benefit from the release of</p>	384
383	<p>1 the report?</p> <p>2 MR. STALEY: I think you have asked</p> <p>3 that twice now, and I don't think you like the</p> <p>4 answer but he has answered the question.</p> <p>5 MR. KIM: He didn't answer the</p> <p>6 question.</p> <p>7 MR. STALEY: He did.</p> <p>8 BY MR. KIM:</p> <p>9 1366 Q. Mr. Kassam, what was the size of</p> <p>10 your position before the release of the Viceroy</p> <p>11 report?</p> <p>12 A. I don't know.</p> <p>13 1367 Q. Can you find out?</p> <p>14 U/A MR. STALEY: We'll take it under</p> <p>15 advisement.</p> <p>16 BY MR. KIM:</p> <p>17 1368 Q. Mr. Staley, I would like an</p> <p>18 undertaking for you to produce records of all of</p> <p>19 the deposits and withdrawals of Recon securities</p> <p>20 for each of the Anson accounts?</p> <p>21 U/A MR. STALEY: I'll take it under</p> <p>22 advisement.</p> <p>23 BY MR. KIM:</p> <p>24 1369 Q. Now, this is a question for</p> <p>25 Mr. Staley. I would like for you to provide</p>	385
	<p>1 undertakings -- sorry, I would like Mr. Staley and</p> <p>2 his team to provide undertakings for Facedrive,</p> <p>3 ReconAfrica, Africa -- sorry, Aphria, for its</p> <p>4 holding, trading and profit and loss records for</p> <p>5 all of the companies, for Facedrive, ReconAfrica,</p> <p>6 Africa -- Aphria, sorry, Zenabis, Facedrive,</p> <p>7 Harvest Health and HEXO?</p> <p>8 R/F MR. STALEY: No.</p> <p>9 MR. KIM: I would like also an</p> <p>10 undertaking --</p> <p>11 MR. STALEY: That's far too broad a</p> <p>12 request based on relevance.</p> <p>13 BY MR. KIM:</p> <p>14 1370 Q. I would like for you to produce</p> <p>15 any whistleblower complaints that Anson or people</p> <p>16 related to Anson filed with any of the securities</p> <p>17 regulators, be it here or in the United States, for</p> <p>18 those stocks that I just mentioned?</p> <p>19 R/F MR. STALEY: No.</p> <p>20 BY MR. KIM:</p> <p>21 1371 Q. I would like an undertaking for</p> <p>22 you to produce all of the communications with any</p> <p>23 journalists that Mr. Kassam or anyone at Anson had</p> <p>24 with any journalists about the companies I just</p> <p>25 referenced?</p>	
	<p>1 R/F MR. STALEY: Won, these are very, very</p> <p>2 broad questions that are not relevant. We are not</p> <p>3 answering that question.</p> <p>4 BY MR. KIM:</p> <p>5 1372 Q. I want production of any of the</p> <p>6 communications that Mr. Kassam and/or people from</p> <p>7 Anson had with management or anyone in management</p> <p>8 or directors for the companies I just mentioned?</p> <p>9 R/F MR. STALEY: That is very, very broad,</p> <p>10 well beyond anything that is relevant.</p> <p>11 BY MR. KIM:</p> <p>12 1373 Q. So let's go then to document 5505.</p> <p>13 Are you familiar with this document?</p> <p>14 A. Okay, I am now.</p> <p>15 1374 Q. It is your document?</p> <p>16 A. I see it.</p> <p>17 1375 Q. You introduce Mark Rendell, who is</p> <p>18 a journalist at The Globe and Mail, to</p> <p>19 Mr. Doxtator?</p> <p>20 A. I believe so.</p> <p>21 1376 Q. And how do you know Mr. Rendell?</p> <p>22 A. Mr. Rendell is a journalist at The</p> <p>23 Globe and Mail. We speak with a wide variety of</p> <p>24 sources, as I had mentioned, including journalists.</p> <p>25 1377 Q. And would you call him a friend?</p>	

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1 A. No.
 2 1378 Q. Well, what was your purpose in
 3 making the introduction to Mr. Doxtator?
 4 A. I believe Robert Doxtator wanted
 5 to speak to Mark Rendell on cannabis names.
 6 1379 Q. And so it was done at
 7 Mr. Doxtator's request?
 8 A. I believe so, yes.
 9 1380 Q. Have you or anyone at Anson ever
 10 collaborated with Mr. Rendell on an article in The
 11 Globe?
 12 A. Generally speaking, you can't
 13 collaborate with, you know, big publications like
 14 The Globe and Mail. They are a completely
 15 independent, you know, publishing firm with authors
 16 who stand behind what they publish.
 17 So we can, you know, offer information
 18 to them or, you know, our own theories and
 19 diligence, but we have not collaborated on any
 20 piece of work together.
 21 1381 Q. But you have provided information
 22 to Mr. Rendell?
 23 A. I believe over the years we
 24 provided a lot of information to Mr. Rendell.
 25 1382 Q. Okay, and about companies where

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1 you had investments or short positions?
 2 A. I believe at times we provided
 3 information to journalists when we have long
 4 positions or short positions or no position at all.
 5 1383 Q. And it would always be on an
 6 anonymous basis?
 7 A. No, he knows who we are. We are
 8 not sending it from ProtonMail or anything.
 9 1384 Q. I know, but did you ever get
 10 identified in these articles?
 11 A. I don't know which articles you
 12 are referring to.
 13 1385 Q. No, but like I am
 14 talking -- before we get to the specific articles,
 15 have you ever been identified as somebody that he
 16 spoke to?
 17 MR. STALEY: How is this relevant? How
 18 is this relevant, Won? We are going very, very far
 19 afield.
 20 MR. KIM: There is an allegation that
 21 Anson collaborated with journalists to promote and
 22 to disparage different stocks, Rob.
 23 MR. STALEY: Right, and he has already
 24 told you he doesn't collaborate.
 25 MR. KIM: Well, he has been a source.

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1 MR. STALEY: Well --
 2 BY MR. KIM:
 3 1386 Q. Mr. Kassam, do you think when you
 4 provide information or a source, do you think that
 5 is collaborating?
 6 A. No, I believe that is just
 7 providing a source or, you know, information to
 8 journalists.
 9 1387 Q. So you wouldn't call that
 10 collaborating. What would you call it?
 11 A. I would call it, you know, as I
 12 said, we share diligence, you know, so I don't
 13 think I am collaborating if I share diligence with
 14 you about Twitter that we are collaborating on
 15 something. It is just people -- it is just a
 16 normal part of -- it is normal course action in the
 17 stock market.
 18 1388 Q. So when you provide diligence,
 19 though, there is a reasonable expectation that the
 20 journalists would write a story about it?
 21 A. No. I am generally speaking
 22 trying to get an author informed of a situation. I
 23 would say, you know, the bulk of the times they
 24 have no interest in a story. It is just either
 25 getting them up to speed on a particular name or

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1 showing what we believe is interesting information.
 2 1389 Q. And hopefully they would follow up
 3 on it?
 4 A. It honestly depends. Like
 5 sometimes it is just about industry expertise.
 6 Sometimes it is about, you know, a particular name.
 7 But you know, the problem is we never have any
 8 look-through into what a journalist is doing, so
 9 they are on their own.
 10 1390 Q. But you provide ideas for
 11 journalists; correct?
 12 A. We provide, you know, interesting
 13 situations that we are involved with, and so we
 14 will, you know, make some of those situations known
 15 to a journalist, or at times we see a journalist
 16 publishes on something that we think we have more
 17 information on and we'll provide, you know,
 18 incremental diligence to what they already know.
 19 1391 Q. And have you ever identified
 20 companies to The Globe and Mail as a potential
 21 story, potential subject?
 22 MR. STALEY: How is that relevant?
 23 MR. KIM: There is an allegation
 24 that in the Defamatory --
 25 MR. STALEY: Take me to the allegation.

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1 Take me to the allegation.
 2 MR. KIM: Okay, let's go to Part 2 of
 3 the Defamatory Manifesto.
 4 MR. STALEY: Yeah, let's ask about --
 5 MR. KIM: Let's go to 550.
 6 MR. STALEY: Let's go to that.
 7 BY MR. KIM:
 8 1392 Q. Sir, are you familiar with this
 9 passage in Part 2 of the Manifesto, Mr. Kassam?
 10 A. I believe so.
 11 1393 Q. And there is a statement in the
 12 Manifesto that The Globe and Mail publishes "hit
 13 piece[s] on every company Anson gets into trouble
 14 on"; do you see that?
 15 A. I see it.
 16 1394 Q. Okay. Now, let me ask you, have
 17 you ever fed anyone at The Globe and Mail,
 18 including Mr. Rendell, any stories about
 19 ReconAfrica?
 20 MR. STALEY: Sorry, can you ask -- I am
 21 not sure the question is clear. Can you just state
 22 it again so we can figure out whether or not --
 23 BY MR. KIM:
 24 1395 Q. Have you provided any diligence to
 25 Mr. Rendell about ReconAfrica?

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1 A. I don't believe we provided any
 2 information to Mr. Rendell on ReconAfrica.
 3 1396 Q. Sir, I am not -- I understand it
 4 is hard to answer these questions, but I am not
 5 interested in your beliefs. I want you to check
 6 your records to see if you ever contacted
 7 Mr. Rendell about ReconAfrica?
 8 U/A MR. STALEY: We'll take it under
 9 advisement.
 10 BY MR. KIM:
 11 1397 Q. What about Greg McArthur?
 12 A. I can't recall.
 13 1398 Q. Can you check your records?
 14 U/A MR. STALEY: We'll take it under
 15 advisement.
 16 BY MR. KIM:
 17 1399 Q. Who is Greg McArthur, Mr. Kassam?
 18 A. Greg McArthur is -- I think he is
 19 a Report on Business reporter at The Globe and
 20 Mail.
 21 1400 Q. Have you shared due diligence with
 22 Mr. McArthur on any of the companies?
 23 A. Any of which companies?
 24 1401 Q. Any of the companies that appear
 25 in the Manifesto or in the Statement of Claim.

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1 MR. STALEY: Well, no, hold on. You
 2 are going to have to identify specifically which
 3 ones you are referring to, because there is lots of
 4 companies mentioned.
 5 BY MR. KIM:
 6 1402 Q. Have you talked to Mr. McArthur
 7 about Facedrive?
 8 A. I believe we have had
 9 conversations about Facedrive.
 10 1403 Q. What do you recall about your
 11 diligence that you shared with Mr. McArthur?
 12 A. I believe we shared diligence, you
 13 know, of, you know, publicly available information
 14 that was out there that I thought was an
 15 interesting story for him.
 16 1404 Q. Okay. Did you share any
 17 information about your lawsuit, this lawsuit, with
 18 Mr. McArthur?
 19 A. I believe we have had
 20 conversations about this lawsuit, yes.
 21 1405 Q. And did you provide any
 22 information about this lawsuit with Mr. McArthur?
 23 A. What do you mean by provide
 24 information about the lawsuit?
 25 1406 Q. Well, public documents such as the

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1 Statement of Claim.
 2 A. I believe we have had
 3 correspondence in regards to the Statement of
 4 Claim, yes.
 5 1407 Q. And did he approach you or did you
 6 approach him about this lawsuit?
 7 A. I believe he approached us.
 8 1408 Q. And you shared the Statement of
 9 Claim. What else did you share?
 10 MR. STALEY: So, Won, the allegation in
 11 the Defamatory Manifesto has to do with publishing
 12 a hit piece on every company that Anson gets into
 13 trouble on or has a long short in. How are these
 14 questions about this litigation relevant to any
 15 matter that is pleaded?
 16 MR. KIM: The allegations are that
 17 Anson personnel and Mr. Kassam coordinated -- used
 18 The Globe and Mail and their journalists to publish
 19 hit pieces about the companies.
 20 MR. STALEY: Right, and you are asking
 21 about something entirely different --
 22 MR. KIM: Well, I am just --
 23 MR. STALEY: -- in this examination.
 24 MR. KIM: I am just covering --
 25 R/F MR. STALEY: No, you are asking

394	<p>1 questions that are not relevant based on the</p> <p>2 pleading, and you have just confirmed it is not</p> <p>3 relevant.</p> <p>4 BY MR. KIM:</p> <p>5 1409 Q. Other than Mr. McArthur and</p> <p>6 Mr. Rendell, who else have you spoken to at The</p> <p>7 Globe and Mail about these companies?</p> <p>8 MR. STALEY: Which companies?</p> <p>9 MR. KIM: The companies at issue.</p> <p>10 MR. STALEY: What companies? You are</p> <p>11 going to have to go through them, Won. We are not</p> <p>12 going to --</p> <p>13 MR. KIM: Have you talked to any --</p> <p>14 MR. STALEY: I have told you about 50</p> <p>15 times, we are not playing that game.</p> <p>16 BY MR. KIM:</p> <p>17 1410 Q. Have you talked to anyone at The</p> <p>18 Globe and Mail other than Greg McArthur and Mark</p> <p>19 Rendell about ReconAfrica, Mr. Kassam?</p> <p>20 A. I can't recall.</p> <p>21 1411 Q. Can you check your records?</p> <p>22 U/A MR. STALEY: We'll take it under</p> <p>23 advisement.</p> <p>24 BY MR. KIM:</p> <p>25 1412 Q. What about Facedrive?</p>	396
395	<p>1 A. What about it?</p> <p>2 1413 Q. Have you talked to anybody at The</p> <p>3 Globe and Mail other than Mr. Rendell and</p> <p>4 Mr. McArthur about Facedrive?</p> <p>5 A. I can't recall.</p> <p>6 1414 Q. Please check your records and</p> <p>7 advise.</p> <p>8 U/A MR. STALEY: We'll take it under</p> <p>9 advisement.</p> <p>10 BY MR. KIM:</p> <p>11 1415 Q. What about Aphria?</p> <p>12 A. What about it?</p> <p>13 1416 Q. It is the same question.</p> <p>14 A. Have I spoken with anyone at The</p> <p>15 Globe and Mail other than Mark Rendell or Greg</p> <p>16 McArthur about Aphria?</p> <p>17 1417 Q. Yes.</p> <p>18 A. I can't recall.</p> <p>19 1418 Q. Can you check your records?</p> <p>20 U/A MR. STALEY: We'll take it under</p> <p>21 advisement.</p> <p>22 BY MR. KIM:</p> <p>23 1419 Q. What about Zenabis?</p> <p>24 MR. STALEY: He is going to say "What</p> <p>25 about it?", and you are going to say the same</p>	397

398	<p>1 by Mr. Doxtator. That is your information. Why</p> <p>2 would you introduce Mr. Doxtator to Mr. Rendell?</p> <p>3 A. I believe, you know, at that time</p> <p>4 we were working, you know, and we had started a</p> <p>5 relationship with Mr. Doxtator, and you know, I was</p> <p>6 showing him some goodwill by making the</p> <p>7 introduction.</p> <p>8 1424 Q. And was it in regard to a</p> <p>9 particular cannabis stock?</p> <p>10 A. I don't know what the -- what the</p> <p>11 specific thing that Mr. Doxtator wanted to speak to</p> <p>12 Mark Rendell about.</p> <p>13 1425 Q. Now, I would like to call up</p> <p>14 document 14639. Sir, do you know this document?</p> <p>15 A. I don't.</p> <p>16 1426 Q. Have you ever seen it before?</p> <p>17 A. I can't recall.</p> <p>18 1427 Q. So you don't know who "Jeff7621"</p> <p>19 is?</p> <p>20 A. I don't believe so.</p> <p>21 MR. KIM: You know what, Rob, I think</p> <p>22 this would be a good time. Can we come back at 2</p> <p>23 o'clock? And I think I will be maybe an hour, an</p> <p>24 hour and a half, at most.</p> <p>25 MR. STALEY: Okay. Do you want to come</p>	400
399	<p>1 back earlier? We don't mind coming back earlier.</p> <p>2 [Discussion off the Record.]</p> <p>3 -- RECESSED AT 12:52 P.M.</p> <p>4 -- RESUMED AT 1:30 P.M.</p> <p>5 BY MR. KIM:</p> <p>6 1428 Q. Mr. Kassam, have you ever had</p> <p>7 any -- you or anyone at Anson ever had any warnings</p> <p>8 or fines or charges from Canadian regulators for</p> <p>9 using pseudonyms or social media persona not</p> <p>10 related to Anson?</p> <p>11 A. I believe we went over this</p> <p>12 yesterday.</p> <p>13 1429 Q. Yeah, we are talking about -- I</p> <p>14 know yesterday we talked about "Emperor Has No</p> <p>15 Clothes" on Seeking Alpha, but what about "Grumpy</p> <p>16 Bear"?</p> <p>17 MR. STALEY: What about "Grumpy Bear"?</p> <p>18 BY MR. KIM:</p> <p>19 1430 Q. Was "Grumpy Bear" one of the</p> <p>20 aliases for somebody at Anson?</p> <p>21 A. I don't believe so, no.</p> <p>22 1431 Q. No? There is no one related to</p> <p>23 Grumpy Bear Research?</p> <p>24 A. Not from Anson, no.</p> <p>25 1432 Q. Do you know who was behind Grumpy</p>	401
	<p>1 Bear Research?</p> <p>2 A. I don't.</p> <p>3 1433 Q. Okay. Now, this morning and</p> <p>4 yesterday we briefly discussed your relationship</p> <p>5 with your other short sellers and people related to</p> <p>6 short selling firms. What about Grizzly -- I</p> <p>7 forgot to ask you about Grizzly Bear Research. Do</p> <p>8 you work with Grizzly Bear Research?</p> <p>9 A. I believe it is Grizzly Research,</p> <p>10 isn't it?</p> <p>11 1434 Q. Sorry, Grizzly. Sorry, that is</p> <p>12 me. Grizzly Research?</p> <p>13 A. Yeah, no, yeah, we have a working</p> <p>14 relationship with Grizzly Research.</p> <p>15 1435 Q. Okay, and who there at Grizzly?</p> <p>16 A. I believe his name is Jeff Inquist</p> <p>17 (ph.).</p> <p>18 1436 Q. And do you know where he is</p> <p>19 located?</p> <p>20 A. I believe he lives in California.</p> <p>21 1437 Q. Have you cooperated or</p> <p>22 collaborated with Grizzly on any of the tickers</p> <p>23 that we discussed this morning that appears in the</p> <p>24 Manifesto?</p> <p>25 A. Sorry, specifically what tickers?</p>	
	<p>1 1438 Q. Facedrive, ReconAfrica, Aphria?</p> <p>2 A. Those three?</p> <p>3 1439 Q. No -- I mean, well, we could go</p> <p>4 through all of the list. But maybe I could just</p> <p>5 ask you, what tickers have you worked with Grizzly</p> <p>6 on?</p> <p>7 A. I can't recall.</p> <p>8 1440 Q. Can you search your records and</p> <p>9 find out?</p> <p>10 R/F MR. STALEY: No.</p> <p>11 BY MR. KIM:</p> <p>12 1441 Q. Okay, let me be more specific</p> <p>13 then. We'll do it the hard way. Did you work with</p> <p>14 Grizzly on Zenabis?</p> <p>15 A. I don't recall.</p> <p>16 1442 Q. Can you find out?</p> <p>17 MR. STALEY: Sorry, which one again?</p> <p>18 MR. KIM: Zenabis.</p> <p>19 U/A MR. STALEY: We'll take it under</p> <p>20 advisement.</p> <p>21 BY MR. KIM:</p> <p>22 1443 Q. What about Aphria?</p> <p>23 A. I don't recall.</p> <p>24 1444 Q. Can you find out?</p> <p>25 U/A MR. STALEY: We'll take it under</p>	

402	<p>1 advisement.</p> <p>2 BY MR. KIM:</p> <p>3 1445 Q. What about Genius Brands?</p> <p>4 A. I don't recall.</p> <p>5 1446 Q. Can you find out?</p> <p>6 U/A MR. STALEY: The same answer, under</p> <p>7 advisement.</p> <p>8 BY MR. KIM:</p> <p>9 1447 Q. Tilray?</p> <p>10 A. I don't recall.</p> <p>11 1448 Q. Mr. Staley?</p> <p>12 U/A MR. STALEY: Under advisement.</p> <p>13 BY MR. KIM:</p> <p>14 1449 Q. Facedrive?</p> <p>15 A. I don't recall.</p> <p>16 1450 Q. Mr. Staley?</p> <p>17 U/A MR. STALEY: Under advisement.</p> <p>18 BY MR. KIM:</p> <p>19 1451 Q. NexTech AR Solutions?</p> <p>20 A. I don't recall.</p> <p>21 1452 Q. Mr. Staley?</p> <p>22 U/A MR. STALEY: Under advisement.</p> <p>23 BY MR. KIM:</p> <p>24 1453 Q. ReconAfrica?</p> <p>25 A. I don't recall.</p>	404	<p>1 1464 Q. Mr. Staley?</p> <p>2 U/A MR. STALEY: Under advisement.</p> <p>3 BY MR. KIM:</p> <p>4 1465 Q. What about Valorem?</p> <p>5 A. I don't recall.</p> <p>6 1466 Q. Mr. Staley?</p> <p>7 MR. STALEY: How is this relevant, Won?</p> <p>8 I think we have gone pretty far down the list of</p> <p>9 names here. How are these relevant?</p> <p>10 MR. KIM: Well, I am just asking -- he</p> <p>11 has advised that he shares research and</p> <p>12 collaborates with other short sellers. He has</p> <p>13 provided -- you have provided undertakings this</p> <p>14 morning and yesterday for the other firms. I don't</p> <p>15 understand why this is difficult. I just omitted</p> <p>16 Grizzly from my notes.</p> <p>17 U/A MR. STALEY: It is just a question of</p> <p>18 how far down the list we are going, that's all.</p> <p>19 I'll take it under advisement.</p> <p>20 BY MR. KIM:</p> <p>21 1467 Q. Okay, so why don't you undertake</p> <p>22 to produce any -- if Anson entities cooperated with</p> <p>23 Grizzly on any of these stocks that we mentioned?</p> <p>24 MR. STALEY: Sorry, I took under</p> <p>25 advisement a number of the specific questions about</p>
403	<p>1 1454 Q. Mr. Staley?</p> <p>2 U/A MR. STALEY: Under advisement.</p> <p>3 BY MR. KIM:</p> <p>4 1455 Q. Harvest Health?</p> <p>5 A. I don't recall.</p> <p>6 1456 Q. Mr. Staley?</p> <p>7 U/A MR. STALEY: Under advisement.</p> <p>8 BY MR. KIM:</p> <p>9 1457 Q. What about Med Men?</p> <p>10 A. I don't recall.</p> <p>11 1458 Q. Mr. Staley?</p> <p>12 U/A MR. STALEY: Under advisement.</p> <p>13 BY MR. KIM:</p> <p>14 1459 Q. GFL Environmental?</p> <p>15 A. I don't recall.</p> <p>16 1460 Q. Mr. Staley?</p> <p>17 U/A MR. STALEY: Under advisement.</p> <p>18 BY MR. KIM:</p> <p>19 1461 Q. GSX Techedu?</p> <p>20 A. I don't recall.</p> <p>21 1462 Q. Mr. Staley?</p> <p>22 U/A MR. STALEY: Under advisement.</p> <p>23 BY MR. KIM:</p> <p>24 1463 Q. What about Champignon Brands?</p> <p>25 A. I don't recall.</p>	405	<p>1 a number of the stocks.</p> <p>2 BY MR. KIM:</p> <p>3 1468 Q. Okay. What about HEXO then?</p> <p>4 A. I don't recall.</p> <p>5 1469 Q. Mr. Staley?</p> <p>6 U/A MR. STALEY: Under advisement.</p> <p>7 BY MR. KIM:</p> <p>8 1470 Q. Now, we spoke about Nate Anderson</p> <p>9 and Hindenburg. I understand that you shared</p> <p>10 information with Nate Anderson on Aphria, and that</p> <p>11 was this morning. What about on Genius Brands?</p> <p>12 Did Anson collaborate with Mr. Anderson on Genius</p> <p>13 Brands?</p> <p>14 A. I don't believe we did, no.</p> <p>15 1471 Q. Do you know? Do you know for</p> <p>16 sure?</p> <p>17 A. We didn't.</p> <p>18 1472 Q. You didn't, you know for sure?</p> <p>19 MR. STALEY: He has answered.</p> <p>20 BY MR. KIM:</p> <p>21 1473 Q. What about NexTech, sir?</p> <p>22 A. I don't even know what NexTech is.</p> <p>23 1474 Q. Okay, what about Callidus?</p> <p>24 MR. STALEY: How is that -- Won, I</p> <p>25 think we are getting into names here that I don't</p>

