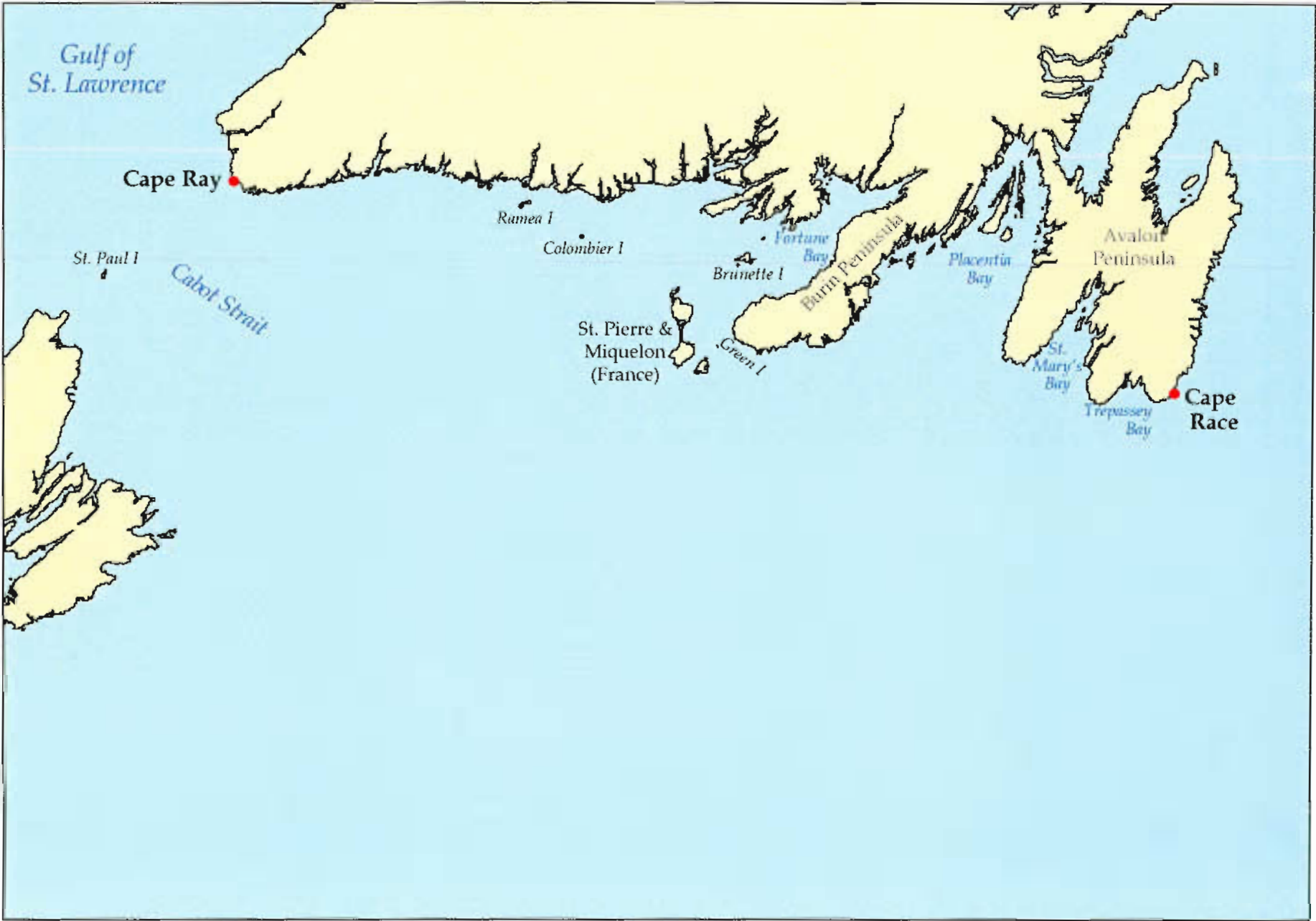
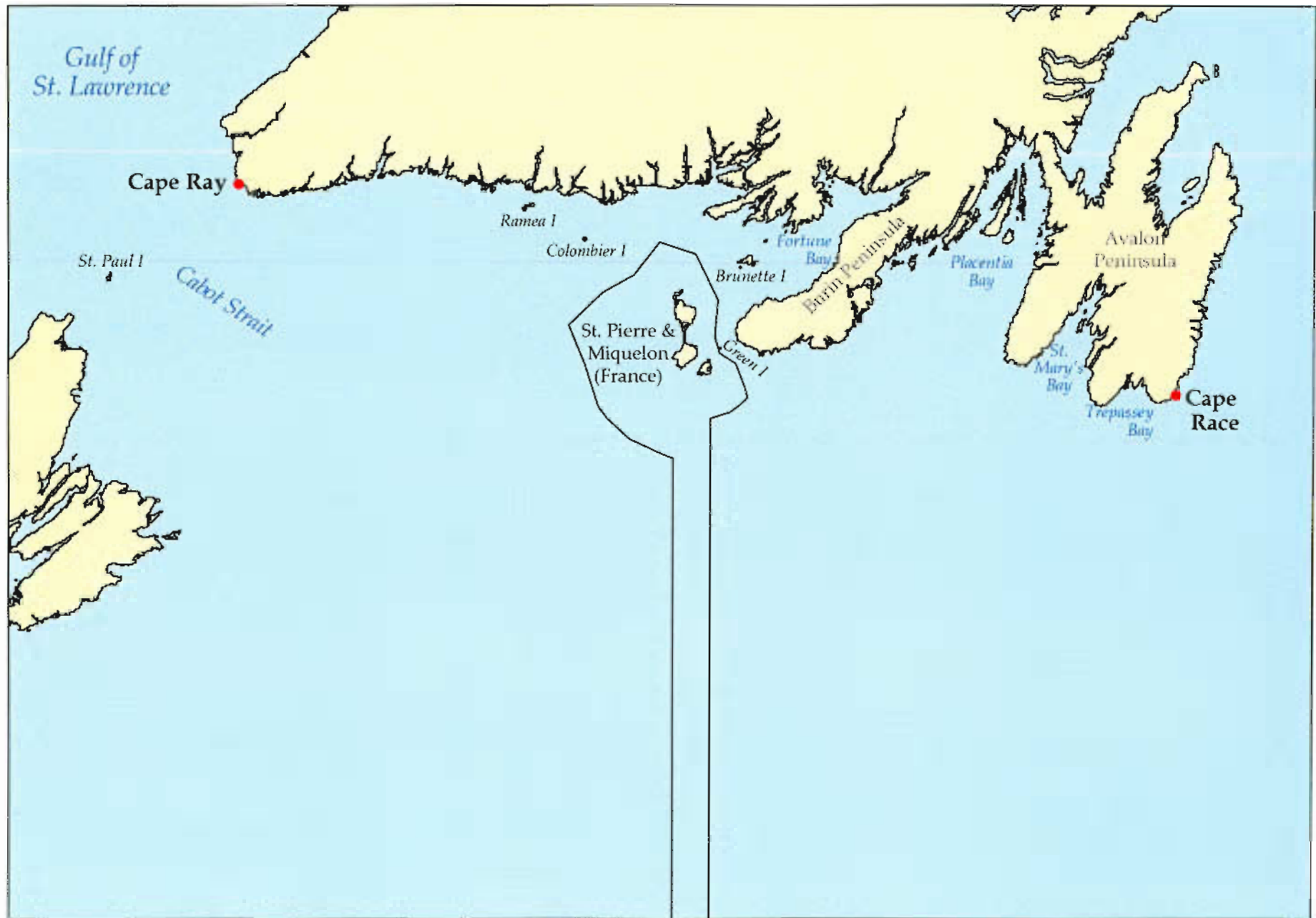


