IN THE MATTER OF AN ARBITRATION UNDER CHAPTER ELEVEN OF THE NORTH AMERICAN FREE TRADE AGREEMENT AND THE 1976 UNCITRAL ARBITRATION RULES

between

THEODORE DAVID EINARSSON, HAROLD PAUL EINARSSON, RUSSELL JOHN EINARSSON, AND GEOPHYSICAL SERVICE INCORPORATED

(the "Claimants")

-and-

GOVERNMENT OF CANADA

(the "Respondent", and together with the Claimants, the "Disputing Parties")

ICSID CASE NO. UNCT/20/6

GOVERNMENT OF CANADA

CUMULATIVE INDEX OF SUPPORTING DOCUMENTATION

Accompanying the Rejoinder Memorial on Jurisdiction, Merits and Damages

1 November 2024

Trade Law Bureau Government of Canada Lester B. Pearson Building 125 Sussex Drive Ottawa, Ontario K1A 0G2 CANADA

Contents

I.	WITNESS STATEMENTS	1
II.	EXPERT REPORTS	2
III.	EXHIBITS	8
IV.	LEGAL AUTHORITIES	53

I. WITNESS STATEMENTS

No.	Canada's Witness Statements
Witness St	atements filed with Canada's Counter-Memorial on Jurisdiction, Merits and Damages, 16 January 2023
RWS-01	Witness Statement of Bharat Dixit, 16 January 2023
	Annex I
	Annex II - Offshore Program Spreadsheet, "Geophysical Service Incorporated
	Annex III
RWS-02	Witness Statement of Trevor Bennett, 16 January 2023
	Annex I C-NLOPB Land Tenure Regions Map
	Annex II – C-NLOPB Maps of GSI and Other Seismic Data
RWS-03	Witness Statement of Carl Makrides, 14 January 2023
	Annex I – CNSOPB Jurisdiction Map
	Annex II – CNSOPB Map of GSI Data by Year
	Annex III – CNSOPB Map of GSI Programs
	Annex IV - CNSOPB Map of 2D Data, GSI Highlighted
	Annex V – CNSOPB Map of 3D Data, GSI Highlighted
	Annex VI – CNSOPB Map of All Seismic Data, GSI Highlighted

Witness Statements filed with Canada's Rejoinder Memorial on Jurisdiction, Merits and Damages, 1 November 2024	
RWS-04	Witness Statement of Bharat Dixit, 1 November 2024
RWS-05	Witness Statement of Trevor Bennett, 11 October 2024
RWS-06	Witness Statement of Carl Makrides, 24 October 2024

II. EXPERT REPORTS

No.	Canada's Expert Reports
Expert Reports filed with Canada's Counter-Memorial on Jurisdiction, Merits and Damages, 16 January 2023	
RER-01	Expert Report of Barry Sookman, 16 January 2023
RER-02	Expert Report of Robert Hobbs, 14 January 2023
RER-03	Expert Report of Doug Uffen, 16 January 2023
RER-04	Expert Report of The Brattle Group, 16 January 2023
	BR-1 : Geophysical Service Incorporated v. Encana Corporation, 2016 ABQB 230, dated 21 April 2016
	BR-2: Geophysical Service Incorporated v. Sable Mary Seismic Incorporated and Mathew Kimball, 2009 NSSC 404, dated 31 December 2009
	BR-3: Geophysical Service Incorporated, Acquired Data Library
	BR-4 : Geophysical Service Incorporated v. Encana Corporation, 2015 ABQB 196, dated 19 March 2015
	BR-5 : Geophysical Service Incorporated v. Encana Corporation, 2016 ABQB 49, dated 22 January 2016
	BR-6 : World Bank, Legal Framework for The Treatment of Foreign Investment Volume II, dated 25 September 1992
	2

- **BR-7**: Email from Paul Einarsson to Bharat Dixit, dated 4 February 2010
- BR-8: S&P Capital IQ, PGS ASA Company Tearsheet Report
- BR-9: S&P Capital IQ, TGS ASA Company Tearsheet Report
- **BR-10**: Jeffries & Company Inc., "The Seismic Industry Survival of the Fittest," dated December 2003
- **BR-11**: Bank of America Merrill Lynch, "Seismic: stick to quality initiate TGS at Buy, reinstate CGG Neutral, PGS U/P", dated 26 September 2019
- **BR-12**: Brattle Workpapers
- **BR-13**: Joseph E. Stiglitz and Robin W. Boadway, "Principals of Microeconomics and the Canadian economy," 2nd edition W.W. Norton & Company, Inc., 1997
- **BR-14**: Jeffries & Company, Inc., "Seismic Technology Takes Center Stage," dated October 1998
- **BR-15**: Geophysical Service Incorporated v. Occidental Corp., Case 4:20-cv-1396, Order of Dismissal, dated 24 March 2021
- **BR-16**: Geophysical Service Incorporated, Exhibit C Occidental Corp. Cover Letter, dated 14 August 2019
- **BR-17**: Geophysical Service Incorporated v. Plains Midstream Canada ULC, 2022 ABKB 722, dated 1 November 2022
- **BR-18**: Geophysical Service Incorporated v. Suncor Energy Inc, 2017 ABQB 465, dated 26 July 2017
- **BR-19**: Geophysical Service Incorporated v. Falkland Oil and Gas Limited 2019 ABQB 162, dated 7 March 2019
- **BR-20**: Pulse Seismic, Data Library and Services
- **BR-21**: Richard A. Brealey, Stewart C. Myers, and Franklin Allen, "Principles of Corporate Finance," 10th edition McGraw-Hill/Irwin, 2010
- BR-22: S&P Global Ratings, CGG Outlook, dated 7 March 2018

	BR-23: S&P Global Ratings, PGS Outlook, dated 8 May 2018
	BR-24 : Moody's Investors Service, "Moody's withdraws IGSS's rating for business reasons", dated 27 October 2017
	BR-25: NAIC Generic Rating Symbol Mapping
	BR-26: Credit Spreads by Rating from NYU Professor Aswath Damodaran
	BR-27: IFRS, "Going concern - a focus on disclosure," dated January 2021
	BR-28 : Geophysical Service Incorporated v. Falkland Islands, Claim No. SC/CIV/05/14, Approved Judgment, dated 9 December 2016
	BR-29 : U.S. Energy Information Administration, 2008 Cushing, OK WTI Spot Price FOB
	BR-30: Schlumberger Limited, 2010 Annual Report
	BR-31: PGS, 2009 Annual Report
	BR-32 : IVSC, International Valuation Standards Effective 31 January 2022, dated 31 January 2022
	BR-33 : Maniatis, A., Dorobantu, F., and Nunez, F., "A Framework for Interest Awards in International Arbitration," Fordham International Law Journal, Vol. 41, 2018
	BR-34 : Fisher, F. and Romaine, R.C., "Janis Joplin's Yearbook and the Theory of Damages," Journal of Accounting, Auditing and Finance, January 1990
	BR-35 : Colon, J.M. and Knoll, M.S., "Prejudgment Interest in International Arbitration," Penn Law: Legal Scholarship Repository, dated 29 October 2007
	BR-36 : U.S. Energy Information Administration, Annual Brent Crude Prices, dated 29 December 2022
	BR-37: S&P Capital IQ, Pulse Financials
	BR-38 : S&P Capital IQ, Canadian Dollars per US Dollars Monthly Exchange Rate
Expert R	eports filed with Canada's Rejoinder Memorial on Jurisdiction, Merits and Damages, 1 November 2024
RER-05	Expert Report of Barry Sookman, 25 October 2024

Expert Report of Robert Hobbs, 22 October 2024
Expert Report of Doug Uffen, 29 October 2024
Expert Report of The Brattle Group, 29 October 2024
BR-39: Geophysical Service Incorporated v. Total S.A., Total E&P Canada Ltd., and the Canada-Newfoundland and Labrador Offshore Petroleum Board (Alberta Court of Queen's Bench, Court File No. 1401-03449), Statement of Claim, 28 March 2014
BR-40: Geophysical Service Incorporated v. Total S.A., Total E&P Canada Ltd., and the Canada-Newfoundland and Labrador Offshore Petroleum Board; Companies A-Z (Alberta Court of Queen's Bench, Court File No. 1401-03449), Statement of Defence, 13 October 2015
BR-41:
BR-42:
BR-43:
BR-44:
BR-45:
BR-46:
BR-47:

BR-48:
BR-49:
BR-50:
BR-51:
BR-52:
BR-53:
BR-54:
BR-55: Geophysical Service Incorporated v. Plains Midstream Canada ULC, 2023 ABCA 277, 29 September 2023
BR-56: Amended Statement of Claim, GSI v. ConocoPhillips, 27 June 2013
BR-57: ConnocoPhillips – Statement of Defence, 19 August 2013
BR-58: Amended Amended Statement of Defence, <i>GSI v. Husky Oil</i> , 31 October 2018
BR-59: Statement of Defence, GSI v. Murphy Oil Company LTD., 28 March 2014
BR-60: Geophysical Service Incorporated, Acquired Data, last accessed 29 August 2024

BR-61:
BR-62:
BR-63:
BR-64: Campbell, Ian R., and Howard E. Johnson. The Valuation of Business Interests, 2001 [Excerpt]
BR-65: Kantor, Mark. Valuation for Arbitration: Compensation Standards, Valuation Methods and Expert Evidence, 2008 [Excerpt]
BR-66: Email from Paul Einarsson to Stephen Locke (GSC), 01 December 2008
BR-67: International Transfer Pricing and Other International Transactions, 27 February 1987
BR-68: CapIQ TGS ASA OB TGS Financials Cash Flow
BR-69: CapIQ TGS ASA OB TGS Financials Income Statement
BR-70: FRED Canadian Dollars to US Dollar Spot Exchange Rate
BR-71:
BR-72:
BR-73:
BR-74:
BR-75:

III. EXHIBITS

Exhibit No.	Canada's Exhibits		
Ex	Exhibits Filed with the Government of Canada's Statement of Defence, 9 June 2022		
R-001	Geophysical Service Incorporated v. Encana Corporation, et al., 2016 ABQB 230.		
R-002	Geophysical Service Incorporated v. Encana Corporation, et al., 2017 ABCA 125.		
R-003	Geophysical Service Incorporated v. Encana Corporation, et al., 2017 SCC 37634.		
R-004	Geophysical Service Incorporated v. Canada-Newfoundland and Labrador Offshore Petroleum Board and Her Majesty in Right of Newfoundland and Labrador (Case No. 2011 01G 5430), Supreme Court of Newfoundland and Labrador Trial Division (General)), Statement of Claim, 10 August 2011.		
R-005	Geophysical Service Incorporated v. Canada-Newfoundland and Labrador Offshore Petroleum Board and Her Majesty in Right of Newfoundland and Labrador (Case No. 2011 01G 5430), Supreme Court of Newfoundland and Labrador Trial Division (General)) Amended Statement of Claim, 7 January 2013.		
R-006	Geophysical Service Incorporated v. Olympic Seismic Ltd., Her Majesty the Queen in Right of Canada as represented by the Attorney General of Canada on behalf of the National Energy Board; and Companies A-Z (Case No. 1201-16166), Statement of Claim, 19 December 2012.		
R-007	Geophysical Service Incorporated v. Arcis Seismic Solutions Corp., Her Majesty the Queen in Right of Canada as represented by the Attorney General of Canada on behalf of the National Energy Board; Canada-Newfoundland and Labrador Offshore Petroleum Board and Companies A-Z, Case No. 1301-02933, Statement of Claim dated 6 March 2013.		
R-008	Geophysical Service Incorporate and Lynx Canada Information Systems Ltd. (Case No. 0901-08210), Amended Amended Statement of Claim, 4 June 2013		
R-009	Geophysical Service Incorporate and Lynx Canada Information Systems Ltd. (Case No. 0901-08210), Statement of Claim, 2 June 2009.		
R-010	Geophysical Service Incorporated v. Her Majesty the Queen in Right of Canada as represented by the Attorney General of Canada itself, and on behalf of the Department of Natural Resources Canada; and the National Energy Board (GSI Claim Case No. 1401-05316), Statement of Claim, 14 May 2014		
R-011	Geophysical Service Incorporated v. Total S.A. and Total E&P Canada Ltd., 2020 ABQB 730, Judgment, 25 November 2020.		

R-012 Geophysical Service Incorporated v. Anadarko Petroleum Corporation (Case N 4:15-cv-02765, U.S. Dist. Tx), Complaint, 22 September 2015. Geophysical Service Incorporated v. Anadarko Petroleum Corporation (Case N 4:15-cv-02765, U.S. Dist. Tx), Agreed Motion to Lift Stay and Join Stipulation Dismissal With Prejudice, 18 March 2021. R-014 Letter from M. Lemmens, Borden Ladner Gervais to M. Luz, Trade Law Burea 15 July 2019. Exhibits filed with Canada's Counter-Memorial on Jurisdiction, Merits and Damages 1 January 2023 R-015 CCH Canadian Ltd. v. Law Society of Upper Canada, 2004 SCC 13 R-016 Toronto Real Estate Board v. Commissioner of Competition, 2017 FCA 236
R-012 4:15-cv-02765, U.S. Dist. Tx), Complaint, 22 September 2015. Geophysical Service Incorporated v. Anadarko Petroleum Corporation (Case N 4:15-cv-02765, U.S. Dist. Tx), Agreed Motion to Lift Stay and Join Stipulation Dismissal With Prejudice, 18 March 2021. R-014 Letter from M. Lemmens, Borden Ladner Gervais to M. Luz, Trade Law Burea 15 July 2019. Exhibits filed with Canada's Counter-Memorial on Jurisdiction, Merits and Damages 1 January 2023 R-015 CCH Canadian Ltd. v. Law Society of Upper Canada, 2004 SCC 13
R-013 4:15-cv-02765, U.S. Dist. Tx), Agreed Motion to Lift Stay and Join Stipulation Dismissal With Prejudice, 18 March 2021. R-014 Letter from M. Lemmens, Borden Ladner Gervais to M. Luz, Trade Law Burea 15 July 2019. Exhibits filed with Canada's Counter-Memorial on Jurisdiction, Merits and Damages 1 January 2023 R-015 CCH Canadian Ltd. v. Law Society of Upper Canada, 2004 SCC 13
Exhibits filed with Canada's Counter-Memorial on Jurisdiction, Merits and Damages 1 January 2023 R-015 CCH Canadian Ltd. v. Law Society of Upper Canada, 2004 SCC 13
R-015 CCH Canadian Ltd. v. Law Society of Upper Canada, 2004 SCC 13
7 7 11
R 016 Toronto Real Estate Roard v. Commissioner of Competition 2017 ECA 226
1010110 Real Estate Board V. Commissioner of Competition, 2017 FCA 250
R-017 Cinar Corporation v. Robinson, 2013 SCC 73
R-018 Théberge v. Galerie d'Art du Petit Champlain Inc. (2002), 17 C.P.R. (4th) 10 (S.C.C.)
R-019 Massie & Renwick Ltd. v. Underwriters Survey Bureau Ltd., [1940] 1 D.L.R. 62 (S.C.C.)
R-020 Eli Lilly & Co. v. Novopharm Ltd., [1998] 2 SCR 129
R-021 Electric Chain Co. of Can. Ltd. v. Art Metal Works Inc., [1933] S.C.R. 581
R-022 Robert D. Sutherland Architects Ltd. v. Montykola Investments Inc., 1996 NSC
R-023 Éditions Québec Amérique inc. c. Druide informatique inc., 2017 QCCS 4092
R-024 Netupsky v. Dominion Bridge Co. Ltd. (1971), 24 D.L.R. (3d) 484 (S.C.C.)
R-025 Tremblay v. Orio Canada Inc., 2013 FCA 225
R-026 Planification-Organisation-Publications Systèmes (POPS) Ltée v. 9054-818 Québec Inc, 2013 FC 427
R-027 New Brunswick Telephone Co. Ltd. v. John Maryon International Ltd. (1982), 2 C.C.L.T. 146 (N.B. C.A.)
R-028 Silverson v. Neon Products Ltd. (1978), 38 C.P.R. (2d) 234 (B.C. S.C.)
R-029 Geophysical Service Incorporated v The Falkland Islands, Claim N SC/CIV/05/14, 9 December 2016
R-030 Continental Commercial Systems Corp. (Telecheque Can.) v. R., [1982] 5 W.W. 340 (B.C. C.A.),
R-031 Delrina Corp. v. Triolet Systems Inc. (2002), 17 C.P.R. (4th) 289 (Ont. C.A.)
R-031 Delrina Corp. v. Triolet Systems Inc. (2002), 17 C.P.R. (4th) 289 (Ont. C.A.) R-032 Winkler v. Hendley, 2021 FC 498

