

**FEDERAL COURT OF CANADA  
(TRIAL DIVISION)**

BETWEEN:

**MOHAMED ATTIAH**

Plaintiff

and

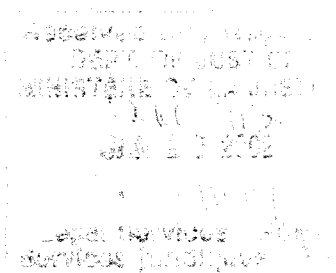
**ATOMIC ENERGY OF CANADA LIMITED AND HER MAJESTY THE  
QUEEN IN RIGHT OF CANADA represented by THE CANADIAN  
SECURITY INTELLIGENCE SERVICE and  
THE ROYAL CANADIAN MOUNTED POLICE**

Defendants

**MINUTES OF SETTLEMENT**

The parties hereto agree to settle this action upon the following terms:

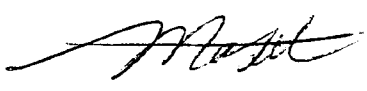
1. A cheque in the sum of \$20,000.00 shall be issued by the Canada Department of Justice payable to the Plaintiff in full satisfaction of the Plaintiff's claim for relief arising out of action T-2002-01 in The Federal Court (Trial Division). The cheque shall be made payable to Joseph Markin In Trust and is to be paid to Mr. Markin forthwith upon signing by the Plaintiff and delivery to counsel for the Defendants, the Royal Canadian Mounted Police (RCMP) and the Canadian Security Intelligence Service (CSIS) and to Counsel for Atomic Energy of Canada Limited (AECL) of these Minutes of Settlement and the Full and Final Release.
2. The Defendant, AECL, agrees to employ the Plaintiff at its facility at Chalk River, Ontario, commencing October 1, 2001, with salary and benefits to be determined by the Defendant, AECL.



3. The Plaintiff shall be responsible for any income tax liability including any claims or demands under the Canada Income Tax Act in respect of withholding tax, interest or penalties and any costs or expenses incurred in defending such claim or demand arising out of the payments set out in paragraphs 1 and 2 herein.
4. Counsel for the Plaintiff agrees to serve and file a Notice of Discontinuance of Action number T-2002-01, at the same time as the execution of these Minutes and the Release and receipt of the settlement funds referred to in paragraph 1 herein.
5. The parties agree that these monies are being paid without any admission of fault or liability on the part of the Defendants, or any servants, employees or agents of Her Majesty The Queen in Right of Canada and AECL.
6. The parties further agree that the fact and the terms of this settlement are to remain strictly confidential and are not to be disclosed in any form or communication to any non-party, save and except for any matters required for the completion of this settlement.
7. The Plaintiff further agrees as a condition of receiving these settlement monies, that, if the Plaintiff or his agents breach the confidentiality of this settlement, the Plaintiff shall immediately forfeit the amount of the settlement to the Defendants, AECL, and Her Majesty The Queen in Right of Canada.
8. The Plaintiff agrees that, in the event of contact with a media representative about this action and the background events to this action, the Plaintiff will state that the matter has been resolved and will make no other statement.

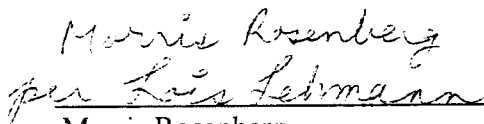
9. The Plaintiff will forthwith ask the Canadian Human Rights Commission (CHRC) for its consent to withdrawal of his complaint filed on or about November 8, 2001 against any or all of the Defendants. The Plaintiff will forward to counsel for the Defendants a copy of his request to and the response of the CHRC immediately upon receipt thereof.
  
10. The Plaintiff shall execute a Full and Final Release in the form attached hereto as Appendix "A" releasing the Defendants from any and all claims arising with respect to action no. T-2002-01 in the Federal Court (Trial Division). The Full and Final Release shall be forwarded to Counsel for the Defendants, RCMP and CSIS, with the executed Minutes of Settlement.

Dated at Toronto this <sup>17th</sup> 6<sup>th</sup> day of January, 2002 ~~December, 2001~~ <sup>MR</sup>



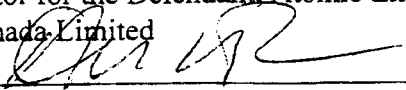
Mohamed Attiah

Dated at Toronto, this 11<sup>th</sup> day of January, 2002 ~~December, 2001~~ <sup>MR per</sup>

  
per Lois Lehmann

Morris Rosenberg  
Deputy Attorney General of Canada  
Per: Lois Lehmann, Senior Counsel  
Solicitor for the Defendant, Her Majesty  
the Queen as represented by the Canadian  
Security Intelligence Service and the Royal  
Canadian Mounted Police

Dated at Mississauga, this 11<sup>th</sup> day of January 2002 ~~December, 2001~~ <sup>MR</sup>


(Seal) Atomic Energy of Canada Limited  
Solicitor for the Defendant, Atomic Energy  
of Canada Limited  
Per: 

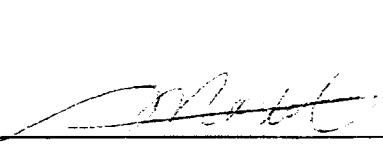
FULL AND FINAL RELEASE

IN CONSIDERATION of the terms enumerated in the Minutes of Settlement executed by and on behalf of the parties to Federal Court (Trial Division) action number T-2002-01, I, **Mohamed Attiah**, on behalf of my heirs, executors, administrators and assigns do hereby release and forever discharge Her Majesty The Queen in Right of Canada as represented by the Royal Canadian Mounted Police and the Canadian Security Intelligence Service and Atomic Energy of Canada Limited (including their agents, servants, employees, successors and assigns) for any and all actions, causes of action, claims, contracts or demands at law, in equity or under any statute, including any claims under the Canada Human Rights Act, which I now have or which have existed up to the present time, or which my heirs, executors, administrators or assigns, shall or may have in respect of any and all matters which were or could have been raised in action number T-2002-01 in the Federal Court (Trial Division).

AND I HEREBY DECLARE that I fully understand and agree with the terms of settlement as set out in the Minutes of Settlement and in this Release; that the items stated are the sole consideration for this Release; that, prior to signing this Release, I have obtained legal advice from my counsel, and that I voluntarily accept those terms for the purpose of making a full, final and binding settlement of all claims as described above.

*RP* SIGNED, SEALED AND DELIVERED at Toronto on December  
5<sup>th</sup>, ~~2001~~ 2002 *RP*

  
Witness:

  
Mohamed Attiah

Print Name: Rosemarie Cupido