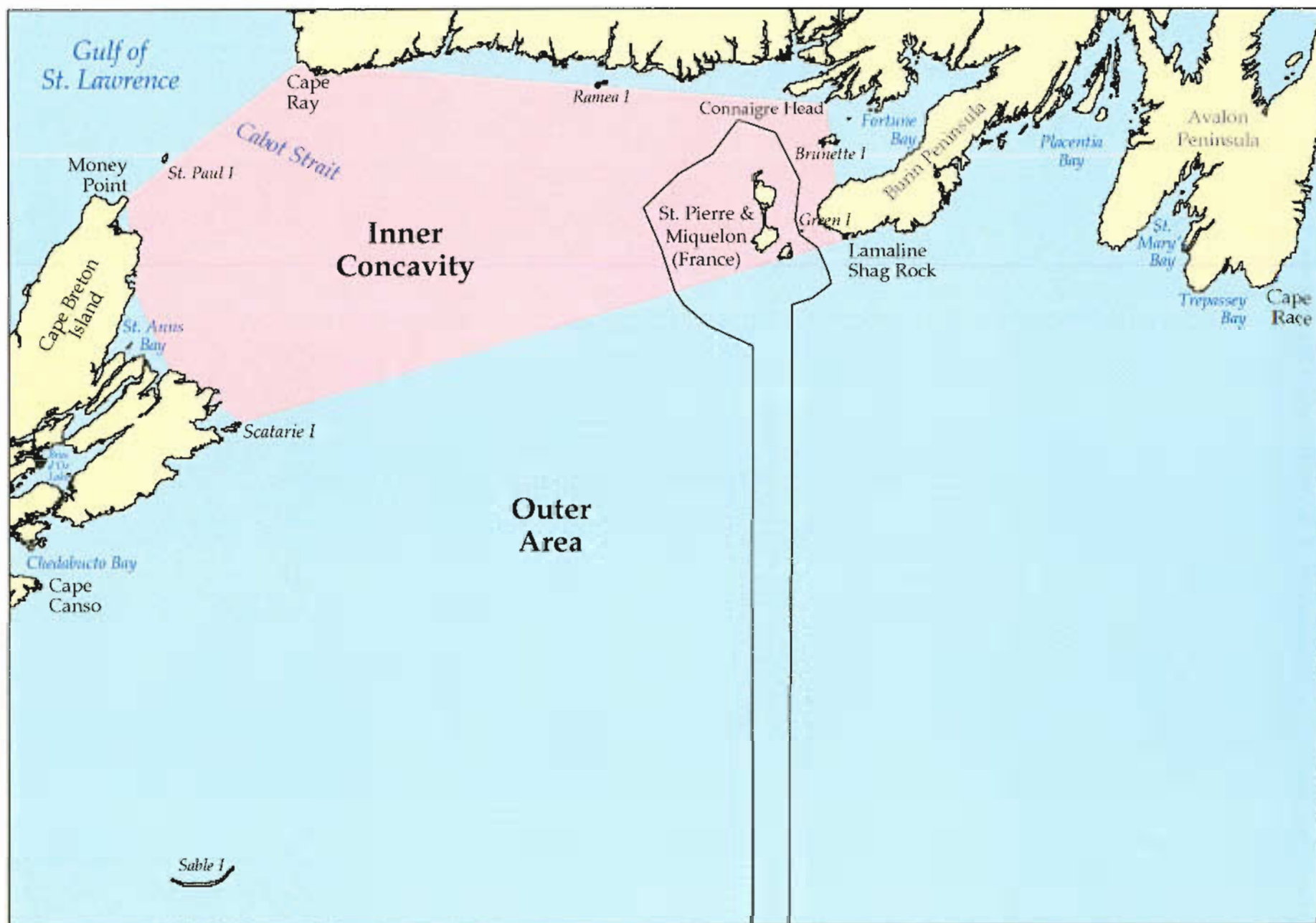
The Geographical Setting of the South Coast of Newfoundland