Exhibit No.	Canada's Exhibits
R-034	Tele-Direct (Publications) Inc. v. American Business Information Inc., (1997), 76 C.P.R. (3d) 296 (Fed. CA.)
R-035	R. v. Stewart, 1988 CanLII 86 (SCC), [1988] 1 SCR 963
R-036	Modatech Systems Inc. (Trustee of) v. Bastion Development Corp., 1998 CanLII 4429 (BC CA)
R-037	Agence du revenu du Québec c. Unidisc musique inc., 2021 QCCA 393
R-038	Robertson v. Thomson Corp. (2004), 72 O.R. (3d) 481 (Ont. C.A.)
R-039	Robertson v. Thomson Corp. [2006] 2 S.C.R. 363 (S.C.C.)
R-040	Entertainment Software Association v. SOCAN, 2012 SCC 34
R-041	Society of Composers, Authors and Music Publishers of Canada v. Entertainment Software Association, 2022 SCC 30
R-042	Albian Sands Energy Inc. v. Positive Attitude Safety Systems, 2005 FCA 332
R-043	Harmony Consulting Ltd. v G.A. Foss Transport Ltd., 2012 FCA 226
R-044	Nicholas v Environmental Systems International (Limited), 2010 FC 741
R-045	Pinto v. Bronfman Jewish Education Centre, 2013 FC 945
R-046	Gould Estate v. Stoddart Publishing Co. (1998), 39 O.R. (3d) 545 (C.A.)
R-047	Gould Estate v. Stoddart Publishing Co. (1999), 82 C.P.R. (3d) vi (S.C.C.)
R-048	Red Label Vacations Inc. v. 411 Travel Buys Ltd., 2015 FC 19, 2015 CarswellNat 427 (F.C.)
R-049	Marquis v. DKL Technologies (1989), 24 C.I.P.R. 289 (Qué. S.C.)
R-050	Euro-Excellence Inc. V. Kraft Canada Inc., 2007 SCC 37, [2007] 3 S.C.R. 20
R-051	Jeffrey Rogers Knitwear Productions Ltd. v. R.D. International Style Collections Ltd. (1986), 19 C.P.R. (3d) 217 (Fed. T.D.)
R-052	Bouchet v. Kyriacopoulos (1964), 45 C.P.R. 265 (Can. Ex. Ct.)
R-053	Bouchet v. Kyriacopoulos (1966), 45 C.P.R. 281 (note) (S.C.C.)
R-054	Dan Bereskin, Research and Development in Canada (Butterworths, 1987) [Excerpts]
R-055	Kevin Garnett, Gillian Davies & Gwilym Harbottle, Copinger and Scone James on Copyright, vol 1, 16th ed (London, UK: Sweet & Maxwell, 2011) [Excerpts]
R-056	Owners, Strata Plan LMS 3905 v. Crystal Square Parking Corp., 2020 SCC 29
R-057	Cameron v. Tate, 1888 CanLII 47 (SCC), 15 SCR 622
R-058	Matic et al v Waldner et al, 2016 MBCA 60

Exhibit No.	Canada's Exhibits
R-059	Century 21 Canada Limited Partnership v. Rogers Communications Inc., 2011 BCSC 1196
R-060	Olivieri v. Sherman, 2007 ONCA 491
R-061	Fraser Jewellers (1982) Ltd. v. Dominion Electric Protection Co. 1997 CanLII 4452, (1997), 34 O.R. (3d) 1 (C.A.)
R-062	Rudder v. Microsoft Corp. (1999), 2 C.P.R. (4th) 474 (Ont. S.C.J.)
R-063	Canadian Real Estate Association v. Sutton (Quebec) Real Estate Services Inc. 2003 CarswellQue 682 (S.C.)
R-064	Sattva Capital Corp. v. Creston Moly Corp., 2014 SCC 53
R-065	Not Used
R-066	R. v. Resolute FP Canada Inc., 2019 SCC 60
R-067	Bishop v. Stevens, [1990] 2 S.C.R. 467
R-068	Tremblay v Orio Canada Inc, 2013 FC 109
R-069	Cselko Associates Inc. v. Zellers Inc., [1992] O.J. No. 1456 (Gen. Div.)
R-070	Planification-Organisation-Publications Systèmes (POPS) Ltée v. 9054-8181 Québec Inc, 2014 FCA 185
R-071	Russell v. Nyack, 2005 ABPC 227
R-072	Adi Ltd. v. Destein (1982), 41 N.B.R. (2d) 518 (Q.B.)
R-073	M.J.B. Enterprises Ltd. v. Defence Construction (1951) Ltd., 1999 CanLII 677 (SCC), [1999] 1 SCR 619
R-074	Canadian Pacific Hotel Ltd v Bank of Montreal [1987] 1 S.C.R 711 (SCC)
R-075	Double N Earthmovers Ltd v Edmonton (City) [2007] 1 S.C.R. 116
R-076	Barrett v Universal-Island Records Ltd [2006] EWHC 1009 (Ch)
R-077	Tajdin v. Aga Khan, 2012 FCA 12
R-078	Not Used
R-079	Sanofi-Aventis Australia Pty Ltd v Apotex Pty Ltd (No 3) [2011] FCA 846 (29 July 2011)
R-080	Sanofi-Aventis Australia Pty Ltd v Apotex Pty Ltd (No 3) [2012] FCAFC 102

Exhibit No.	Canada's Exhibits
R-081	Catnic Components Limited v. Hill & Smith Limited, [1978] F.S.R. 405
R-082	Grimmer v. Carleton Road Industries Association, 2009 NSSC 169
R-083	Montreal Trust Co. v. Herc Oil Corp., 2004 SKCA 116
R-084	Patent Act, R.S.C. 1985, c. P-4
R-085	Plant Breeders' Rights Act, S.C. 1990, c.20
R-086	Sam Ricketson and Jane C Ginsburg, <i>International Copyright and Neighbouring Rights: The Berne Convention and Beyond</i> , 2d ed (Oxford: Oxford University Press, 2005) [Excerpts]
R-087	Silke von Lewinski, <i>International Copyright Law and Policy</i> (Oxford: Oxford University Press, 2008) [Excerpts]
R-088	Mihály Ficsor, The Law of Copyright and the Internet: the 1996 WIPO Treaties, their Interpretation and Implementation (Oxford: Oxford University Press, 2002) [Excerpt]
R-089	Daniel Gervais, <i>The TRIPS Agreement: Drafting History and Analysis</i> , 4 th ed (London: Thompson Reuters (Professional) Ltd., 2012) [Excerpts]
R-090	J.A.L Sterling, World Copyright Law: Protection of Authors' Works, Performances, Phonograms, Films, Video, Broadcasts and Published Editions in National, International, and Regional Law, 2d ed (London: Sweet & Maxwell, 2003) [Excepts]
R-091	Howard P. Knopf, in Gordon F. Henderson, ed., Copyright and Confidential Information Law of Canada (Scarborough: Carswell, 1994) [Excerpts]
R-092	Sunny Handa, Copyright Law in Canada (Markham: Butterworths Canada Ltd., 2002) [Excerpts]
R-093	Reference re Broadcasting Act, 2011 FCA 64
R-094	Reference re Broadcasting Act, S.C. 1991 (Canada) 2012 SCC 68
R-095	ATV Music Publishing of Canada Ltd. v. Rogers Radio Broadcasting Ltd., 1982 CarswellOnt 918 (ON SC)
R-096	Baker (Estate) v. Sony BMG Music (Canada) Inc., 2011 ONSC 7105
R-097	Performing Rights Organization of Canada Ltd./Société de droits d'exécution du Canada Ltée v. Lion d'Or (1981) Ltée, 1987 CarswellNat 751 (Fed Ct TD)
R-098	Business Corporations Act, R.S.O. 1990, c. B.16

Exhibit No.	Canada's Exhibits
R-099	National Instrument 43-101 Standards of Disclosure for Mineral Projects
R-100	R. v. Wholesale Travel Group Inc. [1991] 3 SCR 154
R-101	R. v. Fitzpatrick [1995] 4 SCR 154
R-102	Scott v. Ontario Racing Commission, 2009 CanLII 34782 (ON SCDC)
R-103	R. v. Piko Foods Ltd. and Paul Peter Zwierzewicz, 2011 BCPC 204
R-104	Jackson v. Vaughan (City), 2009 CanLII 10991 (ON SC)
R-105	Geophysical Services Incorporated v TGS-Nopec Geophysical Services, Civil Action No-14-1368, Memorandum and Opinion, 2018 WL 3032575 (S.D.Texas, June 19, 2018)
R-106	Geophysical Services Incorporated v TGS-Nopec Geophysical Services Civil Action No-14-1368, Memorandum and Order on TGS's Renewed Motion for Attorney's Fees and Costs, (S.D. Texas, Feb. 19, 2020)
R-107	Geophysical Services Incorporated v TGS-Nopec Geophysical Services, No 18-20493 (5th Cir. Sept. 13, 2019)
R-108	Geophysical Service Incorporated v The Falkland Islands, Approved Judgment, Civil Appeal No 2 of 2016, 10 April 2018
R-109	Floe Telecom Ltd v Office of Communications [2009] Bus LR 1116
R-110	Elmer A. Driedger, <i>The Construction of Statutes</i> (Toronto: Butterworths, 1974) [Excerpts]
R-111	Rogers Communications Inc. v. Voltage Pictures, LLC, 2018 SCC 38
R-112	Ruth Sullivan, <i>The Construction of Statutes</i> , 7 th ed (Toronto: LexisNexis Canada, 2022) [Excerpts]
R-113	R. v. Ali, 2019 ONCA 1006
R-114	Németh v. Canada (Justice), 2010 SCC 56, [2010] 3 S.C.R. 281
R-115	Ulybel Enterprises Ltd., 2001 SCC 56, [2001] 2 SCR 867
R-116	Friends of the Oldman River Society v. Canada (Minister of Transport), [1992] 1 SCR 3
R-117	Bell ExpressVu Limited Partnership v. Rex, 2002 SCC 42 (CanLII), [2002] 2 SCR 559

Exhibit No.	Canada's Exhibits
R-118	Desputeaux v. Éditions Chouette (1987) inc., 2003 SCC 17 (CanLII), [2003] 1 SCR 178
R-119	Chef Ready Foods Ltd. v. Hongkong Bank of Canada, 1990 CanLII 529 (BCCA)
R-120	Century Services Inc. v. Canada (Attorney General), 2010 SCC 60 (CanLII), [2010] 3 SCR 379
R-121	Charlebois v. Saint John (City), 2005 SCC 74 (CanLII), [2005] 3 SCR 563
R-122	Toronto Ry. Co. v. Paget, (1909) 42 SCR 488
R-123	Halifax Board of Trade v. Grand Trunk Railway Co., (1911) 44 S.C.R. 298
R-124	Tabernacle Permanent Building Society v. Knight [1892] A.C. 298
R-125	Conseil scolaire francophone de la Colombie-Britannique v. British Columbia, 2013 SCC 42 (CanLII), [2013] 2 SCR 774
R-126	Society of Composers, Authors and Music Publishers of Canada v. Bell Canada, 2012 SCC 36 (CanLII), [2012] 2 SCR 326
R-127	Keatley Surveying Ltd. v. Teranet Inc., 2019 SCC 43 (CanLII), [2019] 3 SCR 418
R-128	Interpretation Act, R.S.C., 1985, c. I-21
R-129	Crawford v. Canada (Warden of William Head Penitentiary) (T.D.), 1992 CanLII 14836 (FC), [1992] 3 FC 539
R-130	British Columbia Telephone Company Ltd. v. The Queen (1992), 92 DTC 6129 (F.C.A.) [1992] F.C.J. No. 27
R-131	Kandola v. Canada (Citizenship and Immigration), 2013 FC 336 (CanLII)
R-132	Taylor v. Goodwin (1879), 4 Q.B.D. 228
R-133	Attorney General v. The Edison Telephone Company of London Ltd. (1880), 6 Q.B.D. 244
R-134	Canadian Pacific Railway Co. v. McCabe Grain Co. (1968), 69 D.L.R. (2d) 313 (B.C.C.A.)
R-135	Lumberland Inc. v. Nineteen Hundred Tower Ltd., [1977] 1 S.C.R. 581
R-136	Case X35 (1990), 90 A.T.C. 316 (A.A.T.)
R-137	Deneault v. Monette (1933), 55 B.R. 111 (Que.)
R-138	Canada (Attorney General) v. Hislop, 2007 SCC 10

Exhibit No.	Canada's Exhibits
R-139	National Westminster Bank plc v. Spectrum Plus Limited & Ors [2005] UKHL 41 (30 June 2005)
R-140	Ontario (Finance) v. Progressive Casualty Insurance Company of Canada, 2009 ONCA 258 (CanLII)
R-141	Beairsto v. Cook, 2018 NSCA 90 (CanLII)
R-142	Morrow v. Zhang, 2008 ABQB 98 (CanLII)
R-143	Morrow v. Zhang, 2009 ABCA 215
R-144	Morrow v. Zhang, 2009 CanLII 71477 (SCC)
R-145	R. v. Kirkpatrick, 2022 SCC 33
R-146	Quinn v. Leathem, [1901] A.C. 495 (H.L.)
R-147	R. v. Henry, 2005 SCC 76
R-148	R. v. Prokofiew, 2010 ONCA 423
R-149	Not Used
R-150	Geophysical Service Incorporated v 612469 Alberta Limited (CalWest Printing & Reproductions), 2016 ABQB 356, Reasons for Judgment, 28 June 2016
R-151	Geophysical Service Incorporated v Martin (2013), 343 Nlfd & PEIR 180 (Nfld TD)
R-152	Geophysical Service Inc. v. Canada-Nova Scotia Offshore Petroleum Board, 2014 NSSC 172, Decision on Motion, 14 May 2014
R-153	Dolmage v. Erskine (2003), 23 C.P.R. (4th) 495 (Ont. S.C.J.)
R-154	Drolet v. Stiftung Gralsbotschaft, 2009 FC 17, 2009 CarswellNat 1563
R-155	Rains v. Molea, 2013 ONSC 5016
R-156	Supreme Court of Canada, "Role of the Court", 23 August 2017
R-157	Barrett and Mellor v Australian Broadcasting Corporation [1940] A.C. 491
R-158	Geophysical Service Incorporated, Offshore Canada Maps
R-159	Geophysical Service Incorporated, Acquired Data website
R-160	CGG, Website Screenshot, as of 6 January 2023

Exhibit No.	Canada's Exhibits
R-161	Schlumberger, Website Screenshot, as of 6 January 2023
R-162	PGS, Website Screenshot, as of 6 January 2023
R-163	Spectrum ASA, 2018 Annual Report
R-164	Searcher Seismic, Data Library, Canada, Website Screenshot, as of 6 January 2023
R-165	Geoex MCG, Website Screenshot, as of 6 January 2023
R-166	GeoPartners Ltd, Website Screenshot, as of 6 January 2023
R-167	PXGEO, Website Screenshot, as of 6 January 2023
R-168	Seabed Exploration, Website Screenshot, as of 6 January 2023
R-169	BGP Inc., Multi-client library, Website Screenshot, as of 6 January 2023
R-170	Schlumberger Limited, 2009 Annual Report
R-171	Schlumberger Limited, 2010 Annual Report
R-172	TGS, 2009 Annual Report
R-173	PGS, 2009 Annual Report
R-174	PGS, Third Quarter 2022 Presentation, 26 October 2022
R-175	OPEC, Crude Oil Production, Source Information Chart, as at 31 August 2022
R-176	Geophysical Service Incorporated, Non-exclusive Data, Website Screenshot
R-177	TGS, 2021 Annual Report
R-178	PGS, 2021 Annual Report
R-179	CGG, 2021 Annual Report
R-180	Schlumberger Limited, Multiclient Data Library, Website Screenshot, as of 6 January 2023
R-181	PGS, Data Library Hotspots, "Newfoundland and Labrador", Website Screenshot, as of 6 January 2023
R-182	PGS, Data Library Interactive Map, Website Screenshot, as of 6 January 2023
R-183	TGS, Map of MC Offshore Data, Canada East Coast, Website Screenshot, as of 6 January 2023

Exhibit No.	Canada's Exhibits
R-184	PGS, The Ramform Story, as of 6 January 2023
R-185	TGS, Seismic Acquisition and Processing: The Technology Race, 9 November 2020
R-186	TGS, East Coast Canada, Interactive Maps, 5 November 2020
R-187	Geophysical Service Incorporated, Non-Exclusive Data, Offshore East Coast Canada
R-188	Energeo Alliance, Model Master Licensing Agreement, May 2022
R-189	CCG, Cloud Services, website screenshot as of 6 January 2023
R-190	Öz Yilmaz, Investigations in Geophysics, Introduction to 3D Seismic Exploration, 30 September 2014
R-191	TGS, Pareto Oil and Offshore Conference Presentation, September 2012
R-192	Schlumberger, 2021 Annual Report
R-193	TGS, 2012 Annual Report
R-194	TGS, 2017 Annual Report
R-195	Map of Survey Regions
R-196	Geophysical Service Incorporated v. Canada-Nova Scotia Offshore Petroleum Board, Court File No. T-467-14, Affidavit of Carl Makrides, 28 March 2014
R-197	Geophysical Service Incorporated v. Canada-Nova Scotia Offshore Petroleum Board, Court File No. T-467-14, Affidavit of Carl Makrides 6 October 2014.
R-198	Canada-Nova Scotia Offshore Petroleum Resources Accord, 26 August 1986
R-199	CNSOPB, "Geophysical and Geological Programs in the Nova Scotia Offshore Area Guidelines for Work Programs, Authorizations & Reports", 1992
R-200	CNSOPB, "Geophysical, Geological, Geotechnical and Environmental Program Guidelines", 26 January 2015
R-201	Geophysical Service Inc. v. Canada – Nova Scotia Offshore Petroleum Board, 2014 NSSC 172, Decision on Motion, 14 May 2014
R-202	Geophysical/Geological Work Authorization, Program NS24-G005-001P, 13 July 1998
R-203	Geophysical/Geological Work Authorization, Program NS24-G005-003P, 4 October 2000