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1 understand how they are relevant because --
 2 MR. KIM: Well, there was a chat.
 3 There was a chat that Mr. Kassam produced with
 4 Mr. Doxtator where he says he gave them all of the
 5 information -- gave information on Callidus.
 6 Should we produce that?
 7 MR. STALEY: But how is that relevant
 8 to a matter at issue in the proceeding? There
 9 could be lots of documents --
 10 MR. KIM: Well, I'm just asking
 11 questions.
 12 MR. STALEY: Well, that is fine, but
 13 the questions have to be relevant to a matter at
 14 issue, and I have given you a fair bit of latitude,
 15 but I think we have now gone beyond --
 16 MR. KIM: I agree. Well, I think it is
 17 relevant.
 18 R/F MR. STALEY: Okay, well, we'll agree to
 19 disagree, but I don't understand how -- the fact
 20 that it is a chat doesn't make it relevant. It
 21 just means that it is a chat.
 22 BY MR. KIM:
 23 1475 Q. Well, I mean, you understand
 24 that -- I am not going to argue about this here.
 25 Mr. Kassam, how about did you work with

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1 Mr. Anderson on Genius Brands?
 2 A. I did not.
 3 1476 Q. Okay. So you have never
 4 collaborated on anything with Mr. Anderson.
 5 Anybody else?
 6 MR. STALEY: Sorry, I don't think that
 7 is a fair --
 8 MR. KIM: Well, let me --
 9 R/F MR. STALEY: -- summary of what his
 10 evidence is. So if you have a question, you
 11 can -- don't put a premise in front of it that is
 12 not accurate based on this witness's own testimony.
 13 BY MR. KIM:
 14 1477 Q. Mr. Kassam, has Anson ever shorted
 15 Genius Brands?
 16 A. I don't believe we have. We were
 17 long the entire time. We might have shorted --
 18 1478 Q. Were you net long?
 19 A. -- against. We were net long,
 20 correct.
 21 1479 Q. Okay, but you had short positions
 22 on Genius Brands?
 23 A. I believe from time to time we
 24 were dealt a short Genius Brands, correct.
 25 1480 Q. Okay, Counsel, I would like

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1 production of Anson's position on Genius Brands
 2 from April 2020 to the end of 2020?
 3 U/A MR. STALEY: I'll take it under
 4 advisement. I am having a real difficulty with its
 5 relevance, but I'll take it under advisement.
 6 BY MR. KIM:
 7 1481 Q. Now, sir, have you ever traded
 8 personally or through any Anson entities in a
 9 company called Harvest Health?
 10 A. I don't recall.
 11 1482 Q. Can you find out?
 12 U/A MR. STALEY: We'll take it under
 13 advisement.
 14 BY MR. KIM:
 15 1483 Q. Okay. Now, Mr. Kassam, it is my
 16 understanding that the first law firm retained by
 17 you and Anson entities to investigate the
 18 defamatory statements was Blake Cassels?
 19 A. I believe so, yes.
 20 1484 Q. Okay. And did you have a
 21 previously existing relationship with Blake
 22 Cassels?
 23 A. Like as a firm or the individuals
 24 in the firm?
 25 1485 Q. No, with the firm.

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1 A. I don't believe we had previously
 2 engaged them on any matter, no.
 3 1486 Q. Okay. And when did you first
 4 engage -- was your decision to retain Mr. Barrack,
 5 was it personal to Mr. Barrack or was it the Blakes
 6 firm?
 7 A. It was personal to Mr. Barrack.
 8 1487 Q. And do you recall when you first
 9 raised the issue of investigating the defamatory
 10 statements to retain Mr. Barrack?
 11 MR. STALEY: I mean, you are getting
 12 into matters that are covered -- that are
 13 privileged.
 14 MR. KIM: No, I am asking general
 15 questions. I am not asking about any information
 16 about particulars of the retainer. I am asking
 17 about the date when he first approached
 18 Mr. Barrack.
 19 U/A MR. STALEY: When he approached
 20 Mr. Barrack? We'll take it under advisement.
 21 BY MR. KIM:
 22 1488 Q. Now, what made you decide to
 23 retain Mr. Barrack?
 24 R/F MR. STALEY: That is not a proper
 25 question.

410	<p>1 MR. KIM: It is a question. It is a 2 proper question. 3 MR. STALEY: It is, but it is not 4 proper and it is not relevant. Why one chooses to 5 retain one's lawyers is not relevant to a matter at 6 issue in the proceeding. 7 BY MR. KIM: 8 1489 Q. Okay. Now, who was involved in 9 retaining Mr. Barrack at your firm? 10 R/F MR. STALEY: That is all privileged. 11 BY MR. KIM: 12 1490 Q. Can you tell me was there a 13 pre-existing relationship between Sunny Puri and 14 Iris Fischer at Blakes? 15 R/F MR. STALEY: That is not relevant. 16 BY MR. KIM: 17 1491 Q. Can you undertake to -- Mr. 18 Kassam, when did you retain Artemis Consulting? 19 R/F MR. STALEY: That is privileged. 20 BY MR. KIM: 21 1492 Q. How did you get introduced to 22 Artemis Consulting? 23 R/F MR. STALEY: Privileged. 24 BY MR. KIM: 25 1493 Q. Can you tell me have you retained</p>	412	<p>1 R/F MR. STALEY: The same answer, it's all 2 privileged. 3 MR. KIM: It is not privileged. I am 4 talking about Anson internal investigations. 5 MR. STALEY: No, it is all privileged. 6 MR. KIM: That is not privileged. 7 There is no privilege to internal investigations. 8 MR. STALEY: I disagree with you as it 9 relates to matters that are done in contemplation 10 of litigation. 11 MR. KIM: By a -- 12 MR. STALEY: I am not going to debate 13 it with you, Won. 14 MR. KIM: I understand. I agree, we 15 are not going to debate here. 16 MR. STALEY: We are not debating it. 17 BY MR. KIM: 18 1498 Q. And can we call Mr. Puri's 19 affidavit. I am going to go to paragraph 36. Are 20 you familiar with Mr. Puri's affidavit, Mr. Kassam? 21 A. I believe so. 22 1499 Q. Okay. Is that accurate that you 23 were advised for the first time on or about July 24 28th that your lawyers at Blakes had reached out 25 and advised of a potential conflict?</p>
411	<p>1 any other private investigators to investigate the 2 Defendants? 3 R/F MR. STALEY: We are claiming privilege 4 at this point in time on any investigative work 5 that may have been done by or on behalf of the 6 Plaintiffs. 7 BY MR. KIM: 8 1494 Q. Can you tell me how many entities 9 Anson and Mr. Kassam retained to investigate the 10 allegations in the Statement of Claim? 11 R/F MR. STALEY: The same answer. 12 BY MR. KIM: 13 1495 Q. Mr. Kassam, when did you decide 14 you wanted to add Mr. Stafford to the lawsuit? 15 R/F MR. STALEY: That is a matter touching 16 on lawyer-client privilege. 17 BY MR. KIM: 18 1496 Q. Tell me, Mr. Kassam, why wasn't 19 Mr. Stafford named as an original Defendant when 20 the pleading was issued in December 2020? 21 R/F MR. STALEY: The same answer. 22 BY MR. KIM: 23 1497 Q. Can you tell me, Mr. Kassam, when 24 did Anson start collecting evidence against 25 Mr. Stafford in-house?</p>	413	<p>1 A. He wrote it, but I believe it to 2 be true. 3 1500 Q. Okay. And do you know who the 4 lawyers were at Blakes that reached out about the 5 conflict? 6 A. I don't know. 7 1501 Q. Can you find out? 8 U/A MR. STALEY: I am not sure it is 9 relevant who it is, Won. We'll take it under 10 advisement. 11 BY MR. KIM: 12 1502 Q. Okay. And next day, July 29th, 13 "we spoke to them about the potential conflict". 14 Who is "we"? 15 A. I would imagine my General 16 Counsel, but I am not sure of the specifics of who 17 attended that call. 18 1503 Q. Can you find out who at Anson 19 attended that call? 20 U/A MR. STALEY: The same answer. I don't 21 believe it is relevant, but I'll take it under 22 advisement. 23 BY MR. KIM: 24 1504 Q. Okay. And then Blakes "advised 25 that another group of lawyers at Blakes were acting</p>

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1 for Stafford on another matter"; do you see that?
 2 A. I see it.
 3 1505 Q. Do you know who the other group of
 4 lawyers at Blakes were?
 5 A. I don't know any of them
 6 specifically, but I was told it was the Vancouver
 7 office.
 8 1506 Q. The Vancouver office?
 9 A. Or the British Columbia office.
 10 1507 Q. Okay, what else did they tell you
 11 about who represented Mr. Stafford?
 12 A. They just said it was people based
 13 in BC.
 14 1508 Q. Okay. Did Blakes send a letter
 15 regarding the conflict?
 16 A. I don't know. That would have
 17 gone to my General Counsel.
 18 1509 Q. Could you produce anything -
 19 redacted for privilege, of course - on the conflict
 20 issue received at your office from Blakes?
 21 R/F MR. STALEY: No. No, we are not
 22 producing any of the lawyer-client privileged
 23 communications between Blakes and Anson.
 24 BY MR. KIM:
 25 1510 Q. Were you concerned that your

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1 information may have been compromised by the fact
 2 that you had retained the same firm that had been
 3 acting for Mr. Stafford?
 4 R/F MR. STALEY: That touches on matters
 5 that are not pleaded and they are not relevant.
 6 MR. KIM: I am talking about this
 7 affidavit, Mr. Staley.
 8 MR. STALEY: That is fine, but this is
 9 not a motion to deal -- this is not the motion for
 10 which the affidavit was filed. There are lots of
 11 things that get filed in interlocutory motions that
 12 may be relevant to the motion but are not relevant
 13 to the matters at issue in the proceeding and are
 14 not the proper subject of examination for
 15 discovery.
 16 BY MR. KIM:
 17 1511 Q. Mr. Kassam, what did people at
 18 Blakes tell you about the firewall they had to
 19 screen out conflict?
 20 R/F MR. STALEY: That is privileged.
 21 BY MR. KIM:
 22 1512 Q. Were you concerned that your
 23 information may have been compromised?
 24 R/F MR. STALEY: Privileged and not
 25 relevant.

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1 BY MR. KIM:
 2 1513 Q. Can you tell me, Mr. Kassam, what
 3 was behind the decision to switch from Blakes to
 4 Davies?
 5 R/F MR. STALEY: Privileged and not
 6 relevant.
 7 BY MR. KIM:
 8 1514 Q. Did you have a pre-existing
 9 relationship with Davies?
 10 R/F MR. STALEY: Privileged and not
 11 relevant.
 12 BY MR. KIM:
 13 1515 Q. Mr. Kassam, have you ever met or
 14 do you know a Jonathan Lisus?
 15 R/F MR. STALEY: That is not relevant.
 16 BY MR. KIM:
 17 1516 Q. Have you ever retained Jonathan
 18 Lisus or the Lax O'Sullivan law firm with --
 19 MR. STALEY: Not relevant.
 20 MR. KIM: -- regard to this lawsuit?
 21 R/F MR. STALEY: Not relevant.
 22 MR. KIM: The fact of the retainer is
 23 relevant.
 24 MR. STALEY: Well, we may agree to
 25 disagree, but he is not going to answer the

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1 question just because you say it is relevant.
 2 BY MR. KIM:
 3 1517 Q. Now, Mr. Kassam, going through --
 4 you swore the Affidavit of Documents in this
 5 matter?
 6 A. Sorry?
 7 1518 Q. You swore the Affidavit of
 8 Documents on behalf of yourself and Anson in this
 9 matter; is that correct?
 10 A. I believe so, yes.
 11 1519 Q. And what search have you done to
 12 go through your records?
 13 A. Sorry, I don't understand the
 14 question.
 15 1520 Q. Did you go through your personal
 16 records, or did somebody else in your firm go
 17 through your records to produce the Affidavit of
 18 Documents?
 19 A. I believe my General Counsel
 20 spearheaded the search.
 21 1521 Q. Can you tell me which email
 22 addresses you searched through in order to prepare
 23 the affidavit?
 24 R/F MR. STALEY: It is not a
 25 cross-examination on the Affidavit of Documents.

418	<p>1 MR. KIM: Affidavit of Documents.</p> <p>2 MR. STALEY: Pardon me?</p> <p>3 BY MR. KIM:</p> <p>4 1522 Q. On the Affidavit of Documents for</p> <p>5 Mr. Kassam and the corporate entities, how many</p> <p>6 email addresses were searched? Mr. Kassam, did you</p> <p>7 produce -- did you go through your email and</p> <p>8 produce the documents?</p> <p>9 A. Did I go through my email to</p> <p>10 produce what, sorry?</p> <p>11 1523 Q. Relevant documents. Who did it,</p> <p>12 you or your General Counsel?</p> <p>13 A. My General Counsel.</p> <p>14 1524 Q. Okay. What about going through</p> <p>15 the chats that have been produced?</p> <p>16 A. I believe that was my General</p> <p>17 Counsel as well.</p> <p>18 1525 Q. Okay. Did you go through</p> <p>19 Mr. Puri's email addresses?</p> <p>20 A. My General Counsel did, I believe.</p> <p>21 I didn't.</p> <p>22 1526 Q. Okay. Anybody else other than you</p> <p>23 and Mr. Puri?</p> <p>24 A. I don't know. That would be a</p> <p>25 question for my General Counsel.</p>	420
419	<p>1 1527 Q. Now, did you go through -- are all</p> <p>2 of the -- are there any emails or texts -- are</p> <p>3 there any emails not subject to privilege that have</p> <p>4 not been produced in this matter?</p> <p>5 MR. STALEY: Well, there is obviously</p> <p>6 the grounds, Won, would be privilege and they would</p> <p>7 be relevance, right.</p> <p>8 MR. KIM: Well --</p> <p>9 MR. STALEY: So you should assume that</p> <p>10 on behalf of the Plaintiffs a diligent search was</p> <p>11 made informed by internal and external legal</p> <p>12 counsel for the purpose of meeting the Plaintiff's</p> <p>13 discovery obligations and that proper production</p> <p>14 was made.</p> <p>15 BY MR. KIM:</p> <p>16 1528 Q. Mr. Kassam, what is your email</p> <p>17 address that Betting Bruiser/Mr. Doxtator</p> <p>18 communicated to you on?</p> <p>19 A. I believe it is my corporate email</p> <p>20 address, MKassam@AnsonFunds.com.</p> <p>21 1529 Q. Did you ever communicate with</p> <p>22 Mr. Doxtator on another email address?</p> <p>23 A. I don't believe so, no.</p> <p>24 1530 Q. What about your -- did you have</p> <p>25 communication through WhatsApp?</p>	421
	<p>1 A. I believe we had conversations</p> <p>2 through WhatsApp.</p> <p>3 1531 Q. And have you produced all of the</p> <p>4 WhatsApp messages exchanged between you and</p> <p>5 Mr. Doxtator?</p> <p>6 A. I believe I have.</p> <p>7 1532 Q. And what is the contact</p> <p>8 information that your WhatsApp handle is attached</p> <p>9 to? Is it a cell phone number?</p> <p>10 A. It is a cell phone number, yes.</p> <p>11 1533 Q. And what is that?</p> <p>12 A. 416-500-9999.</p> <p>13 1534 Q. Have there been any documents or</p> <p>14 chats that have been deleted between you and --</p> <p>15 A. I don't believe so, no.</p> <p>16 1535 Q. It is Mr. Doxtator's information</p> <p>17 that you communicated with him using Signal?</p> <p>18 A. I don't believe that is true.</p> <p>19 1536 Q. Do you have a Signal account?</p> <p>20 A. I do.</p> <p>21 1537 Q. And have you checked through your</p> <p>22 Signal account to produce any communications which</p> <p>23 you may have had with Mr. Doxtator?</p> <p>24 A. I believe we did search it, yes.</p> <p>25 1538 Q. And there are no messages?</p>	
	<p>1 A. If there were, it would have been</p> <p>2 produced.</p> <p>3 1539 Q. Okay.</p> <p>4 MR. STALEY: How many has your client</p> <p>5 produced, Won?</p> <p>6 MR. KIM: My clients have produced</p> <p>7 everything they have, I think, Mr. Staley, but I am</p> <p>8 asking Mr. Kassam.</p> <p>9 MR. STALEY: I don't see any Signal</p> <p>10 messages produced by your client.</p> <p>11 MR. KIM: Did you ask him?</p> <p>12 MR. STALEY: I am stating that.</p> <p>13 BY MR. KIM:</p> <p>14 1540 Q. Mr. Kassam, are there any messages</p> <p>15 or emails -- any chats, emails or messages that you</p> <p>16 may have had with Mr. Doxtator which are lost or</p> <p>17 deleted on your end?</p> <p>18 A. I don't believe so.</p> <p>19 [Court Reporter intervenes for</p> <p>20 clarification.]</p> <p>21 MR. STALEY: He said "I don't believe</p> <p>22 so."</p> <p>23 BY MR. KIM:</p> <p>24 1541 Q. Now, did you discuss with Mr. Puri</p> <p>25 the contents of the Manifesto?</p>	

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1 MR. STALEY: Well, I mean, obviously,
 2 Won, there would be communications that would be
 3 privileged or some that might not be and there
 4 would be different time frames, and so that is a
 5 very broad question that --
 6 MR. KIM: I understand.
 7 MR. STALEY: -- covers a lot of field.
 8 BY MR. KIM:
 9 1542 Q. But I understand that Mr. Puri is
 10 a principal in the firm; correct?
 11 A. Today?
 12 1543 Q. Yes.
 13 A. Or at the time?
 14 1544 Q. No, today.
 15 A. Today he is a principal at the
 16 firm, correct.
 17 1545 Q. And what was his position at 2018?
 18 A. I believe he was an Associate
 19 Portfolio Manager or Portfolio Manager. I can't
 20 recall.
 21 1546 Q. But would it be fair to say that
 22 Mr. Puri is a very close work colleague of yours?
 23 A. That would be a fair assessment,
 24 yes.
 25 1547 Q. Okay. Did you produce any chats

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1 between you and Mr. Puri regarding the unlawful
 2 statements?
 3 A. I believe all our chats were taken
 4 and produced.
 5 1548 Q. Okay. There doesn't seem to be
 6 any chats and emails from Mr. Puri in the
 7 productions. Why is that?
 8 MR. STALEY: So I think, Won, as far as
 9 we understand, everything that is relevant and not
 10 privileged has been produced.
 11 BY MR. KIM:
 12 1549 Q. Have you asked Mr. -- did Mr. Puri
 13 have occasion to communicate with Mr. Doxtator?
 14 A. I believe they communicated at
 15 times, yes.
 16 1550 Q. Okay, and have those emails, chats
 17 or texts been produced?
 18 A. I don't -- I wouldn't know that.
 19 1551 Q. Okay.
 20 MR. STALEY: There certainly are some
 21 in the productions, Won, some of which I think we
 22 have taken -- we have been to.
 23 BY MR. KIM:
 24 1552 Q. And do you know if Mr. Puri's
 25 email has been -- have they -- have all of the

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1 chats, emails, texts, subject to privilege, have
 2 they been produced?
 3 A. I believe so.
 4 1553 Q. Will you undertake to check and
 5 find out if any texts, chats or messages passing
 6 between Mr. Doxtator and Mr. Puri have been
 7 produced?
 8 R/F MR. STALEY: No. A diligent search was
 9 done of all Anson records, including Mr. Puri's
 10 devices and chats, and proper production has been
 11 made. We are not doing any further searches.
 12 BY MR. KIM:
 13 1554 Q. Have any of the texts, chats or
 14 emails or other messages between Mr. Doxtator and
 15 Mr. Puri, have they been lost? Have there been any
 16 that have been subject to deletion or loss?
 17 MR. STALEY: Not to our knowledge.
 18 BY MR. KIM:
 19 1555 Q. Now, Mr. Kassam, why haven't you
 20 produced any messages between you and Mr. Spears,
 21 Mr. Anderson, Mr. Left and Mr. Axler about the
 22 unlawful statements? Are there any?
 23 A. I can't recall.
 24 1556 Q. Did you communicate with
 25 Mr. Anderson, Mr. Spears, Mr. Left or Mr. Axler

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1 about the Defamatory Manifestos?
 2 A. I believe we would have had
 3 conversations, you know, after it had come out.
 4 1557 Q. And have you produced any of them?
 5 MR. STALEY: Conversations are
 6 typically not produced, as people speak to each
 7 other.
 8 BY MR. KIM:
 9 1558 Q. But you agree with me that their
 10 names and their firms from time to time pop up on
 11 the Defamatory Manifestos?
 12 MR. STALEY: They do, but that doesn't
 13 mean -- that just doesn't make any communication
 14 necessarily relevant, the fact that they pop up.
 15 So you are going to have to ground these in
 16 relevance, Won.
 17 BY MR. KIM:
 18 1559 Q. Thank you for that guidance. I am
 19 just asking can you produce all of the relevant
 20 communications between you or anyone at Anson to
 21 Adam Spears, Nate Anderson, Andrew Left and Ben
 22 Axler about the Defamatory Manifesto?
 23 U/A MR. STALEY: We'll take that under
 24 advisement, but I believe all relevant documents
 25 have been produced.