The Geographical Setting of the South Coast of Newfoundland



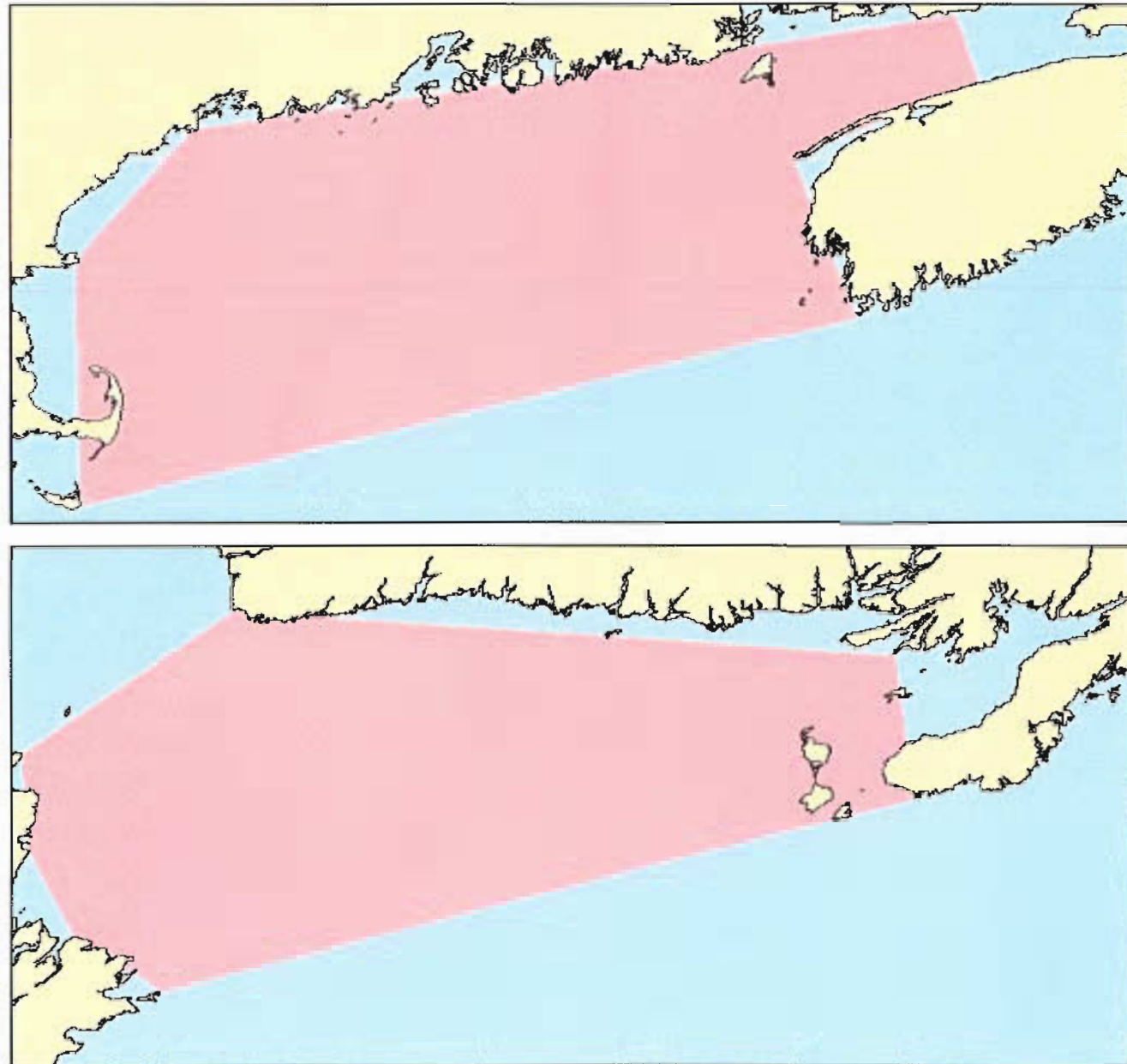
The Inner Concavity and the Outer Area



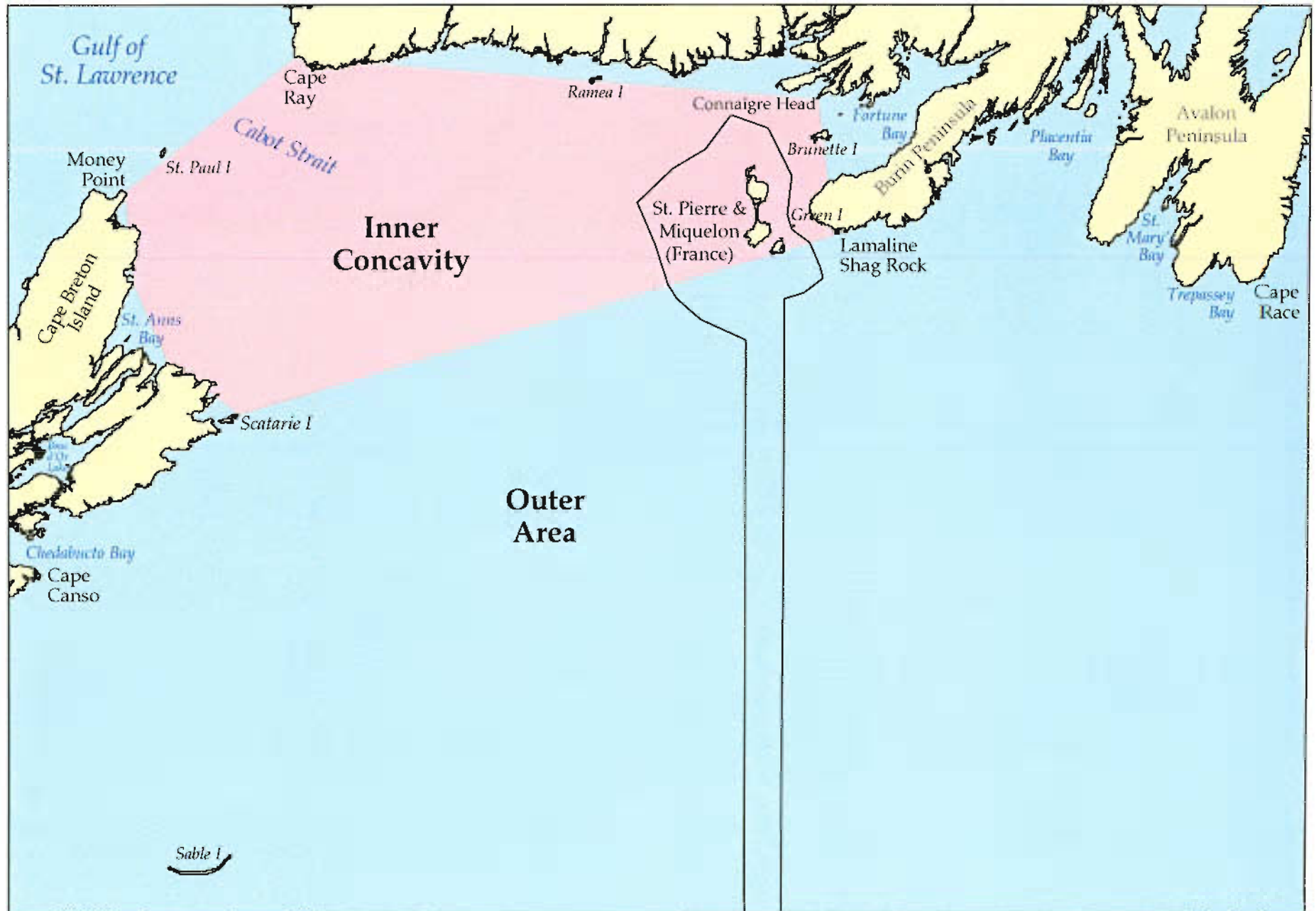
Based on Figure 2, N&L Memorial, Phase Two

Oral Presentation, Phase Two, Figure: 65

The Configuration of the Gulf of Maine and the Inner Concavity are Almost Identical



The Inner Concavity and the Outer Area



Based on Figure 2, N&L Memorial, Phase Two

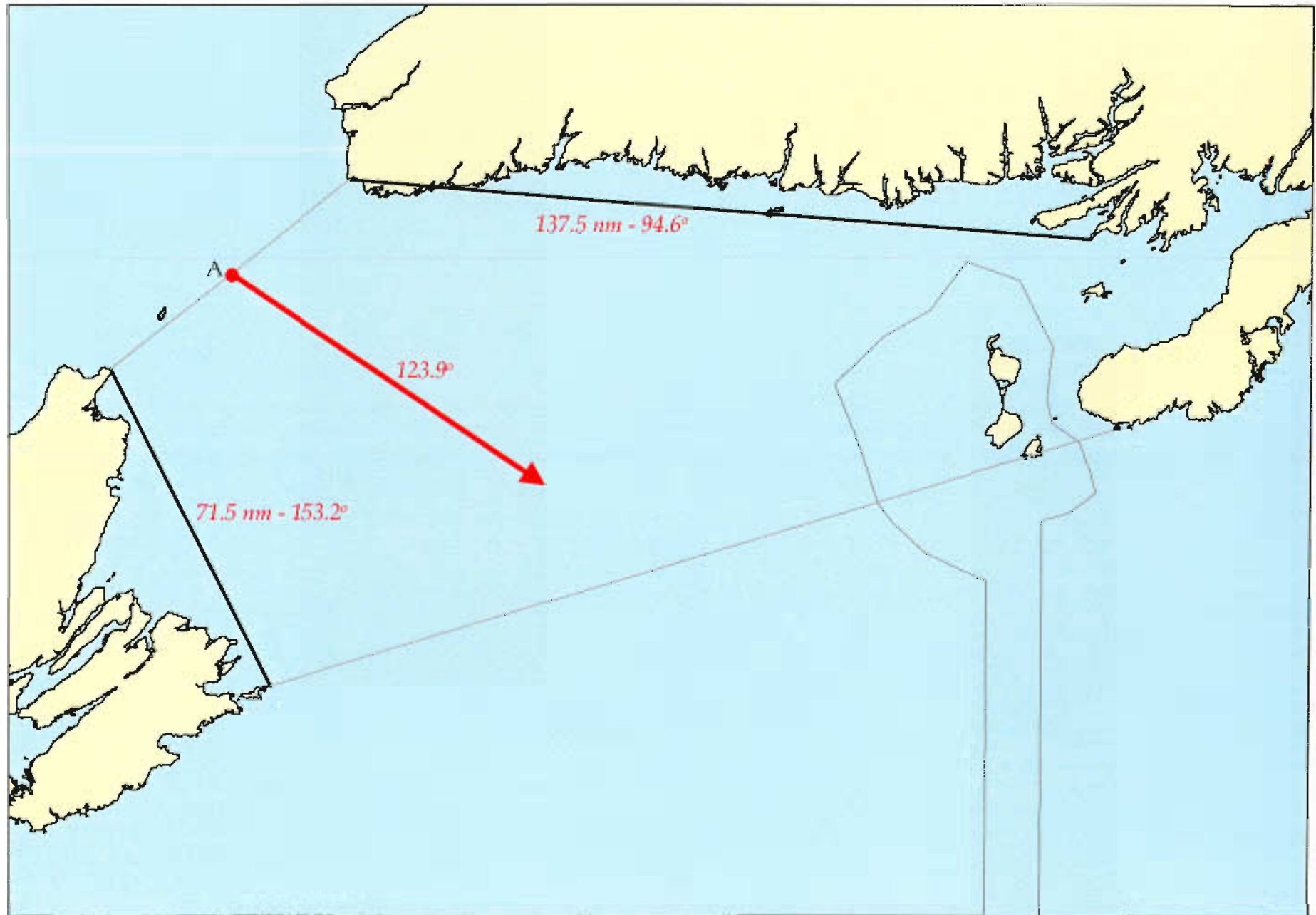
Oral Presentation, Phase Two, Figure: 67

