

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 PROCEEDINGS**  
(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.	Notification by the Defendant of any preliminary Motion(s) in respect of the Motion Introductive of Proceedings, including Motions for permission to examine people other than the Plaintiff on discovery; Defendant will also send a written request for documents it wishes to have communicated prior to discovery;	Within 10 days following presentation of Motion Introductive of Proceedings
2.	Presentation of preliminary Motion(s), and other Motion(s) set forth in Item #1, above, if any;	Within 20 days following presentation of Motion Introductive of Proceedings
2.1	If agreed by Plaintiff, or ordered by the Court, communication of documentation requested for purposes of discovery	October 10, 2010

3.	Examination on Discovery of Plaintiff and, if agreed or ordered by the Court, any other individual;	October 29, 2010
4.	Service and filing of the Defendant's Defence and exhibits in support thereof;	December 23, 2010
5.	Notification and presentation by Plaintiff of any preliminary Motion(s) in respect of the Defence; written request for documentation prior to discoveries	January 15, 2011
6.	Communication of documentation requested for purposes of discovery, if agreed or ordered by the Court	January 29, 2011
7.	Examinations on Discovery of representatives of the Defendant;	February 4, 2011
8.	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;	Within 180 days of service of Motion Introductive of Proceedings
9.	Service and filing of Defendant's Article 274.2 C.C.P. Declaration, Rule 15, expert reports, exhibits and Notices, if any;	Within 30 days of Plaintiff's filing of Article 274.1 C.C.P. Declaration

MONTREAL, July 16, 2010.

*Shel Stein Inc.*

STEIN & STEIN INC.

*Kugler Kandestin LLP*

KUGLER KANDESTIN, L.L.P.

Attorneys for Plaintiff

MONTREAL, July 16, 2010.

*Borden Ladner Gervais LLP*

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Attorneys for Defendant