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1 BY MR. KIM:
 2 1560 Q. Now, yesterday you advised that
 3 you were first sent the Defamatory Manifesto, the
 4 first part, by David Cynamon, and then you sent it
 5 to other people. Can you produce the email from
 6 David Cynamon?
 7 U/T MR. STALEY: Yeah, if we haven't, we
 8 will produce it.
 9 BY MR. KIM:
 10 1561 Q. Okay, and your emails circulating
 11 it to others when you received it?
 12 U/A MR. STALEY: We'll take that under
 13 advisement.
 14 BY MR. KIM:
 15 1562 Q. I would like an undertaking for
 16 you to produce your correspondence with Allen
 17 Spektor regarding the Defamatory Manifesto Part 1,
 18 Part 2, and Betting Bruiser tweets and anything
 19 related to Robert Doxtator in this lawsuit?
 20 U/A MR. STALEY: We'll take it under
 21 advisement.
 22 BY MR. KIM:
 23 1563 Q. Now, I am going to be asking,
 24 Mr. Staley, for you to undertake to disclose the
 25 findings, opinions and conclusions of any experts

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1 retained to report on the matters in this action,
 2 including the expert's name, address and
 3 qualifications?
 4 U/A MR. STALEY: We will comply with the
 5 Rules of Civil Procedure.
 6 BY MR. KIM:
 7 1564 Q. At any time, have you hired
 8 private investigators to follow Robert Doxtator,
 9 Jacob Doxtator, James Stafford, Andrew Rudensky or
 10 Andrew DeFrancesco?
 11 U/A MR. STALEY: We'll take that under
 12 advisement.
 13 BY MR. KIM:
 14 1565 Q. If so, can you undertake to
 15 provide the investigator's name, address and the
 16 report?
 17 U/A MR. STALEY: We'll comply with the
 18 Rules of Civil Procedure.
 19 BY MR. KIM:
 20 1566 Q. Can you undertake to provide
 21 will-says before the trial of this action for
 22 anyone you might call as a witness?
 23 U/A MR. STALEY: We will comply with the
 24 Rules of Civil Procedure.
 25 BY MR. KIM:

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1 1567 Q. With a summary of all their
 2 evidence to be provided as a witness?
 3 U/A MR. STALEY: We'll comply with the
 4 Rules of Civil Procedure.
 5 MR. KIM: That goes for the main action
 6 and the counterclaim.
 7 MR. STALEY: Our answer will not change
 8 depending on what element of the overall proceeding
 9 we are speaking to here.
 10 MR. KIM: Now, Mr. Kassam, you know
 11 what, I am going to take a five-minute break and go
 12 through the last of my questions with my
 13 colleagues. Could we take a break?
 14 MR. STALEY: Yes.
 15 -- RECESSED AT 2:04 P.M.
 16 -- RESUMED AT 2:08 P.M.
 17 MR. KIM: Mr. Kassam, first of all,
 18 thank you for sitting through examinations.
 19 Subject to the voluminous undertakings
 20 and advisements, which we will work through with
 21 your team, those are my questions for today.
 22 I think my colleague Mr. Richard may
 23 have some questions on anything I didn't cover, but
 24 I did want to thank you for yesterday and today.
 25 U/A THE WITNESS: Thank you as well.

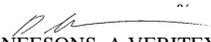
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1 EXAMINATION BY MS. PASCUTTO:
 2 1568 Q. Thank you. Kevin is not online,
 3 but I will be taking his place.
 4 Mr. Kassam, I am Bethanie Pascutto, and
 5 I am also Counsel at Groia & Company for Jacob
 6 Doxtator.
 7 Just a couple of final questions. Have
 8 you retained Artemis Risk as an expert for this
 9 action?
 10 U/A MR. STALEY: We'll take that under
 11 advisement.
 12 BY MS. PASCUTTO:
 13 1569 Q. To the extent that you have
 14 retained them as an expert, we would expect
 15 disclosure of their report, if you have it.
 16 MR. STALEY: I understand your
 17 position.
 18 BY MS. PASCUTTO:
 19 1570 Q. And also we would like the names
 20 and addresses and emails for any individuals who
 21 you expect to have information about your
 22 allegations specifically involving Jacob Doxtator?
 23 U/A MR. STALEY: We will comply with the
 24 Rules of Civil Procedure.
 25 MS. PASCUTTO: Okay, those are all my

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1 questions.
 2 MR. STALEY: Very good, thank you.
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 4 -- Adjourned at 2:20 p.m.
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1 REPORTER'S CERTIFICATE
 2
 3 I, DEANA SANTEDICOLA, RPR, CRR,
 4 CSR, Certified Shorthand Reporter, certify:
 5 That the foregoing proceedings were
 6 taken before me at the time and place therein set
 7 forth, at which time the witness was put under oath
 8 by me;
 9 That the testimony of the witness
 10 and all objections made at the time of the
 11 examination were recorded stenographically by me
 12 and were thereafter transcribed;
 13 That the foregoing is a true and
 14 correct transcript of my shorthand notes so taken.
 15
 16
 17
 18 Dated this 27th day of April, 2023.
 19
 20
 21
 22
 23 
 24 NEESONS, A VERITEXT COMPANY
 25 PER: DEANA SANTEDICOLA, RPR, CRR, CSR

[& - 1119]

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&	1021 295:4	1055 304:19	1088 316:22
& 262:6 429:5	1022 295:6	10559 288:24	1089 317:1
1	1023 295:10	1056 305:1	1090 317:5
1 261:14	1024 295:17	1057 305:5	1091 317:11
280:21 397:19	1025 295:22	1058 305:18	1092 317:14
426:17	1026 296:10	1059 305:24	1093 317:21
10 292:7	1027 296:23	1060 306:11	1094 318:3
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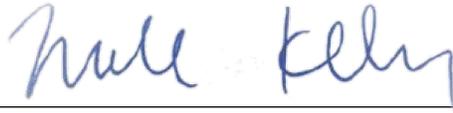
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TAB 2P

This is **Exhibit “P”** to the Affidavit of **Alexander Mulligan**,
sworn before me this **30th** day of **November, 2023**.

A handwritten signature in blue ink, appearing to read "Mark Kelly", written over a horizontal line.

A Commissioner for Taking Affidavits

LSO# 84488D

Court File No. CV-20-00653410-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

B E T W E E N:

ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP, ANSON INVESTMENTS MASTER FUND LP and MOEZ
KASSAM

Plaintiffs

- and -

JAMES STAFFORD, ANDREW RUDENSKY, ROBERT LEE DOXTATOR, JACOB DOXTATOR, and JOHN DOE 1, JOHN DOE
2, JOHN DOE 3, JOHN DOE 4 and OTHER PERSONS UNKNOWN

Defendants

**UNDERTAKINGS, QUESTIONS TAKEN UNDER ADVISEMENT, AND REFUSALS
given at the Examination for Discovery of Moez Kassam held on April 20 and 21, 2023**

No.	Page(s)	Question(s)	Category	Specific Question	Documents Referenced in Transcript	Answer or Precise Basis for Refusal
April 20, 2023						
Examination by Kevin Richard, counsel to Jacob Doxtator						
1.	20-21, 22-23	53-58, 61-62	UT	To advise who created the " Maltego Report " (AAI00014600) and when it was created.	Exhibit 1 - AAI00014600	Without waiving any privilege, the Maltego Report was generated by Artemis Risk Consulting ("Artemis Risk") on December 10, 2020 using the Maltego software.

2.	26-27	77-80	UA	To advise whether anyone at Artemis Risk told the Plaintiffs what the asterisks on page 2 of the Maltego Report mean.	Exhibit 1 - AAI00014600	The Plaintiffs have no specific recollection of receiving any advice from Artemis Risk, at the time the Maltego Report was initially provided, regarding the meaning of the asterisks set out in the Maltego Report. However, the Plaintiffs understood (and understand to this day) that the asterisks represent unknown characters from an email address and phone number, respectively.
3.	34-35	105-106	UA	To advise whether, before the Plaintiffs commenced the action against Jacob Doxtator, the Plaintiffs looked into whether or not an email address could be associated with more than one Twitter account.	Exhibit A - Twitter's Help page	Without waiving any privilege, the Plaintiffs did not personally make these inquiries prior to commencing the action against Jacob Doxtator. The Plaintiffs retained an experienced investigative firm to carry-out an investigation into who was responsible for the wrongful conduct identified in the Plaintiffs' Fresh as Amended Statement of Claim (the " Claim "). In naming Jacob Doxtator as a Defendant, the Plaintiffs relied on the findings of the investigative firm.
4.	40-41	120	UA	To provide a detailed description of all the steps that were taken to create the Maltego Report, including by identifying the "transforms" and "entities" that were used.	Exhibit 1 - AAI00014600	Without waiving any privilege, and by way of summary, the following steps were taken in relation to the Maltego Report: The Maltego software is an open-source intelligence and data

					<p>mining software used for link analysis and data visualization.</p> <p>Maltego SocialLinks is an extension or add-on to the Maltego software that focuses specifically on social media data. It provides users with the ability to gather information from social media platforms such as Twitter, Facebook, LinkedIn, Instagram, and others. With SocialLinks, users can search for profiles, analyse connections and relationships between individuals, monitor social media activity, and gain insights into social networks and online communities.</p> <p>Step 1: On September 27, 2020, the Twitter account @JohnMur670039142 posted the first tweet referencing the www.moezkassam.com domain. The @JohnMur670039142 Twitter account was subsequently searched within Maltego SocialLinks, yielding the following results:</p> <ul style="list-style-type: none">- (Entity) Name: The Twitter account @JohnMur670039142 is associated with the name John Murphy on Twitter.- (Entity) Telephone: The findings from Maltego SocialLinks revealed that
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						<p>the Twitter account is associated (or was previously associated) with a telephone number ending in +*****88.</p> <ul style="list-style-type: none">- (Entity) Email Address: The Maltego SocialLinks findings identified an email address associated (or previously associated) with the Twitter account. The email address provided is ja*****@g****.*. <p>Step 2: Based on the findings from Step 1, additional searches were completed within the Maltego Software. These searches were completed based on information obtained through other investigative efforts:</p> <ul style="list-style-type: none">- (Entity) Jacob Doxtator: Through other investigative efforts, Jacob Doxtator was identified as a close relative of Robert Doxtator. It was also determined that Jacob Doxtator has a Twitter account (@_jacobdoxtator), and had retweeted a number of posts made by Robert Doxtator on his Twitter account (@BettingBruiser)- (Entity) Email Address: By using Maltego SocialLinks
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						<p>on the Twitter username @_jacobdoxtator, it was identified that the Twitter account was associated (or had previously been associated) with the email address jacobdoxtator@gmail.com. Further searches identified that the email address is also associated with Jacob Doxtator's Facebook account, Ask.fm account and Google ID, among other accounts.</p> <p>- (Entity) Telephone Number: The searches on SocialLinks also indicated that the @_jacobdoxtator Twitter account was associated with (or was previously associated with) the telephone number +*****88.</p>
5.	41-42	123	REF	To advise whether Mr. Kassam is aware that in Maltego you could create a document or you could draw links from one document to another.	Exhibit B	<p>Without prejudice to the Plaintiffs' position that this question is irrelevant, Mr. Kassam has no knowledge of this issue as he has never used the Maltego software.</p> <p>In any event, Mr. Kassam has no reason to believe that the Maltego Report prepared by the investigative firm retained by the Plaintiffs does not reflect an actual association between Jacob Doxtator and the</p>

						<p>@JohnMur670039142 Twitter account.</p> <p>See the answer to Item #4, above, providing a description of the process by which the Maltego Report was obtained.</p>
6.	42-43	126	REF	To advise whether, on its face, Exhibit B would suggest that the Plaintiffs' counsel, Rob Staley of the Bennett Jones firm, is associated with the John Murphy account.	Exhibit B	Refused on the basis of relevance.
7.	43	127	REF	To advise whether Mr. Kassam is aware that in Maltego you could simply insert information and arrows to create a document similar to Exhibit 1.	Exhibit B	<p>Without prejudice to the Plaintiffs' position that this question is irrelevant, Mr. Kassam has no knowledge of this issue because he has never used the Maltego Software.</p> <p>In any event, Mr. Kassam has no reason to believe that the Maltego Report prepared by the investigative firm retained by the Plaintiffs was created by simply inserting information or arrows to "create a document" as suggested in the question.</p> <p>See the answer to Item #4, above, providing a description of the process by which the Maltego Report was obtained.</p>

8.	43-44	128-131	REF	To advise if, to his knowledge, Mr. Kassam is aware of whether anyone at Artemis Risk simply inserted information into the Maltego Report as compared to pulling such information from a search.		No. Mr. Kassam does not have any reason to believe that anyone at Artemis Risk simply "inserted" information in the Maltego Report.
9.	47-49	140-144	UA	To advise of what evidence or documents the Plaintiffs have relating to the allegations in paragraphs 25, 26, 27, 28, 30, 53, 54, 64, 65, 69, 74, 81, 82, 83, 84, 85, 89, 90, 91, 92, 103, 105, 107, 108, and 139 to 140 of the Claim.		<p>The Plaintiffs rely on (a) the entirety of the documentary productions in this matter (which comprises over 1000 documents); (b) the extensive discovery evidence (including any answers to undertakings and questions taken under advisement to be provided by the Defendants); (c) information and documents obtained from third party production orders; (d) the findings and reports of expert witnesses that the Plaintiffs anticipate calling at trial; and (e) anticipated witness testimony at trial, among other things, to support the allegations set out in the Claim.</p> <p>With respect to the allegations in the identified paragraphs of the Claim, the particulars and basis for those allegations are described in detail in the Claim.</p>
Examination by Won Kim, counsel to James Stafford and Robert Doxtator						

10.	51	150	UA	To provide a chart setting out how the various Anson Funds are related.		<p>The various Anson Funds have the same co-investment advisers (Anson Advisors Inc. and Anson Funds Management LP). They are otherwise not "related."</p> <p>The Anson Funds all generally follow a Cayman master/feeder structure, except for the Arch Anson Tactical Real Estate Fund and Arch Anson Tactical Real Estate NR Fund, which are both Ontario LPs and have a side by side structure.</p>
11.	64-66	216-219	UA	To produce the draft retainer agreement with Mr. Robert Doxtator.		<p>As known to Robert Doxtator, the only written "draft" terms exchanged between Anson and Mr. Doxtator were those proposed by Sunny Puri in an email to Mr. Doxtator, dated October 5, 2018, produced in this action (AAI00005542). However, those terms were ultimately not accepted by Mr. Doxtator.</p> <p>As described in the Plaintiffs' Amended Reply and Defence to Counterclaim of Robert Doxtator, including at paragraphs 7-10, the arrangements between Robert Doxtator and the Plaintiffs in respect of specific "ad hoc" diligence opportunities were set out in a series of oral discussions and WhatsApp messages exchanged by Mr. Kassam and</p>

						Robert Doxtator, produced in this action.
12.	64-66 69	216-220 227-228	UA	<p>To produce any standard form retainer agreement with contract researchers / consultants setting out Anson Funds' policy of not accepting material non-public information.</p> <p>To produce any standard form retainer agreement with "people who are ad hoc, not somebody [Anson Funds is] in a contractual relationship with".</p>		<p>With respect to the first question: at the relevant time, there was no such standard form retainer agreement. As Mr. Kassam advised during his examination at Page/Line Reference [64:8], Anson did not at that time have a "standard form" retainer for the consultants and/or researchers it engaged.</p> <p>With respect to the second question: there are no such standard form retainer agreements. By definition, Anson could not have a "standard form retainer agreement" for use with individuals/entities with whom it does <u>not</u> have a contractual relationship, nor for "ad hoc" relationships.</p>
13.	76-77	249-257	UA	To identify and provide particulars in respect of the occasion on which Anson Funds posted on the Seeking Alpha website and did not disclose that it had a financial interest in the company/companies referred to in the post.		On one occasion, approximately eight years ago in 2015, a post was made by an individual at Anson on the Seeking Alpha website that did not include the financial disclosure required. The post concerned a company called Nobilis Health Corp.
14.	93-94	317-320	UA	To advise whether Mr. Rudensky was involved in any transactions with Mr. Kassam and/or any Anson entities while he was at		Without prejudice to the Plaintiffs' position that this question is irrelevant, based on the Plaintiffs' review of its records, Mr.

				Delavaco, and if so, to provide particulars.		<p>Rudensky appears to have been involved in potential offerings related to SOL Global and Cool Holdings.</p> <p>The balance of the question is refused on the grounds of relevance, proportionality, and overbreadth.</p> <p>In any event, to the Plaintiffs' knowledge, the Defendants, including Robert Doxtator and Mr. Stafford, are in communication with Mr. Rudensky, and may obtain this information directly from him.</p>
15.	98	331-332	REF	To identify the companies that the Anson group "was long on in the cannabis space".		Refused on the grounds of relevance, proportionality, and overbreadth.
16	99-103 226	334-344 788	REF	To advise why Mr. Rudensky is named as a Defendant in the Claim, and not Delavaco and/or Mr. DeFrancesco.		<p>Refused on the basis of relevance and privilege.</p> <p>Without prejudice to that position, Mr. Rudensky was named as a Defendant after he was identified as being involved in the wrongful conduct set out in the Claim, including on the basis of, among other things, detailed inculpatory evidence communicated by Robert Doxtator to Mr. Kassam directly. For example, in a WhatsApp exchange between Robert Doxtator and Mr. Kassam, dated</p>

					<p>October 1, 2020, produced in this action (AAI00010303), Robert Doxtator repeatedly confirmed Mr. Rudensky's involvement in the planning and coordination behind the First and Second Defamatory Manifestos, and the conspiracy, stating, among other things:</p> <ul style="list-style-type: none">- "Rudensky for sure wrote part 1 ... Stafford was paying him to do it ... he tried to get me to talk to him"; and- "I'm telling you 100% [Rudensky] is [involved in the conspiracy]".
17.	103-105	345-352	REF	<p>To advise whether Mr. Kassam is aware of any information which ties Mr. Stafford, Mr. Robert Doxtator, Mr. Rudensky and Mr. Jacob Doxtator, other than the facts that have been pleaded in the Claim.</p>	<p>Without prejudice to the Plaintiffs' position that this is an improper question, the Plaintiffs note that the Claim provides a comprehensive description of the relationship(s) between Mr. Stafford, Mr. Robert Doxtator, Mr. Rudensky and Mr. Jacob Doxtator, as well as their respective conduct in connection with the defamatory statements and conspiracy, as known to the Plaintiffs at this time.</p> <p>In addition to the allegations particularized in the Claim, the Plaintiffs rely on (a) the entirety of the documentary productions in this matter (which comprises over 1000 documents); (b) the extensive discovery evidence</p>

						<p>(including any answers to undertakings provided by the defendants); (c) information and documents obtained from third party production orders; (d) the findings and reports of expert witnesses that the Plaintiffs anticipate calling at trial; (e) and anticipated witness testimony at trial, among other things, as the basis for linking Mr. Stafford, Mr. Robert Doxtator, Mr. Rudensky and Mr. Jacob Doxtator to the defamatory statements and conspiracy identified in the Claim.</p> <p>The full particulars of the defendants' relationships, and misconduct, are known only to the defendants.</p>
18.	115-116	387-391	UA	To produce any draft retainer agreements between the Plaintiffs and Mr. Robert Lee Doxtator.		See answer to Item #11, above.
19.	120-121	404-406	UA	To set out all of the <i>ad hoc</i> terms for the projects that Mr. Robert Doxtator worked on for Mr. Kassam and/or Anson.		<p>The financial terms of the limited work completed by Robert Doxtator are described at length in the Claim (see in particular paras. 44-46) and the Plaintiffs' Amended Reply and Defence to Counterclaim (see in particular paras. 7-10).</p> <p>In particular, over a series of oral discussions, and WhatsApp messages exchanged by Mr.</p>

						<p>Kassam and Robert Doxtator, produced in this action, Anson agreed that it would pay Mr. Doxtator 15% of profits it made on any trades it executed on the basis of research/diligence provided by Mr. Doxtator, with Anson retaining complete discretion as to (a) whether to trade on the research/diligence provided; and (b) the financial terms of the trade.</p>
20.	121 122-123	407-408 411-414	UT	<p>To advise of the dollar amount Mr. Robert Doxtator has been paid by Anson (including the fee for his research on CannTrust).</p>		<p>As reflected in email/WhatsApp exchanges dated July 23-25, 2019 produced in this action (see e.g. AAI00010372 and AAI00005519), Anson paid Mr. Doxtator \$30,000 for his research/diligence on CannTrust.</p> <p>As reflected in the Claim (paragraph 46, in particular) and in email/WhatsApp exchanges produced in this action (see e.g. AAI00010559) Anson was prepared to pay Mr. Doxtator 15% of the profit yielded on its General Electric trade, in accordance with the terms of the parties' agreement. However, Mr. Doxtator refused to accept payment.</p>
21.	123-124	415-417	UT	<p>To provide the terms of the Plaintiffs' engagement of Mr. Robert Doxtator in respect of GE.</p>		<p>See answer to Item #19, above.</p>

