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| F I L E D | FEDERAL COURT COUR FÉDÉRALE | | D É P O S É |
| 31-OCT-2023 | | | |
| Robert Mvondo | | | |
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FEDERAL COURT

File No.:T-2304-23

BETWEEN:

Carla B. Paul

Applicant

and

Attorney General of Canada

Respondent

NOTICE OF APPLICATION

TO THE RESPONDENT:

A PROCEEDING HAS BEEN COMMENCED by the applicant. The relief claimed by the applicant appears on the following page.

THIS APPLICATION will be heard by the Court at a time and place to be fixed by the Judicial Administrator. Unless the Court orders otherwise, the place of hearing will be as requested by the applicant. The applicant requests that this application be heard at Winnipeg, MB (place where Federal Court of Appeal (or Federal Court) ordinarily sits).

IF YOU WISH TO OPPOSE THIS APPLICATION, to receive notice of any step in the application or to be served with any documents in the application, you or a solicitor acting for you must prepare a notice of appearance in Form 305 prescribed by the Federal Courts Rules and serve it on the applicant's solicitor, or where the applicant is self-represented, on the applicant, WITHIN 10 DAYS after being served with this notice of application.

Copies of the Federal Courts Rules information concerning the local offices of the Court and other necessary information may be obtained on request to the Administrator of this Court at Ottawa (telephone 613-992-4238) or at any local office.

IF YOU FAIL TO OPPOSE THIS APPLICATION, JUDGMENT MAY BE GIVEN IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU.

(Date) October 31st, 2023

Issued by: (Robert) Buye M'VONDO
(Registry Officer)

Address of local office 400-363 Broadway, Winnipeg, Manitoba, R3C 3N9

TO:

Name: Attorney General of Canada

Address: 601-400 St. Mary Avenue

Winnipeg, Manitoba

R3C 4K5

APPLICATION

This is an application for judicial review in respect of: Canada Revenue Agency's decision respecting the Applicant's Request for Tax Payor Relief pursuant to the *Income Tax Act*, IC07-1R1 Part II, 20(3.1), paragraphs 23(a), 25(a), 25(c) and 25(d).

The decision was communicated to the Applicant on: October 5, 2023.

The applicant makes application for: Judicial review of my file, including files previously submitted to CRA, as well as further supplementary documents as evidence in order to reevaluate my eligibility for Tax Payor Relief.

The grounds for the application are:

1. I seek to make an application for judicial review under subsection 18.1(1) of the *Federal Courts Act* with grounds for review under subsection 18.1(4).
2. Tax Payer Relief is available pursuant to the *Income Tax Act*, s. 220 (3.1).
3. Pursuant to paragraphs 23(a), 25(a) and (c) the taxpayer experienced circumstances that should entitle her to relief.
4. The Minister has wrongfully interpreted the legislation to deny such relief.

This application will be supported by the following material:

The applicant's affidavit including the following documentary exhibits:

1. Statements of penalties and interest for the relevant years;
2. A calculation of the totality of the said penalties and interest;
3. Application for Tax Payer Relief dated February 11, 2022;
4. Decision by J. Gil, dated November 1, 2022;
5. Request for Taxpayer Relief dated December 12, 2022;
6. Appeal Decision, dated October 5, 2023.

Dated at Winnipeg, Manitoba this 31st day of October, 2023



(Signature of the Applicant)

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