Exhibit No.	Canada's Exhibits
R-204	Geophysical/Geological Work Authorization, Program NS24-G005-004P, 15 May 2001
R-205	Geophysical/Geological Work Authorization, Program NS24-G005-007P, 19 July 2002
R-206	Geophysical/Geological Work Authorization, Program NS24-G005-008P, 25 April 2003
R-207	Letter from J.E. (Jim) Dickey, Chief Executive Officer, CNSOPB to Matthew Kimball, Vice President, Marine Operations, Geophysical Service Inc., RE: "Geophysical Program Authorization No. NS24-G005-003P", 4 October 2000
R-208	Letter from J.E. (Jim) Dickey, Chief Executive Officer, CNSOPB to Matthew Kimball, Vice President, Marine Operations, Geophysical Service Inc., RE: "Geophysical Program Authorization No. NS24-G005-004P", 15 May 2001
R-209	Letter from J.E. (Jim) Dickey, Chief Executive Officer, CNSOPB to Matthew Kimball, Vice President, Marine Operations, Geophysical Service Inc., RE: "Geophysical Program Authorization No. NS24-G005-7P", 19 July 2002
R-210	Letter from J.E. (Jim) Dickey, Chief Executive Officer, CNSOPB to Matthew Kimball, Vice President, Marine Operations, Geophysical Service Inc., RE: "Geophysical Program Authorization No. NS24-G005-8P", 25 April 2003
R-211	CNSOPB, "Liability Agreement – Borrowed Materials"
R-212	CNSOPB "Information on Well Data, Geological Data and Geophysical Data" February 2012
R-213	CNSOPB "Information on Well Data, Geological Data and Geophysical Data" December 2019
R-214	CNSOPB, Map of Marine Protected Areas, Georges Bank Prohibition Area, Sable Island National Park Reserve and Donkin Coal Block Area, February 2019
R-215	Letter from Paul Einarsson, Geophysical Service Incorporated to Mr. J.E. (Jim) Dickey, Chief Executive Officer, CNSOPB, RE: "GSI participation in the Shared Data Repository", 29 February 2000
R-216	Geophysical Service Incorporated v. The Chairman, Canada-Nova Scotia Offshore Petroleum Board and Information Commissioner of Canada, Affidavit of Michael S. McPhee, Federal Court - Trial Division T-2102-00, 26 January 2001
R-217	Letter from Paul Einarsson, COO, Chairman, Executive Vice President, Geophysical Service Incorporated to Mr. J.E. (Jim) Dickey, Chief Executive Officer, CNSOPB, 30 March 2006

Exhibit	
No.	Canada's Exhibits
R-218	Letter from Anthony J. Jordan, Gowlings to Michael McPhee, CNSOPB, RE: "Geophysical Service Incorporated ("GSI")", 30 March 2007, attaching draft Statement of Claim
R-219	Letter from Paul Einarsson to Ms. Mary Jean Verrall, CNSOPB, 4 April 2008
R-220	Letter from H. Paul Einarsson to Brian Altheim, CNSOPB, RE: "Confidential Information", 4 November 2008
R-221	Email from Stuart Pinks, Chief Executive Officer, CNSOPB to Paul Einarsson, Geophysical Service Incorporated, RE: "GSI", 17 August 2009
R-222	Letter from Stuart Pinks, Chief Executive Officer, CNSOPB to Paul Einarsson, Geophysical Service Incorporated, RE: "Your Letter of May 3, 2010", 12 May 2010
R-223	Letter to A. William Moreira, Stewart McKelvey from Stuart Pinks, Chief Executive Officer, CNSOPB, RE: "Geophysical Service Incorporated – Copyright and Website Content of NS13-1 Call for Bids", 3 October 2013
R-224	Geophysical Service Incorporated v. Canada-Nova Scotia Offshore Petroleum Board, the Attorney General of Nova Scotia and the Attorney General of Canada, Case No. 410874, Notice of Application, 8 January 2013
R-225	Program # 8620-C039-001E, Final Report Chedabucto Bay November 1974, 18 April 1977
R-226	Canada Oil and Gas Lands Administration "Released Geophysical and Geological Reports – Canada Lands" January 1984
R-227	Geophysical Service Incorporated v. Encana et al, GSI Case No. 0701-04061, Affidavit of John P. Andrews, 27 August 2015, filed August 31, 2015
R-228	Petroleum and Natural Gas Act, 1965
R-229	Petroleum and Natural Gas Act, R.S.N.L., 1990, c. P-10
R-230	Newfoundland and Labrador Petroleum Regulations, 1977, Newfoundland Regulation 139/78
R-231	The Atlantic Accord, "A Memorandum of Agreement between the Government of Canada and the Government of Newfoundland and Labrador on Offshore Oil and Gas Resource Management and Revenue Sharing", 11 February 1985
R-232	Newfoundland Offshore Area Oil and Gas Operations Regulations, 1995, SOR/88-347
R-233	Newfoundland Offshore Area Petroleum Geophysical Operations Regulations, 1996, SOR/95-334
R-234	Letter from H.H. Stanley, Chairman & Chief Executive Officer, C-NLOPB to the Honourable Roger Grimes, Minister of Mines and Energy, Government of

Exhibit No.	Canada's Exhibits
	Newfoundland & Labrador and the Honourable Ralph Goodale, Minister of Natural Resources Canada, Government of Canada, RE: "Confidentiality Period of Non-Exclusive Geological Work or Geophysical Work", 22 February 1999
R-235	Canada-Newfoundland and Labrador Offshore Petroleum Board News Release, "New Policy", 24 February 1999
R-236	Letter from Hal Stanley, Chairman & Chief Executive Officer, C-NLOPB to Mr. T.D. Einarsson, President, Geophysical Service Inc., RE: "Confidentiality Period of Non-Exclusive Geological Work or Geophysical Work", 24 February 1999
R-237	Letter from H.H. Stanley, Chairman & Chief Executive Officer, C-NLOPB to Mr. W. Kammermeyer, Manager, Canadian Association of Geophysical Contractors, RE: "Confidentiality Period of Non-Exclusive Geological Work or Geophysical Work", 24 February 1999
R-238	COGLA, Geophysical and Geological Programs on Canada Lands: Guidelines for Approvals and Reports, March 1984
R-239	COGLA, Geophysical and Geological Programs on Frontier Lands: Guidelines for Approvals and Reports, January 1987
R-240	C-NLOPB, Geophysical, Geological, Environmental and Geotechnical Program Guidelines, January 1996
R-241	C-NLOPB, Geophysical, Geological, Environmental and Geotechnical Program Guidelines, January 1999
R-242	C-NLOPB, Geophysical, Geological, Environmental and Geotechnical Program Guidelines, November 2001
R-243	C-NLOPB, Geophysical, Geological, Environmental and Geotechnical Program Guidelines, April 2004
R-244	C-NLOPB, Geophysical, Geological, Environmental and Geotechnical Program Guidelines, May 2008
R-245	Canada-Newfoundland and Labrador Offshore Petroleum Board, "Disclosure Agreement – Information Requests", 6 December 2002
R-246	C-NLOPB, Chart of GSI-related seismic programs
R-247	National Energy Board, "Frontier Lands: Released Information", December 1992
R-248	Letter from James Strain, Chairman, C-NLOPB to Keith Mathews, Manager, Haliburton Geophysical Service Inc., RE: "Release of Geophysical Information", 31 August 1992
R-249	Letter from William R. Pieshel, Parlee McLaws to James Strain, Chair and Chief Executive Office, C-NLOPB, RE: "Release of Non-Exclusive Offshore

Exhibit No.	Canada's Exhibits
	Newfoundland Seismic Data by the Canada-Newfoundland Offshore Petroleum Board", 3 November 1993
R-250	Letter from John G. Fitzgerald, Chairman, C-NLOPB to Doug Dowdell, Operations Manager, Geophysical Service Incorporated, RE: "1997 Speculative 3-D Seismic Survey Jeanne d'Arc Basin" (Program 8924-G005-001P), 10 July 1997
R-251	Letter from Hal Stanley, Chairman, C-NLOPB to Doug Dowdell, Operations Manager, Geophysical Service Incorporated, RE: "1998 2-D Seismic Grand Banks" (Program 8924-G005-002P), 14 June 1998
R-252	Letter from Hal Stanley, Chairman, C-NLOPB to Doug Dowdell, Operations Manager, Geophysical Service Incorporated, RE: "1999 2-D Seismic Grand Banks" (Program 8924-G005-003P), 4 June 1999
R-253	Letter from Hal Stanley, Chairman, C-NLOPB to Matt Kimball, Vice President, Geophysical Service Incorporated, RE: "2000 2-D Non-Exclusive Seismic Survey, Orphan Basin" (Program 8924-G005-004P), 22 June 2000
R-254	Letter from Hal Stanley, Chairman, C-NLOPB to Matt Kimball, Vice President, Geophysical Service Incorporated, RE: "2001 2-D Non-Exclusive Seismic South Newfoundland" (Program 8924-G005-005P), 3 May 2001
R-255	Letter from Hal Stanley, Chairman, C-NLOPB to Matt Kimball, Vice President, Geophysical Service Incorporated, RE: "Extension to Authorization Number 8924-G005-006P" (Program 8924-G005-006P), 17 August 2001
R-256	Letter from Hal Stanley, Chairman, C-NLOPB to Matt Kimball, Vice President, Geophysical Service Incorporated, RE: "2001 2-D Non-Exclusive Seismic Carson Basin" (Program 8924-G005-007P), 6 July 2001
R-257	Letter from Hal Stanley, Chairman, C-NLOPB to Matt Kimball, Vice President, Geophysical Service Incorporated, RE: "2002 Non-Exclusive 2-D Seismic Northeast Newfoundland Shelf" (Program 8924-G005-008P), 5 August 2002
R-258	Letter from Hal Stanley, Chairman, C-NLOPB to Davey Einarsson, President and CEO, GSI, RE: "2002 Non-Exclusive 2-D Seismic Gulf of St. Lawrence" (Program 8924-G005-009P), 21 November 2022
R-259	Letter from Hal Stanley, Chairman, C-NLOPB to Davey Einarsson, President and CEO, GSI, RE: "2003 Non-Exclusive 2-D and 3-D Seismic Orphan Basin" (Program 8924-G005-0010P), 22 July 2003
R-260	Letter from Hal Stanley, Chairman, C-NLOPB to Davey Einarsson, President and CEO, GSI, RE: "2003 Non-Exclusive 2-D and 3-D Seismic Orphan Basin" (8924-G005-0011P), 22 July 2003

Exhibit No.	Canada's Exhibits
R-261	Letter from Hal Stanley, Chairman, C-NLOPB to Davey Einarsson, President and CEO, GSI, RE: "2003 Non-Exclusive 2-D Seismic Labrador Shelf" (Program 8924-G005-012P), 26 September 2003
R-262	Letter from Fred Way, A/Chairman and CEO, C-NLOPB, to Davey Einarsson, President and CEO, GSI, RE: "2004 2-D Seismic Survey Offshore Labrador", 28 June 2004 (Program 8924-G005-013P)
R-263	Letter from Fred Way, A/Chairman and CEO, C-NLOPB, to Davey Einarsson, President and CEO, GSI, RE: "2004 2-D Seismic Survey Offshore Labrador" (Program 8924-G005-014P), 17 June 2005
R-264	Letter from Fred Way, A/Chairman and CEO, C-NLOPB, to Davey Einarsson, President and CEO, GSI, RE: "Program Number 8924-G005-015P 2D Non-Exclusive Labrador", 30 June 2006
R-265	Letter from Fred Way, A/Chairman and CEO, C-NLOPB, to Davey Einarsson, President and CEO, GSI, RE: "Program Number 8924-G005-016P, 2D Seismic Equipment Testing", 23 June 2006
R-266	Letter from Max Ruelokke, Chairman and CEO, C-NLOBP, to Davey Einarsson, President and CEO, GSI, RE: "Program Number 8924-G005-017P: 2D Non-Exclusive Labrador", 26 July 2007
R-267	Letter from Max Ruelokke, Chairman and CEO, C-NLOBP, to Davey Einarsson, President and CEO, GSI, RE: "Program Number 8924-G005-018P: 2D Non-Exclusive Labrador", 30 June 2008
R-268	Letter from Fred Way, A/Chairman and CEO, C-NLOPB, to Davey Einarsson, President and CEO, GSI, RE: "Program Number 8924-G005-019P: 2D Non-Exclusive, Anticosti Basin", 17 October 2008
R-269	Letter from Sam Nader, VP-Marketing, Geophysical Service Incorporated to John G. Fitzgerald, P. Eng Chairman and CEO (Acting), C-NLOPB, 17 November 1997
R-270	Letter from John Fitzgerald, Chairman (Acting), C-NLOPB to Sam Nader, Vice- President – Marketing, Geophysical Service Incorporated, RE: "Release of Seismic Data", 27 November 1997
R-271	Letter from Davey Einarsson, President, Geophysical Service Incorporated to Neil DaSilva, Chief Geoscientist, C-NLOPB, RE: "Your Letter of May 13, 1999", 1 June 1999
R-272	Letter from Doug Dowdell, Operation Manager, Geophysical Service Incorporated to Neil DaSilva, C-NLOPB, 5 May 1999
R-273	Letter from Neil DaSilva, Chief Geoscientist, C-NLOPB to Doug Dowdell, Operation Manager, Geophysical Service Incorporated, RE: "Notification of requests for geophysical data collected through GSI", 13 May 1999

Exhibit No.	Canada's Exhibits
R-274	Letter from Hal Stanley, Chairman & Chief Executive Officer, C-NLOPB to Mr. T.D. Einarsson, President, Geophysical Service Inc., RE: "Release of Non-Exclusive Seismic Data", 18 June 1999
R-275	Letter from Max Ruelokke, Chairman and CEO, C-NLOPB to H. Paul Einarsson, Chairman and COO, Geophysical Service Incorporated, RE: "Disclosure of Information – Geophysical (Seismic) Data", 25 August 2009
R-276	Letter from Max Ruelokke, Chairman and CEO, C-NLOPB to Paul Einarsson, Chairman, Geophysical Service Incorporated, 9 June 2010
R-277	Geophysical Service Incorporated v. Antrium Energy Inc. and Canada- Newfoundland and Labrador Offshore Petroleum Board, ABQB 1401-00904, Statement of Claim, January 24, 2014
R-278	Geophysical Service Incorporated v. Encana et al., Case No. 0701-04061, Affidavit of Bharat Dixit ("First Affidavit of Bharat Dixit"), 28 August 2015
R-279	Geophysical Service Incorporated v. Murphy Oil Company Ltd., Case No. 1301-15085, Affidavit of Bharat Dixit, 7 October 2016
R-280	NEB/COGLA Integration, Discussion Paper, August 1991, pp. 2-3.
R-281	Oil and Gas Production and Conservation Act, R.S., 1985 c. O-4
R-282	An Act to Amend the Oil and Gas Production and Conservation Act, S.C. 1992, c. 35
R-283	Senate of Canada, Proceedings of the Standing Committee on Energy and Natural Resources, 22 October 1986
R-284	Letter from John Clink, Manager, Old GSI to Minister Masse, Ministry of Energy, Mines and Resources, 6 February 1987
R-285	Letter from Davey Einarsson, Senior Vice President, Old GSI to Minister Masse, Ministry of Energy, Mines and Resources, 17 February 1987
R-286	Letter from Minister Masse, Ministry of Energy, Mines and Resources to John Clink, Manager, Old GSI, 3 December 1986
R-287	Letter from Minister Masse, Ministry of Energy, Mines and Resources to John Clink, Manager, Old GSI, RE: "Confidential Period for Geophysical Information", 8 April 1987
R-288	Letter from Bharat Dixit, Chief Conservation Office, National Energy Board to Darlene Davis (GSI) RE: "Geophysical Service Incorporated 2D Marine Seismic Survey North Labrador Sea 2008 [5554116]", 8 August 2008
R-289	NEB, "Frontier Lands: Released Information", June 2005
R-290	NEB, "The Frontier Information Office: Information Bulletin", June 1995
R-291	NEB, "The Frontier Information Office: Information Bulletin", 2002
R-292	NEB, "Frontier Information Office Log: GSI Logs", 2000-2002