22.	123-124	416-417	UA	To provide the terms of the Plaintiffs' engagement of Mr. Robert Doxtator in respect of Hexo, Aphria, TGOD, and Cronos.		See answer to Item #19, above.
23.	124	418	UA	To provide the terms of the Plaintiffs' engagement of Mr. Robert Doxtator in respect of GE, Hexo, Aphria, TGOD, and Cronos, and to advise whether the information provided by Mr. Doxtator was used by the Plaintiffs and whether Mr. Doxtator was paid for his research projects.		<p>With respect to the financial terms of any engagement between Anson and Mr. Doxtator, see answer to Item #19, above.</p> <p>With respect to Hexo, Aphria, TGOD, and Cronos specifically, Anson did not trade on the basis of any research/diligence provided by Mr. Doxtator for those companies.</p> <p>With respect to General Electric, as set out in the answer to Item #20, above, Anson attempted to pay Mr. Doxtator for his research/diligence on GE (in accordance with the terms described in the answer at #19, above). However, Mr. Doxtator refused to accept any payment, as reflected in a WhatsApp exchange between Mr. Doxtator and Mr. Kassam, dated August 21, 2019, produced in this action (AAI00010559).</p>
24.	126-127	425-430	REF	To identify the persons and/or the entities that Mr. Puri sent the video on Canopy to.		Without prejudice to the Plaintiffs' position that this question is irrelevant, the Plaintiffs have made inquires of Mr. Puri and can advise that Mr. Puri has no recollection of

						sending the video provided by Mr. Robert Doxtator to any third party.
25.	126-128	425-432	UA	To advise whether Mr. Doxtator was told that the video he provided on Canopy was forwarded to other parties.		See answer to Item #24, above.
26.	128-129	433-435	REF	To provide all documents and correspondence related to the distribution of the information and due diligence on companies and stocks provided by Mr. Doxtator to Mr. Kassam and Anson entities.		Refused on the grounds of relevance, proportionality and overbreadth.
27.	148-149	516-519	UA	To provide the identity of the investigators and their work product that Mr. Kassam is relying on to plead the conspiracy in this litigation.		Without waiving any privilege, the Plaintiffs advise that they previously retained Artemis Risk and K2 Integrity through legal counsel. The Plaintiffs maintain privilege over all communications with the investigators and/or the investigators' work product. The balance of the question is refused on basis of privilege.
28.	157-158	548-549	UA	To advise where Mr. Doxtator acknowledged that he was a co-conspirator.		This question misstates Mr. Kassam's evidence on examination. As reflected in the examination transcript, Mr. Kassam did not say Robert Doxtator "acknowledged he was a co-conspirator." Instead, at Page/Line Reference [157:13]-[158:7], Mr. Kassam's evidence

					<p>was that Robert Doxtator "said that he was affiliated with this situation" and "alluded to who the other people were."</p> <p>The basis for the Plaintiffs' understanding that Robert Doxtator was involved in the publishing of the defamatory statements, and involved in the conspiracy, is set out at length in the Plaintiffs' pleadings and the productions made in this action.</p> <p>Among other things, but without limiting the generality of the foregoing, Robert Doxtator has repeatedly made statements that indicate he was intimately involved in the conspiracy.</p> <p>For example, in a WhatsApp exchange between Robert Doxtator and Mr. Kassam, dated October 1, 2020, produced in this action (AAI00010303), Robert Doxtator confirmed his intimate knowledge of the planning and coordination behind the First and Second Defamatory Manifestos, and the conspiracy, as well as his relationships and interactions with the individuals <i>he</i> identified as being responsible. For example, he states, among other things:</p> <ul style="list-style-type: none">- "Rudensky for sure wrote part 1 ... Stafford was
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						<p>paying him to do it ... he tried to get me to talk to him";</p> <ul style="list-style-type: none">- "I'm telling you 100% [Rudensky] is [involved in the conspiracy]";- "I can make 250k going to the other side ... that's just to help bury you";- "I'm saying I was originally offered a lot more money to help the people to bury you";- "That's what Stafford sent me today ... That [sic] the general game plan for part 2" (in which Mr. Doxtator shares a screenshot of a text message from Mr. Stafford setting out the detailed plans for preparation of the Second Defamatory Manifesto). <p>In recordings of private phone calls between Robert Doxtator and Mr. Kassam, dated October 2020, produced in this action (ROB00000019, ROB00000020, and ROB00000021), Robert Doxtator again confirmed his inside knowledge of the planning and coordination behind the conspiracy, as well as the other conspirators.</p> <p>In a WhatsApp message from Robert Doxtator to Mr. Kassam, dated December 18, 2020,</p>
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						<p>produced in this action (AAI00010568), Robert Doxtator states: "On our recorded call I told you exactly who wrote it" (being the First Defamatory Manifesto).</p> <p>In a WhatsApp exchange between Robert Doxtator and Allen Spektor, dated September 27-29, 2020, produced in this action (ROB00000026), Robert Doxtator states that he "knew [the First Defamatory Manifesto] was coming" and that he "know [<i>sic</i>] who wrote" it.</p>
29.	157-163	548-563	UA	To advise and produce the portion(s) of the WhatsApp chat transcript(s) where Mr. Doxtator admits that he is part of a conspiracy.		<p>See answer to Item #28, above.</p> <p>In the course of the examination of Mr. Kassam, counsel raised questions about the authenticity of the transcripts of certain WhatsApp messages exchanged between Robert Doxtator and Mr. Spektor.</p> <p>Now produced as AAI00007639 is an email from Mr. Spektor to Mr. Kassam, enclosing an extract of Mr. Spektor's WhatsApp conversations with Robert Doxtator (now produced as AAI00007640 and AAI00007641).</p>
30.	167	576	REF	To advise of the roles played by Mr. Stafford, Mr. Rudensky, Mr.		The particulars of the roles played by Mr. Stafford, Mr. Rudensky, Mr. Robert Doxtator and Mr. Jacob

				Robert Lee Doxtator, and Mr. Jacob Doxtator in the conspiracy.		<p>Doxtator will be known only to the defendants and their co-conspirators.</p> <p>Without prejudice to the Plaintiffs' position that this is an improper question, the Plaintiffs' understanding of the role played by each defendant is described throughout the Claim.</p>
31.	175	598-599	REF	To identify and produce the list of former investors of Anson Funds who left because of the publication of the Defamatory Manifesto.		<p>In light of Robert Doxtator's breach of the deemed undertaking rule (and efforts to harass material witnesses), the Plaintiffs are not prepared to identify and/or produce documents related to former investors that redeemed their investment because of the Defamatory Manifesto.</p> <p>As a consequence, the Plaintiffs do not intend to pursue a claim for special damages in connection with investor redemptions. For clarity, nothing in this answer should be taken to prejudice or derogate from the Plaintiffs' intention to pursue special damages for other losses suffered as a consequence of the Defamatory Manifesto and broader conspiracy.</p>
32.	177-180	605-616	UT	To produce any documents that specifically go to Mr. Silwin and Athletic Knit's withdrawing of their investment from Anson Funds		See answer #31.

				due to the publication of the Defamatory Manifesto.		
33.	181	618-621	UT	To provide a list of the Plaintiffs' clients who withdrew investments from Anson Funds and who can be characterized as "Adam Spears legacy assets".		See answer #31.
34.	183-184	628-631	UA	To produce Anson's trading records with respect to trades in Zenabis.		Now produced as AAI00026712 is Anson's trading records for Zenabis until April 23, 2020.
35.	184-185	633-637	UA	To produce any correspondence between the Plaintiffs and Canaccord setting out the change in terms of their working relationship due to the publication of the Defamatory Manifesto.		Anson primarily communicated with Cannacord in person and/or by telephone/video conference in discussing Cannacord's requested changes to the parties' working relationship. Now produced as AAI000014794 is a series of emails sent between February 6 and 19, 2021 between Mr. Kassam and individuals at Canaccord in relation to Canaccord temporarily shutting down Anson's trading accounts.
36.	192	659	UA	To provide a document evidencing the financial statements for Anson Advisors Inc., Anson Funds Management LP, and Anson Investments Master Fund LP.		Without prejudice to the Plaintiffs' position that this request is irrelevant, now produced as AAI00014790, AAI00014798, AAI00014805, AAI00014811, AAI00014815, AAI00014819, AAI00014837, AAI00014842, and AAI00014846 are the financial

						statements of the requested Anson entities from 2020-2022.
37.	192-195	661-669	UA	<p>The second paragraph of the email at AAI00010136 reads:</p> <p><i>"I was speaking to a few PR guys last night. They said we need a response, but it can't be to the letter itself."</i></p> <p>To identify and advise who the PR guys were.</p>	AAI00010136	Mr. Kassam advises, to the best of his recollection, that one of the individuals referenced in this email was Ebrahim El Kalza. Mr. Kassam cannot recall which other "PR guys" he may have spoken to.
38.	198-199	677-679	REF	To go through the Defamatory Manifesto Part 1 and identify which statements about Anson's investment positions are true and which are false.		The Plaintiffs refer to the Claim, which properly pleads defamation, including by pleading the defamatory words, meaning/sense and "sting" of the Defamatory Manifesto.
39.	203-204	692-697	UA	If Mr. Kassam or any of the Anson entities are under investigation by the SEC, to provide the particulars of what the allegations are.		<p>Since Anson operates in a regulated industry, it has, from time-to-time, received inquiries from regulatory authorities including the SEC.</p> <p>To the extent Anson is aware of the particulars of any allegations that might underlie any regulatory inquiries, any known allegations are irrelevant to the allegations raised in this action.</p>

40.	204-205	698-701	REF	To advise, if Mr. Kassam or any of the Anson entities were under investigation by the SEC, would they be communicating that fact to their investors.		Without prejudice to the Plaintiffs' position that this is an improper question, see answer to Item #39, above. The remainder of the request is refused on the basis it is speculative and the premise of the question has not been established.
41.	208	708	REF	To advise whether Mr. Kassam or any of the Anson entities had occasion to notify Anson's limited partners that Mr. Kassam and/or the Anson entities were under investigation by the SEC.		Without prejudice to the Plaintiffs' position that this is an improper question, see answer to Item #39, above. The remainder of the request is refused on the basis it is speculative and the premise of the question has not been established.
42.	208-209	710	REF	To advise if Mr. Kassam has received any notice of investigation from the SEC from 2018 to the current date.		See answer to Item #39, above.
43.	209	711	REF	To advise if Mr. Kassam has received any redemption requests from Anson's investors because of a pending investigation or a current investigation from the SEC.		Without prejudice to the Plaintiffs' position that this is an improper question, Mr. Kassam is not aware of any investor having requested a redemption on the purported basis that Anson is currently or was formerly the target of an investigation by the SEC.

44.	210-211	713-723	UT	To produce the responses Luigi Calabrese received from the Defamatory Manifesto "tipline" to his birchstreet@gmail.com email address.	AAI00001245	The Plaintiffs have already produced all such emails (see e.g. AAI00000033, AAI00005915, AAI00006395, AAI00010800, AAI00010798, AAI00010799).
45.	213-214	733-734	UA	To identify the other firms hired by the Plaintiffs to investigate the conspiracy.		See answer to Item #27, above.
46.	216-218	740-751	UA	To advise how Mr. Paul Roth reached out to Mr. Kassam.	AAI0000590	As stated during the examination, Mr. Kassam initially sent Mr. Roth a message on Twitter.
47.	216-218	740-752	UA	To provide the phone number and email address of Mr. Paul Roth.		(416) 486-1432 The Plaintiffs are not aware of Mr. Roth's email address.
48.	219-220	757-761	REF	To advise when Mr. Kassam sent his chats with @PresumablyPaul to his lawyers.		Refused on the grounds of relevance and privilege.
49.	224-225	775-783	UA	To provide a list of the companies owned or operated by Andy DeFrancesco that Anson has invested in.		Since 2020, Anson has invested in SOL Global and Cool Holdings.
50.	226	788	REF	To advise why Mr. Andy DeFrancesco is not part of this lawsuit.		Refused on the basis of relevance and privilege.
51.	227-229	793-801	UA	To check the Plaintiffs' records and advise if Mr. Paul Roth (@PresumablyPaul) identified	AAI0000601	As Mr. Kassam stated during his examination, and as reflected in the Plaintiffs' productions, Mr.

				anybody other than Robert Doxtator (@BettingBruiser) and Andy DeFrancesco as being involved in the conspiracy..		Roth identified Robert Doxtator, Andy DeFrancesco, and James Stafford as being involved in the conspiracy.
52.	234	816-817	UA	To check the Plaintiffs' records and advise if Mr. Paul Roth (@PresumablyPaul) had mentioned the names of Andrew Rudensky or Jacob Doxtator.		No. See answer to Item #51, above.
53.	237	831-834	UA	To advise if Mr. Kassam spoke with Paul Roth between April 22 and June 16, 2021.	AAI0000631	Yes.
54.	238-242	837-851	REF	To advise what gives Mr. Kassam confidence that the transcripts provided by the heavensabove@protonmail.com are authentic.		The question was already answered by Mr. Kassam during his examination at Page/Line Reference [240:25]-[241:8] In any event, the basis for the Plaintiffs' belief in the authenticity of the transcripts is well-founded and set out in the Claim (see in particular, paragraph 68 and Appendix "E").
55.	246-247	870-874	REF	To advise what Anson's general counsel did with the transcripts received from HeavensAbove@ProtonMail.com.		Refused on the grounds of relevance and privilege.
56.	251-252	889-892	UT	To check the Plaintiffs' records and advise if the date of the	ROB0000019	Mr. Kassam has no reason to believe the date of the recording is not September 30, 2020.

				recording at ROB0000019 is not September 30 th , 2020.		However, the recording was taken by Robert Doxtator (without Mr. Kassam's knowledge or consent), and as such Robert Doxtator would be in the position to confirm the date of the recording. The Plaintiffs have asked the same of Robert Doxtator during his examination.
57.	255-258	904-909	REF	To advise whether, at this time, the Plaintiffs have calculated which part of any diminishment in their standing/reputation stems from the publication of the Defamatory Manifestos versus the publication of the allegation that the Plaintiffs are under an investigation by the SEC.		Refused on the grounds of relevance, proportionality, overbreadth, as lacking foundation, and as being speculative.
April 21, 2023						
Continued examination by Won Kim, counsel to James Stafford and Robert Doxtator						
58.	266	914	REF	To advise whether Mr. Kassam or Anson have ever submitted a whistleblower complaint to the OSC.		They have not.
59.	266-267	915-917	U/A	To advise whether Mr. Kassam or Anson have ever submitted a whistleblower complaint to the OSC, SEC, any other securities regulator, or the DOJ, about Aphria.		They have not.

60.	270	930	REF	To advise whether Mr. Kassam or anyone at Anson knew of any of the information in the report titled: "Aphria: A Shell Game with a Cannabis Business on the Side" published by Hindenburg Research on December 3, 2018 (the " Hindenburg Aphria Report ") prior to its publication.	AAI00014703	As framed, this question asks whether Mr. Kassam and Anson "knew of <u>any</u> of the information" contained in the Hindenburg Aphria report. To the Plaintiffs' knowledge, the Hindenburg Aphria report was based on publicly available information, much of which would have been known to Anson independently of the Hindenburg Aphria report.
61.	270-271	931	U/A	To produce any communications between Mr. Kassam and/or anyone at Anson and Nate Anderson containing any information that "made its way" into the Hindenburg Aphria Report.	AAI00014703	As stated during Mr. Kassam's examination, Anson did not provide any information to Mr. Anderson relating to the Hindenburg Aphria report published on December 3, 2018. Based on diligent review of their records, the Plaintiffs can advise there are no such communications.
62.	273-274	941-942	U/A	To advise of Anson's short positions as at the time of publication of the Hindenburg Aphria Report.	AAI00014703	Anson had a net long equity position in Aphria at the time of the Hindenburg Aphria report published on December 3, 2018.
63.	274	945	U/A	To produce all records relating to Anson's positions, holdings, profits and/or losses in respect of Aphria for the years 2018 and 2019.		Now produced as AAI00026707 is Anson's trading data for Aphria, for the relevant period surrounding the December 3, 2018 Hindenburg report.

64.	274-275	947-951	U/A	To advise whether Anson provided Mr. Anderson or anyone at Hindenburg Research with research about Aphria prior to the publication of the report titled: "Could Rampant Red Flags Drown Aphria's Proposed Nuuvera Acquisition" published by Hindenburg Research on March 21, 2018.	AAI00014703 (which document is not the report in question but refers to the report in question)	Refused on the basis of relevance. The March 21, 2018 Hindenburg report is irrelevant to the allegations and issues in the action.
65.	275-276	952	U/A	To advise of the basis for the privilege claim in respect of the Plaintiffs' emails with Mr. Anderson that are listed on the Plaintiffs' Supplemental Schedule B1.		<p>The referenced documents were included on the Plaintiffs' Supplemental Schedule B1, which was delivered in response to the Defendants' demand that the Plaintiffs identify every piece of correspondence with their former counsel Blakes, Cassels & Graydon LLP ("Blakes").</p> <p>The referenced documents are attachments to emails between the Plaintiffs and their former counsel Blakes. The Plaintiffs assert litigation- and solicitor-client privilege over the communications with counsel.</p> <p>For clarity, the Plaintiffs do not accept that any/all documents listed on their Schedule B1 are relevant to any issue in the action. The correspondence was identified on the Schedule B1 solely in response to James Stafford and Robert Doxtator's demand that the Plaintiffs provide</p>

						a detailed schedule of all correspondence with Blakes.
66.	275-276	953	U/A	To produce the Plaintiffs' emails with Mr. Anderson that are listed on the Plaintiffs' Supplemental Schedule B1.		<p>For clarity, the Plaintiffs do not accept that any/all documents listed on Schedule B1 are relevant to any issue in the action. See answer to Item #65, above.</p> <p>However, as set out in the answer to Item #68 below, the Plaintiffs have now produced all relevant communications between Mr. Kassam and/or Anson and Mr. Anderson, including any such emails that were listed on the Plaintiffs' Supplemental Schedule B1.</p>
67.	276	954	U/A	To produce all invoices and other records of payment by Mr. Kassam and/or Anson to Mr. Anderson, Hindenburg Research, and ClaritySpring.		There were no payments made by Anson to Mr. Anderson, Hindenburg Research, or ClaritySpring relating to any of the short reports referred to in the Unlawful Statements.
68.	276-277	955	U/A	To produce all relevant communications between Mr. Kassam and/or Anson and Mr. Anderson and/or Hindenburg Research.		See the correspondence (along with their respective attachments) now produced as AAI00016633, AAI00016634, AAI00016635, AAI00016636, AAI00016296, AAI00017664, AAI00017665, AAI00016287, AAI00018201, AAI00018202, AAI00016871, AAI00016978, AAI00017284, AAI00017439, AAI00018817, AAI00016177, AAI00016429, AAI00016430, AAI00016740,

						<p>AAI00017654, AAI00017655, AAI00017656, AAI00019135, AAI00019204, AAI00016220, AAI00016689, AAI00016738, AAI00016959, AAI00016960, AAI00016970, AAI00016971, AAI00017016, AAI00017017, AAI00017029, AAI00017030, AAI00017100, AAI00017371, AAI00017372, AAI00017415, AAI00017416, AAI00017525, AAI00017526, AAI00018929, AAI00018930, AAI00024226, AAI00024705, AAI00024721, AAI00025033, AAI00025435, AAI00025670.</p> <p>See also, answers to Items #61, 64, and 66, above.</p>
69.	277-278	956-960	U/A	To check the Plaintiffs' records and confirm that Mr. Kassam and/or Anson have never submitted a whistleblower complaint to the OSC, SEC, or any other regulator about Aphria.		They have not.
70.	283-285	984-989	REF	To check Anson's records and advise whether Anson ever bought put options in respect of Aphria shares at any time post publication of the Hindenburg Aphria Report.		Refused on the basis of relevance. Anson trades options in many different securities, at different times, and for different reasons, including as a hedging strategy. Whether Anson specifically purchased put options in connection with Aphria is irrelevant to the allegations in the action.

71.	285	989	U/A	To produce all communications between Mr. Kassam and/or Anson and any member of Aphria's management.		Refused on the grounds of relevance and overbreadth.
72.	286-287	994-998	U/A	To advise of the price at which Anson acquired its "founder stock" in Aphria.		Without prejudice to the Plaintiffs' position that this question is irrelevant and improper, Anson did not acquire "founder stock" in Aphria. As Mr. Kassam explained during his examination, Anson participated in the initial financing of Aphria. The subscription was completed at a price of \$0.60 per Unit.
73.	287	999	REF	To advise of the "face value" of the Aphria stock as at the time that Anson acquired its "founder stock" in Aphria.		See answer to Item #72, above.
74.	288	1000	REF	To produce records of Mr. Kassam's and/or Anson's purchase of "founder stock" in Aphria from Andy DeFrancesco, including how many stocks were purchased, at what price, and on what date.		See answer to Item #72, above. The balance of the question is refused on the grounds of relevance and overbreadth.
75.	296-297	1027-1028	U/A	To produce communications between Mr. Kassam and/or Anson and Andrew Left and/or Citron Research about Aphria.		The Plaintiffs have conducted a diligent search of their records. Based on that review, there are no relevant communications with Mr. Left regarding Aphria.

76.	301-302	1042	REF	To advise how Mr. Kassam and/or Anson decide on the size of an investment and the timing of a short position.		Refused on the grounds of relevance and overbreadth.
77.	310	1063	REF	To produce all of the derivatives Anson has bought for any of the companies mentioned in the Defamatory Manifestos or MarketFrauds.to articles.		Refused on the grounds of relevance and overbreadth.
78.	311	1065	U/T	To identify, in advance of trial, all of the unlawful statements that the Plaintiffs intend to pursue at trial.		Since defamatory statements continue to be published by the defendants, the Plaintiffs will provide responses to this request at an appropriate time in advance of trial.
79.	315	1081-1082	U/A	To advise whether Anson ever shorted Zenabis.		They did.
80.	315-316	1084-1086	U/A	To advise whether Anson ever shorted Zenabis while it was long on Zenabis.		It is impossible to be both "short" and "long" a particular stock at the same time. However, to the extent the question asks whether Anson ever had a hedged position in Zenabis, the answer is yes.
81.	315	1087	REF	To produce all of Anson's records relating to trades in Zenabis shares.		See answer to Item #34, above.

