



CANADA

PROVINCE OF QUEBEC  
DISTRICT OF MONTREAL

NO.: 500-06-000500-104

SUPERIOR COURT  
(Class Action)

VIRGINIA NELLES

Plaintiff

-vs-

ROYAL BANK OF CANADA

Defendant

**AGREEMENT AS TO THE CONDUCT OF THE PROCEEDINGS  
AS OF AUGUST 19, 2011  
(Article 151.1 C.C.P.)**

Deadline to serve Motion Introductive of Proceedings:	August 20, 2010
Date of presentation of the Motion Introductive of Proceedings:	Within 10 days of service of Motion Introductive of Proceedings:
Deadline for Plaintiff to file an Inscription for Proof and Hearing on the Merits and Article 274.1 C.C.P. Declaration:	Within 180 days of service of Motion Introductive of Proceedings

	PROCEDURE	DEADLINE
1.	Examinations on Discovery of representatives of the Defendant;	October 15, 2011
1(a)	<i>Analysis of Exhibits to be examined 5 and 6 October 2011</i>	
2.	Service and filing of Plaintiff's Answer to Plea, Article 274.1 C.C.P. Declaration, Rule 15, Inscription, Expert Reports, Exhibits and Notices, if any;	November 15, 2011

2(a): Information on delay to be expected for filing of Defendant's expertise

Sept. 15, 2011

Motion to be filed by Sept. 8, 2011

*Sept 14, 2011*

3.	Service and filing of Defendant's Article 274.2 C.C.P. Declaration, Rule 15, Expert Reports, Exhibits and Notices, if any; <i>subject to adjustment depending on availability of Defendant's expertise</i>	Within 30 days of Plaintiff's filing of Article 274.1 C.C.P. Declaration
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A) *filing of final declaration of readiness: 30 days after completion of item 3*  
 Montreal, August 19, 2011

*Stein + Stein clac.*  
 STEIN & STEIN INC.

*Kugler Kandestin LLP*  
 KUGLER KANDESTIN, L.L.P.

Attorneys for Plaintiff

Montreal, August 24, 2011

*B L G*  
 BORDEN LADNER GERVAIS, LLP  
 Attorneys for Defendant