Appropriate Method ***Fundamental Principles***

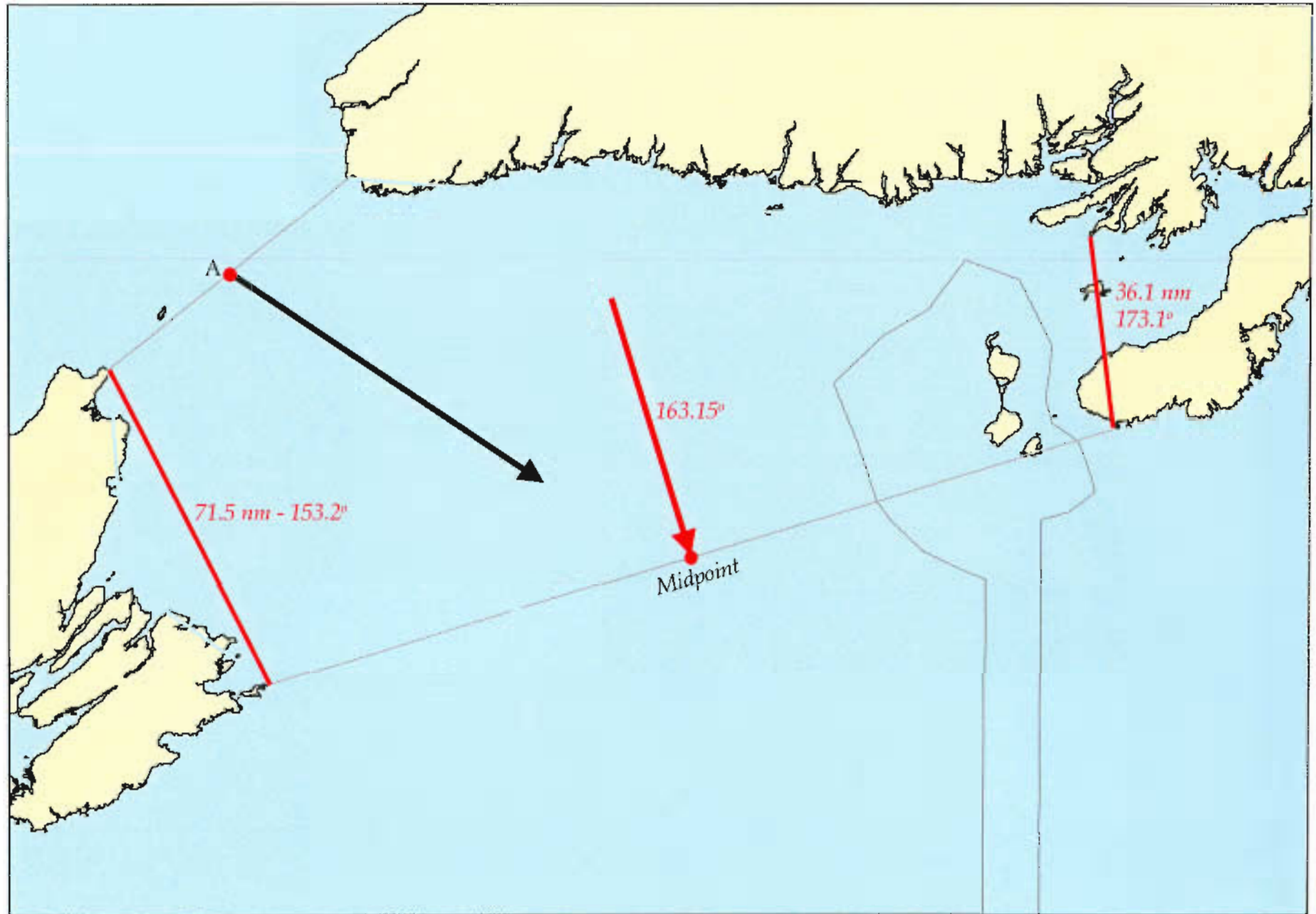
The delimitation:

- ✓ ***Must be based on actual coastal relationships;***
- ✓ ***Should avoid relying on any distorting incidental features;***
- ✓ ***Has to take account of any disparity in coastal lengths;***
- ✓ ***Must avoid encroachment or cut-off.***

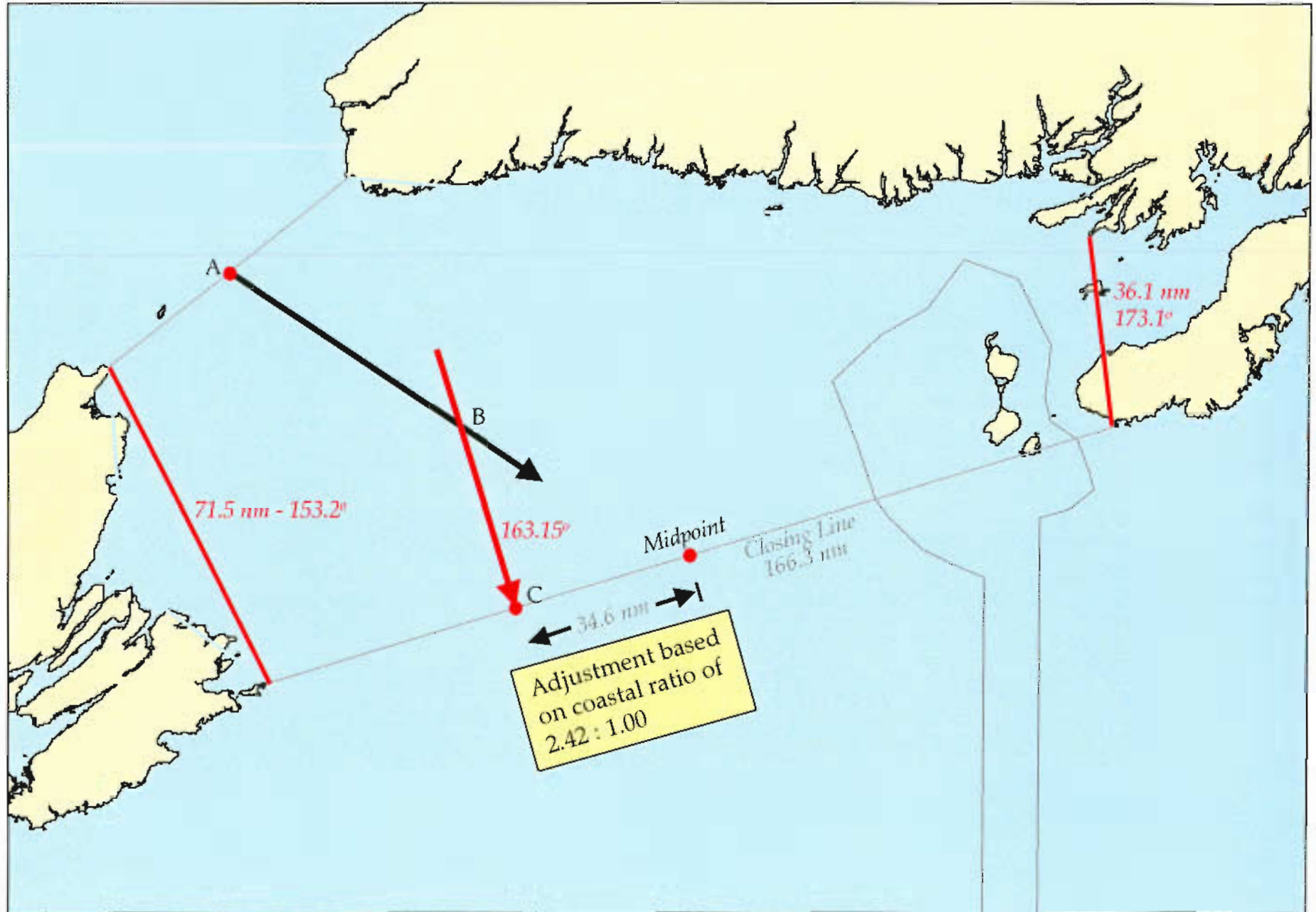
The First Segment - A Bisector in the Area of Cabot Strait