82.	324-325	1118-1119	REF	To identify which exchanges Anson has traded on, in respect of the following companies referred to in the Defamatory Manifesto: Aphria, Facedrive, HEXO, and ReconAfrica.		Refused on the grounds of relevance, proportionality, and overbreadth.
83.	331-332	1143	REF	To disclose Anson's positions in Aphria, Zenabis, ReconAfrica, HEXO and Facedrive during the period from 2018 to present.		<p>Now produced as AAI00026707 is Anson's relevant trading records for Aphria (see answer to Item #63, above).</p> <p>Now produced as AAI00026712 is Anson's relevant trading records for Zenabis (see answer to Item #34, above).</p> <p>Now produced as AAI00026711 is Anson's trading records for ReconAfrica, for the relevant period surrounding the June 24, 2021 Viceroy Research report.</p> <p>Now produced as AAI00026710 is Anson's trading records for HEXO, for the relevant period surrounding the July 29, 2019 Friendly Bear report.</p> <p>Now produced as AAI00026708 is Anson's trading records for Facedrive, for the relevant period surrounding the July 23, 2020 Hindenburg report.</p>

						The balance of the question is refused on the grounds of relevance and overbreadth.
84.	332-333	1144-1149	REF	To advise who Anson's prime brokers are for the period from 2018 to present.		<p>Without prejudice to the Plaintiffs' position that this question is irrelevant, Anson has used the following prime brokers: TD Securities, Cantor Fitzgerald, Clear Street LLC, Jefferies LLC, Maxim Group LLC, Pershing LLC, BMO Nesbitt Burns Inc., BNP Paribas Prime Brokerage, Inc., National Bank Independent Network.</p> <p>In any event, this information is, and has been, publicly-available in Anson's Form ADV filings.</p>
85.	336-337	1158-1162	REF	Has Anson ever made a trade without assurances that the short position could be covered.		<p>As Mr. Kassam repeatedly advised during his examination, including at Page/Line Reference [56:21]-[57:14], Anson is subject to the SEC and OSC rules applicable to short-selling, and to his knowledge has always complied with those rules.</p> <p>Anson otherwise relies on the prime brokerages with whom it engages, and on whom the responsibility ultimately lies for ensuring sufficient "borrow" to cover any short positions, in accordance with applicable rules.</p>

						<p>This is common, accepted industry practice.</p> <p>In any event, this question is largely speculative and unintelligible.</p>
86.	339-340	1173-117	U/A	<p>To produce any communications between Anson and Canaccord, Eight Capital, or Echelon Capital, evidencing the interruption or pause in Anson's relationship with those entities.</p>		<p>As it relates to Canaccord, see answer to Item #35, above.</p> <p>With respect to Echelon Capital, now produced as AAI00025935, AAI00025936, and AAI00025937 are email correspondences between Mr. Kassam and Echelon CEO David Cusson, from October 2020, when Echelon shut down Anson's trading accounts for a time after the publication of the Defamatory Manifesto.</p> <p>Based on a diligent review of the Plaintiffs' records, there are no such communications with Eight Capital.</p>
87.	341-343	1178-1186	REF	<p>To advise whether the entity/person that would facilitate the technical naked shorting would be the brokerage not Anson.</p>		<p>See answer to Item #85, above.</p>
88.	348	1209-1211	REF	<p>To advise who Mr. Kassam dealt with to borrow shares in Facedrive.</p>		<p>Without prejudice to the Plaintiffs' position that this question is irrelevant, the Plaintiffs advise that Mr. Kassam does not arrange for</p>

						<p>the "borrows" on any of Anson's executed trades.</p> <p>In any event, Anson does not use any dedicated "borrow" person or source for a given stock, but instead uses a variety of sources (through Anson's securities lending manager) to secure a given borrow, which is dependent on the specific facts and circumstances.</p>
89.	350	1218-1223	UA	To advise who Mr. Kassam borrowed from when he in fact borrowed securities in Facedrive.		See answer to Item #88, above.
90.	355-356	1245-1246	REF	To produce any correspondence Mr. Kassam received from TD from 2018 to April 21, 2023.		Refused on the grounds of relevance, proportionality, and overbreadth.
91.	355-356	1245-1247	REF	To produce any correspondence Mr. Kassam received from TD from the summer to the end of 2018.		Refused on the grounds of relevance, proportionality, and overbreadth.
92.	357-358	1252-1256	UA	To produce the documents that Mr. Kassam received from TD with regard to his position on Tilray.		Without prejudice to the Plaintiffs' position that the question is overbroad, see the correspondence (along with their respective attachments) now produced as: AAI00015543, AAI00015545, AAI00015546, AAI00015547, AAI00015548, AAI00015549, AAI00015550, AAI00015551, AAI00015552, AAI00015553, AAI00015555,

					AAI00015556, AAI00015557, AAI00015558, AAI00015559, AAI00015560, AAI00015561, AAI00015562, AAI00015563, AAI00015564, AAI00015565, AAI00015567, AAI00015568, AAI00015573, AAI00015575, AAI00015576, AAI00015580, AAI00015581, AAI00015589, AAI00015590, AAI00015591, AAI00015592, AAI00015594, AAI00015595, AAI00015596, AAI00015597, AAI00015599, AAI00015601, AAI00015602, AAI00015603, AAI00015604, AAI00015605, AAI00015606, AAI00015607, AAI00015608, AAI00015609, AAI00015618, AAI00015620, AAI00015621, AAI00015622, AAI00015623, AAI00015627, AAI00015629, AAI00015630, AAI00015631, AAI00015632, AAI00015634, AAI00015635, AAI00015636, AAI00015638, AAI00015640, AAI00015641, AAI00015642, AAI00015643, AAI00015644, AAI00015645, AAI00015646, AAI00015647, AAI00015648, AAI00015649, AAI00015651, AAI00015652, AAI00015653, AAI00015654, AAI00015655, AAI00015660, AAI00015663, AAI00015665, AAI00015670, AAI00015674, AAI00015675, AAI00015676, AAI00015678, AAI00015686, AAI00015687, AAI00015688, AAI00015689, AAI00015690, AAI00015691, AAI00015692, AAI00015693,
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						AAI00015696, AAI00015698, AAI00015703, AAI00015704, AAI00015705, AAI00015706, AAI00015707, AAI00015710, AAI00015711, AAI00015712, AAI00015714, AAI00015716, AAI00015717, AAI00015718, AAI00015719, AAI00015720, AAI00015721, AAI00015722, AAI00015728, AAI00015729, AAI00015732, AAI00015733, AAI00015737, AAI00015738, AAI00015744, AAI00015752, AAI00015753, AAI00015772, AAI00015784, AAI00015785, AAI00015786, AAI00015788, AAI00015790, AAI00015797, AAI00015798, AAI00015810, AAI00015817, AAI00015818, AAI00015837, AAI00015839, AAI00015840, AAI00015845, AAI00015846, AAI00015847, AAI00015848.
93.	358-359	1257-1260	UT	To check and advise whether Anson got RECO shares through a bought-deal financing.	AAI00010179	Anson participated in an August 2020 public offering for RECO.
94.	360	1268-1271	UA	To advise where Anson got their borrow for Recon Africa.		See answer to Item #88, above.
95.	362	1278-1279	REF	To advise how often is Mr. Kassam required to adjust the margins.		Refused on the basis that the question is irrelevant and unintelligible.

96.	368-370	1301-1309	UA	To advise whether Mr. Kassam participated in a private placement round for Harvest Health.		Without prejudice to the Plaintiffs' position that the question is irrelevant, he did not.
97.	368-369	1301-1310	REF	To provide the terms of the participation and the subsequent short positions for all of the tickers (HEXO Corp., Tilray, Zenabis, Aphria, Harvest Health) where Anson participated in a private placement.		<p>Without prejudice to the Plaintiffs' position that the question is irrelevant and overbroad, the Plaintiffs can advise as follows:</p> <p>Anson did not participate in a private placement in connection with HEXO Corp.</p> <p>Anson did not participate in a private placement in connection with Tilray.</p> <p>Anson participated in an October 2018 debenture offering in connection with Zenabis.</p> <p>Anson participated in a June 2018 and April 2019 private placement in connection with Aphria.</p> <p>With respect to any applicable trading records, see the answer to Item #83, above.</p> <p>The balance of the question is refused as irrelevant and overbroad.</p>

98.	370-371	1311-1314	UA	To advise where Anson borrowed the shares from for the short position in Facedrive in 2020.		See answer to Item #88, above.
99.	371-372	1318	UA	To provide all of the records of all positions taken on Facedrive across all of the Anson Funds, including records of where Anson obtained the borrow to cover its short position.		Now produced as AAI00026708 is Anson's relevant trading records for Facedrive (see answer to Item #83, above). As it relates to the "borrow", see answer to Item #88, above. The balance of the question is refused as irrelevant and overbroad.
100.	372-373	1324	UA	Mr. Kassam's Schedule B1 lists emails between July 13, 2020 to July 23, 2020 between Sunny Puri, Joshua Fineman, Michael Roussel and Nate Anderson with the subject line "Re: Facedrive, Re: FD and Facedrive edits". To advise what is the basis for the privilege.		See answer to Item #65 above.
101.	373	1325	REF	If not privileged, to produce the original emails mentioned above (Q. 1324), including attachments, in their entirety.		See answers to Items #65, 66 and 68, above. The balance of the question is refused on the grounds of relevance, proportionality, and overbreadth.
102.	373	1326-1327	REF	To advise how much money Anson made on shorting Facedrive.		\$1,715,663.03.

103.	373-374	1328-1329	UA	To advise whether, beside the Master Fund, there were other Anson Funds involved in the shorting of Facedrive.		Yes.
104.	374	1330	UA	To produce all of the trading records for all of the Anson-related entities on Facedrive.		See answer to Item #99, above.
105.	374-375	1331-1336	UA	To advise which are the underlying brokerages used to acquire the short position on ReconAfrica.		BMO and TD.
106.	376-378	1341-1345	REF	To advise whether Anson dealt with RBC, TD, CIBC, and/or National Bank on ReconAfrica stock in May 2021.		Yes. Anson regularly engages TD as the prime brokerage on many of its transactions.
107.	378-379	1346-1349	REF	To advise who lent Anson the funds in order to acquire the short position on ReconAfrica.		See answer to Item #94, above.
108.	379-380	1351-1355	REF	To find out and advise which portion of the report at AAI00014699 is from the diligence about ReconAfrica provided to Viceroy Research.	AAI00014699	After conducting a diligent review of their records, the Plaintiffs advise that, to the best of their recollection, they did not provide any information to Viceroy Research that was put in the report.
109.	382-383	1363-1366	UA	To advise what was the size of Anson's position on ReconAfrica before the release of the Viceroy report.		Now produced as AAI00026711 is Anson's relevant trading records for ReconAfrica (see answer to Item #83, above).

110.	383	1368	UA	To produce records of all of the deposits and withdrawals of ReconAfrica securities for each of the Anson accounts.		See answer to Item #109, above. The balance of the question is refused on the grounds of relevance, proportionality, and overbreadth.
111.	383-384	1369	REF	To provide, for each of the Anson accounts, the holding, trading, profit and loss records for the dealings with Facedrive, ReconAfrica, Aphria, Zenabis, Harvest Health and HEXO.		See answer to Item #83, above.
112.	384	1370	REF	To produce any whistleblower complaints that Anson or people related to Anson filed with any of the Canadian and/or US securities regulators for Facedrive, ReconAfrica, Aphria, Zenabis, Harvest Health and HEXO stocks.		There are no such complaints.
113.	384-385	1371	REF	To produce all of the communications that Mr. Kassam or anyone at Anson had with any journalists about Facedrive, ReconAfrica, Aphria, Zenabis, Harvest Health and HEXO.		As Mr. Kassam advised during his examination, he has regular discussions with business journalists regarding a wide variety of matters. The balance of the question, as posed, is refused on the grounds of relevance, proportionality, and overbreadth.

114.	385	1372	REF	To produce any of the communications that Mr. Kassam and/or people from Anson had with anyone in management or directors for Facedrive, ReconAfrica, Aphria, Zenabis, Harvest Health and HEXO.		Refused on the grounds of relevance, proportionality, and overbreadth.
115.	390-391	1395-1396	UA	To check records and advise whether Mr. Kassam has ever contacted Mr. Mark Rendell about ReconAfrica.		He did not.
116.	391	1397-1398	UA	To check records and advise whether Mr. Kassam has ever contacted Mr. Greg McArthur about ReconAfrica.		He did not.
117.	392-393	1404-1408	REF	To advise if Mr. Kassam shared with Mr. Greg McArthur any other documents about this lawsuit other than the Claim.		Refused on the basis of relevance.
118.	394	1410-1411	UA	To check records and advise whether Mr. Kassam have talked about ReconAfrica with anyone else at the Globe and Mail other than Greg McArthur and Mark Rendell.		Yes. Mr. Kassam advises that he spoke with Geoffrey York at the Globe & Mail.
119.	394-395	1412-1414	UA	To check records and advise whether Mr. Kassam have talked about Facedrive with anyone else at the Globe and Mail other than Greg McArthur and Mark Rendell.		Yes. Mr. Kassam advises that he spoke with David Milstead at the Globe & Mail.

120.	395	1415-1418	UA	To check records and advise whether Mr. Kassam have talked about Aphria with anyone else at the Globe and Mail other than Greg McArthur and Mark Rendell.		Yes. Mr. Kassam advises that he spoke with David Milstead at the Globe & Mail.
121.	396-397	1420-	REF	To check records and advise whether Mr. Kassam have talked about VIVO Cannabis, Genius Brands, Tilray, NexTech AR Solutions, Harvest Health, Med Men, GFL Environmental, GSX Techedu, Champignon Brands Inc., Valorem Brands, HEXO with anyone else at the Globe and Mail other than Greg McArthur and Mark Rendell.		As Mr. Kassam advised during his examination, he has regular discussions with business journalists regarding a wide variety of matters. See answers to Items #115, 116, 118, 119, and 120, above. The balance of the question, as posed, is refused on the grounds of relevance, proportionality, and overbreadth.
122.	400-401	1433-1440	REF	To advise what tickers Anson has worked with Grizzly Bear Research on.		Refused on the grounds of relevance, proportionality, and overbreadth.
123.	401	1441	UA	To advise whether Anson has worked with Grizzly Bear Research on Zenabis.		No, Anson has not.
124.	401	1443-1444	UA	To advise whether Anson has worked with Grizzly Bear Research on Aphria.		No, Anson has not.

125.	402	1445-1446	UA	To advise whether Anson has worked with Grizzly Bear Research on Genius Brands.		No, Anson has not.
126.	402	1447-1448	UA	To advise whether Anson has worked with Grizzly Bear Research on Tilray.		No, Anson has not.
127.	402	1449-1450	UA	To advise whether Anson has worked with Grizzly Bear Research on Facedrive.		No, Anson has not.
128.	402	1451-1452	UA	To advise whether Anson has worked with Grizzly Bear Research on NexTech AR Solutions.		No, Anson has not.
129.	402-403	1453-1454	UA	To advise whether Anson has worked with Grizzly Bear Research on ReconAfrica.		No, Anson has not.
130.	403	1455-1456	UA	To advise whether Anson has worked with Grizzly Bear Research on Harvest Health.		No, Anson has not.
131.	403	1457-1458	UA	To advise whether Anson has worked with Grizzly Bear Research on Med Men.		No, Anson has not.
132.	403	1459-1460	UA	To advise whether Anson has worked with Grizzly Bear Research on GFL Environmental.		No, Anson has not.

133.	403	1461-1462	UA	To advise whether Anson has worked with Grizzly Bear Research on GSX Techedu.		No, Anson has not.
134.	403-404	1463-1464	UA	To advise whether Anson has worked with Grizzly Bear Research on Champignon Brands Inc..		No, Anson has not.
135.	404	1465-1466	UA	To advise whether Anson has worked with Grizzly Bear Research on Valorem Brands.		No, Anson has not.
136.	405	1468-1469	UA	To advise whether Anson has worked with Grizzly Bear Research on HEXO.		No, Anson has not.
137.	405-406	1474	REF	To advise whether Anson collaborated with Mr. Nate Anderson on Callidus.		No, Anson has not.
138.	406-407	1475-1476	REF	To advise whether Anson collaborated on anything with Mr. Nate Anderson.		As Mr. Kassam stated repeatedly during his examination, including at Page/Line Reference [59:20], [267:22], [372:5], Anson has collaborated on research and diligence with Nate Anderson.
139.	407-408	1479-1480	UA	To produce documents indicating Anson's position on Genius Brands from April 2020 to December 2020.		Now produced as AAI00026709 are Anson's positions in Genius Brands, on a net aggregate basis, during the relevant period.
140.	408	1481-1482	UA	To advise whether Mr. Kassam has ever traded personally or		Without prejudice to the Plaintiffs' position that the question is irrelevant, the answer is no, Mr.

				through any Anson entities in Harvest Health.		Kassam did not personally trade in Harvest Health.
141.	409	1486-1487	UA	To advise when Mr. Kassam first approach Mr. Barrack of Blake Cassels and raised the issue of investigating the defamatory statements.		Without waiving privilege, the Plaintiffs formally retained the Blakes law firm in this action on October 27, 2020. To the extent this question requests more specific details surrounding communications between the Plaintiffs and their former counsel, that request is refused on the basis of privilege.
142.	409	1488	REF	To advise what made Mr. Kassam decide to retain Mr. Barrack.		Refused on the grounds of relevance and privilege.
143.	410	1489	REF	To advise who at Anson was involved in retaining Mr. Barrack.		Refused on the grounds of relevance and privilege.
144.	410	1490	REF	To advise whether there was a pre-existing relationship between Sunny Puri and Iris Fischer at Blakes.		Refused on the grounds of relevance and privilege.
145.	410	1491	REF	To advise when Mr. Kassam retained Artemis Consulting.		Refused on the grounds of relevance and privilege.
146.	410	1492	REF	To advise how Mr. Kassam got introduced to Artemis Consulting.		Refused on the grounds of relevance and privilege.
147.	410-411	1493	REF	To advise whether Mr. Kassam has retained any other private		Without waiving any privilege, the Plaintiffs have engaged Artemis

				investigators to investigate the Defendants.		Risk, and previously retained K2 Integrity, through legal counsel, to investigate the matters alleged in the Claim.
148.	411	1494	REF	To advise how many entities Anson and Mr. Kassam retained to investigate the allegations in the Claim.		See answer to Item #147, above.
149.	411	1495	REF	To advise when Mr. Kassam decided to add Mr. Stafford to the lawsuit.		Refused on the grounds of relevance and privilege.
150.	411	1496	REF	To advise why Mr. Stafford was not named as an original Defendant when the pleading was issued in December 2020.		Without waiving any privilege, the basis for the Plaintiffs' decision to add Mr. Stafford as a Defendant in this action is set out in the Affidavit of Sunny Puri, sworn January 5, 2022, filed in the Plaintiffs' motion to amend.
151.	411-412	1497	REF	To advise when Anson started collecting evidence against Mr. Stafford in-house.		Refused on the grounds of relevance and privilege.
152.	412-413	1499-1501	UA	To provide the names of the lawyers at Blakes who reached out and advised of a potential conflict.	paragraph 36 of Puri's affidavit	Without waiving any privilege, and as set out in the Plaintiffs' materials filed in the motion to amend, the Plaintiffs were formerly represented by Michael Barrack, Iris Fischer, Christopher DiMatteo, and Kaley Pulfer of the Blakes law firm. To the extent this question requests more specific details

						surrounding communications between the Plaintiffs and their former counsel, that request is refused on the basis of privilege.
153.	413	1502-1503	UA	To advise who at Anson attended the call on July 29, 2020 when Blakes advised of a potential conflict.		Refused on the grounds of relevance and privilege.
154.	414	1508-1509	REF	To produce any communication (redacted for privilege) between Anson and Blakes on the conflict issue.		Refused on the grounds of relevance and privilege.
155.	414-415	1510 1512	REF	To advise whether Mr. Kassam was concerned that his information may have been compromised by the fact that he had retained the same firm that had been acting for Mr. Stafford.		Without prejudice to the Plaintiffs' position that this question is irrelevant and speculative, the answer is no.
156.	415	1511	REF	To advise what the lawyers at Blakes told Mr. Kassam about the firewall they had in place to screen out conflict.		Without waiving privilege, the specific steps taken by Blakes to establish and maintain an ethical wall are set out in the Affidavit of Stephen Smith, sworn January 17, 2023, filed in the Plaintiffs' motion to amend. To the extent this question requests more specific details surrounding communications between the Plaintiffs and their former counsel, that request is refused on the basis of privilege.

157.	416	1513	REF	To advise what was behind the decision to switch from Blakes to Davies.		Without waiving privilege, the Plaintiffs' explanation as to why they changed counsel from Blakes to Davies is set out in the Affidavit of Sunny Puri, sworn January 5, 2022, filed in the Plaintiffs' motion to amend.
158.	416	1514	REF	To advise whether Mr. Kassam had a pre-existing relationship with Davies.		Refused on the basis of relevance and privilege.
159.	416	1515	REF	To advise if Mr. Kassam knew Jonathan Lissus or if he ever met him.		Refused on the basis of relevance and privilege.
160.	416	1516	REF	To advise if Mr. Kassam has ever retained Jonathan Lissus or Lax O'Sullivan regarding this lawsuit.		Refused on the grounds of relevance and privilege.
161.	417-418	1520-1521	REF	To advise which email addresses Mr. Kassam searched through in order to prepare his Affidavit of Documents.		<p>Refused on the basis of privilege. The review of the Plaintiffs' documents and records, as well as any production decisions, was carried out by the Plaintiffs' counsel in this action. As such, the specific search terms and parameters used to identify and determine relevance are subject to privilege.</p> <p>In any event, the Defendants refused to engage with the Plaintiffs on the terms of a discovery plan, in which the Plaintiffs had proposed the search terms and parameters to be</p>

						employed for document production in this action.
162.	423-424	1549-1553	REF	To check and advise whether any texts, chats or messages passing between Mr. Doxtator and Mr. Puri have not been produced.		<p>The Plaintiffs have, in coordination with their legal counsel, conducted a diligent review of their records and produced the relevant and non-privileged records identified in the course of that review.</p> <p>The Plaintiffs note that effectively no documents or correspondence between Robert Doxtator and Anson has been produced by Robert Doxtator in this action.</p>
163.	424-425	1556-1559	UA	To produce all of the relevant communications between Mr. Kassam or anyone at Anson and Adam Spears, Nate Anderson, Andrew Left and Ben Axler about the Defamatory Manifesto.		The Plaintiffs have conducted a diligent review of their records. Based on that review, there are no other relevant, non-privileged communications.
164.	426	1560	UT	To produce the email from David Cynamon providing the Defamatory Manifesto.		There is no such email.
165.	426	1561	UA	To produce Mr. Kassam's emails circulating the Defamatory Manifesto to others.		See the correspondence now produced as AAI00026035, AAI00026041, AAI00026064, AAI00026117, and AAI00026135.
166.	426	1562	UA	To produce Mr. Kassam correspondence with Allen Spektor regarding the Defamatory Manifesto Part 1, Defamatory Manifesto Part 2, and		<p>See answer to Item #29, above.</p> <p>In addition, now produced as AAI00007794 is relevant email</p>

				Betting Bruiser tweets and anything related to Robert Doxtator in this lawsuit.		correspondence between Mr. Kassam and Mr. Spektor dated October 2020.
167.	426-427	1563	UA	To disclose the findings, opinions and conclusions of any experts retained to report on the matters in this action, including the expert's name, address and qualifications.		The Plaintiffs will comply with their obligations under the <i>Rules</i> .
168.	427	1564	UA	To advise whether Mr. Kassam has hired private investigators to follow Robert Doxtator, Jacob Doxtator, James Stafford, Andrew Rudensky or Andrew DeFrancesco.		Refused on the basis of privilege.
169.	427	1565	UA	If Mr. Kassam has hired private investigators to follow Robert Doxtator, Jacob Doxtator, James Stafford, Andrew Rudensky or Andrew DeFrancesco, to provide the investigator's name, address and the report.		Refused on the basis of privilege.
170.	427-428	1566-1567	UA	To provide will-says before the trial of this action for anyone called as witness, together with a summary of all their evidence.		The Plaintiffs are prepared to discuss providing witness lists and witness statements on a mutual basis in advance of trial, or to comply with any trial management order made in that respect.
171.	429	1568	UA	To advise whether Anson has retained Artemis Risk as an expert for this action.		The Plaintiffs will comply with their obligations under the <i>Rules</i> .

