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**File No:** 30245

April 10, 2026

**The Honourable Justice Denis Gascon**

c/o Competition Tribunal  
17<sup>th</sup> Floor, 333 Laurier Avenue West  
Ottawa, Ontario K1A 0G7

Dear Justice Gascon:

**Re: *Consumers Council of Canada v. Live Nation Entertainment, Inc. et al.*, CT-2025-008**

We write to you in response to the letter dated March 27, 2026 from the respondents in the above-mentioned case requesting permission to file the proposed affidavit of Patti-Anne Tarlton (“**Tarlton Affidavit**”).

The Tarlton Affidavit is focused on showing that the respondents do not have control over many live music venues in Canada. Viewed on its own, the Tarlton Affidavit paints an incomplete or misleading picture. For example, it lists venues that the respondents do not “own or operate,” but it fails to mention that many of those same venues are exclusively ticketed by the respondent, Ticketmaster. We have enclosed a brief draft reply affidavit of Maria Arabella Robles (“**Robles Reply Affidavit**”), which identifies venues referenced in the Tarlton Affidavit over which the respondents appear to have substantial ticketing control.

The applicant consents to the filing of the Tarlton Affidavit – assuming it is not materially changed before it is sworn and filed – if the Robles Reply Affidavit can also be filed.

All of which is respectfully submitted.

Yours truly,  
**SOTOS LLP**

David Sterns

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