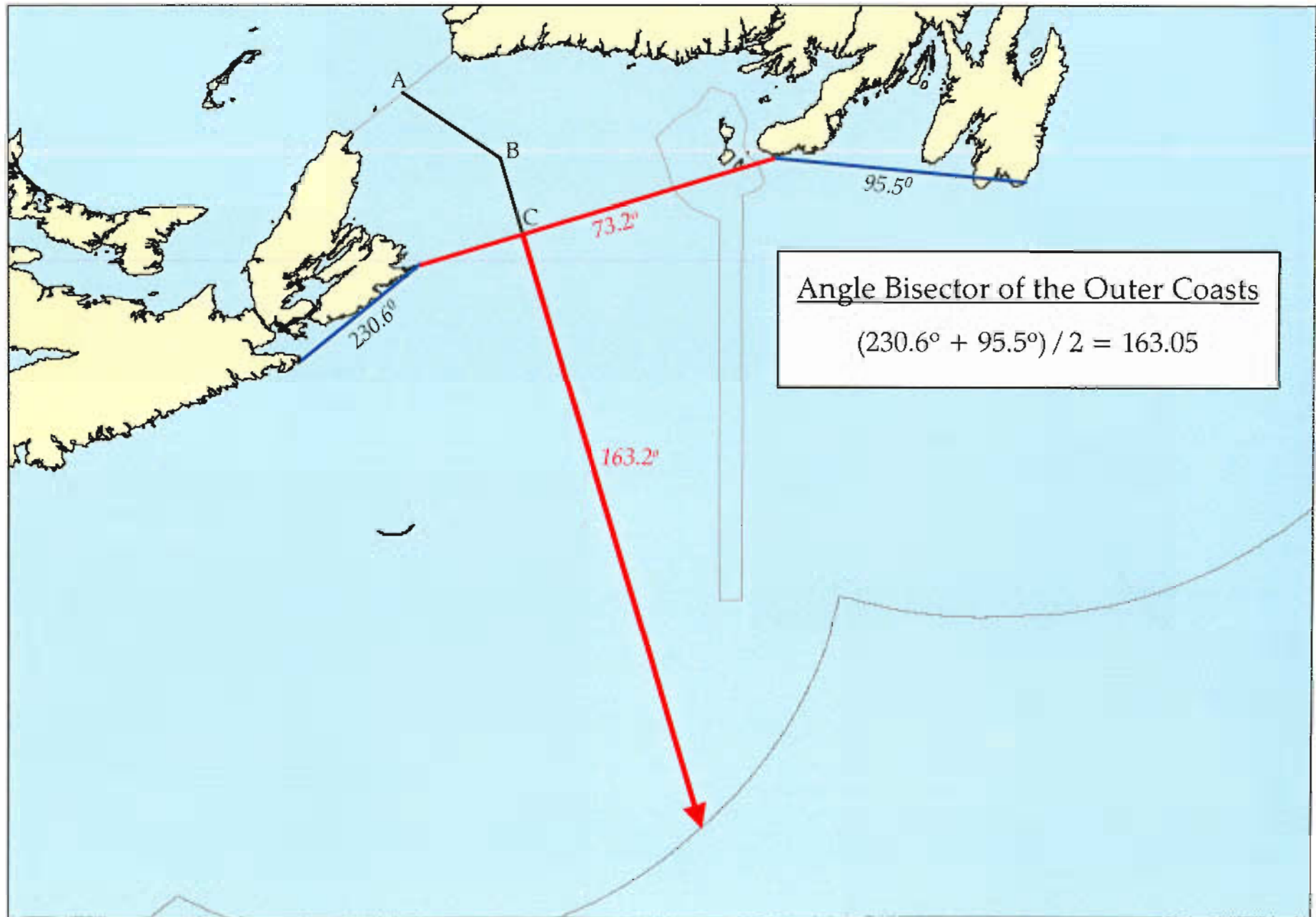
The Second Segment - An Adjusted Bisector Intersecting the Closing Line of the Inner Concavity



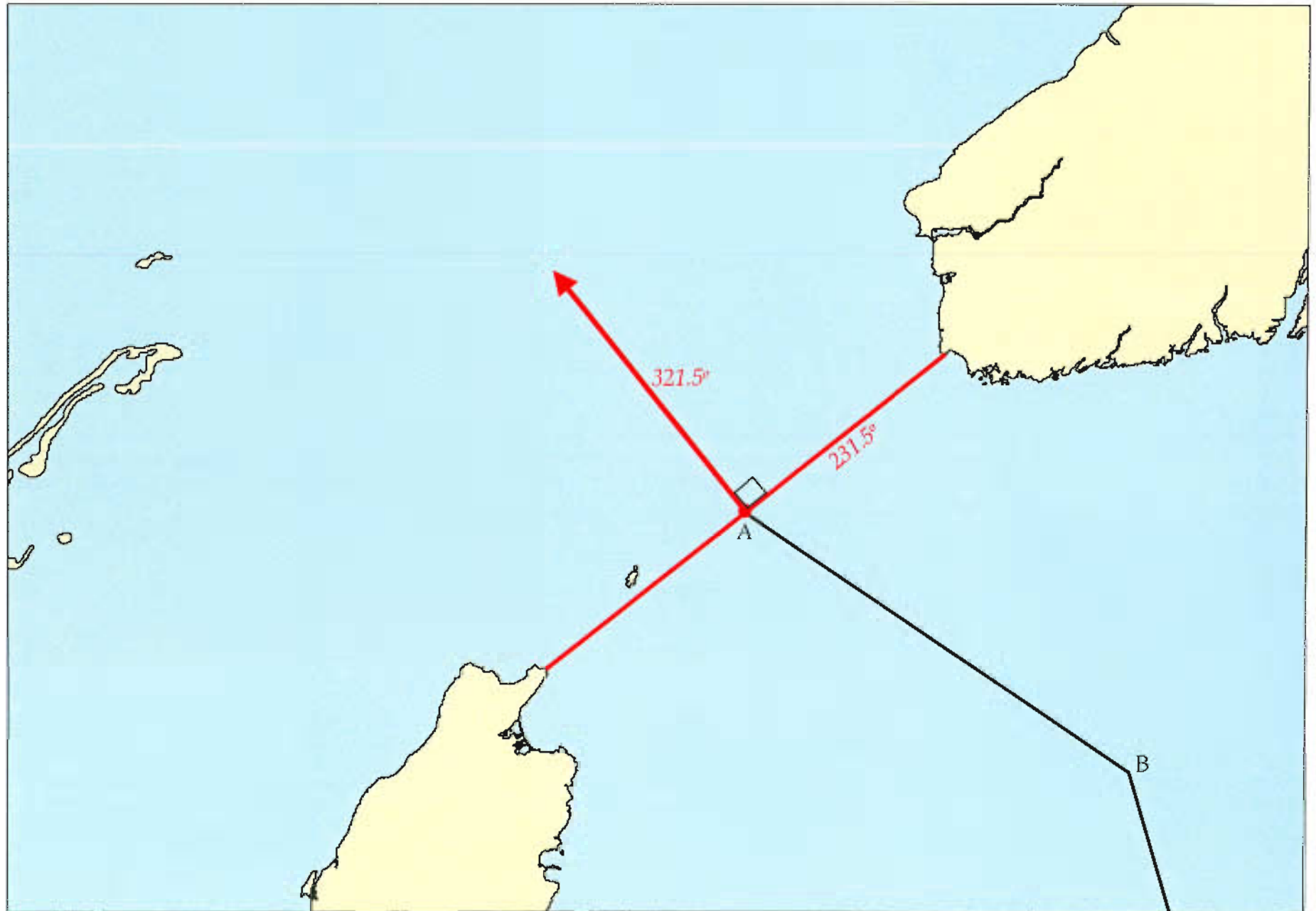
The Second Segment - An Adjusted Bisector Intersecting the Closing Line of the Inner Concavity