172.	429	1569	UA	To the extent that Anson has retained Artemis Risk as an expert, to produce their report.		The Plaintiffs will comply with their obligations under the <i>Rules</i> .
173.	429	1570	UA	To provide the names, addresses and emails for any individuals who Mr. Kassam expects to have information about his allegations, specifically involving Jacob Doxtator.		See answer to Item #170, above.

TAB 2Q

This is **Exhibit “Q”** to the Affidavit of **Alexander Mulligan**,
sworn before me this **30th** day of **November, 2023**.

A handwritten signature in blue ink, appearing to read "Julie Kelly", written over a horizontal line.

A Commissioner for Taking Affidavits

LSO #84488D

Outstanding Questions Posted at the Discovery Examination of the Plaintiff Moez Kassam on April 20 and 21, 2023

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
<i>Questions Relevant to the Plaintiffs' Claims, including their Pleadings and the Evidentiary Basis for their Claims</i>							
#9	UA	140-144	47-49	To advise of what evidence or documents the Plaintiffs have relating to the allegations in paragraphs 25, 26, 27, 28, 30, 53, 54, 64, 65, 69, 74, 81, 82, 83, 84, 85, 89, 90, 91, 92, 103, 105, 107, 108, and 139 to 140 of the Claim ¹	<p>The Plaintiffs rely on</p> <p>(a) the entirety of the documentary productions in this matter (which comprises over 1000 documents);</p> <p>(b) the extensive discovery evidence (including any answers to undertakings and questions taken under advisement to be provided by the Defendants);</p> <p>(c) information and documents obtained from third party production orders;</p> <p>(d) the findings and reports of expert witnesses that the Plaintiffs anticipate calling at trial; and</p> <p>(e) anticipated witness testimony at trial, among other things, to support the allegations set out in the Claim.</p> <p>With respect to the allegations in the identified paragraphs of the Claim, the particulars and basis for those allegations are described in detail in the Claim.</p>	<p>The answer is unresponsive.</p> <p>Mr. Stafford and Jacob Doxtator are entitled to know the case they have to meet, including the specific documents and information the Plaintiffs intend to rely on to prove their case.</p>	
#17	R	345–352	103–105	To advise whether Mr. Kassam is aware of any information which ties Mr. Stafford, Mr. Robert Doxtator, Mr. Rudensky and Mr. Jacob Doxtator other than the facts that	<p>Without prejudice to the Plaintiffs' position that this is an improper question, the Plaintiffs note that the Claim provides a comprehensive description of the relationship(s) between Mr. Stafford, Mr. Robert Doxtator, Mr. Rudensky and Mr. Jacob Doxtator, as well as their respective conduct in connection with the defamatory</p>	<p>The answer is unresponsive.</p> <p>Mr. Stafford and Jacob Doxtator are entitled to know the case they have to meet, including the documents and information the Plaintiffs intend to rely on to prove their case.</p>	

¹ Plaintiffs' Fresh as Amended Statement of Claim, issued May 27, 2022 ("FASOC"), Exhibit B to the Affidavit of Alexander Mulligan, sworn November 30, 2023 ("Mulligan Affidavit")

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
				have been pleaded in the Claim ²	<p>statements and conspiracy, as known to the Plaintiffs at this time.</p> <p>In addition to the allegations particularized in the Claim, the Plaintiffs rely on (a) the entirety of the documentary productions in this matter (which comprises over 1000 documents); (b) the extensive discovery evidence (including any answers to undertakings provided by the defendants); (c) information and documents obtained from third party production orders; (d) the findings and reports of expert witnesses that the Plaintiffs anticipate calling at trial; (e) and anticipated witness testimony at trial, among other things, as the basis for linking Mr. Stafford, Mr. Robert Doxtator, Mr. Rudensky and Mr. Jacob Doxtator to the defamatory statements and conspiracy identified in the Claim.</p> <p>The full particulars of the defendants' relationships, and misconduct, are known only to the defendants.</p>		
#27	UA	516-519	148-149	To provide the identity of the investigators and their work product that Mr. Kassam is relying on to plead the conspiracy in this litigation.	<p>Without waiving any privilege, the Plaintiffs advise that they previously retained Artemis Risk and K2 Integrity through legal counsel. The Plaintiffs maintain privilege over all communications with the investigators and/or the investigators' work product.</p> <p>The balance of the question is refused on basis of privilege.</p>	<p>Mr. Stafford and Jacob Doxtator are entitled to know the evidence upon which the Plaintiffs intend to rely to prove their claims.</p> <p>No grounds for privilege given. Regardless, the Plaintiffs waived any privilege by producing and relying on part of their investigator's work product³</p>	

² FASOC, Exhibit B to the Mulligan Affidavit.

³ Maltego Report regarding the John Murphy Twitter Account @JohnMur670039142, generated by Artemis Risk Consulting for the plaintiffs on December 10, 2020 using the Maltego software (Production ID AAI00014600), Exhibit U to the Mulligan Affidavit.

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
#30	R	576	167	To advise of the roles played by Mr. Stafford, Mr. Rudensky, Mr. Robert Lee Doxtator, and Mr. Jacob Doxtator in the conspiracy.	The particulars of the roles played by Mr. Stafford, Mr. Rudensky, Mr. Robert Doxtator and Mr. Jacob Doxtator will be known only to the defendants and their co-conspirators. Without prejudice to the Plaintiffs' position that this is an improper question, the Plaintiffs' understanding of the role played by each defendant is described throughout the Claim	Mr. Stafford and Jacob Doxtator are entitled to know the specific conduct they have allegedly committed, including how they have allegedly participated in a conspiracy to defame and harm the personal and business relationships of the Plaintiffs. Mr. Stafford and Jacob Doxtator are entitled to know the case they have to meet in order to mount a fulsome defence at trial.	
#38	R	677-679	198-199	To go through the Defamatory Manifesto Part 1 ⁴ and identify which statements about Anson's investment positions are true and which are false	The Plaintiffs refer to the Claim, which properly pleads defamation, including by pleading the defamatory words, meaning/sense and "sting" of the Defamatory Manifesto.	Answer given is not responsive. The Plaintiffs' FASOC does not plead which words from the Defamatory Manifesto Part 1 are defamatory, despite Mr. Kassam conceding at discovery that some statements in the Defamatory Manifesto are true at [196:16–197:2]. ⁵ Mr. Stafford and Jacob Doxtator are entitled to know the case they have to meet.	
#78	UT	1065	311	To identify, in advance of trial, all of the unlawful statements that the Plaintiffs intend to pursue at trial.	Since defamatory statements continue to be published by the defendants, the Plaintiffs will provide responses to this request at an appropriate time in advance of trial.	The Plaintiffs undertook to answer this question and have not done so. Mr. Stafford and Jacob Doxtator are entitled to know all of the Impugned Statements upon which the Plaintiffs base their claims in order to mount fulsome defences at trial.	

⁴ Moez Kassam and Anson Funds: A Tale of Corruption, Greed, and Failure, published September 29, 2020, hosted on www.moezkassam.com, Production ID AAI0000082 (the "Defamatory Manifesto Part 1"), Exhibit J to the Mulligan Affidavit.

⁵ Transcript of the Discovery Examination of Moez Kassam on April 20, 2023 ("April 20 Moez Kassam Transcript"), Exhibit N to the Mulligan Affidavit

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
#145	R	1491	410	To advise when Mr. Kassam retained Artemis Consulting.	Refused on the grounds of relevance and privilege.	Relevant to Mr. Stafford's right to bring a motion addressing the Blake Cassels & Graydon LLP ("Blakes") conflict expressly acknowledged in Conway J.'s Endorsement dated May 3, 2022. ⁶ The Plaintiffs' retention of Artemis establishes when they began investigating Mr. Stafford, and therefore when his confidential information was not secure from Blakes' Anson team.	
#151	R	1497	411-412	To advise when Anson started collecting evidence against Mr. Stafford in-house.	Refused on the grounds of relevance and privilege.	Relevant. See #145. Privilege improperly asserted and no grounds for privilege given.	
#161	R	1520-1521	417-418	To advise which email addresses Mr. Kassam searched through in order to prepare his Affidavit of Documents. ⁷	Refused on the basis of privilege. The review of the Plaintiffs' documents and records, as well as any production decisions, was carried out by the Plaintiffs' counsel in this action. As such, the specific search terms and parameters used to identify and determine relevance are subject to privilege. In any event, the Defendants refused to engage with the Plaintiffs on the terms of a discovery plan, in which the Plaintiffs had proposed the search terms and parameters to be employed for document production in this action.	Relevant to the completeness of the Plaintiffs' productions. Mr. Stafford and Jacob Doxtator are entitled to explore at discovery the process undertaken to compile the Plaintiffs' affidavit of documents. Privilege improperly asserted. The email addresses reviewed for relevant documents on behalf of the named and corporate plaintiffs is not solicitor-client or litigation privileged.	
#164	UT	1560	426	To produce the email from David Cynamon	There is no such email.	The Plaintiffs' answer contradicts Mr. Kassam's discovery testimony. Mr. Kassam confirmed	

⁶ Endorsement of Justice Conway granting the Plaintiffs' Motion for Leave to Amend the FASOC, dated May 3, 2022, Exhibit A to the Mulligan Affidavit.

⁷ Plaintiffs Affidavit of Documents, sworn by the Named Plaintiffs Moez Kassam on January 25, 2023, Exhibit L to the Mulligan Affidavit.

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
				providing the Defamatory Manifesto		in his response to Question 534 that he first became aware of the Defamatory Manifesto when Mr. Cynamon sent it to him [153:7-20]. ⁸ The undertaking request was for that communication between Mr. Kassam and Mr. Cynamon, whether it is an email or not. Alternatively, the Plaintiffs must correct Mr. Kassam’s answer if he was mistaken at discovery	
<i>Questions Relevant to the Plaintiffs’ Corporate Structure and Trading Practices</i>							
#10	UA	150	51	To provide a chart setting out how the various Anson Funds are related	The various Anson Funds have the same co-investment advisers (Anson Advisors Inc. and Anson Funds Management LP). They are otherwise not “related.” The Anson Funds all generally follow a Cayman master/feeder structure, except for the Arch Anson Tactical Real Estate Fund and Arch Anson Tactical Real Estate NR Fund, which are both Ontario LPs and have a side-by-side structure.	The answer is not responsive to the undertaking requested. It does not identify what funds comprise the “Anson Funds” generally and does not include an organizational chart setting out their relationships with one another, through the investment advisers Anson Advisors Inc. and Anson Funds Management LP or otherwise.	
#36	UA	659	192	To provide a document evidencing the financial statements for Anson Advisors Inc., Anson Funds Management LP, and Anson Investments Master	Without prejudice to the Plaintiffs’ position that this request is irrelevant, now produced as AAI00014790, AAI00014798, AAI00014805, AAI00014811, AAI00014815, AAI00014819, AAI00014837, AAI00014842, and AAI00014846 are the financial statements of the requested Anson entities from 2020-2022 ⁹	Answer provided is incomplete. The Plaintiffs have only produced financial statements from 2020 to 2022. Relevant to the Impugned Statements that contain specific allegations about the Plaintiffs’ trading techniques in 2018 and	

⁸ April 20 Moez Kassam Transcript, Exhibit N to the Mulligan Affidavit.

⁹ Anson entities’ financial statements for 2020-2022, Exhibit CC to the Mulligan Affidavit.

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
				Fund LP for years 2018 to present.		2019, including Tilray and Aphria. Relevant to quantification of the Plaintiffs' damages, including loss of goodwill as explained by Mr. Kassam during his examination [188:1-25]. ¹⁰ The 2018 and 2019 financial statements show, <i>inter alia</i> , the growth of the Plaintiffs' assets under management prior to and following the first Impugned Statements' publication.	
#77	R	1063	310	To produce all of the derivatives Anson has bought for any of the companies mentioned in the Defamatory Manifestos or MarketFrauds.to articles.	Refused on the grounds of relevance and overbreadth.	Relevant to Mr. Stafford's justification defence. These companies are listed at paragraph 134 of the Plaintiffs' Claim. ¹¹ Additionally, the Second Defamatory Manifesto includes a soundbite of Mr. Kassam saying, "So I know when stuff's gonna [sic] go down and I'll buy puts [i.e., put options, a derivative instrument]." ¹² The undertaking is proportionate and not overly broad.	
#85	R	1158-1162	336-337	Has Anson ever made a trade without assurances that the	As Mr. Kassam repeatedly advised during his examination, including at Page/Line	The question is relevant to Mr. Stafford's truth defence and the answer is unresponsive.	

¹⁰ April 20 Moez Kassam Transcript, Exhibit N to the Mulligan Affidavit.

¹¹ FASOC, Exhibit B to the Mulligan Affidavit: Zoom, Facedrive, GSX Techedu, Genius Brands International, Gamestop, RECO, Valorem Resources, Starr Peak Mining, Whole Earth Brands, United Lithium, Mountain Valley MD Holdings, SOL Global, Clean Power Capital Corp, Red White & Bloom, Moderna, Medivolve, AMM Power, Value Line, Champignon Brands, Medmen, and Zenabis.

¹² Moez Kassam & Anson Funds Part II: Rotten to the Core, dated June 28, 2021, hosted on www.marketfrauds.to, Production ID AAI00010037 (the "Defamatory Manifesto Part 2"), Exhibit K to the Mulligan Affidavit.

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
				short position could be covered.	<p>Reference [56:21]- [57:14],¹³ Anson is subject to the SEC and OSC rules applicable to short-selling, and to his knowledge has always complied with those rules.</p> <p>Anson otherwise relies on the prime brokerages with whom it engages, and on whom the responsibility ultimately lies for ensuring sufficient “borrow” to cover any short positions, in accordance with applicable rules. This is common, accepted industry practice.</p> <p>In any event, this question is largely speculative and unintelligible.</p>	Whether the Plaintiffs rely on their prime brokers is does not address the issue of whether the Plaintiffs have ever taken a short position without assurance they could cover it. As the Impugned Statements state the Plaintiffs took naked short positions in Tilray, Facedrive and Recon Africa, the question is relevant to their truth and is not speculative.	
<i>Questions Relevant to the Plaintiffs’ Dealings with Regulators, including the OSC and SEC</i>							
#39	UA	692-697	203-204	If Mr. Kassam or any of the Anson entities are under investigation by the SEC, to provide the particulars of what the allegations are.	<p>Since Anson operates in a regulated industry, it has, from time-to-time, received inquiries from regulatory authorities including the SEC.</p> <p>To the extent Anson is aware of the particulars of any allegations that might underlie any regulatory inquiries, any known allegations are irrelevant to the allegations raised in this action.</p>	<p>Relevant to Mr. Stafford’s justification defence and to the Plaintiffs’ damages. The Impugned Statements state that the SEC is investigating the Plaintiffs, including for trading on material non-public information. Any basis for the SEC’s investigations into the Plaintiffs are therefore relevant to the truth of the Impugned Statements.</p> <p>The bases of any SEC investigations into the Plaintiffs are relevant to the Plaintiffs’ reputations and therefore to the effect the Impugned Statements may have had on their reputation.</p>	

¹³ April 20 Moez Kassam Transcript, Exhibit N to the Mulligan Affidavit

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
#40	R	698-702	204-205	To advise, if Mr. Kassam or any of the Anson entities were under investigation by the SEC, would they be communicating that fact to their investors.	Without prejudice to the Plaintiffs' position that this is an improper question, see answer to Item #39, above. The remainder of the request is refused on the basis it is speculative and the premise of the question has not been established.	The question is not speculative ¹⁴ and is relevant to the Plaintiffs' alleged damages Whether the Plaintiffs' investors are aware of the bases for any SEC investigations is relevant to Plaintiffs' reputation and thus the effect the Impugned Statements may have had on that reputation.	
#41	R	708	208	To advise whether Mr. Kassam or any of the Anson entities had occasion to notify Anson's limited partners that Mr. Kassam and/or the Anson entities were under investigation by the SEC.	Without prejudice to the Plaintiffs' position that this is an improper question, see answer to Item #39, above. The remainder of the request is refused on the basis it is speculative and the premise of the question has not been established.	This question is not speculative (see #40 above) ¹⁵ and relevant to the Plaintiffs' damages. Whether the Plaintiffs' limited partners are aware of the bases for any SEC investigations into the Plaintiffs is relevant to Plaintiffs' reputation and therefore to the effect the Impugned Statements may have had on that reputation.	
#42	R	710	208-209	To advise if Mr. Kassam has received any notice of investigation from the SEC from 2018 to the current date.	See answer to Item #39, above.	This question is not speculative (see #40 and #41 above) ¹⁶ relevant to the Plaintiffs' damages and Mr. Stafford's justification defence. Whether the Plaintiffs have received an SEC notice of investigation is relevant to the Plaintiffs' reputation and therefore to the effect the	

¹⁴ See United States ("US") Securities and Exchange Commission ("SEC") Administrative Proceeding File No. #3-21782, Release No. 98755, *In a Matter of Anson Advisors Inc.*, dated October 19, 2023 and US SEC Administrative Proceeding News Release "SEC Charges Canadian Investment Adviser with Violating Trade Rule – Administrative Proceeding – File No. 3-21783", dated October 19, 2023, Exhibits DD and EE to the Mulligan Affidavit.

¹⁵ *Ibid.*

¹⁶ *Ibid.*

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
						<p>Impugned Statements may have had on that reputation.</p> <p>The Impugned Statements state the SEC is investigating the Plaintiffs, and any notices of investigation the Plaintiffs have received are relevant to the truth of that statement.</p>	
Questions Relevant to the Plaintiffs' Collaboration with Short Reporters and Journalists							
#66	UA	953	275– 276	To produce the Plaintiffs' emails with Mr. Anderson that are listed on the Plaintiffs' Supplemental Schedule B1. ¹⁷	<p>For clarity, the Plaintiffs do not accept that any/all documents listed on Schedule B1 are relevant to any issue in the action. See answer to Item #65, above.</p> <p>However, as set out in the answer to Item #68 below, the Plaintiffs have now produced all relevant communications between Mr. Kassam and/or Anson and Mr. Anderson, including any such emails that were listed on the Plaintiffs' Supplemental Schedule B1.</p>	<p>The question is relevant to the truth of the Impugned Statements and Mr. Stafford's truth defence. The answer is incomplete.</p> <p>The Plaintiffs' Schedule B1 shows that in March 2018, the Plaintiffs exchanged emails with Mr. Anderson about Aphria,¹⁸ a company at issue in the Impugned Statements, which the Plaintiffs have not produced. As the Impugned Statements claim the Plaintiffs have regularly and secretly colluded and coordinated with activist short sellers like Mr. Anderson to publish negative stories about companies, they are shorting (like Aphria), these emails are relevant to the truth of the statements.</p> <p>No privilege attaches to these emails: they were sent in 2018, before any of the Impugned</p>	

¹⁷ Supplementary Affidavit of Documents of Moez Kassam, sworn April 4, 2023, Exhibit M to the Mulligan Affidavit.

¹⁸ *Ibid*; see e.g., BLK0000142, BLK00001525, BLK00001526, BLK00001529, BLK00001532, BLK00001533

No.	UT/UA/R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
						Statements were even allegedly published.	
#101	R	1325	373	If not privileged, to produce the original emails mentioned above (Q. 1324 regarding communications between Sunny Puri, Joshua Fineman, Michael Roussel and Nate Anderson regarding Facedrive), including attachments, in their entirety ¹⁹	See answers to Items #65, 66 and 68, above. The balance of the question is refused on the grounds of relevance, proportionality, and overbreadth.	<p>Relevant to Mr. Stafford's truth defence. The Impugned Statements claim the Plaintiffs were involved in writing the Hindenburg Research Facedrive report published July 23, 2020. The Plaintiffs have produced at Item #68 all the requested communications except five, which show the Plaintiffs' collaborated with Mr. Anderson to write the Hindenburg Facedrive report.</p> <p>As the Plaintiffs have produced all but five of the requested communications,²⁰ this request is neither overbroad nor disproportionate. These communications are not litigation or solicitor-client privileged.</p>	
#113	R	1371	384-385	To produce all of the communications that Mr. Kassam or anyone at Anson had with any journalists about Facedrive, ReconAfrica, Aphria, Zenabis, Harvest Health and HEXO.	<p>As Mr. Kassam advised during his examination, he has regular discussions with business journalists regarding a wide variety of matters.</p> <p>The balance of the question, as posed, is refused on the grounds of relevance, proportionality, and overbreadth.</p>	<p>The question is relevant to Mr. Stafford's justification defence and the answer is unresponsive.</p> <p>The Impugned Statements state that Mr. Kassam discussed Recon Africa, Facedrive, and Aphria with journalists as part of a market manipulation strategy. The Plaintiffs have confirmed at Items 118–120 that they discussed these</p>	

¹⁹ *Ibid*; see e.g., BLK00000217 to BLK00000227, BLK00000505 to BLK00000522, BLK00000942 to BLK00000953

²⁰ *Ibid*: BLK00000943 (and attachments BLK00000944 and BLK00000945); BLK00000505 (and attachment BLK00000506); BLK00000507 (and attachment BLK00000508); BLK00000509; and BLK00000226 (and attachment BLK00000227).

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
						companies with journalists. The Plaintiffs' Schedule B-1 also confirms that they sent emails about Facedrive to Bloomberg News journalist Joshua Fineman. ²¹ Production of those communications is relevant to the truth of the Impugned Statements. The request is confined to specific companies and thus is not disproportionate or overbroad.	
#163	UA	1556-1559	424-425	To produce all of the relevant communications between Mr. Kassam or anyone at Anson and Adam Spears, Nate Anderson, Andrew Left and Ben Axler about the Defamatory Manifesto.	The Plaintiffs have conducted a diligent review of their records. Based on that review, there are no other relevant, non-privileged communications.	The answer is incomplete. The Plaintiffs' affidavit of documents shows relevant, non-privileged communications exist. For instance, the Plaintiffs' Schedule B shows that Mr. Kassam received a ZIP Archive and Text File from Nate Anderson titled "Chat" on September 30, 2020, after the Defamatory Manifesto was allegedly published, ²² but a month before the Plaintiffs retained counsel in this action on October 27, 2020. ²³ As the Plaintiffs listed these communications in their Schedule B, the Plaintiffs have necessarily determined that those files are relevant to this lawsuit. It follows that any communications where	

²¹ *Ibid*, BLK00000226, BLK00000227, BLK00000507, BLK00000508, BLK00000519, BLK00000520

²² Plaintiffs' AOD, Exhibit L to the Mulligan Affidavit, AAI00010132, AAI00010133, AAI00010134

²³ The Plaintiffs' answer Item #141, answer to questions 1486-1487 (p. 409): "Without waiving privilege, the Plaintiffs formally retained the Blakes law firm in this action on October 27, 2020". Exhibit P to the Mulligan Affidavit.