Exhibit	Canada's Exhibits
No.	
R-293	NEB, "Liability Agreement – Borrowed Materials", GSI Signed Agreements, 2000-2001
R-294	NEB, "Liability Agreement – Borrowed Materials", effective to 2003
R-295	NEB, "Liability Agreement – Borrowed Materials", effective 2003-2006
R-296	NEB, "Liability Agreement – Borrowed Materials", effective after 2006
R-297	National Energy Board, Frontier Information Office Sign, current as of 2011
R-298	Letter from Bharat Dixit, Team Leader, National Energy Board to Davey Einarsson, President and CEO, Geophysical Service Incorporated, RE: "Second Request – Outstanding Report for GSI 2D Marine Seismic Survey North Labrador Sea 2008", 26 January 2010
R-299	Email from Paul Einarsson, Chairman and COO, Geophysical Service Incorporated to Bharat Dixit, Team Leader, National Energy Board, RE: "Requests for outstanding reports GSI 2D Labrador File no. OF-EP-GeopOp-G138-55541160101", 4 February 2010
R-300	Letter from Bharat Dixit, Team Leader, National Energy Board to Paul Einarsson, Chairman, Geophysical Service Incorporated, RE: "Reporting Deficiencies for GSI 2D Seismic Survey Labrador Sea 2008", 25 May 2010
R-301	Letter from Bharat Dixit, Team Leader, National Energy Board to Paul Einarsson, Chairman, Geophysical Service Incorporated, RE: "Deficiencies for GSI 2D Seismic Survey Labrador Sea 2008 Program (ID 5554116), Response to GSI email, dated 17 June 2010", 30 June 2010
R-302	Letter from Michel Mantha, Access to Information & Privacy Coordinator, National Energy Board to Doug Dowdell, Geophysical Service Incorporated, RE: "Access to Information Request dated 20 September 1999", 8 October 1999
R-303	Letter from Michel L. Mantha, Access to Information & Privacy Coordinator, National Energy Board to Paul Einarsson, RE: "Access to Information Request dated 2 March 2000", 21 March 2000
R-304	Geophysical Service Incorporated v. The Chairman, National Energy Board, Court File No. T-2101-00, Affidavit of John McCarthy, 7 March 2001
R-305	Letter from James Eamon, Gowlings to Bharat Dixit, National Energy Board, RE: "Confidential Information of Geophysical Service Incorporated ("GSI")", 3 June 2010
R-306	Letter from Anne Marie Erickson, Secretary of the Board, National Energy Board, to James T. Eamon, Q.C., Gowlings Lafleur Henderson LLP, RE: "Letter dated 3 June 2010 re: Geophysical Services Inc. ("GSI")", 22 July 2010
R-307	Constitution Act, 1982, Schedule B to the Canada Act 1982 (UK), 1982, c. 11
R-307	Constitution Act, 1982, Schedule B to the Canada Act 1982 (UK), 1982, c. 11

Exhibit No.	Canada's Exhibits
R-308	Constitution Act, 1867, 30 & 31 Vict., c. 3
R-309	Reference re Newfoundland Continental Shelf, [1984] 1 S.C.R. 86
R-310	Energy, Mines and Resources Canada & Indian and Northern Affairs Canada, "Statement of Policy: <i>Proposed Petroleum and Natural Gas Act</i> and new <i>Canada Oil and Gas Land Regulations</i> ", 19 May 1976
R-311	Ministry of Energy, Mines and Resources Canada & Indian and Northern Affairs Canada, "An Energy Strategy for Canada: Policies for Self-Reliance", 1976
R-312	House of Commons Debates, 19 May 1976
R-313	House of Commons of Canada, Common Debates, "Canada Oil and Gas Act, Measure Respecting Oil and Gas Interests", 11 December 1980
R-314	House of Commons of Canada, Common Debates, "Canada Oil and Gas Act, Measure Respecting Oil and Gas Interests", 11 December 1980
R-315	"'Clause-by-Clause' Review of relevant sections of COGA presented to Parliament during COGA's Introduction,"
R-316	NEB/COGLA, "Integration Discussion Paper", August 1991
R-317	COGLA, "Geophysical Surveys on Canada Lands: Guidelines for Approvals and Reports", November 1982
R-318	COGLA, "Geophysical Surveys on Canada Lands: Guidelines for Approvals and Reports", January 1983
R-319	Canada Petroleum Resources Act, Clause-by-Clause Review, 1986
R-320	House of Commons of Canada, "Commons Debates", 33 rd Parliament, 2 nd session, 14 October 1986
R-321	Transcript of the Proceedings of Standing Senate Committee on Energy and Natural Resources, 18 November 1986
R-322	Canada Oil and Gas Geophysical Operations Regulations, SOR/96-117
R-323	Letter from Graham R. Campbell, Director General, Resource Evaluation, COGLA to John Clink, GSI, 16 February 1988
R-324	Minutes of the CPA Negotiating Subcommittee Meeting with Graham Campbell, 22 January 1988
R-325	CNSOPB, Geophysical and Geological Programs in the Nova Scotia Offshore Area Guidelines for Work Programs, Authorizations & Report, 1992

Exhibit No.	Canada's Exhibits
R-326	CNSOPB, Geophysical and Geological Programs in the Nova Scotia Offshore Area Guidelines for Work Programs, Authorizations & Report, 2015
R-327	Affidavit of Bharat Dixit, sworn August 28, 2015, filed in Geophysical Service Incorporated v Encana Corporation, 2016 ABQB 230
R-328	Transcript of "Questioning of T. David Einarsson by Mr. Marko Vesely in Geophysical Service Incorporated v. Encana Corporation, 2016 ABQB 230, 13 August 2015
R-329	Not Used
R-330	Program 9229-G-005-001P/NEB 5553693 (Fort Laird Seismic Survey), Application Date December 11, 1996
R-331	Mac Mackay, Ship fax: a blog about ships and shipping from Halifax, Nova Scotia and beyond, "GSI-Admiral – sold (old news)", 26 March 2012
R-332	Geophysical Services Inc. v. Sable Mary Seismic Inc., 2010 NSSC 357, Judgment, 29 September 2010
R-333	Geophysical Services Inc. v. Sable Mary Seismic Inc., 2013 NSSC 424, Decision on Costs, 20 December 2013
R-334	Letter from Matti Lemmens, BLG, to Chief Justice Wittmann, Alberta Court of Queen's Bench, 10 September 2015
R-335	Geophysical Service Incorporated v. Grynberg Petroleum Company, Action No. 0401-04329, Statement of Claim, 17 March 2004
R-336	Geophysical Service Incorporated v. Her Majesty in right of her Government of the Falkland Islands, Approved Costs Judgment, 21 May 2018
R-337	Email from Paul Einarsson, GSI, to Loris Mirella, Global Affairs Canada, 22 February 2019
R-338	Petroleum Africa, "Hyperdynamics and GSI Enter Seismic Deal", 27 February 2008
R-339	Petroleum Africa, "HyperD Finalizes Preparation for Offshore Guinea Seismic Shoot", 8 April 2008
R-340	Hyperdynamics Corporation, "Form 10K", 30 September 2008
R-341	Sale and Purchase Agreement between Hyperdynamics Corporation (SCS Corporation) and Dana Petroleum (E&P) Limited, 4 December 2009
R-342	Purchase and Sale Agreement between SCS Corporation Ltd. And Tullow Guinea Ltd., 20 November 2012

Exhibit No.	Canada's Exhibits
R-343	CNLOPB, Program Authorization 8924-G005-010P and 8924-G005-011P, 22 July 2003
R-344	Territorial Lands Act, R.S.C. 1952, c. 363
R-345	Public Lands Grants Act, R.S.C. 1952, c. 224
R-346	Program NS24-G005-002P, 9 April 1999
R-347	GSI v. Devon, ABQB File No 1401 12230, Amended (4X) Statement of Claim, 24 June 2015
R-348	GSI v Murphy, ABQB File No. 1301 15085, Statement of Claim, 20 December 2013
R-349	GSI v. Plains Midstream, BP et al., Amended (2x) Statement of Claim, 16 July 2014
R-350	GSI v. Corridor Resources Inc., ABQB File No. 1301 10045, Statement of Claim, 22 August 2013
R-351	Not Used
R-352	Not Used
R-353	GSI v. Antrim Energy Inc., 2015 ABQB 482, Decision, 31 July 2015
R-354	GSI v. C-N Offshore Petroleum, 2003 FCT 507
R-355	Canada Transportation Agency, Decision No. 253-W-2009, "Application by TGS-NOPEC Geophysical Company, pursuant to the <i>Coasting Trade Act</i> , S.C., 1992, c.31
R-356	Mac Mackay, "GSI Admiral – sold (old news)", Shipfax, 26 March, 2012
R-357	Screenshot of Vessel Finder, "GSI Pacific Research Vessell, IMO 7907908"
R-358	Screenshot of Marine Traffic, "GSI Pacific Special Vessel IMO: 7907908"
R-359	Geophysical Services Incorporate v. Canada (Attorney General), 2021 NSSC 77, Decision - Summary Judgment on Evidence, 1 March 2021
R-360	Canada (Attorney General) v. Geophysical Services Incorporated, 2022 NSCA 41, Reasons for Judgment, 3 December 2021
R-361	Geophysical Service Incorporated (Re), [2009] C.I.T.T., No. 32, Canadian International Trade Tribunal Decisions (File No. PR-2009-08), Decision, 19 May 2009

Exhibit No.	Canada's Exhibits
R-362	CTV News, "Calgary seismic firm alleges its IP rights were violated over improper data release", 12 January 2014
R-363	Geophysical Service Incorporated v. National Energy Board and others, 2011 FCA 360, 15 December 2011
R-364	Geophysical Service Incorporated v. Canada-Nova Scotia Offshore Petroleum Board and others, Supreme Court of Nova Scotia, No. HFX No. 410874 ("GSI v CNSOPB, SC Nova Scotia 2013"), Statement of Claim, 8 January 2013
R-365	Geophysical Service Inc. v. Her Majesty the Queen in Right of Canada, Federal Court File No. T-1023-14, Statement of Claim, July 12 2017
R-366	GSI v Encana, ABQB File No. 0701 04061, Amended SOC (23 May 2014)
R-367	Geophysical Service Incorporated v. Hunt Oil Company of Canada, 2017 NSSC 344, Decision on Motion to Order Protection of Certain Confidential Information, 2017 NSSC 344, 4 May 2017
R-368	Geophysical Service Incorporated v. TGS-Nopec Geophysical Company ("GSI v. TGS"), United States District Court, Southern District of Texas File No. 4:2014cv01368, Complaint, 16 May 2014
R-369	GSI v. Occidental, File no. 4:20-cv-01396, Original Complaint
R-370	GSI v. Devon, ABQB File No 1401 12230, Decision, 2017 ABQB 463, (26 July 2017)
R-371	Geophysical Service Incorporated v. Encana Corporation, 2015 ABQB 196, Reasons for Judgment of K.R. Laycock, Master in Chambers, 19 March 2015
R-372	GSI v CalWest, ABCA No. 1601-0179AC, Letter from Matti Lemmens, BLG to Registrar, Court of Appeal of Alberta, 12 January 2018
R-373	Letter from Timothy C. Platnich, Caron & Partners LLP, 13 January 2015
R-374	GSI v. Encana, 2016 ABQB 230, Case Management, 8 April 2015
R-375	GSI v. Encana, 2016 ABQB 230, Case Management, 2 June 2015
R-376	GSI v. Encana, 2016 ABQB 230, Order, 2 June 2015
R-377	GSI v. Encana, Judgment Roll dated 21 April 2016, filed at the Judicial Centre of Calgary, 5 July 2015
R-378	GSI v. Murphy, 2017 ABQB 464
R-379	GSI v. Murphy, 2018 ABCA 380, Memorandum of Judgment, 21 November 2018
R-380	GSI v Murphy, Supreme Court of Canada File No. 38486, 23 May 2019

Exhibit No.	Canada's Exhibits
R-381	Geophysical Service Incorporated v. Encana Corporation, 2018 ABCA 384, Judgment, 11 November 2018
R-382	Geophysical Service Inc. v. Her Majesty the Queen in Right of Canada, Federal Court File No. T-1023-14, Statement of Claim, July 12 2017
R-383	Geophysical Service Inc. v. Her Majesty the Queen in Right of Canada, Federal Court File No. T-1023-14, 2018 FC 670
R-384	Waste Management I, Mexico's Counter-Memorial Regarding the Competence of the Tribunal 5 November 1999
R-385	Waste Management I, Submission of the Government of Canada, 17 December 1999
R-386	Tembec Inc., Tembec Investments Inc. and Tembec Industries Inc. v. United States of America, Statement of Defense on Jurisdiction of Respondent United States of America, 15 December 2004
R-387	KBR Inc. v. United Mexican States (UNCITRAL), Submission of the United States Pursuant to Article 1128
R-388	Shorter Oxford English Dictionary, (Oxford University Press, 2002, 5th ed.), Vols. 1 and 2 [Excerpts]
R-389	Detroit International Bridge Company v. Canada, Submission of the United States of America, 14 February 2014
R-390	Detroit International Bridge Company v. Canada, Submission of Mexico, 14 February 2014
R-391 to R-400	Not Used
R-401	GSI v. Murphy Oil Company Ltd., GSI v. Encana Corporation, File No. 38486, Application for leave to appeal dismissed, 23 May 2019
R-402	GSI v. Wade Atlantic, Decision, 22 November 2013
R-403	GSI v Plains Midstream, ABQB File No. 1401 00646, Procedural Card, (Consulted on December 19, 2022)
R-404	GSI v. Total, 1401 03449, Procedural Card (Consulted on December 19, 2022)
R-405	GSI v. Nalcor, ABQB File No. 1301 09665, SOC (13 August 2013)
R-406	GSI v. Nalcor, ABQB File No. 1301 09665, Procedural Card, (Consulted December 7, 2022)
R-407	GSI v. Anadarko, S.D. Tex, File No. 4:2015cv02765, Agreed motion to lift stay and Joint stipulation of dismissal with prejudice, (18 March 2021)

Exhibit No.	Canada's Exhibits
R-408	GSI v. Anadarko, S.D. Tex, File No. 4:2015cv02765, Order of Dismissal, (29 March 2021)
R-409	GSI v. Anadarko et al., ABQB File No 1201 15228, Procedural Card, (Consulted on December 19, 2022)
R-410	N.D. Tex, GSI v. HuntOil, GSI Complaint, (18 September 2015)
R-411	N.D. Tex, GSI v. HuntOil, GSI Amended Complaint, (8 August 2016)
R-412	GSI v. HuntOil, N.D. Tex File No. 3:2015cv03045, Joint Stipulation of Dismissal with Prejudice, (16 September 2020)
R-413	GSI v. ConocoPhilips, Complaint, 22 September 2015
R-414	S.D. Tex, GSI v. ConocoPhilips, Amended Complaint, 3 August 2016
R-415	W.D. Ark., GSI v. Murphy Oil, GSI, First Amended Complaint, 26 June 2017
R-416	W.D. Ark. File No. 1:2017cv01023, Joint Motion to Lift and Joint Motion to Dismiss with Prejudice, (26 March 2021)
R-417	GSI v. Murphy Oil, W.D. Ark. File No. 1:2017cv01023, Order granting motion to lift stay and dismiss case (26 March 2021)
R-418	GSI v. TGS, Memorandum and Opinion, 19 June 2018
R-419	GSI v. TGS-Nopec, S.D. Tex. File No. 4:2014cv01368, Memorandum and Opinion, (30 March 2015)
R-420	Geophysical Service Incorporated v. TGS-Nopec Geophysical Company, Federal Court Appeal, File No. No. 0:2018pcf20493, Unpublished Opinion, 13 September 2019
R-421	Geophysical Service Incorporated v. TGS-Nopec Geophysical Company, Supreme Court File No. 19-873, Petition denied, 26 May 2020
R-422	GSI v. Anadarko, S.D. Tex, File No. 4:2015cv02765, Amended Complaint, (3 May 2017)
R-423	GSI v. TGS-Nopec, FCA (5th Cir.) File No. 0:2018pcf20493, Appellant's Brief, (13 December 2018)
R-424	GSI v. TGS-Nopec, FCA (5th Cir.) File No. 0:2018pcf20493, GSI Reply in Opposition to Motion to Dismiss, 18 May 2018
R-425	Geophysical Service, Incorporated v. TGS-NOPEC Geophysical Company, No. 19-873, Petition for Writ of Certiorari, 10 January 2020
R-426	Resolute Forest Products Inc. v. Government of Canada (UNCITRAL), U.S. 1128 Submission on Jurisdiction, 14 June 2017
R-427	Merrill and Ring Forestry L.P. v. Government of Canada (UNCITRAL), Submission of the United States of America, 14 July 2008

