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FEDERAL COURT

BETWEEN:

## VIRGINIA HILLIS and GWENDOLYN LOUISE DEEGAN

**PLAINTIFFS** 

File No. T-1736-14

and

## THE ATTORNEY GENERAL OF CANADA and THE MINISTER OF NATIONAL REVENUE

## DEFENDANTS

## REPLY

- 1. The plaintiffs admit the allegations of fact contained in paragraphs 9, 12, 14, and 26-28 of the statement of defence.
- The plaintiffs deny the allegations of fact contained in paragraphs 6-8, 10-11, 13, 15, 17-18, 20-25 and 29-39 of the statement of defence.
- 3. In response to the whole of the statement of defence and, in particular, paragraphs 7-8, 13, 18, 20-24, 29, 31-32 and 34-35, the plaintiffs say that the FATCA Provisions, the Convention, the Agreement (as these terms are defined in the amended statement of claim) and the OECD Common Reporting Standard speak for themselves.

Dated: November 20, 2014

el for the Plai

Joseph J. Arvay, Q.C. ard David E. Gruber

This Reply is filed by Solicitors for the Plaintiffs, Farris, Vaughan, Wills & Murphy LLP, PO Box 10026, Pacific Centre South, 25<sup>th</sup> Floor, 700 West Georgia Street, Vancouver BC V7Y 1B3. Tel: 604.684.9151 / Fax: 604.661.9349