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
						Mr. Anderson sent those files to Mr. Kassam are also relevant. No privilege attaches to the ZIP Archive, the Text File, or any covering communications between Nate Anderson and Mr. Kassam. The dominant purpose of those documents was not for use in or advice on the litigation.	
<i>Questions Relevant to the Core Allegations in the Alleged Unlawful Statements, including both Defamatory Manifesto Parts 1 and 2, the impugned Stockhouse Posts, @BettingBruiser tweets, and John Murphy Tweets</i>							
#83	R	1143	332-332	To disclose Anson's positions in Aphria, Zenabis, ReconAfrica, HEXO and Facedrive during the period from 2018 to present.	<p>Now produced as AAI00026707²⁴ is Anson's relevant trading records for Aphria (see answer to Item #63, above).</p> <p>Now produced as AAI00026712²⁵ is Anson's relevant trading records for Zenabis (see answer to Item #34, above).</p> <p>Now produced as AAI00026711²⁶ is Anson's trading records for Recon Africa, for the relevant period surrounding the June 24, 2021 Viceroy Research report.</p> <p>Now produced as AAI00026710²⁷ is Anson's trading records for HEXO, for the relevant period surrounding the July 29, 2019 Friendly Bear report.</p> <p>Now produced as AAI00026708²⁸ is Anson's trading records for Facedrive, for</p>	<p>The answer is unresponsive. The produced documents are not official trading records and therefore do not accurately or completely represent the Plaintiffs' positions in the requested companies. The Plaintiffs arbitrarily imposed timeframes on this request without justification or explanation.</p> <p>The question is relevant to Mr. Stafford's justification defence. Zenabis is one of the core companies discussed in the Impugned Statements, in particular the Stockhouse posts and Defamatory Manifestoes.²⁹</p>	

²⁴ Anson Funds' Trading Data for Aphria Inc surrounding December 3, 2018, Exhibit X to the Mulligan Affidavit.

²⁵ Anson Funds' Trading Records for Zenabis Global Inc until April 23, 2020, Exhibit W to the Mulligan Affidavit.

²⁶ Anson Funds' Trading Records for Recon Africa surrounding June 24 2021, Exhibit Y to the Mulligan Affidavit.

²⁷ Anson Funds' Trading Records for HEXO surrounding July 29, 2019, Exhibit Z to the Mulligan Affidavit.

²⁸ Anson Funds' Trading Records for Facedrive surrounding July 23, 2020, Exhibit AA to the Mulligan Affidavit.

²⁹ Exhibits H, I, J and K of the Mulligan Affidavit.

No.	UT/UA/R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
					<p>the relevant period surrounding the July 23, 2020 Hindenburg report.</p> <p>The balance of the question is refused on the grounds of relevance & overbreadth.</p>	<p>The requested records would show when the Plaintiffs took positions in the requested companies, the financial instruments through which they took those positions, and the brokerages and sources of those instruments.</p>	
#97	R	1301-1310	368-369	<p>To provide the terms of the participation and the subsequent short positions for all of the tickers (HEXO Corp., Tilray, Zenabis, Aphria, Harvest Health) where Anson participated in a private placement.</p>	<p>Without prejudice to the Plaintiffs' position that the question is irrelevant and overbroad, the Plaintiffs can advise as follows:</p> <ul style="list-style-type: none"> • Anson did not participate in a private placement in connection with HEXO Corp. • Anson did not participate in a private placement in connection with Tilray. • Anson participated in an October 2018 debenture offering in connection with Zenabis. • Anson participated in a June 2018 and April 2019 private placement in connection with Aphria. <p>With respect to any applicable trading records, see the answer to Item #83, above.</p> <p>The balance of the question is refused as irrelevant and overbroad.</p>	<p>The question is relevant to Mr. Stafford's truth defence and the answer is unresponsive.</p> <p>The Impugned Statements allege that Mr. Kassam's participation in each of these private placements was contingent on certain conditions, which conditions are not supplied in the answer.</p> <p>Producing the terms of Anson's participation in the Zenabis and Aphria private placements is not overbroad as, according to the Plaintiffs' answer, they only would apply to a total of three transactions regarding two specifically named companies.</p>	
#111	R	1369	383-384	<p>To provide, for each of the Anson accounts, the holding, trading, profit and loss records for the dealings with Facedrive, ReconAfrica, Aphria,</p>	<p>See answer to Item #83, above.</p>	<p>The question is relevant to Mr. Stafford's justification defence and the answer is not responsive to the question. This information is relevant to the truth of the Impugned Statements, which claim that the Plaintiffs have</p>	

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
				Zenabis, Harvest Health and HEXO.		traded in these companies across a network of affiliated funds. The records the Plaintiffs produced at Item #83 do not identify which Anson account held which securities in the requested companies ³⁰	
#114	R	1372	385	To produce any of the communications that Mr. Kassam and/or people from Anson had with anyone in management or directors for Facedrive, ReconAfrica, Aphria, Zenabis, Harvest Health and HEXO.	Refused on the grounds of relevance, proportionality, and overbreadth.	Relevant to Mr. Stafford's justification defence. The Impugned Statements state that the Plaintiffs developed relationships with Zenabis and Aphria management and used these relationships to manipulate the stocks and profit off their short positions.	
Questions Relevant to the Core Allegations in Defamatory Manifesto Part 1							
#34	UA	627-631	183-184	To produce Anson's trading records with respect to trades in Zenabis.	Now produced as AAI00026712 ³¹ is Anson's trading records for Zenabis until April 23, 2020.	See #83 above.	
#81	R	1087	315-316	To produce all of Anson's records relating to trades in Zenabis shares.	See answer to Item #34, above.	See #83 above.	
#90	R	1245-1246	355-356	To produce any correspondence Mr. Kassam received from TD from 2018 to	Refused on the grounds of relevance, proportionality, and overbreadth.	Relevant to Mr. Stafford's justification defence. The Impugned Statements specifically state that on July 24,	

³⁰ Anson's Trading Records for Zenabis, Aphria, Recon Africa, HEXO and Facedrive, Exhibits W, X, Y, Z, and AA of the Mulligan Affidavit.

³¹ Anson's Trading Records for Zenabis, Exhibit W to the Mulligan Affidavit.

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
				April 21, 2023.		2020, TD put up a sell order for 75,400 shares of Facedrive for \$14.16 on TSX Venture and then pulled the order two minutes before markets opened as a favour to the Plaintiffs. Correspondence between TD and the Plaintiffs on this date are relevant to the truth of this statement.	
#99	UA	1318	371-372	To provide all of the records of all positions taken on Facedrive across all of the Anson Funds, including records of where Anson obtained the borrow to cover its short position.	Now produced as AAI00026708 ³² is Anson's relevant trading records for Facedrive (see answer to Item #83, above). As it relates to the "borrow", see answer to Item #88, above. The balance of the question is refused as irrelevant and overbroad.	See #83 above.	
#104	UA	1330	374	To produce all of the trading records for all of the Anson- related entities on Facedrive.	See answer to Item #99, above.	See #83 above.	
#139	UA	1479-1480	407-408	To produce documents indicating Anson's position on Genius Brands from April 2020 to December 2020.	Now produced as AAI00026709 ³³ are Anson's positions in Genius Brands, on a net aggregate basis, during the relevant period.	The question is relevant to Mr. Stafford's truth defence and the answer is unresponsive. The document produced only indicates that the Plaintiffs had a long "net aggregate position" on Genius Brands between April and December of 2020. It does not indicate whether Anson hedged this long position with any short positions during that time and	

³² Anson's Facedrive Trading Records, Exhibit AA to the Mulligan Affidavit.

³³ Anson's Genius Brand Trading Records, Exhibit BB to the Mulligan Affidavit.

No.	UT/UA/R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
						therefore is incomplete and unresponsive. The Impugned Statements and the FASOC allege that the Plaintiffs “took ‘significant short positions’ [in Genius] immediately prior to the release of a negative report that they commissioned Nate Anderson of Hindenburg Research to write”. ³⁴	
Questions Relevant to the Core Allegations in Defamatory Manifesto Part 2							
#62	UA	941-942	273-274	To advise of Anson’s short positions as at the time of publication of the Hindenburg Aphria Report. (referring to AAI00014703)	Anson had a net long equity position in Aphria at the time of the Hindenburg Aphria report published on December 3, 2018.	The question is relevant to Mr. Stafford’s truth defence and the answer is evasive and unresponsive. The answer only advises of the Plaintiffs’ <u>net</u> position at the time the report in question was published, not whether Anson was <u>delta short</u> during that time (see Mr. Kassam’s answer to Question 630 at [183:13–18]). ³⁵ The question is relevant to the truth of the claim in the Impugned Statements that the Plaintiffs shorted Aphria in advance of the Hindenburg report’s publication.	
#63	UA	945	274	To produce all records relating to Anson’s positions, holdings, profits and/or losses in	Now produced as AAI00026707 ³⁶ is Anson’s trading data for Aphria, for the relevant period surrounding the December 3, 2018 Hindenburg report.	See #83 above.	

³⁴ FASOC, Appendix E at para 61, Exhibit B to the Mulligan Affidavit.

³⁵ Transcript of Discovery Examination of Moez Kassam on April 21, 2023, Exhibit O to the Mulligan Affidavit.

³⁶ Anson’s Aphria Trading Records, Exhibit X to the Mulligan Affidavit.

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
				respect of Aphria for the years 2018 & 2019.			
#71	UA	989	285	To produce all communications between Mr. Kassam and/or Anson and any member of Aphria's management.	Refused on the grounds of relevance and overbreadth.	Relevant to Mr. Stafford's truth defence. The Impugned Statements state that Mr. Kassam obtained sensitive inside information from his friendly relationship with Aphria management.	
#93	UA	1257–1260	358–359	To check and advise whether Anson got RECO shares through a bought-deal financing.	Anson participated in an August 2020 public offering for RECO.	The question is relevant to Mr. Stafford's truth defence and the answer is not responsive to the question. The Plaintiffs' answer state that they participated in a <u>public offering</u> , and does not address whether the Plaintiffs participated in any <u>bought-deal financing</u> . As the Impugned Statements claim that the Plaintiffs acquired shares in Recon Africa through a bought-deal financing, this question is relevant to the truth of that statement.	
#94	UA	1268-1271	360	To advise where Anson got their borrow for Recon Africa.	See answer to Item #88, above ³⁷	The question is relevant to Mr. Stafford's truth defence and the answer is not responsive to the question. The records the Plaintiffs produced for Recon Africa do not indicate the various banks and accounts that they and/or their	

³⁷ Anson's Recon Africa Trading Records, Exhibit Y to the Mulligan Affidavit.

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
						brokers used for their Recon Africa holdings. As the Impugned Statements specifically claim that the Plaintiffs held a large short position in Recon Africa, received shares through Recon Africa's bought deal financing on May 5, 2021 and spread these shares amongst various banks to increase their permitted borrow on the stock, these account records are relevant to the truth of these statements.	
#107	R	1346-1349	378-379	To advise who lent Anson the funds in order to acquire the short position on ReconAfrica.	See answer to Item #94, above. ³⁸	See Item #94	
#109	UA	1363-1366	382-393	To advise what was the size of Anson's position on ReconAfrica before the release of the Viceroy report	Now produced as AAI00026711 is Anson's relevant trading records for ReconAfrica (see answer to Item #83, above)	See Item #83.	
#110	UA	1368	383	To produce records of all of the deposits and withdrawals of ReconAfrica securities for each of the Anson accounts.	See answer to Item #109, above. The balance of the question is refused on the grounds of relevance, proportionality, and overbreadth.	See Item #94.	

³⁸ *Ibid.*

No.	UT/ UA /R	Question	Page	Specific Question	Answer or Basis for Refusal	Reason answer required	Disposition by the Court
Questions Not Included in the Plaintiffs' Chart							
NR ³⁹ #1	N/ A	694–695	203– 204	To advise whether any of the Anson entities is under investigation by the Securities and Exchange Commission [the “SEC”].	You know, given the size and scope of the fund and what we do, you know, there are -- you know, we are always -- you know, we're big player here and in the North American market, and as such, we get inquiries from time-to-time about from whole multitude of investigators and people and the like. It's just a matter of, you know, in terms of we get inquiries from time-to-time [sic].	<p>The question is relevant to the Plaintiffs' damages and Mr. Stafford's truth defence. The answer given is incomplete and unresponsive.</p> <p>The SEC announced on October 19, 2023, that it had reached a settlement with the Plaintiffs following an investigation into their improper trading.⁴⁰</p> <p>Any SEC investigations into the Plaintiffs are relevant to the Plaintiffs' reputations and therefore to the effect the Impugned Statements may have had on that reputation. They are also relevant to Mr. Stafford's justification defence, as the Impugned Statements state the SEC has investigated the Plaintiffs for improper trading.</p>	

³⁹ *i.e.*, Non-Responsive

⁴⁰ Exhibits DD and EE to the Mulligan Affidavit.

TAB 2R

This is **Exhibit “R”** to the Affidavit of **Alexander Mulligan**,
sworn before me this **30th** day of **November, 2023**.

A handwritten signature in blue ink, appearing to read "Paul Kelly", written over a horizontal line.

A Commissioner for Taking Affidavits

LSO# 84488D

Court File No. CV-20-00653410-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

B E T W E E N:

ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP, ANSON
INVESTMENTS MASTER FUND LP and MOEZ KASSAM

Plaintiffs

and

ROBERT LEE DOXTATOR, JACOB DOXTATOR, JOHN DOE 1, JOHN
DOE 2, JOHN DOE 3, JOHN DOE 4 and PERSONS UNKNOWN

Defendants

A N D B E T W E E N:

ROBERT LEE DOXTATOR

Plaintiff by Counterclaim

and

ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP, ANSON
INVESTMENTS MASTER FUND LP, MOEZ KASSAM and ALLEN
SPEKTOR

Defendants to the Counterclaim

**AFFIDAVIT OF SUNNY PURI
(SWORN JANUARY 5, 2022)**

I, Sunny Puri, of the City of Toronto, in the Province of Ontario, MAKE OATH AND
SAY:

1. I am a Portfolio Manager at the Plaintiff, Anson Advisors Inc. ("**AAI**"). I have worked at AAI since April 2013 and am involved in all aspects of its business. As such, I have personal knowledge of the matters contained in this Affidavit, except where I state such

knowledge to be based on information and belief, in which cases I have identified the source(s) of my information and believe the information to be true.

2. I am swearing this Affidavit in support of the motion by the Plaintiffs for leave to amend the Statement of Claim (the “**Claim**”) and other ancillary relief.

3. When I use the words “**we**” or “**us**” in this Affidavit, I am referring to the Plaintiffs (or at least more than one of us).

A. Background to the Claim and the Amended Claim

4. The Plaintiffs/Moving Parties are AAI, Anson Funds Management LP (“**AFM**”), Anson Investments Master Fund LP (“**AIMF**”, and collectively with AAI and AFM, “**Anson**”), and Moez Kassam (“**Kassam**”), the Chief Executive Officer of AAI and one of Anson’s founders.

5. The Plaintiffs began this action by way of Statement of Claim issued December 18, 2020 (the “**Claim**”). A copy of the Claim is attached as **Exhibit A**.

6. As set out therein, the Claim described how the Plaintiffs (Anson and Kassam) are the targets of a sophisticated and coordinated conspiracy to damage our business and reputations (the “**Conspiracy**”). Among other things, the Claim alleged that the named Defendants, Robert Doxtator (“**Robert**”) and Jacob Doxtator (“**Jacob**”, and together with Robert, the “**Doxtators**”), together with other individuals whose identities were unknown to the Plaintiffs at the time, conspired to publish and broadly disseminate a number of false and defamatory statements about the Plaintiffs (the “**Unlawful Statements**”). The Unlawful Statements have caused considerable harm to our business and reputations.

7. As further described in the Claim, the Plaintiffs claimed damages against the Defendants of \$100 million, plus aggravated and punitive damages. The Plaintiffs pleaded causes of action of conspiracy, false light, intentional interference with economic relations, appropriation of personality, and defamation.

8. The Claim expressly pleaded that the unknown Defendants were individuals whose identities were not known to the Plaintiffs, and that the Plaintiffs would seek to amend the Claim to substitute the actual names of the unknown Defendants when they were discovered and to incorporate additional material facts or information regarding the Conspiracy that subsequently came to light.

9. As indicated on the backpage of the Claim, at the time the Claim was issued in December 2020, the Plaintiffs were represented by Michael Barrack, Iris Fischer, Christopher DiMatteo, and Kaley Pulfer of the Blake, Cassels & Graydon LLP law firm ("**Blakes**").

10. The Plaintiffs are now represented by Matthew Milne-Smith, Andrew Carlson, and Maura O'Sullivan of the Davies Ward Phillips & Vineberg LLP law firm ("**Davies**").

11. The Plaintiffs now seek leave to file the Fresh as Amended Statement of Claim (the "**Amended Claim**") attached as Schedule A to our Notice of Motion dated November 23, 2021. Among other things, the Amended Claim seeks to:

- (a) plead significant new material facts regarding the nature and scope of the Conspiracy to disseminate Unlawful Statements about the Plaintiffs, including material facts regarding the involvement of James Stafford

(“**Stafford**”) and Andrew Rudensky (“**Rudensky**”), and additional Unlawful Statements published since the Claim was initially issued;

- (b) add Stafford and Rudensky as Defendants to this action; and
- (c) add the cause of action of internet harassment, which was recognized by this Court after the Claim was issued.

12. I understand that the only Responding Party opposing the proposed amendments and the filing of the Amended Claim is Stafford. It is not clear to me on what basis Stafford is opposing the amendments. As set out below, while Stafford is (or was) also represented by Blakes (the Plaintiffs’ former counsel) in another proceeding that does not involve the Plaintiffs, the Plaintiffs have retained new counsel at Davies, and so any alleged conflict that the Blakes firm may have had has been resolved and/or rendered moot. As set out below, I am not aware of any non-compensable prejudice to Stafford resulting from the proposed amendments.

B. Procedural History

13. This proceeding remains at an early stage. The only major (and largely procedural) steps that had been taken in this proceeding prior to this motion are the following:

- (a) The Claim was issued on December 18, 2020;
- (b) On January 20, 2021, the Plaintiffs initiated a motion for validated and/or substituted service on Robert (the “**Service Motion**”), because he had been evading service;

- (c) On January 21, 2021, Jacob delivered a Statement of Defence;
- (d) On February 23, 2021, this Court made an Order granting the Plaintiffs' Service Motion, validating service of the Claim on Robert, and permitting him to be served with further materials by email;
- (e) On March 12, 2021, Robert delivered a Notice of Intent to Defend;
- (f) On March 26, 2021, Robert delivered a Statement of Defence and Counterclaim;
- (g) The Plaintiffs delivered a Reply and Defence to Robert Doxtator's Counterclaim on or around April 9, 2021;
- (h) Robert delivered an Amended Statement of Defence and Counterclaim on or around April 13, 2021 (which was formally amended by the Court on April 21, 2021);
- (i) The Plaintiffs delivered an Amended Reply and Defence to Robert's Amended Statement of Defence and Counterclaim on or around April 19, 2021;
- (j) Robert delivered a Reply to our Amended Reply and Defence to his Counterclaim on April 28, 2021; and
- (k) In June 2021, and as set out in more detail below, the Plaintiffs brought an unopposed motion for disclosure from a non-party, Stockhouse Publishing

Ltd. (“**Stockhouse**”) – the owner of the Stockhouse website referred to in the Claim – and that Order was granted by Justice McEwen on June 11, 2021.

14. To my knowledge, the other Defendant to Robert’s Counterclaim, Allen Spektor, has not been served with Robert’s Counterclaim and has therefore not delivered a Statement of Defence to that Counterclaim, and therefore pleadings in the Counterclaim are not closed.

15. In summary, these proceedings are at a nascent stage. They have not yet moved past the pleadings stage, no discovery plan has been agreed to or set, and no documentary or oral discovery has occurred.

C. The Plaintiffs’ Investigations and Discovery of the New Material Facts Pleaded in the Amended Claim

16. Both before and after the initial Claim was issued in December 2020, the Plaintiffs investigated the facts underlying the Conspiracy in two ways, which can be summarized as follows:

- (a) We investigated the facts ourselves, including by conducting research of public sources of information (including but not limited to the internet), speaking to market participants, speaking to experts on website creation, and by retaining an independent consultant to assist us in conducting further investigations; and

- (b) We sought and obtained a disclosure order, also known as a “Norwich Order”, against Stockhouse for disclosure of documents and information concerning a number of the allegedly false and defamatory Unlawful Statements posted on its website.

17. Blakes was only materially involved in the latter of these two avenues of investigation. Even then, while the Blakes firm was involved in the procedural process of *obtaining* the Norwich Order from the Court, it was the Plaintiffs who reviewed and analyzed the materials produced as a result of that Order. Blakes also did not direct, advise or control the independent investigations of the Plaintiffs and our independent consultant, though they were advised from time to time of the results of these investigations. Through these investigations, the Plaintiffs learned the facts and information relating to the Conspiracy, including the new material facts sought to be pleaded in the Amended Claim.

(i) The Plaintiffs Uncovered New Material Facts Through Their Own Efforts and the Efforts of Their Independent Consulting Firm

18. As touched on above, both before and continuing after the initial Claim was issued, the Plaintiffs investigated the facts underlying the Conspiracy ourselves, including by retaining an independent consultant to assist us in conducting further investigations.

19. Specifically, the Plaintiffs retained Artemis Risk Consulting (“**ARC**”), an integrated intelligence and risk management consultancy, to assist the Plaintiffs in investigating the Conspiracy, including to investigate and if possible determine who the creators were of a

number of the Unlawful Posts (in conjunction with and to complement our own efforts in that regard).

20. The Plaintiffs' retainer of ARC, and all of the Plaintiffs' and our counsels' communications with ARC, were for the sole purpose of assisting us and our counsel in preparing for and prosecuting this litigation.

21. Without intending to waive any solicitor-client privilege, litigation privilege, or any other privilege applicable to the Plaintiffs' retainer of and communications with ARC (including any communications between or involving the Plaintiffs' counsel and ARC), ARC discovered a number of underlying material facts, information and documents concerning the matters at issue in this proceeding, which underlying facts and information I understand are not privileged (and which the Plaintiffs will ultimately be required to disclose during the discovery phase of this proceeding).

