



Department of Justice
Canada

Ministère de la Justice
Canada

50 O'Connor Street
Suite 500
Ottawa, Ontario
K1A 0H8

Telephone: (613) 670-6294
Fax: (613) 954-1920

December 23, 2014

Our File Number: 7713113

Without Prejudice

BY EMAIL

Julie Taub
Immigration Law Office
451 Daly Ave, Suite 103
Ottawa, Ontario
K1N 6H6

Dear Ms. Taub:

Re: KAMJIAN, Mikael Karabet et al. v. MCI & MPSEP - Application for Leave and Judicial Review [Inland - Perm.Res./H&C] - CFN; IMM-4165-14

Further to our discussion of earlier today, my client is prepared to settle the above-noted matter on a without costs basis on the following terms:

1. The Applicants will serve and file a Notice of Discontinuance by Friday, January 9, 2015, in accordance with Rule 165 and Form 166 of the *Federal Courts Rules*;
2. Once the Notice of Discontinuance has been filed, the Applicants' original application for permanent residence on the basis of humanitarian and compassionate grounds (submitted to CIC in February 2008) will be remitted for re-determination by a new officer;
3. The Applicants will have 30 days from the date that the Notice of Discontinuance was filed to submit updated submissions to CIC in support of their application. The updated submissions, including anything contained in the H&C application submitted in July 2013 that the Applicants deem relevant, should be sent to the following CIC address:

Citizenship and Immigration Canada
Backlog Reduction Office – Vancouver
#600 – 605 Robson Street
Vancouver, British Columbia
V6B 5J3

Canada

4. CIC will consider issuing Temporary Resident Permits to the Applicants, pending the re-determination of their H&C application;
5. Each party shall bear their own costs for the within application for leave and for judicial review.

If your client accepts this offer, please sign and date a copy of this letter and return marked for my attention.

Yours truly,



Leah Garvin
Counsel, Civil Litigation Section

I accept the terms of the offer as stated above:

Signed: Julie Taub
Julie Taub

Date: December 23, 2014

Counsel for the Applicant