A Perpendicular Reflects the Basic Structure of the Coastal Geography in the Outer Area



The Gulf of St. Lawrence



Oral Presentation, Phase Two, Figure: 73

The Newfoundland and Labrador Line

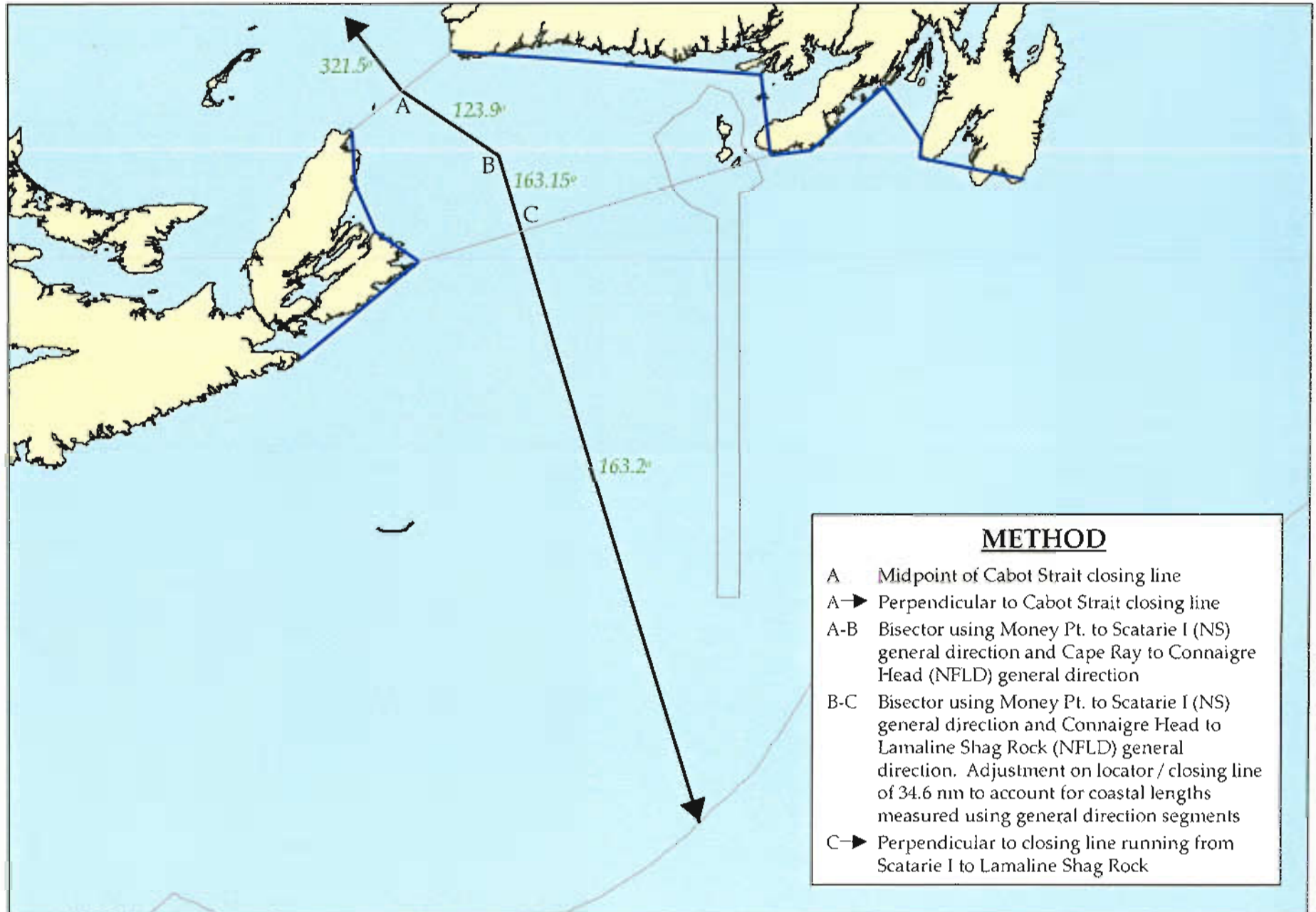


Figure 22, N&L Memorial, Phase Two.

