

Court File: T-

FEDERAL COURT

BETWEEN:

MINISTER OF NATIONAL REVENUE

Applicant

- and -

P&A PALETTA GIVING INC.

Respondent

NOTICE OF SUMMARY APPLICATION
(S. 231.7 of the *Income Tax Act* and R. 316.2 of the *Federal Courts Rules*)

TO THE RESPONDENTS:

A SUMMARY APPLICATION HAS BEEN COMMENCED by the applicant under section 231.7 of the *Income Tax Act*. The relief claimed by the applicant appears on the following pages.

THIS APPLICATION will be heard by the Court on **Tuesday, 6 June 2023**, at 9:30 a.m. or as soon after that time as the application can be heard at the Toronto General Sittings of the Court.

IF YOU WISH TO OPPOSE THIS APPLICATION, you or a solicitor acting for you must serve a respondent's record and file either one electronic copy or three paper copies of that record not later than 2 p.m. on the day that is two days before the day on which the application will be heard.

Copies of the *Federal Courts Rules*, information concerning the local offices of the Court and other necessary information may be obtained on request to the Administrator of this Court at Ottawa (telephone 613-992-4238) or at any local office.

IF YOU FAIL TO OPPOSE THIS APPLICATION, JUDGMENT MAY BE GIVEN IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU.

Date: _____

Issued by: _____

(Registry Officer)

The Registry
The Federal Court
90 Sparks Street
Ottawa, Ontario K1A 0H9

TO: **Paul Paletta** (President of P&A Paletta Giving)
46 Great Falls Blvd.
Waterdown, Ontario L8B 1X8

Michael Paletta (Vice-President of P&A Paletta Giving)
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Burlington, Ontario L7L 4Y8

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SUMMARY APPLICATION

THE APPLICANT MAKES AN APPLICATION FOR:

1. an Order under section 231.7 of the *Income Tax Act*, R.S.C. 1985, c. 1 (the “**Act**”) compelling the respondent to provide the applicant or an authorized person of the applicant any access, assistance, information, or documents sought from the respondent as set out in requests issued under subsection 231.1(1) of the Act to P&A Paletta Giving Inc.;
2. costs on this application; and
3. such further and other relief as this Court deems appropriate.

THE GROUNDS FOR THE APPLICATION ARE:

4. by a request issued under subsection 231.1(1) of the Act to P&A Paletta Giving Inc., dated 26 April 2023, the applicant required that the respondent provide the applicant with documents and information for purposes related to the administration and enforcement of the Act;
5. the respondent was required to provide such documents and information under subsection 231.1(1) of the Act;
6. the respondent has failed to provide such documents and information;
7. the documents and information required are not protected from disclosure by solicitor-client privilege; and
8. the applicant relies on sections 231.1(1) and 231.7 of the Act, as well as on such further and other grounds as the Court accepts.

THE APPLICATION WILL BE SUPPORTED BY THE FOLLOWING MATERIAL

1. the affidavit of Salvatore Tringali; and
2. such further material as counsel for the applicant may submit and this Court permits.

DATED at the City of Ottawa, Ontario, this 29th day of May, 2023



ATTORNEY GENERAL OF CANADA

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