Exhibit No.	Canada's Exhibits
R-428	Merrill and Ring Forestry L.P. v. Government of Canada (UNCITRAL), Submission Mexico made pursuant to Article 1128 of the NAFTA, 2 April 2009
R-429	Metalclad Corporation v. The United Mexican States (ICSID Case No. ARB(AF)/97/1), Submission of the Government of the United States of America, 9 November 1999
R-430	Mondev International Ltd. v. United States of America (ICSID Case No. ARB(AF)/99/2), Second Submission of Canada pursuant to NAFTA Article 1128, 7 July 2001
R-431	Methanex Corporation v. The United States of America (UNCITRAL) Mexico Fourth Submission pursuant to NAFTA Article 1128, 30 January 2004
R-432	Alicia Grace and others v. United Mexican States (UNCITRAL), Submission of the United States of America, 24 August 2021
R-433	Lupaka Gold Corp. v. Republic of Peru (ICSID Case No. ARB/20/46), Non- Disputing Party Submission of the Government of Canada, 26 May 2022
R-434	Geophysical Service Incorporated v. Her Majesty the Queen in Right of Canada as represented by Attorney General of Canada and in Right of Quebec as represented by Attorney General of Quebec, 2019 FC 337, Order and Reasons, 19 March 2019
R-435	B-Mex, LLC and others v. United Mexican States (ICSID Case No. ARB(AF)/16/3), Respondent Counter-Memorial on the Merits, 4 December 2020, [English Translation]
R-436	Angel Samuel Seda and others v. Republic of Colombia (ICSID Case No. ARB/19/6), Submission of the United States of America, 26 February 2021
R-437	Lion Mexico Consolidated L.P. v. Mexico (CIADI Case No. ARB (AF)/15/2), Submission of the United States of America, 21 June 2019
R-438	Gramercy Funds Management LLC and Gramercy Peru Holdings LLC v. Republic of Peru (UNCITRAL), Submission of the United States of America, 21 June 2019
R-439	Eli Lilly, Submission of the United States of America, 18 March 2016
R-440	Eli Lilly v. Canada, Submission of Mexico, 18 March 2016
R-441	Eli Lilly v. Canada, Canada's Response to Article 1128 Submissions of the United States and Mexico, 22 April 2016
R-442	Lion Mexico Consolidated L.P. v. Mexico (CIADI Case No. ARB (AF)/15/2) Non-Disputing Party Submission of the Government of Canada Pursuant to NAFTA Article 1128, 21 June 2019

Exhibit No.	Canada's Exhibits
R-443	Geophysical Service Incorporated v. Encana and others, Supreme Court of Canada File No. 37634, Notice of Leave to Appeal (Geophysical Service Incorporated, Applicant), 22 June 2017
R-444	Geophysical Service Incorporated v. Encana Corporation, 2017 ABQB 466, Judgment, July 26, 2017
R-445	Geophysical Service Incorporated v. Murphy Oil Company Ltd. and Encana Corporation, Judgment No. 38486, May 23, 2019
R-446	Geophysical Service Incorporated v. Falkland Oil and Gas Limited, 2020 ABCA 21, Judgment, 1 January 2020
R-447	Geophysical Service Incorporated v. Falkland Oil and Gas Limited, S.C.C. No. 39093, Judgment, 24 September 2020
R-448	Letter from Matti Lemmens, BLG, to Chief Justice Wittmann, Alberta Court of Queen's Bench, 10 September 2015 (attaching Statement of Claim from Geophysical Service Incorporated v. Grynberg Petroleum Company, Action No. 0401-04329, March 17, 2004)
R-449	Purchase and Sale Agreement between SCS Corporation Ltd. And Tullow Guinea Ltd., November 20, 2012
R-450	Glamis Gold v. United States (UNCITRAL) Rejoinder Memorial of the United States, 15 March, 2007
R-451	Geophysical Service Incorporated v. Anadarko (US), File no. 4:19-mc-02426, Exhibit 2, H. Paul Einarsson Affidavit, 19 December 2019
R-452	Elections Canada, Record of Contributions for "Paul Einarsson" and "Harold Einarsson", available at www.elections.ca (Accessed: January 13, 2023
R-453	National Post, Follow the Money, "Einarsson", available at www.nationalpost.com (Accessed January 13, 2023)
R-454	Alberta Elections, "Einarsson", available at efpublic.elections.ab.ca (Accessed January 13, 2023)
R-455	Canadian Constitution Foundation, 2010 Annual Report
R-456	Canadian Constitution Foundation, 2009 Annual Report
R-457	Canadian Constitution Foundation, 2006 Annual Report
R-458	Ontario Health Coalition, Backgrounder: Canadian Constitution Foundation Challenge against Single-Tier Medicare, May 2007

Exhibit No.	Canada's Exhibits
R-459	Email from Paul Einarsson to CEAA, "RE: Sprinbank Dam needs a CEAA Review", 16 May 2016
R-460	Elections Canada, "Tamlynn Einarsson", (Accessed: January 13, 2023)
R-461	National Post, Follow the Money, "Einarsson", (Accessed January 13, 2023)
R-462	CBC News Calgary, "Cycle Track on 8th Avenue spurs petition while city increases parking," 4 September 2015
R-463	Frontier Centre for Public Policy, Blog Post by Paul Einarsson, "Canada, what happened to We Stand on Guard for Thee?", 29 January 2014
R-464	GSI Website, "CFIB Recognizes Service of GSI COO and Chairman Paul Einarsson", 6 June 2013 (Accessed January 12, 2023).
R-465	Canadian Constitution Foundation, 2010 Annual Report
R-466	U.S. Internal Revenue Service, General FAQ
R-467	U.S. Internal Revenue Service, "Tax Guide for U.S. Citizens and Resident Aliens Abroad – Publication 54"
R-468	Government of Canada, Federal Corporation Information, "Geophysical Service Incorporated", Last annual filing January 1, 2022 (Accessed January 12, 2023
R-469	Geophysical Service Inc. v. HMTQ in Right of Canada et al, Federal Court of Canada, Docket: T-1023-17, Notice of Discontinuance, April 17, 2019
R-470	GSI v. HMTQ, Federal Court File No. T-1023-17, Amended Amended Statement of Claim, 28 September 2018
R-471	Letter from Paul Einarsson, GSI to Right Honourable Jean Chretien, the Prime Minister of Canada, Honourable John Hamm, the Premier of Nova Scotia, and Honourable Roger Grimes, the Premier of Newfoundland, 1 October 2002
R-472	Convention on Certain Questions Relating to the Conflict of Nationality Law, 13 April 1930, League of Nations, Treaty Series, vol. 179, p. 89, No. 4137, Article 4
R-473	The Carlyle Group L.P. and others v. Kingdom of Morocco (ICSID Case No.ARB/18/29) Submission of the United States, 4 December 2020
R-474	Z.R. Rode, "Notes and Comments: Dual Nationals and the Doctrine of Dominant Nationality", The American Journal of International Law (1959)
R-475	Eli Lilly, Supplemental Submission of the United States of America, 8 June 2016
R-476	Eli Lilly, Submission of the United Mexican States, 18 March 2016

Exhibit No.	Canada's Exhibits
R-477	Not Used
R-478	Not Used
R-479	Geophysical Service Incorporated v. Falkland Oil and Gas Limited, 2020 ABCA 21, Judgment, 16 January 2020
R-480	Geophysical Service Incorporated v. Falkland Oil and Gas Limited, S.C.C. No. 39093, Judgment, 24 September 2020.
R-481	Not Used
R-482	GSI v. TGS, Civil Action No-14-1368
R-483	GSI v. TGS, Civil Action No-18-20493
R-484	GSI v. Total, 2020 ABQB 730, Decision, 25 November 2020
R-485	GSI v Plains Midstream, Decision, 2021 ABQB 359
R-486	Letter from M. Lemmens to M. Luz, 15 July 2019
R-487	GSI v. Edison S.P.A. and Edison International S.P.A., ABQB File No. 1301 09664, Statement of Claim, 13 August 2013
R-488	Meditrust HealthCare Inc. v. Shoppers Drug Mart, 61 O.R. (3d) 786 (Ont. Ct. App. 2002
R-489	Hometown Financial, Inc. v. United States, 56 Fed. Cl. 477, 486 (2003)
R-490	Alicia Grace and others v. United Mexican States, ICSID Case No. UNCT/18/4, 1128 Submission of Canada, 24 August 2021
R-491	Convention on Certain Questions Relating to the Conflict of Nationality Law, 13 April 1930, League of Nations, Treaty Series, vol. 179, p. 89, No. 4137
R-492	House of Commons Debates, 19 May 1976
R-493	Affidavit of Rowland Harrison, sworn on 28 August 2015, filed in <i>GSI v. Encana</i> , 2016 ABQB 230
R-494	Geophysical Service Inc. v. Her Majesty the Queen in Right of Canada, Federal Court File No. T-1023-14, 2019 FC 337
R-495	Geophysical Service Incorporated v. TGS-Nopec Geophysical Company, Federal Court Appeal, File No. No. 0:2018pcf20493, Unpublished Opinion, 13 September 2019

Exhibit No.	Canada's Exhibits
R-496	Lion Mexico, Non-Disputing Party Submission of the Government of Canada Pursuant to NAFTA Article 1128, 21 June 2019
R-497	Eli Lilly, Submission of the United States of America, 18 March 2016
Exhibits fi	iled with Canada's Reply to the Claimants' Motion to Compel Documents, 16 February 2024
R-498	Access to Information Act, Request Form to Canada-Newfoundland & Labrador Offshore Petroleum Board, File No. 11452-019-092, 13 March 2013
R-499	Replies to Undertakings, Paul Einarsson, 6 January 2015, Court File No. 0901-08210
R-500	Email exchange between Ms. Matti Lemmens and Mr. Mark Luz, 21 September 2023
R-501	Letter from Canada to Tribunal, 22 September 2023
R-502	Letter from Claimants to Canada, 17 November 2023
R-503	Letter from Claimants to Tribunal, 22 November 2023
R-504	Letter from National Energy Board to Paul Einarsson, "Request under the <i>Access to Information Act</i> (Act)", File A-2013-02, 16 July 2013
R-505	1999 IBA Working Party & 2010 IBA Rules of Evidence Review Subcommittee, Commentary on the revised text of the 2010 IBA Rules on the Taking of Evidence in International Arbitration
R-506	A-2010-00059 Release Package, 20 September 2007
R-507	Extract from A-2011-0057 Release Package, 12 March 2012
R-508	Letter from Canada-Newfoundland and Labrador Offshore Petroleum Board to Paul Einarsson, "Re: ATIA File No. 11452-019-110", 13 March 2012
R-509	Letter from Canada-Newfoundland and Labrador Offshore Petroleum Board to Paul Einarsson, "Re: ATIA File No. 11452-019-110", 13 March 2012 [Complete Version]
R-510	Agreement between Geological Society of Canada and TGS-Nopec Geophysical Company, 28 January 2001
R-511	Email from Joe Runcer/OMV to Canada-Newfoundland and Labrador Offshore Petroleum Board, "Re: CA – M001626 & M001622 – RE: data package request", 21 November 2019

Exhibit No.	Canada's Exhibits
R-512	Email from Canada-Newfoundland and Labrador Offshore Petroleum Board to Equinor, "Re: Geophysical Program, Geological Program and CNLOPB Geoscientific Report – Order", 26 June 2020
R-513	Access to Information Act, Request Form to Canada-Newfoundland and Labrador Offshore Petroleum Board, File No. 11452-019-2019 - EA2023-050232, 28 December 2023
Exhib	oits Filed with Canada's Rejoinder Memorial on Jurisdiction, Merits and Damages, 1 November 2024
R-514	Canada-Newfoundland Offshore Petroleum Board, "Released Geophysical and Geological Reports: Newfoundland Offshore Area," 1 June 1988
R-515	Canada-Newfoundland Offshore Petroleum Board, "Released Geophysical and Geological Reports Newfoundland Offshore Area," August 1992
R-516	Canada-Newfoundland Offshore Petroleum Board, "Released Geophysical and Geological Reports Newfoundland Offshore Area", March 1996
R-517	Canada-Newfoundland Offshore Petroleum Board, "Released Geophysical and Geological Reports Newfoundland and Labrador Offshore Area", March 2006
R-518	Canada-Newfoundland Offshore Petroleum Board, "Released Geophysical and Geological Reports Newfoundland and Labrador Offshore Area", December 2010
R-519	Letter from Les Adamson, British Petroleum PLC to Canada-Newfoundland Offshore Petroleum Board, 25 May 1989
R-520	Canada-Newfoundland Offshore Petroleum Board, "Request for Information", requested by BP Petroleum, 26 June 1990
R-521	Letter from [Redacted], Marathon Oil Company to Bill Dohey, Canada- Newfoundland Offshore Petroleum Board, 16 December 1991
R-522	Canada-Newfoundland Offshore Petroleum Board, "Request for Information", requested by KP Seismic Canada Ltd., 22 October 1994
R-523	Canada-Newfoundland Offshore Petroleum Board, "Request for Information", requested by KP Seismic Canada Ltd., 7 October 1997
R-524	Canada-Newfoundland Offshore Petroleum Board, "Request for Information", requested by GSI, 23 March 1998
R-525	Canada-Newfoundland Offshore Petroleum Board, "Request for Information", requested by GSI, 13 June 2001

Exhibit No.	Canada's Exhibits
R-526	Letter from Jim Doyle, Canada-Newfoundland Offshore Petroleum Board and Curtis Dawe, Barristers Solicitors & Notaries, attaching "names and addresses of all third parties who in the 154 months preceding the 1st of March 2000, requested and were granted access to information concerning or provided by [GSI]", 4 June 2003
R-527	Letter from Mike Baker, Canada-Newfoundland Offshore Petroleum Board to Paul Einarsson, Geophysical Service Incorporated, attaching "Third parties that have requested, and have been granted, access to GSI Information (March 1, 2000 to October 15, 2001)", 22 January 2004
R-528	Letter from Mike Baker, Canada-Newfoundland Offshore Petroleum Board to Tony Yip, Geophysical Service Incorporated, 12 January 2006
R-529	Letter from Mike Baker, Canada-Newfoundland Offshore Petroleum Board to Tony Yip, Geophysical Service Incorporated, 27 April 2006
R-530	Letter from Debra Downing, Canada-Newfoundland Offshore Petroleum Board to Gary Henderson, Geophysical Service Incorporated, 21 February 2008
R-531	Letter from Doug Dowdell, Geophysical Services Incorporated to Hal Stanley, Canada Newfoundland Offshore Petroleum Board, 27 July 1998, attaching letter from Code Hunter Wittman to Doug Dowdell, Geophysical Service Incorporated, 30 July 1998
R-532	Canada Nova Scotia Offshore Petroleum Board, "Information on Well Data, Geological Data, Geophysical Data and Land Rights", March 1998
R-533	Diamond v. Robbins, 2006 NLCA 1
R-534	Zielke v Law Society of Saskatchewan, 2021 SKCA 156
R-535	Okanagan Indian Band v. Bonneau, 2003 BCCA 299
R-536	Massicotte v. Boutin, [1969] SCR 818
R-537	Arslan v Şekerbank T.A.Ş, 2020 SKCA 104
R-538	City of Ottawa v. Town of Eastview, [1941] S.C.R. 448
R-539	R. v. Greater Sudbury (City), 2023 SCC 28
R-540	Bhuthal v. Sahsi, 2024 BCCA 73
R-541	R v. Beaulieu, 2015 MBCA 90
R-542	Tamglass American Inc. v. Richter, Allen & Taylor, Inc., 2005 ABCA 341

Exhibit No.	Canada's Exhibits
R-543	Osmond v. Newfoundland on the Construction of Statutes and (Workers' Compensation Commission), 2001 NFCA 21
R-544	Akpe v IRAC and Grey, 2018 PECA 5
R-545	York Condominium Corporation No. 382 v. Jay-M Holdings Limited, 2007 ONCA 49
R-546	Canada v. Canada North Group Inc., 2019 ABCA 314
R-547	C. Hutchison, "The Modern Principle of Statutory Interpretation", (LexisNexis, 2 nd ed, 2022) [Extract]
R-548	Olympic (1976) Act, SC 1973-74, c. 31
R-549	Competition Act, RSC 1985, c. C-34
R-550	Bankruptcy and Insolvency Act, RSC 1985, c. B-3
R-551	Trimble Solutions Corporation v. Quantum Dynamics Inc., 2021 FC 63
R-552	Copyright Board of Canada, Public Performance of Sound Recordings, Reproduction of Musical Works, Statement of Royalties to be collected by SOCAN, NRCC and CSI, Reasons for Decision (corrected), 6 May 2009
R-553	Sirius Canada Inc. v. CMRRA/SODRAC, 2010 FCA 348
R-554	SODRAC 2003 Inc. v. CBC, 2021 CB 1
R-555	Society of Composers, Authors and Music Publishers of Canada v. Canadian Assn. of Internet Providers, 2004 SCC 45
R-556	Alberta (Education) v. Canadian Copyright Licensing Agency (Access Copyright), [2012] 2 SCR 345
R-557	York University v. Canadian Copyright Licensing Agency (Access Copyright), 2021 SCC 32
R-558	Canadian Broadcasting Corporation v. Conservative Party of Canada, 2021 FC 425
R-559	Canada (Minister of Citizenship and Immigration) v. Vavilov, 2019 SCC 65
R-560	
R-561	