22. To provide one example of a fact uncovered by ARC, it was through ARC that the Plaintiffs were able to retrieve from a Sarajevo-based web developer the Excel spreadsheet titled "Journalists.xlsx" (the "**Stafford Excel**") referred to in paragraphs 28(l), 68, 85 of the Amended Claim, listing 2,854 names of journalists, news editors and others in the business community to whom the Defamatory Manifesto (as referred to in the Amended Claim) was to be sent. The metadata of the Stafford Excel indicates that the proposed Defendant James Stafford was its author.

23. Given that paper copies of Excel files are not particularly useful, I have not attached the Stafford Excel to this Affidavit. However, the Plaintiffs undertake to produce the Native version of this file to the Court and to the Responding Parties on request.

(ii) *The Plaintiffs Uncovered New Material Facts from the Disclosure Provided by the Stockhouse Website Pursuant to a Norwich Order*

24. As touched on above, earlier this year we brought a motion for a Norwich Order against Stockhouse. Stockhouse operates a message board website popular in the investment community. It advertises itself as having “over 1 million unique visitors a month” and as a “global hub for investors”. Members of Stockhouse may publish content on the Stockhouse website and indeed, much of Stockhouse’s content is “user-generated”. A copy of the “About” page on Stockhouse’s website is attached as **Exhibit B**.

25. In support of our motion for a Norwich Order, the Plaintiffs filed a 296-page Motion Record, which included an Affidavit affirmed by me on May 27, 2021, as well as a Factum, Book of Authorities, and a supplemental Affidavit affirmed by me on June 8, 2021. Those materials are available from the public court file in this proceeding and may be made available to the Court on this motion if helpful.

26. However, in summary of the evidence I provided in my Affidavit of May 27, 2021:

- (a) Since the Summer of 2020 and continuing well into 2021, individuals whose identities were unknown to the Plaintiffs (the “**Abusive Stockhouse Posters**”) had repeatedly used Stockhouse to publish false and defamatory statements about the Plaintiffs on an anonymous basis (the “**Abusive**

Stockhouse Posts”), including through the use of “burner” Stockhouse member accounts that have public-facing aliases that do not reflect the true identities of the persons controlling those accounts. By the time we brought our motion, over one thousand Abusive Posts had been published on Stockhouse, and we had identified 109 unique Stockhouse member accounts that had published more than one of those Abusive Posts;

- (b) The Plaintiffs (through our counsel) reached out to Stockhouse about the Abusive Posts, and requested that Stockhouse remove the Abusive Posts and disclose all information in its possession about the Abusive Posters’ identities;
- (c) Over the course of March and April 2021, Stockhouse: (i) advised that it would comply with a Norwich Order if one was obtained; (ii) confirmed that it would not oppose the Plaintiffs’ motion for a Norwich Order; and (iii) voluntarily removed all of the Abusive Posts that the Plaintiffs had brought to its attention, on the grounds that the Abusive Posts violated the terms and conditions of its website (which prohibit the posting of user content that is false, misleading, unlawful, defamatory, libelous, and harassing, among other things).

27. Ultimately, the Plaintiffs’ motion for a Norwich Order was not opposed by either Stockhouse or the named Defendants (the Doxtators), and Justice McEwen granted that motion on June 11, 2021. A copy of Justice McEwen’s handwritten Endorsement,

together with a transcribed copy of that Endorsement, is attached as **Exhibit C**. A copy of the Norwich Order is attached as **Exhibit D**.

28. As set out in the Norwich Order, Stockhouse was required to disclose to the Plaintiffs the following information regarding 109 Stockhouse member accounts listed in Schedule "A" to the Order:

- (a) The name(s) of the person(s) who registered each member account, if such name(s) were provided to Stockhouse;
- (b) All identifying and contact information provided to Stockhouse by such person(s), including email addresses and/or telephone numbers;
- (c) If the Stockhouse member account is a paid account, the third party financial services provider that has payment information related to the member account;
- (d) All Internet Protocol ("IP") addresses associated with the member account and any IP history/user logs associated with the account; and
- (e) Any other documents in Stockhouse's possession, power or control or information in Stockhouse's knowledge that could identify the person(s) who created and/or accessed and/or is/are otherwise associated with each member account.

collectively, the "**Stockhouse Materials**"

29. Ultimately, on or around June 29, 2021, Stockhouse produced four Excel files which collectively contained extensive information regarding the 109 Stockhouse member accounts referenced in the Norwich Order. Given that paper copies of the Excel files are not particularly useful (one of the Excel files has over 103,000 rows of information), I have not attached them to this Affidavit. However, the Plaintiffs undertake to produce the Native versions of these files to the Court and to the Responding Parties on request.

30. To provide one example of a (crucial) material fact that the Plaintiffs discovered from the Stockhouse Materials, it was from the Stockhouse Materials that the Plaintiffs learned that a Stockhouse account associated the username “ToffRaffles” was registered to the email address james@floatingmix.com. The Plaintiffs determined through public sources (including the GoDaddy Whois app) that this email address is registered to Advanced Media Solutions, the parent company of Stafford’s website OilPrice.com. As referred to in paragraphs 16, 61, 106, 143(e) of the Amended Claim and in paragraph 93 of Appendix “D” to the Amended Claim, between November 2020 and March 2021, “ToffRaffles” (*i.e.*, Stafford) published a series of further Unlawful Statements on Stockhouse. This subset of the Unlawful Statements is defined in the Amended Claim as the “**Stafford Unlawful Stockhouse Statements**”.

(iii) The Plaintiffs Used the Above-Noted Information to Draft the Amended Claim, including the Allegations Regarding Stafford

31. The Plaintiffs and our former counsel at Blakes used the new facts, information and documents that the Plaintiffs had uncovered through the above-noted investigative efforts to draft the Amended Claim.

32. To be crystal clear:

- (a) All of the claims and allegations made in the Amended Claim, including those concerning Stafford, were drafted based on the investigations undertaken by and information discovered from the sources set out above; and
- (b) None of the information upon which those claims and allegations are based on was disclosed, provided, or conveyed to the Plaintiffs, or otherwise sourced by, our prior counsel at the Blakes firm.

D. Blakes Advises the Plaintiffs of a Potential Conflict and Establishes a Firewall to Address that Concern

33. As touched on above, on or around June 29, 2021, Stockhouse produced the Stockhouse Materials pursuant to the Norwich Order made by Justice McEwen.

34. It was not until after the Plaintiffs had received and reviewed those materials that the Plaintiffs determined to sue Stafford over his involvement in the Conspiracy (as alleged in the Amended Claim).

35. At that time, we had no knowledge that other lawyers at Blakes were acting for Stafford on a different matter.

36. On the evening of July 28, 2021, our then lawyers at Blakes reached out to us and advised us that a potential conflict had arisen in respect of this matter, and asked to arrange a time to discuss. The next day (July 29, 2021), we spoke with them about the potential conflict, and they advised us that another group of lawyers at Blakes were acting

for Stafford on another matter. Our lawyers at Blakes informed us, however, that none of our confidential information had been conveyed to or accessed by Stafford's lawyers, or vice versa, and that a firewall was being put in place at Blakes to ensure that no such information could or would be conveyed in either direction.

37. We trusted that Blakes would manage the potential conflict professionally and that none of our confidential information had been or was at risk of being conveyed to Stafford. As stated above, we had also not received any information relating to Stafford from Blakes and trusted that Blakes would respect their professional obligations in that regard.

38. As a result, we continued working with our lawyers at Blakes.

E. The Plaintiffs Serve the Amended Claim on Stafford, Stafford Raises a Potential Conflict, and the Plaintiffs Promptly Retain New Counsel

39. Ultimately, in early October 2021, the Plaintiffs' counsel at Blakes circulated an earlier draft of the Amended Claim to the Responding Parties, including to Stafford and Rudensky, and requested that they accept service and confirm their consent to the proposed amendments.

40. In response to Blakes' circulation of the draft Amended Claim, I understand that Stafford took the position that Blakes was conflicted from acting against him in respect of this matter.

41. While the Plaintiffs do not take any position as to whether our former lawyers at Blakes were actually conflicted from acting against Stafford in this proceeding, we did not want there to be any delay in our ability to amend our pleading and otherwise pursue the

prosecution of the Amended Claim as against the Defendants, including Stafford and Rudensky.

42. For that reason, we retained our new lawyers at Davies to replace Blakes so as to promptly resolve the alleged conflict and avoid the expense and delay of any potential motion by Stafford to disqualify Blakes from acting against him on this matter.

43. We retained Davies on or around November 11, 2021, and Mr. Milne-Smith (of Davies) served a Notice of Change of Lawyers on the other parties the very next day. A copy of the Notice of Change of Lawyers dated November 12, 2021 is attached as **Exhibit E**.

44. I understand that in or around the same time period that we were replacing our counsel (in early November 2021), Stafford retained special counsel at the Kim Spencer McPhee Barristers PC law firm (“**KSM**”) for the limited purpose of seeking relief in respect of Blakes’ (now former) simultaneous representation of the Plaintiffs on this matter and Stafford on a separate matter. I further understand that KSM has not been retained and may not be retained by Stafford more generally.

45. On Monday, November 15, 2021, Justice McEwen convened a previously scheduled Case Conference in this matter for the primary purpose of assigning a Case Management Judge and setting a date for a first Case Conference with that Judge. However, a second purpose of that Case Conference was to advise the Court of the Plaintiffs’ intention to amend the Claim (including to add Rudensky and Stafford as Defendants).

46. In that regard, I am informed by Matthew Milne-Smith of Davies that he participated in the Case Conference as our new counsel, and advised Justice McEwen of the Plaintiffs' intention to seek leave to file the Amended Claim. Mr. Milne-Smith also advised Justice McEwen that – as at that date – no Defendant or proposed Defendant had indicated an intention to oppose the amendments. In the result, Justice McEwen directed that if no party opposed the amendments, he would grant the Plaintiffs leave to file the Amended Claim. A copy of Justice McEwen's Endorsement is attached as **Exhibit F**.

47. After the Case Conference, Mr. Milne-Smith sent an email to the other parties and/or their counsel (including Stafford's special counsel at KSM) asking them to advise, by the end of that week, if any of them objected to the filing of the Amended Claim. A copy of Mr. Milne-Smith's email to is attached as **Exhibit G**.

48. I understand from Mr. Milne-Smith and believe that Stafford's special counsel then advised that Stafford opposed the amendments to the Claim, which is why the Plaintiffs have been required to bring this motion.

49. The Plaintiffs formally served our Notice of Motion, with the Amended Claim as Schedule A thereto, on November 23, 2021.

F. Further Unlawful Statements About the Plaintiffs Have Been Published Since We Commenced This Motion

50. It is also important that this Court understands that further false and defamatory Unlawful Statements continue to be published about the Plaintiffs to this day, including on websites apparently dedicated to smearing the Plaintiffs and on other forums on the

internet (such as Stockhouse, Reddit, and Google Reviews) and social media (such as Twitter).

51. To provide some recent examples, commencing December 10, 2021 and continuing to at least December 17, 2021, a wave of new Tweets were posted on the BettingBruiser Twitter account (the “**December 2021 Tweets**”) concerning Anson and Kassam, including false and defamatory Tweets accusing them of being “predatory short sellers” and market manipulators, and Tweets mocking Anson’s receipt of an award from HedgeWeek as the Best Equity Hedge Fund, among other things. Copies of the December 21 Tweets are attached as **Exhibit H**. As alleged in the Claim and Amended Claim, the Plaintiffs understand that Robert owns and operates the BettingBruiser Twitter account.

52. In short, notwithstanding the commencement of the Claim and in the face of our motion to file the Amended Claim, the Conspiracy continues to be carried out. It is of vital importance to the Plaintiffs that this motion, and the proceeding in general, move forward as expeditiously as possible so that the Plaintiffs can achieve vindication and put a stop to the ongoing Conspiracy.

G. Service of the Amended Claim and Further Materials on Stafford on a Go-Forward Basis

53. Despite the Plaintiffs’ efforts to identify Stafford’s residential address, we do not know Stafford’s address or where he resides. We were never informed of either of those basic facts by our lawyers at Blakes, and to the best of my knowledge the lawyers at Blakes acting for the Plaintiffs had no such information. Based on our research, Stafford

appears to have connections to numerous jurisdictions and it is unknown to the Plaintiffs whether Stafford's residential address is in Mexico, England, the Bahamas, or elsewhere.

54. Based on our research, however, the Plaintiffs have good reason to believe that Stafford uses the email addresses admin@oilprice.com and/or james@floatingmix.com.

55. In fact, on October 6, 2021, our lawyers at Blakes emailed a copy of the Amended Claim to Stafford at the above noted-email addresses, requesting that Stafford: (i) confirm receipt of the email; (ii) accept service of the Amended Claim; and (iii) advise whether he would consent to the proposed amendments to the Claim, including his addition as a party. A copy of Blakes' email to this effect is attached as **Exhibit I**.

56. Stafford clearly received notice of the Amended Claim because after Blakes sent that email, Stafford raised the potential conflict arising from Blakes acting against him.

57. Moreover, as touched on above, Stafford retained his special counsel at KSM for the limited mandate of raising the potential conflict by the Blakes firm, and now opposing this motion. However, I understand that KSM has not been retained and may not be retained by Stafford more generally, including in respect of defending the Amended Claim. In other words, I understand that in the event the Plaintiffs are granted leave to file the Amended Claim, KSM does not have and may not be given authority by Stafford to accept service of the Amended Claim on his behalf, and the Plaintiffs will have no method

of effecting formal service on him. In order for this action to proceed efficiently, it is necessary to have an address for service of future documents on Stafford.

SWORN remotely by Sunny Puri at the City of Toronto, in the Province of Ontario, before me on the 5th day of January, 2022, in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



Commissioner for Taking Affidavits
(or as may be)

MAURA O'SULLIVAN
LSO #77098R



Sunny Puri

ANSON ADVISORS INC. et al.
Plaintiffs
ROBERT LEE DOXTATOR
Plaintiff by Counterclaim

-and- ROBERT LEE DOXTATOR et al.
Defendants
-and- ANSON ADVISORS INC. et al.
Defendants to the Counterclaim

Court File No. CV-20-00653410-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

PROCEEDING COMMENCED AT
TORONTO

AFFIDAVIT OF SUNNY PURI SWORN JANUARY 5, 2021

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Lawyers for the Plaintiffs (Defendants to the Counterclaim),
Anson Advisors Inc., Anson Funds Management LP, Anson
Investments Master Fund LP and Moez Kassam

TAB 2S

This is **Exhibit “S”** to the Affidavit of **Alexander Mulligan**,
sworn before me this **30th** day of **November, 2023**.

A handwritten signature in blue ink, appearing to read "Paul Kelly", written over a horizontal line.

A Commissioner for Taking Affidavits

LSO# 84488D

Chat message report

AAIUUU 1U330

Conversations: 1	Participants: 2
Total Messages: 83	Date Range: 7/6/2019

Outline of Conversations



CHAT - 00002 - 2019/07/06 • 83 messages on 7/6/2019 • Betting Bruiser
<16132435556@s.whatsapp.net> • Moez Kassam <+14165009999>

 **CHAT - 00002 - 2019/07/06**

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 4:24 PM
You sleeping

MK Moez Kassam <+14165009999> 7/6/2019, 5:27 PM
What's up

MK Moez Kassam <+14165009999> 7/6/2019, 5:33 PM
Cannnnntrust

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 5:33 PM
You little late

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 5:34 PM
But I knew Friday

MK Moez Kassam <+14165009999> 7/6/2019, 5:34 PM
So did we

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 5:34 PM
I got the report coming Monday

MK Moez Kassam <+14165009999> 7/6/2019, 5:34 PM
Why hasn't it been press released

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 5:34 PM
You owe me one and sign me on already don't be a smuck

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 5:35 PM
Why wasn't brad Rogers departure PR

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 6:53 PM
I got a guy on route to Cantrust Niagara

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 6:54 PM
Can you send someone over to stayner

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 6:54 PM
The other facility

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 7:31 PM



Image: 5dc26bb2-5903-4a3b-97ba-7e8f7b84a937.jpg (148 KB)

- MK** Moez Kassam <+14165009999> 7/6/2019, 7:31 PM
They said it was niagsra
- MK** Moez Kassam <+14165009999> 7/6/2019, 7:31 PM
Oh so it's legit
- #** Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 7:31 PM
That's just yellow tape to pour a cement pad
- #** Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 7:32 PM
Not like crime scene tape
- #** Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 7:32 PM
30-40 employees
- MK** Moez Kassam <+14165009999> 7/6/2019, 7:54 PM
Send report
- #** Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:02 PM
Just waiting on one more thing
- #** Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:03 PM
And we going cut a formal deal or just some hope to pay me later deal ... I come across this stuff before anyone 10k a month and % of trades at your discretion isn't much to ask. I'm getting a lot more then 10k month doing honest work so.
- #** Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:04 PM
But I do like you and you do understand the space unlike other people so .. your call ... give it 6 months I'm sure you'll be happy with me.
- MK** Moez Kassam <+14165009999> 7/6/2019, 8:05 PM
Of this works out , it's a lot right off.
- MK** Moez Kassam <+14165009999> 7/6/2019, 8:05 PM
And then I'm in the chips
- MK** Moez Kassam <+14165009999> 7/6/2019, 8:05 PM
I'll short 20m worth
- #** Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:06 PM
I know but you wanna put something in paper I'd feel more comfortable but honestly it shouldn't come to that when working with someone.

Andrew left would do it too

MK Moez Kassam <+14165009999> 7/6/2019, 8:17 PM
We can have citron on it. Hit puts too

MK Moez Kassam <+14165009999> 7/6/2019, 8:17 PM
Sky is limit

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:18 PM
Whoever it is I just wanna be looked after ... or I'll just take stuff else we're. It's simply.

MK Moez Kassam <+14165009999> 7/6/2019, 8:18 PM
That part is easy

MK Moez Kassam <+14165009999> 7/6/2019, 8:18 PM
I always told u. If catalyst -easy to do

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:19 PM
So what you going give me other then your word you going look after me here

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:19 PM
No matter what no excuses

MK Moez Kassam <+14165009999> 7/6/2019, 8:20 PM
It's me. For all people hate , nobody will say I've ever cheated them. This is gold -I'm just scared they have to Pr Monday am

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:20 PM
That's not true Moez met people said you cheated them

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:21 PM
Sunny particular

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:21 PM
Over and over his name has came up

MK Moez Kassam <+14165009999> 7/6/2019, 8:21 PM
We don't roll the way people want , but nobody has ever said we've stiffed

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:21 PM
100% they have

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:21 PM
Just ask Hindberg and why you didn't get in on APHA

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:22 PM
Lots people have relayed Sunny stiffed them

MK Moez Kassam <+14165009999> 7/6/2019, 8:22 PM
I gave Hindenburg his entire file

MK Moez Kassam <+14165009999> 7/6/2019, 8:22 PM
Anyways it's ur call

MK Moez Kassam <+14165009999> 7/6/2019, 8:22 PM
I'm moving forward either way

MK Moez Kassam <+14165009999> 7/6/2019, 8:22 PM
We got guys going tmrw

MK Moez Kassam <+14165009999> 7/6/2019, 8:23 PM
For pics etc

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:23 PM
Going where? There nothing take pictures of.

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:23 PM
The yellow tape?

MK Moez Kassam <+14165009999> 7/6/2019, 8:23 PM
Yup. That's all I need

MK Moez Kassam <+14165009999> 7/6/2019, 8:23 PM
Narrative is done

MK Moez Kassam <+14165009999> 7/6/2019, 8:24 PM
Again I'm just scared they halt the stock Monday am

MK Moez Kassam <+14165009999> 7/6/2019, 8:24 PM
And this is all for nothing

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:24 PM
Narrative is done

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:24 PM
Sure then I'll put my report out on twitter then right now

MK Moez Kassam <+14165009999> 7/6/2019, 8:24 PM
They have to half it

MK Moez Kassam <+14165009999> 7/6/2019, 8:24 PM
Halt

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:25 PM
Honestly you can't make an offer then what's the point

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:25 PM
I got a lot better then things then yellow tape picture

MK Moez Kassam <+14165009999> 7/6/2019, 8:25 PM
I'm paying u 15 % of profits , aim is short 20m on Monday itself

MK Moez Kassam <+14165009999> 7/6/2019, 8:26 PM
And I'll update u hourly as we get filled

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:26 PM
Okay deal and I got lots behind this so honestly let's cut bullshit and look after me in end that's all I ask and don't make feel taken Advantage of then we got a deal.

MK Moez Kassam <+14165009999> 7/6/2019, 8:26 PM
Let me cut u a big check and rest is easy. Just pray they don't halt this

We need to keep this quiet

MK Moez Kassam <+14165009999> 7/6/2019, 8:27 PM
Others halt to know

MK Moez Kassam <+14165009999> 7/6/2019, 8:27 PM
Half

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:27 PM
It's leaked a little on FB and little on twitter but may not halt

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:27 PM
May PR of HC bulletin but no Halt we good

MK Moez Kassam <+14165009999> 7/6/2019, 8:27 PM
We can stick it to them

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:28 PM
They honestly may lose their license here

MK Moez Kassam <+14165009999> 7/6/2019, 8:30 PM
They should

MK Moez Kassam <+14165009999> 7/6/2019, 8:30 PM
We will push for it

MK Moez Kassam <+14165009999> 7/6/2019, 8:30 PM
Send what u have

MK Moez Kassam <+14165009999> 7/6/2019, 8:30 PM
I want to get Andrew excited and onoadx

MK Moez Kassam <+14165009999> 7/6/2019, 8:30 PM
On-board

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 8:31 PM
Just give me quick minute get it onto PDF

MK Moez Kassam <+14165009999> 7/6/2019, 8:31 PM
K

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 9:18 PM
58944abe-f2e4-4553-88cb-7bbc49ca36c6 (2).pdf

Attachment: e95f200d-0833-4890-a0b1-3b44a269378f.pdf (3 MB)

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 9:18 PM
We got a deal

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 9:27 PM
Going make some edits yet

Betting Bruiser <16132435556@s.whatsapp.net> 7/6/2019, 9:28 PM
Some spelling errors

We ready for Monday? Let me know your plan.

Court File No. CV-20-00653410-00CL

ANSON ADVISORS INC., et al.
Plaintiffs

-and-

STAFFORD, et al.
Defendants

DOXTATOR
Plaintiff to the Counterclaim

ANSON ADVISORS INC., et al.
Defendants to the Counterclaim

ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST

Proceeding commenced at Toronto

MOTION RECORD (VOLUME 2 OF 3)
(Motion to Compel Answers to Undertakings and Refusals)

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