

**FILED / PRODUIT**

Date: September 6, 2022

CT- 2022-002

Sara Pelletier for / pour  
REGISTRAR / REGISTRAIRE

**CT-2022-002**

**THE COMPETITION TRIBUNAL**

OTTAWA, ONT.

Doc. # 197

**IN THE MATTER OF** the *Competition Act*, R.S.C. 1985, c. C-34;

**AND IN THE MATTER OF** the proposed acquisition by Rogers Communications Inc. of Shaw Communications Inc.; and

**AND IN THE MATTER OF** an application by the Commissioner of Competition for one or more orders pursuant to section 92 of the *Competition Act*.

**BETWEEN:**

**COMMISSIONER OF COMPETITION**

**Applicant**

- and -

**ROGERS COMMUNICATIONS INC. AND  
SHAW COMMUNICATIONS INC.**

**Respondents**

**DEMAND FOR PARTICULARS**

With respect to paragraph 17 of the Commissioner's Fresh as Amended Reply, the Respondent, Rogers Communications Inc., seeks particulars of:

1. What difficulties, if any, the Commissioner alleges Videotron will face?
2. The manner in which the Commissioner alleges Videotron's competitiveness will be reduced?
3. What "other benefits" the Commissioner alleges Shaw's wireless business derives from its wireline business?

September 6, 2022

**LAX O'SULLIVAN LISUS GOTTLIEB LLP**  
Suite 2750  
145 King Street West  
Toronto, ON M5H 1J8

**Jonathan Lisus (LSO# 32952H)**  
Tel: 416.598.7873  
Email: jlisus@lolg.ca

**Crawford Smith (LSO# 42131S)**  
Tel: 416.598.8648  
Email: csmith@lolg.ca

**Matthew Law (LSO# 59856A)**  
Tel: 416.849.9050  
Email: mlaw@lolg.ca

**Bradley Vermeersch (LSO# 69004K)**  
Tel: 416.646.7997  
Email: bvermeersch@lolg.ca

Counsel for the Respondent Rogers  
Communications Inc.

TO: **THE COMMISSIONER OF COMPETITION**  
Department of Justice Canada  
Competition Bureau Legal Services  
Place du Portage, Phase I  
50 Victoria Street, 22nd Floor  
Gatineau, QC K1A 0C9

**John S. Tyhurst**

**Derek Leschinsky**

**Katherine Rydel**

**Ryan Caron**

**Kevin Hong**

Tel: (819) 956-2842 / (613) 897-7682

Fax: (819) 953-9267

Counsel for the Applicant,  
The Commissioner of Competition

AND TO: **DAVIES WARD PHILLIPS & VINEBERG LLP**  
155 Wellington Street West  
Toronto, ON M5V 3J7

**Kent E. Thomson**

Tel: 416.863.5566

Email: kentthomson@dwpv.com

**Derek D. Ricci**

Tel: 416.367.7471

Email: dricci@dwpv.com

**Steven Frankel**

Tel: 416.367.7441

Email: sfrankel@dwpv.com

**Chanakya Sethi**

Tel: 416.863.5516

Email: csethi@dwpv.com

Tel: 416.863.0900

Fax: 416.863.0871

Counsel for the Respondent  
Shaw Communications Inc.