Exhibit No.	Canada's Exhibits
R-562	
R-563	U.SCanada Joint Arctic Leaders' Statement re: Arctic Drilling Moratorium, 20 December 2016
R-564	CBC News, "Mackenzie Valley Pipeline Project Officially One for the History Books," 28 December 2017
R-565	CBC News "Feds Return \$430M to oil and gas companies ahead of Arctic offshore exploration ban," 18 December 2019
R-566	CBC News, "Call for Nova Scotia offshore exploration licenses gets no bids," 12 November 2021
R-567	Geophysical Service Incorporated v. Suncor Energy Inc. (Alberta Court of Queen's Bench Court File No. 0901-08209), Statement of Claim, 2 June 2009
R-568	Draft Bill of Sale between GSI and Newbury Holdings Two Ltd. (unexecuted), August 2011
R-569	Memorandum of Agreement between Geophysical Service Incorporated and Maintenance Gear Rebuilders, 26 March 2012
R-570	Agreement of Purchase and Sale between Geophysical Service Incorporated and Ocean Marine Contractors, LLC, 17 October 2012
R-571	Transport Canada, "Coasting Trade Act and Seismic Activities", 2012
R-572	
R-573	
R-574	SLB (formerly Schlumberger/Western/Geco/WesternGeco), Newfoundland and Nova Scotia Marine Data Screenshots
R-575	TGS (formerly Digicon/CGG/Spectrum data) Marine Data Screenshot
R-576	CGG (Viridien) Nova Scotia Phase I
R-577	CGG (Viridien) Nova Scotia Phase II
R-578	Canada Transportation Agency, Decision No. 261-W-2002, Application by P.F. Collins Customs Broker Ltd. on behalf of TGS-NOPEC Geophysical Company, 17 May 2002

Exhibit No.	Canada's Exhibits
R-579	
R-580	Letter from H. Paul Einarsson, Geophysical Service Incorporated to Jeanne Collins, Anadarko Canada Corporation, 10 January 2002
R-581	Letter from H. Paul Einarsson, Geophysical Service Incorporated to Lloyd Chipman, Devon Energy Corporation, 29 May 2002
R-582	Letter from H. Paul Einarsson, Geophysical Service Incorporated to Lloyd Chipman, Devon Energy Corporation, 20 June 2002
R-583	Letter from Lloyd Chipman, Devon Energy Corporation to H. Paul Einarsson, Geophysical Service Incorporated, 2 July 2002
R-584	Letter from H. Paul Einarsson, Geophysical Service Incorporated to Gary Bilous, Husky Oil Limited, 22 March 2010
R-585	GSI v. Her Majesty the Queen (Federal Court of Canada File No. T-1023-17), Amended Amended Statement of Claim, 28 September 2018
R-586	GSI v. Encana Corporation (Alberta Court of Queen's Bench File No. 0701-04061) ("GSI v. Encana"), Statement of Claim, 19 April 2007
R-587	GSI v. Encana Corporation et al. (Supreme Court of Canada File No. 37634), Application for Leave to Appeal, 22 June 2017 [Excerpt]
R-588	GSI v. Encana Corporation et al. (Supreme Court of Canada Court File No. 37634), Respondent's Memorandum of Argument (Attorney General of Canada) in Response to Application for Leave to Appeal, 25 August 2017
R-589	Energy, Mines and Resources Canada, "Offshore Geophysical Surveys: Procedures and Guidelines," May 1980
R-590	NEB, Information for the Public – Geophysical/Geological Operations on Frontier Lands Regulated by the National Energy Board, July 2002
R-591	Canada-Newfoundland Offshore Petroleum Board, "Request for Information", requested by Hunt Oil Company, 10 February 1989
R-592	Letter from Les Adamson, British Petroleum PLC to Bill Dohey, Canada- Newfoundland Offshore Petroleum Board, 13 March 1989
R-593	Canada-Newfoundland Offshore Petroleum Board, "Request for Information", requested by KP Seismic Canada Ltd., 31 July 1997
R-594	Letter from H.W. Woodward, Department of Indian Affairs and Northern Development to J.A.C. Keefe, Geophysical Service Incorporated, 28 October

Exhibit No.	Canada's Exhibits
	1971, attaching Notice of Commencement of Exploratory Work held by Geophysical Service Incorporated, 13 September 1971
R-595	Letter from T.D Einarsson, Geophysical Service Incorporated to S.A. Kanik, Department of Indian Affairs and Northern Development, 22 August 1973, attaching Notices of Commencement of Exploratory Work, held by Geophoto Service Ltd. and Geophysical Service Incorporated, January 1974
R-596	Government of Canada, Indian and Northern Affairs, Notice of Commencement of Exploratory Work held by Geophysical Service Incorporated, 8 July 1976
R-597	Government of Canada, Indian and Northern Affairs, Notice of Commencement of Exploratory Work held by Geophysical Service Incorporated, 18 April 1977
R-598	Government of Canada, Indian and Northern Affairs, Notice of Commencement of Exploratory Work held by Geophysical Service Incorporated, 7 June 1977
R-599	Letter from Stan Kanik, Canada Oil and Gas Lands Administration to R.F. Johnson, Geophysical Service Incorporated, 11 June 1977
R-600	Letter From N.W. Woodward, Indian Affairs Canada Northern Non-Renewable Resources Branch to R.F. Johnson, Geophysical Service Incorporated, 8 March 1978
R-601	Letter from D.G. Crosby, Energy, Mines and Resources Canada to A.C. Hartman, Geophysical Service Inc., 14 March 1978
R-602	Government of Canada, Indian and Northern Affairs, Notice of Commencement of Exploratory Work held by Geophysical Service Incorporated, 1 June 1978
R-603	Government of Canada, Indian and Northern Affairs, Notice of Commencement of Exploratory Work held by Geophysical Service Incorporated, 4 June 1979
R-604	Letter from Neil de Silva, Canada Newfoundland Offshore Petroleum Board to T.D. Einarsson, Geophysical Service Incorporated, 21 December 1993
R-605	
R-606	
R-607	

Exhibit No.	Canada's Exhibits
R-608	
R-609	
R-610	
R-611	
R-612	
R-613	Letter from H. Paul Einarsson, Geophysical Service Incorporated, to Dan Parizek, Anadarko Petroleum Corporation, 13 March 2000
R-614	Letter from H. Paul Einarsson, Geophysical Service Incorporated, to Peter Thomas, Mobil Oil Canada, 14 March 2000
R-615	
R-616	
R-617	GSI v Repsol (ABQB File No. 1601-03432), Procedure Card, consulted on 31 October 2024
R-618	
R-619	
R-620	
R-621	
R-622	

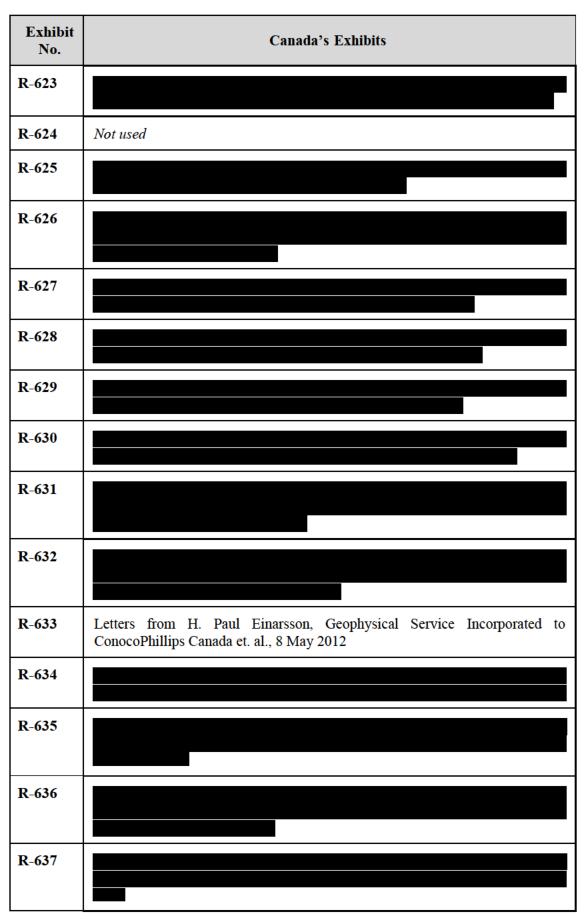


Exhibit No.	Canada's Exhibits
R-638	
R-639	Canada Oil Gas Lands Administration Offshore Program Notice held by Geophysical Service Incorporated, 4 January 1982
R-640	Letter from F.H. Lepine, Canada Oil Gas Lands Administration to R.F. Johnson, Geophysical Service Incorporated, 12 May 1982, attaching Offshore Program Notice, 8 April 1982
R-641	Letter from H.W. Woodward, Department of Indian Affairs and Northern Development to J.A.C. Keefe, Geophysical Service Incorporated, 28 October 1971 attaching Notice of Commencement, 13 September 1971
R-642	Canda Oil and Gas Lands Administration, "Geophysical and Geological Programs on Frontier Lands Guidelines for Approvals and Reports", January 1987
R-643	National Energy Board, "Geophysical/Geological Operations on Frontier Lands Regulated by the National Energy Board: Information for the Public", February 1995
R-644	Canada Newfoundland Offshore Petroleum Board, "Notice Call for Bids No. NF95-1 Newfoundland Offshore Area", 28 September 1995
R-645	GSI v. NEB (Federal Court of Canada File No. T-2101-00), Affidavit of Harold Paul Einarsson, 11 December 2000
R-646	GSI v. CNSOPB (Federal Court of Canada File No. T-2102-00), Affidavit of H. Paul Einarsson, 11 December 2000
R-647	GSI v. CNLOPB (Federal Court of Canada File No. T-2100-00), Affidavit of H. Paul Einarsson, 11 December 2000
R-648	Liability Agreement of Borrowed Materials at National Energy Board by Ardal Petroleum, executed 8 November 2000
R-649	Liability Agreement of Borrowed Materials (unredacted) at National Energy Board by Ardal Petroleum Inc., executed 8 November 2000
R-650	Letter from Michel Mantha, National Energy Board to H. Paul Einarsson, Geophysical Service Incorporated, 21 March 2000 attaching <i>Access to Information Act</i> Request Disclosure from National Energy Board, File No. 232-A000-4-00-01, 21 March 2000
R-651	Letter from Michel Mantha, National Energy Board to Anthony Jordan, Gowlings Lafleur Henderson LLP, 9 June 2003

Exhibit No.	Canada's Exhibits
R-652	Letter from Michael McPhee, Canada Nova Scotia Offshore Petroleum Board to Paul Einarsson, Geophysical Service Incorporated, 28 November 2003
R-653	Access to Information Act Request Disclosure from National Energy Board, Request No. 232-A000-4-2003/08, 31 October 2003
R-654	Access to Information Act Request Disclosure from National Energy Board, Request No. 232-A000-4-2004/07, 15 December 2004
R-655	Access to Information Act Request Disclosure from Canada-Newfoundland Offshore Petroleum Board, Request No. 12710 2004-04, 31 December 2004
R-656	Geophysical Service Incorporated v. Encana Corporation, et al. (Alberta Court of Queen's Bench Court File No. 1601-0103AC), Factum of the Appellant, 21 April 2016
R-657	Geophysical Service Incorporated v. Falkland Oil and Gas Limited and Rockhopper Exploration PLC (Alberta Court of Queen's Bench Court File No. 1601-00797), Amended Statement of Claim, 19 January 2018
R-658	Not used
R-659	Letter from H. Paul Einarsson, Geophysical Service Incorporated to John Byatt, Lynx Canada Information Systems Ltd., 2 November 2003
R-660	Letter from H. Paul Einarsson, Geophysical Service Incorporated to Garry Treanor, GLR Resources, 17 January 2005
R-661	Letter from H. Paul Einarsson, Geophysical Service Incorporated to Craig Temple, Encana Corporation, 30 May 2006
R-662	Letter from H. Paul Einarsson, Geophysical Service Incorporated to Philip Abraham, Encana Corporation, 11 August 2006
R-663	Letter from H. Paul Einarsson, Geophysical Service Incorporated to Philip Abraham, Encana Corporation, 21 September 2006
R-664	Geophysical Service Incorporated v. Encana Corporation, (Alberta Court of Queen's Bench Court File No. 0701-04061) Statement of Defence, 22 June 2007
R-665	Not used
R-666	Geophysical Service Incorporated v. Lynx Canada Information Systems Ltd. et al, (Alberta Court of Queen's Bench Court File No. 0901-08210), Statement of Claim, 2 June 2009
R-667	Geophysical Service Incorporated v. Lynx Canada Information Systems Ltd. et al, (Alberta Court of Queen's Bench File No. 0901-08210), Statement of Defence, 22 January 2010

Exhibit No.	Canada's Exhibits
R-668	Geophysical Service Incorporated v. Lynx Canada Information Systems Ltd. et al, (Alberta Court of Queen's Bench File No. 0901-08210), Third Party Claim of Lynx to Attorney General of Canada and National Energy Board, 27 May 2011
R-669	Geophysical Service Incorporated v. Lynx Canada Information Systems Ltd. et al, (Alberta Court of Queen's Bench File No. 0901-08210), Third Party Statement of Defence, 20 July 2011
R-670	Geophysical Service Incorporated v. Lynx Canada Information Systems Ltd. et al, (Alberta Court of Queen's Bench File No. 0901-08210), Third Party Statement of Defence, 4 August 2011
R-671	Geophysical Service Incorporated v. Lynx Canada Information Systems Ltd. et al, (Alberta Court of Queen's Bench Court File No. 0901-08210) Government of Canada Statement of Defence to Amended Amended Statement of Claim, 11 July 2013
R-672	Geophysical Service Incorporated v. Lynx Canada Information Systems Ltd. et al, (Alberta Court of Queen's Bench Court File No. 0901-08210) National Energy Board Statement of Defence to Amended Amended Statement of Claim, 18 July 2013
R-673	Geophysical Service Incorporated v. Husky Oil Limited (Alberta Court of Queen's Bench Case No. 1001-05568), Statement of Claim, 13 April 2010
R-674	Geophysical Service Incorporated v. Calwest Printing and Reproductions (Alberta Court of Queen's Bench File No. 1101-15306), Statement of Claim, 9 November 2011
R-675	Letter from H. Paul Einarsson, Geophysical Service Incorporated to Tooney Fink, ConocoPhillips Canada Resources, 2 October 2012
R-676	Letter from H. Paul Einarsson, Geophysical Service Incorporated, to Andy Vernon, JEBCO Seismic, 2 October 2012
R-677	Letter from H. Paul Einarsson, Geophysical Service Incorporated to Ken Woodworth, Marathon Oil Canada Corporation, 2 October 2012
R-678	Letter from H. Paul Einarsson, Geophysical Service Incorporated to Cal Buchanan, Murphy Oil Company Ltd., 2 October 2012
R-679	Letter from H. Paul Einarsson, Geophysical Service Incorporated to Bob Ball, BP Canada Energy Company, 2 October 2012
R-680	Not used
R-681	Not used

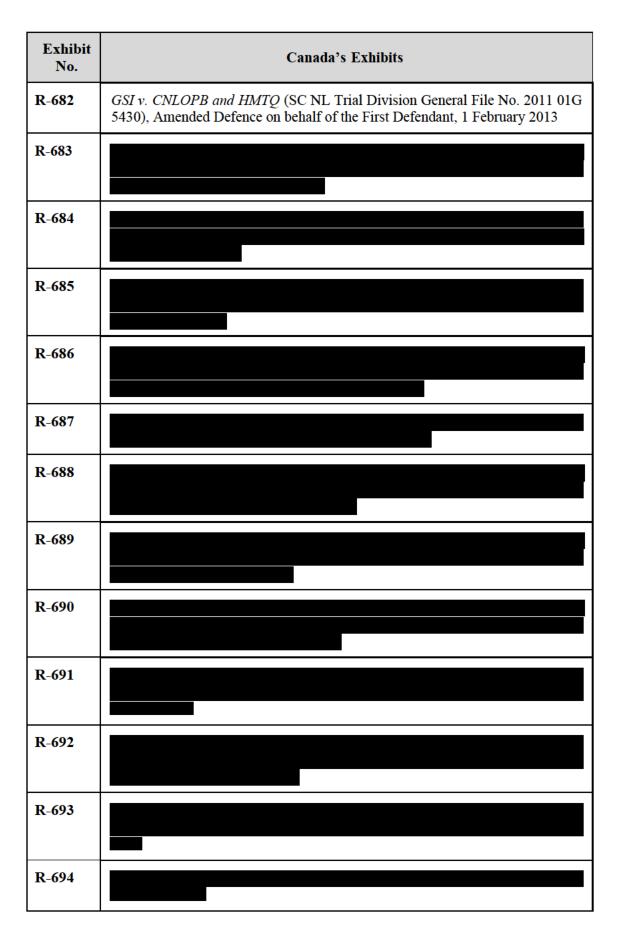


Exhibit No.	Canada's Exhibits
R-695	
R-696	
R-697	Letters from Paul Einarsson, Geophysical Service Incorporated to Francois Gauthier, NWest Energy Inc., 4 December 2008
R-698	Letter from Robert Webb, NWest Energy Corp. et al., to Geophysical Service Incorporated, 16 January 2012
R-699	Email from Robert Webb, NWest Energy Corp to Paul Einarsson, Geophysical Service Incorporated, 16 January 2012
R-700	Geophysical Service Incorporated v. Falkland Oil and Gas Limited and Rockhopper Exploration PLC (Alberta Court of Queen's Bench File No. 1601-00797), Affidavit of Timothy Paul Bushell, 8 March 2018 [Excerpt]
R-701	Emails between Paul Einarsson, Geophysical Service Incorporated, and Steve Locke, Natural Resources Canada, 1 December 2008
R-702	Letter from John N. Iredale, Q.C., Gowlings to Paul Einarsson, Geophysical Service Incorporated, 9 August 2011, attaching Counter-Offer Memorandum of Agreement, 8 August 2011
R-703	
R-704	
R-705	
R-706	
R-707	

