

February 8, 2019

Hand Delivered

The Honourable Justice Michael J. Wood
Supreme Court of Nova Scotia
The Law Courts
1815 Upper Water St.
Halifax, NS B3J 1S7

My Lord:

**Re: In the Matter of QuadrigaCX et al.
Hfx No. 484742**

We are local counsel to Parham Pakjou, a user and customer of the Quadriga platform, and are filing the enclosed Motion materials seeking an Order to act as representative counsel. As noted in the enclosed Notice of Motion, Miller Thomson LLP will act as lead counsel and Cox & Palmer will be local counsel should the requested relief be granted.

This matter has been scheduled by the Court to be heard at 9:30 a.m. on February 14, 2019. To accelerate receipt of the motion materials by the members of the service list, who are all counsel or professionals, we are transmitting copies by email and will provide an Affidavit in respect of same at or prior to the time of the hearing of this Motion.

We enclose the following materials related to this motion:

1. Notice of Motion with requisite filing fee;
2. Affidavit of Mr. Pakjou in support of the Motion;
3. Written submissions in support of the Motion with copies of the cited authorities; and
4. A Pro-forma form of representative counsel Order enclosed to comply with the requirements of the Civil Procedure Rules. It is the intention of the moving party that, should our firms be selected as representative counsel, we would collaborate with the monitor and follow any direction from the Court in preparing the final version of the representative counsel Order.

Gavin D.F. MacDonald | Partner

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The Affidavit of Mr. Pakjou was sworn in Ontario on February 7, 2019 and we are filing a copy. I undertake to file the original of Mr. Pakjou's Affidavit upon receipt.

Yours very truly,

A handwritten signature in blue ink, appearing to read "G.D.F. MacDonald", followed by a large, stylized flourish.

Gavin D.F. MacDonald
GDFM/LB

Enclosures