

FORM 81

**LIST OF DOCUMENTS  
(PARTIAL DISCLOSURE)**

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TAX COURT OF CANADA

BETWEEN:

(name)

Appellant,

and

HER MAJESTY THE QUEEN,

Respondent.

LIST OF DOCUMENTS  
(PARTIAL DISCLOSURE)

The following is a list of the documents of which the appellant (or respondent) has knowledge that might be used in evidence:

- (a) to establish or to assist in establishing any allegation of fact in any pleading filed herein by the said party,  
or
- (b) to rebut or assist in rebutting any allegation of fact in any pleading filed herein by any other party,

and which is filed and served in compliance with section 81.

SCHEDULE A

Documents in the possession, control or power of the party. (Number each document consecutively. Set out the nature and date of the document and other particulars sufficient to identify it.)

SCHEDULE B

Documents of which the party has knowledge but which are not in the party's possession, control or power. (Number each document consecutively. Set out the nature and date of the document and other particulars sufficient to identify it. Give the present location of each document.)

Date:

\_\_\_\_\_  
(Signature) (of party, or of an officer,  
director or employee of the  
party, or of the counsel of  
record of the party)

TAKE NOTICE that the documents referred to in Schedule A above may be inspected and copies taken at (place) on (date) between the hours of (time).