Exhibit No.	Canada's Exhibits
R-708	
R-709	
R-710	
R-711	CBC News, "Chevron puts Arctic Drilling plans on hold indefinitely", 18 December 2014
R-712	CBC News, "Imperial Oil, BP delay Beaufort Sea drilling plans indefinitely", 26 June 2015
R-713	Government of Canada, "Order Amending the Order Prohibiting Certain Activities in Arctic Offshore Waters, 2022: SOR/2023-268", 8 December 2023
R-714	Letter from Sam Nader, Geophysical Service Incorporated to John Hogg, Encana Corporation, 14 August 2002
R-715	
R-716	
R-717	Letter from Jeff Rose, Encana Corporation to Paul Einarsson, Geophysical Service Incorporated, 1 June 2004
R-718	Letter from Don Kempf, Encana Corporation to Paul Einarsson, Geophysical Service Incorporated, 5 October 2005, attaching Master Geophysical Data Acquisition Agreement between EnCana Company and Geophysical Service Incorporated, 2 June 2004
R-719	
R-720	

Exhibit No.	Canada's Exhibits
R-721	
R-722	
R-723	
R-724	
R-725	
R-726	Letter from Tooney Fink, ConocoPhillips to Paul Einarsson, Geophysical Service Inc., 7 October 2011
R-727	Letter from H. Paul Einarsson, Geophysical Service Incorporated to Tooney Fink, ConocoPhillips Canada, 21 August 2012
R-728	Letter from H. Paul Einarsson, Geophysical Service Incorporated to Suncor Energy East Coast Canada, Husky Oil Limited, Devon NEC Corporation, and Murphy Oil Company Ltd., 4 May 2012
R-729	Letter from H. Paul Einarsson, Geophysical Service Incorporated to Lloyd Chipman, Devon Corporation, 20 November 2012
R-730	Letter from H. Paul Einarsson, Geophysical Service Incorporated to Bob Ball, BP Canada Energy Company, 20 November 2012
R-731	Letter from H. Paul Einarsson, Geophysical Service Incorporated to Mr. McDonough, Statoil, 20 December 2012
R-732	Not used
R-733	Lone Pine Resources Inc. v. The Government of Canada (ICSID Case No. UNCT/15/2), Submission of the United States of America (pursuant to Article 1128 of the NAFTA), 16 August 2017
R-734	Geophysical Service Incorporated v. Canada-Nova Scotia Offshore Petroleum Board, 2014 FC 450, 9 May 2014

Exhibit No.	Canada's Exhibits
R-735	Oxford English Dictionary Online, "Give effect to", accessed 24 October 2024, available online at: give effect to - Oxford English Dictionary (oed.com).
R-736	Geophysical Service Incorporated v. AG and National Energy Board (Alberta Court of Queen's Bench Court File No. 1401-05316), Statement of Defence, 25 June 2014
R-737	Geophysical Service Incorporated v. AG and National Energy Board (Alberta Court of Queen's Bench Court File No. 1401-5316), Statement of Defence of the National Energy Board, 30 June 2014
R-738	Geophysical Service Incorporated v. Arcis Seismic Solutions Corp. et al. (Alberta Court of Queen's Bench Court File No. 1301-02933), Canada-Newfoundland and Labrador Offshore Petroleum Board Statement of Defence, 24 July 2015
R-739	Geophysical Service Incorporated v. Calwest Printing & Reproductions (Alberta Court of Queen's Bench Court File No. 1101-15306), Pre-trial Brief of the Defendant Calwest Printing & Reproductions, 25 November 2015
R-740	Geophysical Service Incorporated v. Anadarko et al. (Alberta Court of Queen's Bench Court File No. 1201-15228), Statement of Defence of Canadian Natural Resources, 26 March 2013
R-741	Geophysical Service Incorporated v. ExxonMobil Canada Ltd. and Imperial Oil Limited, (Alberta Court of Queen's Bench Court File No. 130114139), Statement of Defence, 4 April 2014
R-742	Geophysical Service Incorporated v. Plains Midstream et al. (Alberta Court of Queen's Bench Court File No. 1401-00646), Amended Amended Amended Statement of Claim, 21 June 2018
R-743	Geophysical Service Incorporated v. Plains Midstream et al. (Alberta Court of Queen's Bench File No. 1401-00646), Affidavit of Harold Paul Einarsson, 8 April 2019 [Excerpt]
R-744	Geophysical Service Incorporated v. Plains Midstream et al. 2023 ABCA 277, 29 September 2023
R-745	Geophysical Service Incorporated v. ConocoPhillips et al. (Alberta Court of Queen's Bench File No. 1301-07573), Affidavit of Harold Paul Einarsson, 20 June 2019 [Excerpt]
R-746	Geophysical Service Incorporated v. ConocoPhillips et al. (Alberta Court of Queen's Bench File No. 1301-07573), Procedure Card, consulted on 10 October 2024
R-747	Geophysical Service Incorporated v. Nalcor Energy-Oil & Gas (Alberta Court of Queen's Bench File No. 1301-09665), Procedure Card, consulted on 10 October 2024

Exhibit No.	Canada's Exhibits
R-748	Geophysical Service Incorporated v. ExxonMobil Canada Ltd et al. (Alberta Court of Queen's Bench File No. 1301-14139), Statement of Claim, 29 November 2013
R-749	Geophysical Service Incorporated v. ExxonMobil Canada Ltd et al. (Alberta Court of Queen's Bench Court File No. 1301-14139), Procedure Card, consulted on 10 October 2024
R-750	Geophysical Service Incorporated v. Repsol Oil & Gas Canada Inc. (Alberta Court of Queen's Bench Court File No. 1601-03432), Statement of Claim, 9 March 2016
R-751	Geophysical Service Incorporated v. NWest Energy Corp. et al. (Alberta Court of Queen's Bench Court File No. 1201-11934), Procedure Card, consulted on 10 October 2024
R-752	Geophysical Service Incorporated v. Edison S.P.A. and Edison International S.P.A. (Alberta Court of Queen's Bench Court File No. 1301- 09664), Amended Statement of Claim, 19 January 2018
R-753	Geophysical Service Incorporated v. NWest Energy Corp. et al. (Alberta Court of Queen's Bench, Court File No. 1201-11934), Amended Statement of Claim, 21 May 2014 (RR7.317)
R-754	Geophysical Service Incorporated v. Edison (Alberta Court of Queen's Bench, Court File No. 1301-09664), Statement of Claim, 13 August 2013
R-755	Geophysical Service Incorporated v. Edison (Alberta Court of Queen's Bench, Court File No. 1301-09664), Affidavit of Jennifer Carr, 2 December 2014
R-756	Geophysical Service Incorporated v. Edison, (Alberta Court of King's Bench Court File No. 1301-096642024), Reasons for Decision, 15 January 2024
R-757	Geophysical Service Incorporated v. Government of Canada (ICSID Case No. UNCT/20/6), Claimants' Responses to Respondents' Requests, 27 October 2023 [Excerpt]
R-758	Geophysical Service Incorporated v. Anadarko and Canadian Natural Resources (Alberta Court of Queen's Bench Court File No. 1201 15228), Affidavit of Paul Einarsson, 4 September 2019 [Excerpt]
R-759	Geophysical Service Incorporated v. Anadarko (Alberta Court of Queen's Bench Court File No. 1201 15228), Consent Dismissal Order, 15 April 2021
R-760	Geophysical Service Incorporated v. Devon (Alberta Court of Queen's Bench Court File No. 1401-12230), Amended Amended Amended Amended Statement of Claim, 24 June 2015

Exhibit No.	Canada's Exhibits
R-761	Geophysical Service Incorporated v. Hunt Oil Company (Supreme Court of Nova Scotia Court File No. 420361), Amened Notice of Action, 16 January 2014.
R-762	Geophysical Service Incorporated v. Suncor Energy Inc. (Alberta Court of Queen's Bench Court File No. 0901-08209), Amended Amended Amended Statement of Claim, 19 April 2018

IV. LEGAL AUTHORITIES

RL No.	Canada's Legal Authorities	
Legal A	Legal Authorities Filed with the Government of Canada's Statement of Defence, 9 June 2022	
RLA-001	NAFTA Free Trade Commission, "Notes of Interpretation of Certain Chapter Eleven Provisions" (July 31, 2001)	
_	Legal Authorities filed with Canada's Counter-Memorial on Jurisdiction, Merits and Damages, 16 January 2023	
RLA-002	RSM Production Corporation v. Grenada (ICSID Case No. ARB/05/14) Final Award, 13 March 2009	
RLA-003	Methanex Corporation v. United States of America (UNCITRAL) Partial Award, 7 August 2002	
RLA-004	Apotex Inc. v. the Government of the United States of America (UNCITRAL) Award on Jurisdiction and Admissibility, 14 June 2013	
RLA-005	Phoenix Action, Ltd. v. Czech Republic (ICSID Case No. ARB/06/5) Award, 15 April 2009	
RLA-006	Vito G. Gallo v. Government of Canada (UNCITRAL) Award, 15 September 2011	
RLA-007	Pac Rim Cayman LLC v. Republic of El Salvador (ICSID Case No. ARB/09/12) Decision on Jurisdiction, 1 June 2012	
RLA-008	Bridgestone Licensing Services, Inc. and Bridgestone Americas, Inc. v. Republic of Panama (ICSID Case No. ARB/16/34) Decision on Expedited Objections, 13 December 2017	
RLA-009	Cortec Mining Kenya Limited, Cortec (Pty) Limited and Stirling Capital Limited v. Republic of Kenya (ICSID Case No. ARB/15/29) Award, 22 October 2018	

RLA-010	Spence International Investments, LLC, Berkowitz et al. v. Republic of Costa Rica (UNCITRAL) Interim Award, 25 October 2016
RLA-011	Feldman v. United Mexican States (ICSID Case No. ARB(AF)/99/1) Interim Decision on Preliminary Jurisdiction Issues, 6 December 2000
RLA-012	Detroit International Bridge Company v. Government of Canada (UNCITRAL) ("DIBC") Award on Jurisdiction, 2 April 2015
RLA-013	The Renco Group, Inc. v. The Republic of Peru (UNCITRAL) Partial Award on Jurisdiction, 15 July 2016
RLA-014	Commerce Group Corp. and San Sebastian Gold Mines, Inc. v. Republic of El Salvador (CAFTA-DR/ICSID Case No. ARB/09/17) Award, 14 March 2011
RLA-015	Railroad Development Corp. v. Republic of Guatemala (CAFTADR/ICSID Case No. ARB/07/23) Decision on Objection to Jurisdiction under CAFTA Article 10.20.5, 17 November 2008
RLA-016	North American Free Trade Agreement, Statement of Implementation, Canada Gazette Part I, 1 January 1994)
RLA-017	The North American Free Trade Agreement Implementation Act, United States Statement of Administrative Action
RLA-018	KBR Inc. v. United Mexican States (UNCITRAL) Final Award, 30 April 2015
RLA-019	Bacilio Amorrortu v. Republic of Peru (PCA Case No. 2020-11) Partial Award on Jurisdiction, 05 August 2022
RLA-020	Tennant Energy, LLC v. Government of Canada (UNCITRAL) Final Award, 25 October 2022
RLA-021	Marvin Roy Feldman Karpa v. United Mexican States (ICSID Case No ARB(AF)/99/1) Award, 16 December 2002
RLA-022	William Ralph Clayton et. al v. Government of Canada (UNCITRAL) ("Bilcon"), Award on Jurisdiction and Liability, 17 March 2015
RLA-023	Loewen Group, Inc. and Raymond L. Loewen v. United States of America (ICSID Case No. ARB(AF)/98/3), Award, 26 June 2003
RLA-024	Astrida Benita Carrizosa v. Republic of Colombia (ICSID Case No. ARB/18/5), Award of the Tribunal, 19 April 2021
RLA-025	Eli Lilly and Company v. Government of Canada (UNCITRAL) Final Award, 16 March 2017
RLA-026	Fireman's Fund Insurance Company v. United Mexican States (ICSID Case No. ARB(AF)/02/01), Award, 17 July 2006

RLA-027	Corn Products International Inc. v. United Mexican States (ICSID Case No. ARB(AF)/04/01), Decision on Responsibility, 15 January 2008
RLA-028	Emmis et al. v. Hungary (ICSID Case No. ARB/12/2) Award, 16 April 2014
RLA-029	Les Laboratoires Servier, S.A.A., Biofarma, S.A.S., Arts et Techniques du Progres S.A.S. v. Republic of Poland (UNCITRAL) Final Award, 14 February 2012
RLA-030	Comprehensive and Progressive Agreement for Trans-Pacific Partnership
RLA-031	Treaty between the Government of the United States of America and the Government of the Republic of Rwanda Concerning the Encouragement and Reciprocal Protection of Investment, (2008), in force 1 January 2012
RLA-032	United States – Panama Trade Promotion Agreement, (2007), in force 31 October 2012
RLA-033	United States – Colombia Trade Promotion Agreement, (2006), in force 15 May 2012
RLA-034	The Agreement Between the Government of the United States of America and the Government of [Country] Concerning the Encouragement and Reciprocal Protection of Investment, (2012)
RLA-035	Canada's 2021 Foreign Investment Promotion and Protection Agreement (FIPA) Model, (2021)
RLA-036	Andrea J. Menaker, "Benefiting from Experience: Developments in the United States' Most Recent Investment Agreements", (2006) 12:1 U.C. Davis J. Int'l L. Pol'y 121
RLA-037	Andrew Newcombe, "Canada's New Model Foreign Investment Protection Agreement", August 2004
RLA-038	G.C. Christie, "What Constitutes a Taking of Property under International Law?", 38 British Yearbook of International Law 307 (1962)
RLA-039	Restatement of the Law Third: The Foreign Relations of the United States, Vol. 2 (St. Paul, MN: American Law Institute, 1987)
RLA-040	ILC Draft Articles on Responsibility of States for Internationally Wrongful Acts with Commentaries, 2001
RLA-041	Oscar Chinn Case (UK v. Belgium) (PCIJ Ser A/B, No. 63), Judgment, 12 December 1934
RLA-042	Norwegian Ship Owners' Claims (Norway v. USA) (1 RIAA 307), Permanent Court of Arbitration, Award of 13 October 1922
RLA-043	German Interests in Polish Upper Silesia (Germany v. Poland) (PCIJ Ser A, No. 7), Judgment, 25 May 1926

RLA-044	Chorzow Factory Case (Jurisdiction) (1927), Ser. A, No. 9
RLA-045	Barcelona Traction Light and Power Company Limited (Belgium v. Spain), 1970 ICJ 3
RLA-046	Martins Paparinskis, The International Minimum Standard and Fair and Equitable Treatment, 208 (2013)
RLA-047	Accession Mezzanine et al. v. Hungary (ICSID Case No. ARB/12/3) Award, 17 April 2015
RLA-048	Jan Paulsson, Denial of Justice in International Law, (2005)
RLA-049	EnCana Corporation v. Republic of Ecuador (UNCITRAL) Award, 3 February 2006
RLA-050	Christopher Greenwood, State Responsibility for the Decisions of National Courts, in Issues of State Responsibility Before International Judicial Institutions 61 (Malgosia Fitzmaurice & Dan Sarooshi eds., 2004)
RLA-051	Flughafen Zürich A.G. and Gestión e Ingenería IDC S.A. v. Bolivarian Republic of Venezuela (ICSID Case No. ARB/10/19) Award, 18 November 2014
RLA-052	Mr. Franck Charles Arif v. Republic of Moldova (ICSID Case No. ARB/11/23) Award, 8 April 2013
RLA-053	Krederi Ltd. v. Ukraine (ICSID Case No. ARB/14/17) Award 2 July 2018
RLA-054	Bridgestone Licensing Services, Inc. and Bridgestone Americas, Inc. v. Republic of Panama (ICSID Case No. ARB/16/34) Award, 14 August 2020
RLA-055	Edwin M. Borchard, The Diplomatic Protection of Citizens Aboard or the Law of International Claims 330 (1925)
RLA-056	Loewen Group, Inc. and Raymond L. Loewen v. United States of America (ICSID Case No. ARB(AF)/98/3), Opinion of Christopher Greenwood Q.C, 26 March 2001
RLA-057	Liman Caspian Oil BV and NCL Dutch Investment BV v. Republic of Kazakhstan (ICSID Case No. ARB/07/14), Excerpts of the Award, 22 June 2010
RLA-058	Mobil Investments Canada Inc. and Murphy Oil Corporation v. Government of Canada (ICSID Case No. ARB(AF)/07/4) Award, 20 February 2015
RLA-059	América Móvil S.A.B. de C.V. v. Republic of Colombia (ICSID Case No. ARB(AF)/16/5) Award, 07 May 2021
RLA-060	Helnan International Hotels A/S v. Arab Republic of Egypt (ICSID Case No. ARB/05/19) Award, 3 July 2008
	•

RLA-061 Binder v. Czech Republic (UNCITRAL) Award on Jurisdiction, 6 June 2007	
RLA-062 World Values v. Venezuela (ICSID Case No. ARB/13/11) Award, 25 July 201	7
RLA-063 Hassan Awdi v. Romania (ICSID Case No. ARB/10/13) Award, 2 March 201	5
RLA-064 Limited Liability Company Amto v. Ukraine (SCC Case No. 080/2005) Fi Award, 26 March 2008	nal
RLA-065 Renee Rose Levi v. Peru (ICSID Case No. ARB/10/17) Award, 26 February 20)14
Zachary Douglas, "Nothing if Not Critical for Investment Treaty Arbitrati Occidental, Eureko and Methanex"	on:
Payment of Various Serbian Loans, Case PCIJ (Ser. A) No. 20, Sentence No. 12 July 1929	14,
RLA-068 Not Used	
RLA-069 Rupert Joseph Binder v. Czech Republic, (UNCITRAL) Final Award, 15 J 2011	uly
Borzu Sabahi, Kabir Duggal, and Nicholas Birch, <i>Principles Limiting the Amo of Compensation</i> , in Contemporary and Emerging Issues on the Law of Dama and Valuation in International Investment Arbitration, Edited by Christina Beharry, 2018 Koninklijke Brill NV	ges
RLA-071 Pope & Talbot (UNCITRAL) Partial Award, 26 June 2000	
RLA-072 Electrabel S.A. v. Republic of Hungary, (ICSID Case No. ARB/07/19), Decis on Jurisdiction, Applicable Law and Liability, 30 November 2012	ion
Burlington Resources Inc. v. Republic of Ecuador (ICSID Case No. ARB/08 Decision on Liability, 14 December 2012	/5)
Telenor Mobile Communications A.S. v. The Republic of Hungary (ICSID C No. ARB/04/15), Award, 13 September 2006	ase
RLA-075 Philip Morris Brand Sàrl (Switzerland), Philip Morris Products S (Switzerland) and Abal Hermanos S.A. (Uruguay) v. Oriental Republic Uruguay (ICSID Case No. ARB/10/7), Award, 8 July 2016	
CMS Gas Transmission Company v. Argentine Republic (ICSID Case I ARB/01/8) Award, 12 May 2005	No.

