

**This is Exhibit "2" attached to the
Affidavit of Nagib Tajdin
Sworn on May 4, 2012**

MRE

B: TABLE OF UNDERTAKING

His Highness Prince Karim Aga Khan v. Nagib Tajdin and Alnaz Jiwa et al., Reference Proceeding in Court File No. T-514-10 further to the Judgment of Mr. Justice Harrington dated March 4, 2011

**REVISED PLAINTIFF'S SUMMARY OF UNDERTAKINGS
EXAMINATION FOR DISCOVERY OF NAGIB TAJDIN HELD NOVEMBER 8, 2011**

No.	Page Ref.	Plaintiff's Question Summary and Defendant Position at Discovery	Defendant's Response to the Undertaking
1	p. 10 l. 12-22 Q. 30-32	UNDERTAKING: With respect to Exhibit 2, Tab 1 screen capture of e-mail dated November 21, 2009, to produce the entire e-mail string.	<p>Not relevant because deduction for free books are not formally claimed but Reply already given in the same thread in Q.35-40</p> <p>The Email is complete in itself, it contains the number of books ordered, the price to be sold and the intended number of free books, the email is dated before publication and long before the lawsuit</p> <p>This question on Undertakings makes it look like if I did not provide an email that I had on file. His question on an email dated before the book was sent to the printer on November 21 looks like I should have brought him the complete email but in the following lines redacted by Mr Gray, I did say that I did not have the complete email, and the discussion on this question went on up to question 49.</p>
2	p. 50 l. 19-22 Q. 179	UNDERTAKING: With respect to Exhibit 2, Tab 2, "e-mail dated November 24, 2009", to produce an unredacted copy showing the name of the transporter.	No relevant anymore, Shipping costs by Air Cargo even for books sent to Tajdin in Nairobi are not formally claimed neither is claimed the second shipment by air for books gifted to ITREB in Nairobi.
3	p. 83 l. 6-24 Q. 327-329	UNDERTAKING: With respect to Exhibit 1, Tab B-8/A-19 Printer's Statement of Account for account no. 03417, to provide the date on which Mr. Tajdin requested the printer to provide this document.	A: In July 2011 Tajdin requested the Printer to send his letter dated July 26 th 2011 with the last statement of account. The printer attached the last statement of Account to his letter.
4	pp. 83-84 l. 25-24 Q. 330-334	UNDERTAKING: With respect to Exhibit 1, Tab B-8/A-19 Printer's Statement of Account for account no. 03417, to produce Mr. Tajdin's request to the printer	A: To Tajdin's recollection, the request was made by phone. See Q#333 p. 84. In July 2011, Tajdin requested the Printer to send his letter dated July 26 th 2011. The printer attached the last statement of Account to his

Produce

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Ms. Reddy

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Annex 1

Annex

No.	Page Ref.	Plaintiff's Question Summary and Defendant Position at Discovery	Defendant's Response to the Undertaking
		to provide this document.	letter.
5	pp. 91-92 l. 22-19 Q. 366-368	UNDERTAKING: To produce the original documents identifying the printing cost of the book once the Federal Court of Appeal dismisses Mr. Tajdin's appeal of the October 26, 2011 Order of Mr. Justice Russell.	A: The document is available immediately and will be given to the Court during the hearing on 14 May 2012. See Q. 150-155 p. 40-43; Q.172 p.48-49; Q.295-302 p.76-78; Q.366-368 p.91-92. See Tajdin's affidavit sworn 22 April 2012 paragraphs 39-44
6	pp. 106-107 l. 4-11 Q. 411-416	UNDERTAKING: With respect to Exhibit 2, Tab 9 Spreadsheet of Revenue and Expenses – item described as "primary shipping cost out from Printers to various countries (documented)" - to obtain and produce the original unredacted invoices from the shipping company for the amounts referenced in the spreadsheet.	A: No longer relevant. Shipping costs are not formally claimed.
7	pp. 124-125 l. 2-7 Q. 476-483	UNDERTAKING: To provide the exact date on which Mr. Tajdin closed the PayPal account referenced in the documents marked Exhibit 1, Tab B-7 and Exhibit 2, Tab 11 "Golden Edition Paypal Details".	Paypal account GoldenKiz@live.com was closed in November 2010 around the same time as Tajdin gifted his last remaining books to the Aga Khan ITREB organization in Nairobi, Kenya, before the Summary Judgment hearing in front of justice Harrington in December 2010. No Funds were received in that account after April 2010. The account was inactive. Remaining funds were withdrawn in September 2010.
8	pp. 128-129 l. 16-1 Q. 504-505	UNDERTAKING: With respect to Exhibit 1, Tab B-7 and Exhibit 2, Tab 11 "Golden Edition Paypal Details", Mr. Tajdin will provide a letter authorizing the Plaintiff's counsel to verify all PayPal account information directly with PayPal, with the exception of the names of the people who purchased the book.	A: Irrelevant, because selling price is proven, even by third-party emails ex: Plaintiff's Motion Record volume III, Tab 12, Exhibit 3: Copy of mass-Email from Goldenkiz@live.com dated Feb 18, 2010.; Plaintiff's Motion Record volume III, p. 660: Copy of email sent to Tajdin re: London. Paypal Screenshots shown in TAB B-7 help to prove the authenticity of the numbers in the spreadsheets in Exhibit 1, Tab B-7, p. 693-696 and Exhibit 2, TAB 11, p. 779-780. Books sold through Paypal were all below \$50, once shipping costs, bank exchange

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			fees, and Paypal transaction costs were accounted for.
9	pp. 133 l. 7-23 Q. 523-526	UNDERTAKING: With respect to Exhibit 2, Tab 11 "Golden Edition Paypal Details", to provide the meaning of "update to e-cheque received".	A: E-cheques are an internal Paypal payment option. It does not affect the receiver of funds, except that the fund transfer takes many days. The definition and the same explanation is publicly available on the Paypal web site under the following link - See: https://www.paypal-marketing.co.uk/guides/echeques/