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F I L E D	FEDERAL COURT COUR FÉDÉRALE
	08-FEB-2024
Chanelle Gallant	
Halifax, NS	- 1 -

Court File No.: T-238-24

**Federal Court**

BETWEEN :

Negar Moghtaderi

Applicant

- and -

Canada Revenue Agency, Attorney General of Canada

Respondents

**NOTICE OF APPLICATION FOR JUDICIAL REVIEW**

TO THE RESPONDENT:

A PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the applicant. The relief claimed by the applicant appears below.

THIS APPLICATION will be heard by the Court at a time and place to be fixed by the Judicial Administrator. Unless the Court orders otherwise, the place of hearing will be as requested by the applicant. The applicant requests that this application be heard at *(place where Federal Court of Appeal (or Federal Court) ordinarily sits)*.

IF YOU WISH TO OPPOSE THIS APPLICATION, to receive notice of any step in the application or to be served with any documents in the application, you or a solicitor acting for you must file a notice of appearance in Form 305 prescribed by the Federal Courts Rules and serve it on the applicant's solicitor or, if the applicant is self-represented, on the applicant, WITHIN 10 DAYS after being served with this notice of application.

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.

February 8, 2024

Issued by: *(Registry Officer)*

82 Westmorland Street, Suite 100, Fredericton, New Brunswick, E3B 3L3

TO: Canada Revenue Agency, Attorney General of Canada

## APPLICATION

1. The Applicant makes application for:
  - (a) An Order setting aside the CRA's decision, dated January 9, 2024, denying my application for Canada Recovery Benefit application;
  - (b) A declaration that the CRA erred in their determination of my eligibility. Arbitrator erred in awarding punitive damages against the Applicant;
  - (c) An order granting the Applicant its costs in this Application; and
  - (d) Such further and other relief as this Honourable Court may consider just and equitable.
  
2. The grounds for the application are:
  - (a) The CRA incorrectly and/or unreasonably interpreted and applied relevant law;
  - (b) The CRA disregarded or failed to consider relevant evidence; and
  - (c) Such further and other grounds that this Honourable Court may permit.
  
3. The following documentary evidence will be used at the hearing of the application:
  - (a) The Notice of Application for Judicial Review;
  - (b) CRA's initial and redetermination decisions;
  - (c) The Applicant's Affidavit(s) and attached exhibits (including documentary evidence that was submitted to the CRA);
  - (d) The complete records of the CRA including my written submissions and evidence provided; and
  - (e) Such further material as this Honourable Court may permit
  
4. I would like this matter to be heard in Saint John, NB

Respectfully,

*N. Moghtaderi*

Negar Moghtaderi February 8, 2024

74 Cedarwood Drive, Saint John, NB E2K 5P4