RLA-077	Tippetts, Abbett, McCarthy, Stratton v. TAMS-AFFA, Award No. 141-7-2, 22 June 1984 in 6 IRAN U.S. CL. TRIB. REP. 219, 225
RLA-078	OECD, "Indirect Expropriation" and the "Right to Regulate" in International Investment Law, OECD Working Papers on International Investment, No. 2004/4
RLA-079	Carlos Sastre and others v. United Mexican States (UNCITRAL), Award on Jurisdiction, 21 November 2022
RLA-080	Canada-United States-Mexico Free Trade Agreement (entered into force 1 July 2020) ("CUSMA").
RLA-081	Jack Coe, Jr., and Noah Rubins, "Regulatory Expropriation and the Tecmed Case: Context and Contributions", in Todd Weiler, Ed., "International Investment Law and Arbitration: Leading Cases From The ICSID, NAFTA, Bilateral Treaties And Customary International Law", (2005)
RLA-082	Emmis et al. v. Hungary (ICSID Case No. ARB/12/2), Decision on Respondent's Application for Bifurcation, 13 June 2013
RLA-083	Fouad Alghanim & Sons for General Trading & Contracting, W.L.L. and Fouad Mohammed Thunyan Alghanim v. Hashemite Kingdon of Jordan (ICSID Case No. ARB/13/38), Award of the Tribunal, 14 December 2014
RLA-084	Generation Ukraine v. Ukraine (ICSID Case No. ARB/00/9), Award, 16 September 2003
RLA-085	Encana v. Ecuador (UNCITRAL) Award 3 February 2006
RLA-086	UNCTAD Series on International Investment Agreements II, "Expropriation: A Sequel" (2012)
RLA-087	Zachary Douglas, "Property, "Investment and the Scope of Investment Protection Obligations"
RLA-088	John G. Sprankling, "The International Law of Property", (Oxford University Press, 2014)
RLA-089	Eureko B.V. v. Poland (UNCITRAL), Partial Award, 19 August 2005
RLA-090	Merrill and Ring, Award, 31 March 2010
RLA-091	Eskosol S.p.A. in liquidazione v. Italian Republic (ICSID Case No. ARB/15/50), Award, 4 September 2020
RLA-092	Suez, Sociedad General de Aguas de Barcelona S.A. and Vivendi Universal S.A. v. Argentina (ICSID Case No. ARB/03/19) Decision on Liability, 30 July 2010

RLA-093	Vestey Group Ltd v. Bolivarian Republic of Venezuela (ICSID Case No. ARB/06/4) Award, 15 April 2016
RLA-094	Campbell Mclachlan, Laurence Shore & Matthew Weiniger, "International Investment Arbitration: Substantive Principles", (Oxford University Press 2007)
RLA-095	M. Sonarajah, The International Law on Foreign Investment, Third Edition
RLA-096	Monique Sasson, Substantive Law in Investment Treaty Arbitration the Unsettled Relationship Between International and Municipal Law, (Wolter Kluwers 2010)
RLA-097	Andrew Newcombe and Lluis Paradell, Law and Practice of Investment Treaties, Standards of Treatment (2009, Kluwer Law International BV)
RLA-098	Zachary Douglas, "The Foundations of International Investment Law", Oxford University Press, 2014
RLA-099	Affaires Du Chemin De Fer Panevezys-Saldutiskis Railway Cases, PCIJ series A/B. No. 76 (1939)
RLA-100	Methanex v. United States of America (UNCITRAL) Final Award of the Tribunal on Jurisdiction and Merits, 3 August 2005
RLA-101	Case Concerning Elettronica Sicula SpA (ELSI) (United States of America v. Italy), I.C.J. Reports 1989, Judgment, 20 July 1989
RLA-102	Mergé Case – Decision No. 55, UN Italian-United States Conciliation Commission, Decision, 10 June 1955
RLA-103	Not Used
RLA-104	Manuel Garcia Armas et al. v. Republic of Venezuela (UNCITRAL) Award, 13 December 2019
RLA-105	Enrique Heemsen and Jorge Heemsen v. Venezuela (PCA Case No. 2017) Decision on Jurisdiction, 29 October 2019
RLA-106	Not Used
RLA-107	Not Used
RLA-108	Zachary Douglas, "The International Law of Investment Claims" (Cambridge University Press, January 2010)

RLA-109	Michael Ballantine and Lisa Ballantine v. Dominican Republic (UNCITRAL) Submission of the United States of America, 6 July 2018
RLA-110- RLA-119	Not Used
RLA-120	Sergei Viktorovich Pugachev v. Russia, Award on Jurisdiction, 18 June 2020
RLA-121	Saluka Investments B.V. v. The Czech Republic (UNCITRAL), Partial Award, 17 March 2006
RLA-122	Report of the International Law Commission Seventieth session (30 April-1 June and 2 July-10 August 2018) (UN Doc. A/73/10) Chapter IV, p. 32, Conclusion 4, Commentary 18
RLA-123	Bayview Irrigation District et al. v. United Mexican States (ICSID Case No. ARB (AF)/05/1) Award, 19 June 2007
RLA-124	Mobil Investments, Inc. and Murphy Oil Corporation v. Government of Canada (ICSID Case No. ARB(AF)/07/4) Decision on Liability and on Principles of Quantum, 22 May 2012
RLA-125	UNCTAD, "Foreign Direct Investment and Performance Requirements: New Evidence from Selected Countries", UNCTAD/ITE/IIA/2003/7
RLA-126	Gloria L. Sandrino, The NAFTA Investment Chapter and Foreign Direct Investment in Mexico: A Third World Perspective, 27 Vand. J. Transnat'l L. 259, 311
RLA-127	CG. Sacerdoti, "Case T 8735-01-77, The Czech Republic v. CME Czech Republic B.V Expert Opinion of Professor Sacerdoti", TDM 5 (2005)
RLA-128	Kevin C. Kennedy, A WTO Agreement on Investment: A Solution in Search of a Problem?, 24 U. Pa. J. Int'l Econ. L. 77, 164–167 (2003)
RLA-129	Nagesh Kumar, Use and Effectiveness of Performance Requirements: What Can Be Learnt from the Experiences of Developed and Developing Countries, in The Development Dimension of FDI: Policy and Rule-Making Perspectives, Part I, UNCTAD/ITE/IIA/2003/4
RLA-130	UNCTAD, Host Country Operational Measures (UNCTAD/ITE/IIT/26: 2001)
RLA-131	The Canadian-U.S. Free Trade Agreement, Trade: Securing Canada's Future, and was brought into force on January 1, 1989

RLA-132	Pope & Talbot Inc. v. Government of Canada, (UNCITRAL) Submission of the
	United States of America, 7 April 2000
RLA-133	J. Johnson, <i>The North American Free Trade Agreement: A Comprehensive Guide</i> (Ontario: Canada Law Book Inc., 1994)
RLA-134	Kenneth J. Vandevelde, U.S. International Investment Agreements (Oxford: 2009)
RLA-135	J. Anthony VanDuzer, NAFTA Chapter 11 to Date: The Progress of a Work in Progress, in L. Dawson, ed., Whose Rights: The NAFTA Chapter 11 Debate (Ottawa: Centre for Trade Policy and Law, 2002), p. 75
RLA-136	Barton Legum, Understanding Performance Requirement Prohibitions in Investment Treaties, in Contemporary Issues in International Arbitration and Mediation, p. 59
RLA-137	Not Used
RLA-138	Joseph Charles Lemire v. Ukraine II, ICSID Case No. ARB/06/18, Decision on Jurisdiction and Liability, 14 January 2010
RLA-139	S.D. Myers, Inc. v. Government of Canada (UNCITRAL) Second Partial Award, 21 October 2002
RLA-140	S. Ripinsky, <i>Damages in International Investment Law</i> (London, British Institute of International and Comparative Law: 2008)
RLA-141	T. Weiler & L.M. Diaz, Causation and Damages in NAFTA Investor-State Arbitration in NAFTA Investment Law and Arbitration: Past Issues, Current Practice, Future Prospects, (T. Weiler, ed.) (Transnational Publisher: 2004)
RLA-142	Duke Energy Electroquil Partners & Electroquil S.A. v. Republic of Ecuador (ICSID Case No. ARB/04/19) Award, 18 August 2008
RLA-143	International Law Commission, <i>Draft Articles on Responsibility of States for Internationally Wrongful Acts with Commentaries</i> , Text adopted by the International Law Commission at its fifty-third session, in 2001, (A/56/10), United Nations, New York 2001
RLA-144	T.W. Walde & B. Sabahi, Compensation, Damages, and Valuation in The Oxford Handbook of International Investment Law (OUP 2008)
RLA-145	Victor Pey Casado and President Allende Foundation v. Republic of Chile (ICSID Case No ARB/98/2) Award

RLA-146	Nordzucker AG v. The Republic of Poland (UNCITRAL) Third Partial and Final Award, 23 November 2009
RLA-147	Gustav FW Hamester GmbH & Co KG v. Republic of Ghana (ICSID Case No. ARB/07/24) Award, 18 June 2010
RLA-148	Siemens A.G. v. The Argentine Republic (ICSID Case No. ARB/02/8) Award, 6 February 2007
RLA-149	Compania de Aguas def Aconquija SA. and Vivendi Universal v. Argentine Republic (ICSID Case No. ARB/97/3) Award, 20 August 2007
RLA-150	Case Concerning the Territorial Dispute (Libyan Arab Jamahiriya v. Chad), I.C.J. Reports 1994
RLA-151	David Gaukrodger, Investment Treaties as Corporate Law: Shareholder Claims and Issues of Consistency, OECD Working Papers on International Investment, No. 2013/03, OECD Investment Division
RLA-152	Case Concerning Ahmadou Sadio Diallo (Republic of Guinea v Democratic Republic of the Congo) (I.C.J. Reports 2010) Judgment, 30 November 2010
RLA-153	S.D. Myers, Inc. v. Government of Canada, NAFTA/UNCITRAL, Submission of the United States of America
RLA-154	Pope & Talbot, Inc. v. Government of Canada, NAFTA/UNCITRAL, Seventh Submission of the United States of America
RLA-155	GAMI Investments, Inc. v. United Mexican States, NAFTA/UNCITRAL, Submission of the United States of America
RLA-156	International Thunderbird Gaming Corp. v. United Mexican States, NAFTA/UNCITRAL, Submission of the United States of America
RLA-157	Marvin Feldman v. United Mexican States (ICSID Case No. ARB(AF)/99/1) Correction and Interpretation of the Award, 13 June 2003
RLA-158	Not Used

RLA-159	Not Used	
RLA-160	Marvin Roy Feldman Karpa v. United Mexican States (ICSID Case No. ARB(AF)/99/1) Counter-Memorial on Preliminary Questions, 8 September 2000	
RLA-161	Harvard Research Draft, The Law of Responsibility of States for Damage Done in Their Territory to the Person or Property of Foreigners, art. 9, 23 AM. J. INT'L L. SP. SUPP. 134 (1929)	
RLA-162	M. Kazazi, Burden of Proof and Related Issues: A Study on Evidence Before International Tribunals (Kluwer Law International, 1996)	
RLA-163	M. Kantor, Valuation for Arbitration: Compensation Standards, Valuation Methods and Expert Evidence (Kluwer Law International, 2008)	
RLA-164	Case Concerning Military and Paramilitary Activities in and against Nicaragua (Nicaragua v. United States of America) Judgment, 27 June 1986	
RLA-165	Case Concerning the Application of the Convention on the Prevention and Punishment of the Crime of Genocide (Bosnia and Herzegovina v. Serbia and Montenegro, Judgment, 26 February 2007	
RLA-166	The Rompetrol Group N.V. v. Romania (ICSID Case No. ARB/06/3) Award, 6 May 2013	
RLA-167	LG&E Energy Corp., LG&E Capital Corp. and LG&E International Inc. v. Argentine Republic (ICSID Case No. ARB/02/1) Award, 25 July 2007	
Legal A	Legal Authorities filed with Canada's Reply to the Claimants' Motion to Compel Documents, 16 February 2024	
RLA-168	Global Telecom Holding S.A.E. v. Canada (ICSID Case No. ARB/16/16), Procedural Order No. 4, 3 November 2018	
Legal Aut	Legal Authorities filed with Canada's Rejoinder Memorial on Jurisdiction, Merits and Damages, 1 November 2024	
RLA-169	Sergei Paushok et al. v. The Government of Mongolia (UNCITRAL), Award on Jurisdiction and Liability, 28 April 2011	
	I .	

RLA-170	Bayindir Insaat Turizm Ticaret Ve Sanay A.S. v. Islamic Republic of Pakistan (ICSID Case No. ARB/03/29), Award, 27 August 2009
RLA-171	ECE Projektmanagement International GMBH et al. v. The Czech Republic (PCA Case No. 2010-5), Award, 19 September 2013
RLA-172	Middle East Cement Shipping and Handling Co. S.A. v. Arab Republic of Egypt (ARB/99/6), Award, 12 April 2002
RLA-173	Garanti Koza LLP v. Turkmenistan (ICSID Case No. ARB/11/20), Award, 19 December 2016
RLA-174	Standard Chartered Bank v. United Republic of Tanzania (ICSID Case No. ARB/10/12), Award, 2 November 2012
RLA-175	OOO Manolium Processing v. Republic of Belarus (PCA Case No. 2018-06), Final Award, 22 June 2021
RLA-176	Sistem Muhendislik Insaat Sanayi Ve Ticaret Anonim Sirketi v. Kyrgyz Republic, 2012 ONSC 4351, Reasons for Decision, 25 July 2012
RLA-177	Alberto Carrizosa Gelzis et al., v. Republic of Colombia (PCA Case No. 2018-56), Award, 7 May 2021
RLA-178	President Allende Foundation, Victor Pey Casado and Coral Pey Grebe v. Republic of Chile (PCA Case No. 2017-30), Award, 28 November 2019
RLA-179	J. Sprankling, "Rights in Waters and Oceans", <i>The International Law of Property</i> (Oxford University Press, 2014) [Extract]
RLA-180	United Nations Convention on the Law of the Sea, 10 December 1982
RLA-181	Eco Oro Minerals Corp. v. Republic of Colombia (ICSID Case No. ARB/16/41), Decision on Jurisdiction, Liability and Directions on Quantum, 9 September 2021
RLA-182	Eco Oro Minerals Corp. v. Republic of Colombia (ICSID Case No. ARB/16/41), Award on Damages, 15 July 2024
RLA-183	Alica Grace v. United Mexican States (ICSID Case No. UNCT/18/4), Final Award, 19 August 2024
	•

RLA-184	Raimundo J. Santamarta Devis v. Bolivarian Republic of Venezuela (PCA Case No. 2020-56), Award on Jurisdiction Ratione Personae, 26 July 2023 [Unofficial English translation]
RLA-185	Marko Mhialjevic v. Republic of Croatia (ICSID Case No. ARB/19/35), Award, 19 May 2023

65