Equity of the Result - Proportionality Test

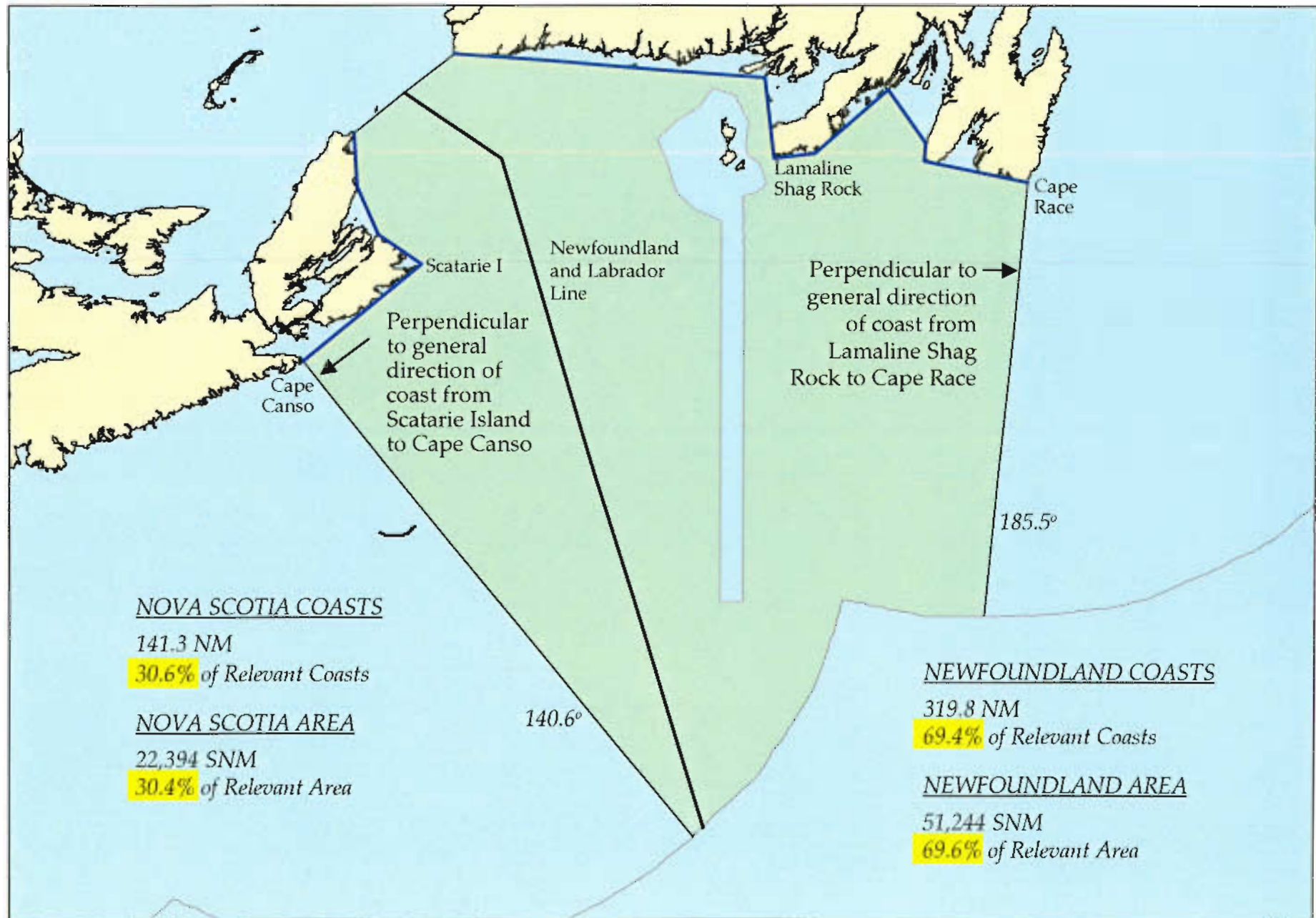


Figure 24, N&L Memorial, Phase Two.

Nova Scotia Demonstrates That Its Line Completely Blocks the Coastal Projection of the South Coast of Newfoundland

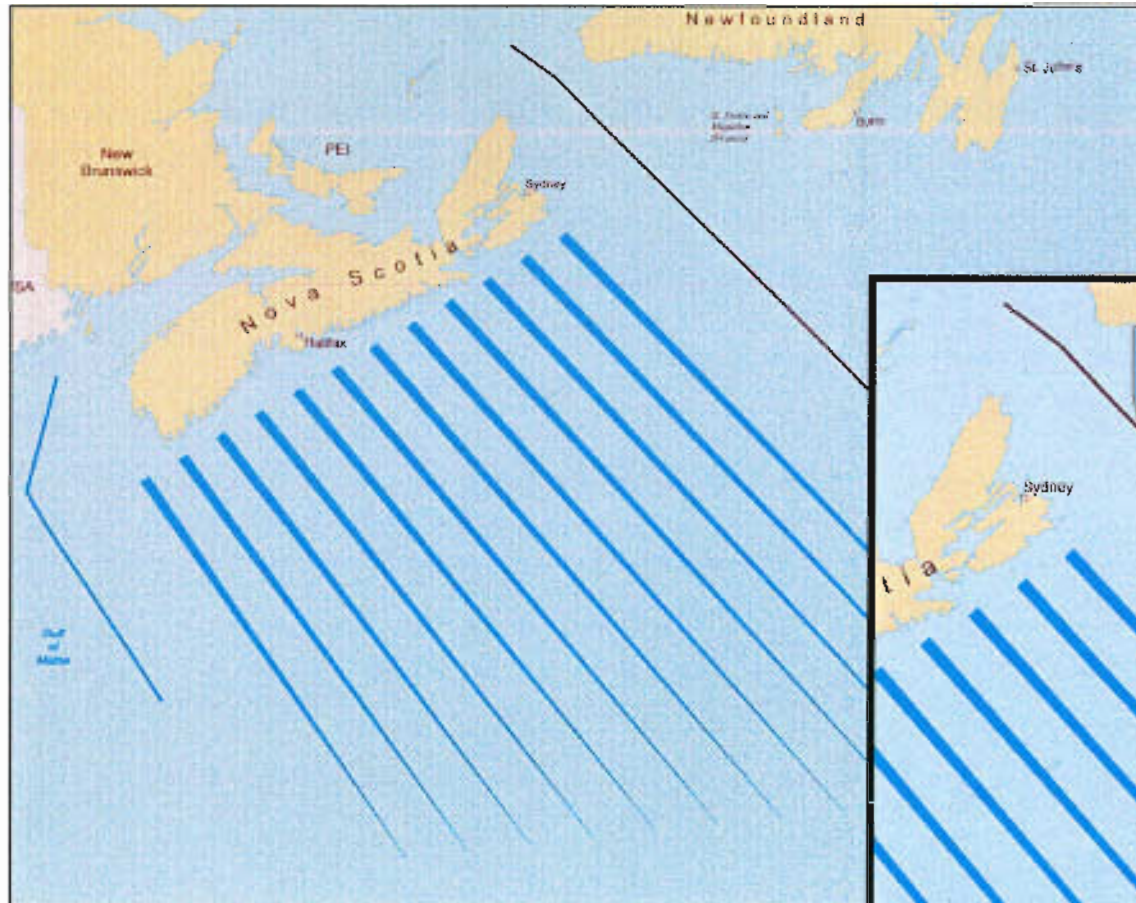
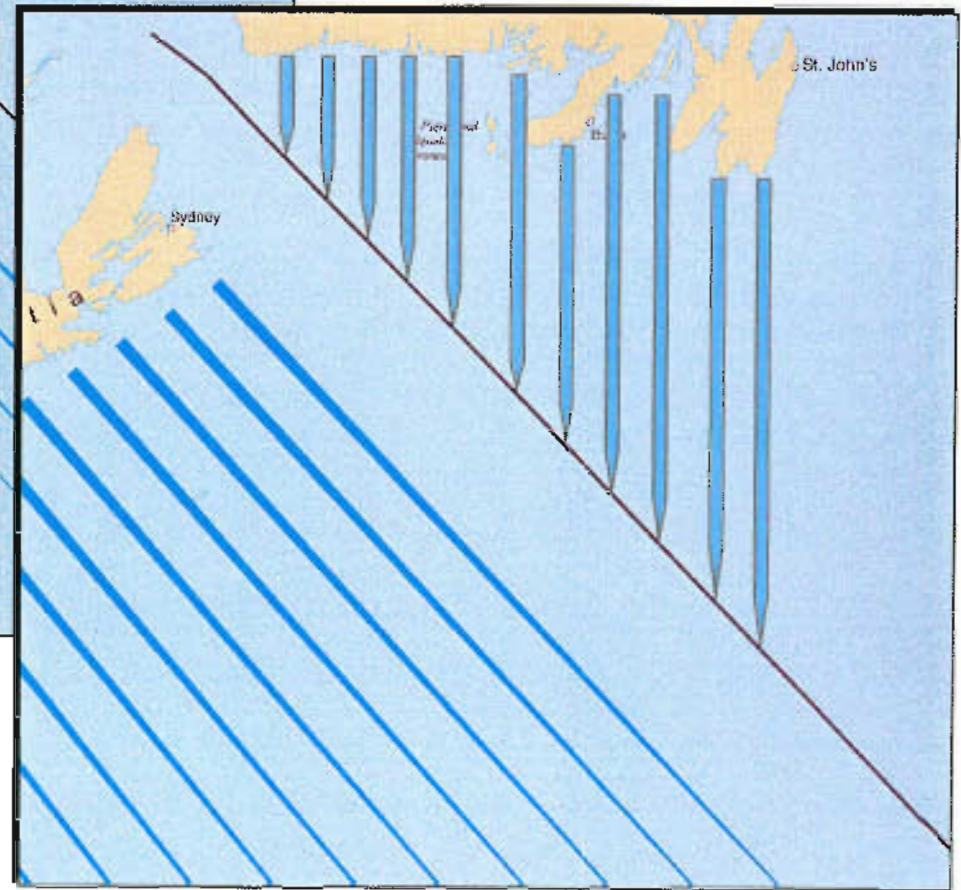
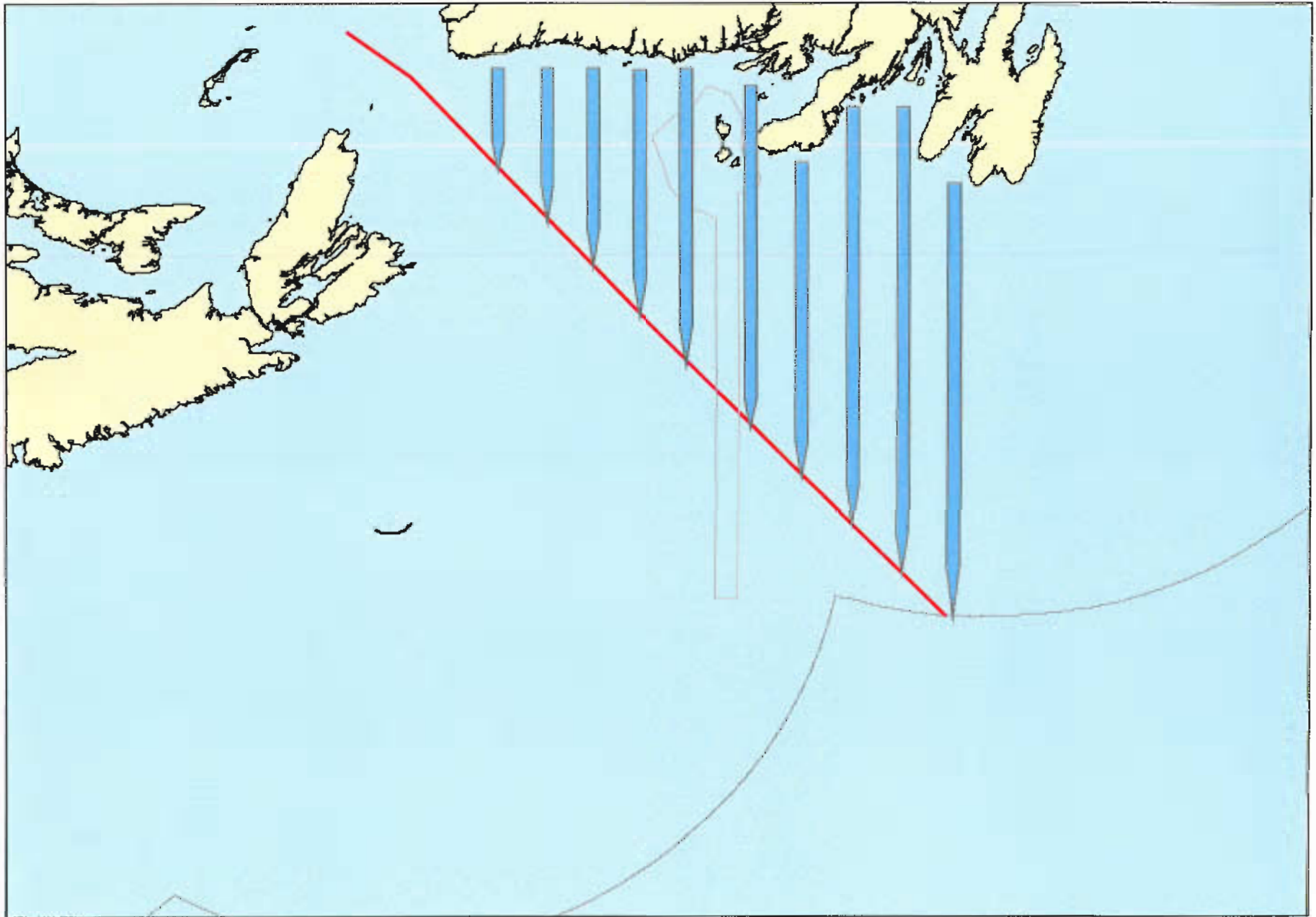


Figure 42, NS Memorial, Phase Two.

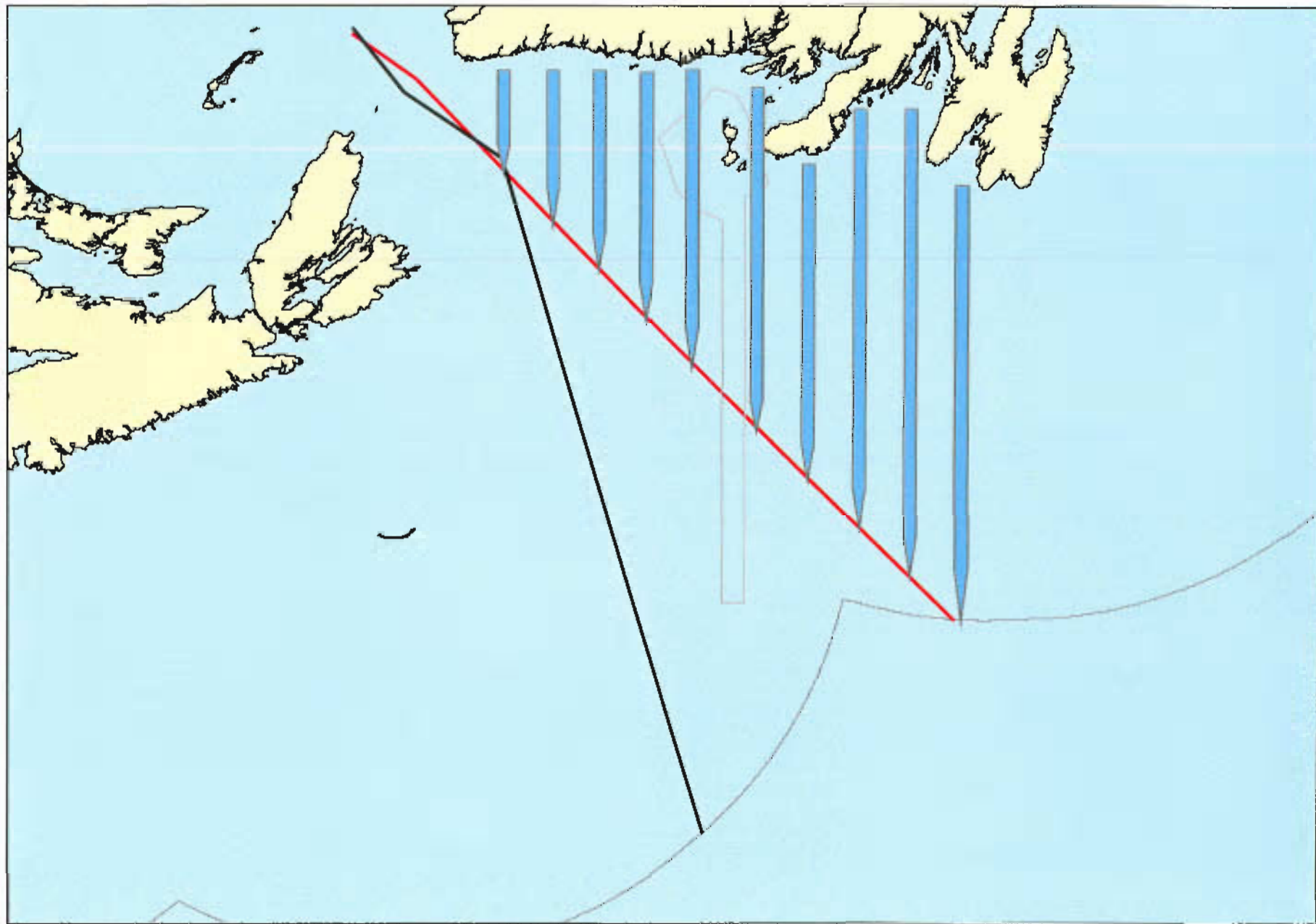


Based on Figure 42, NS Memorial, Phase Two.

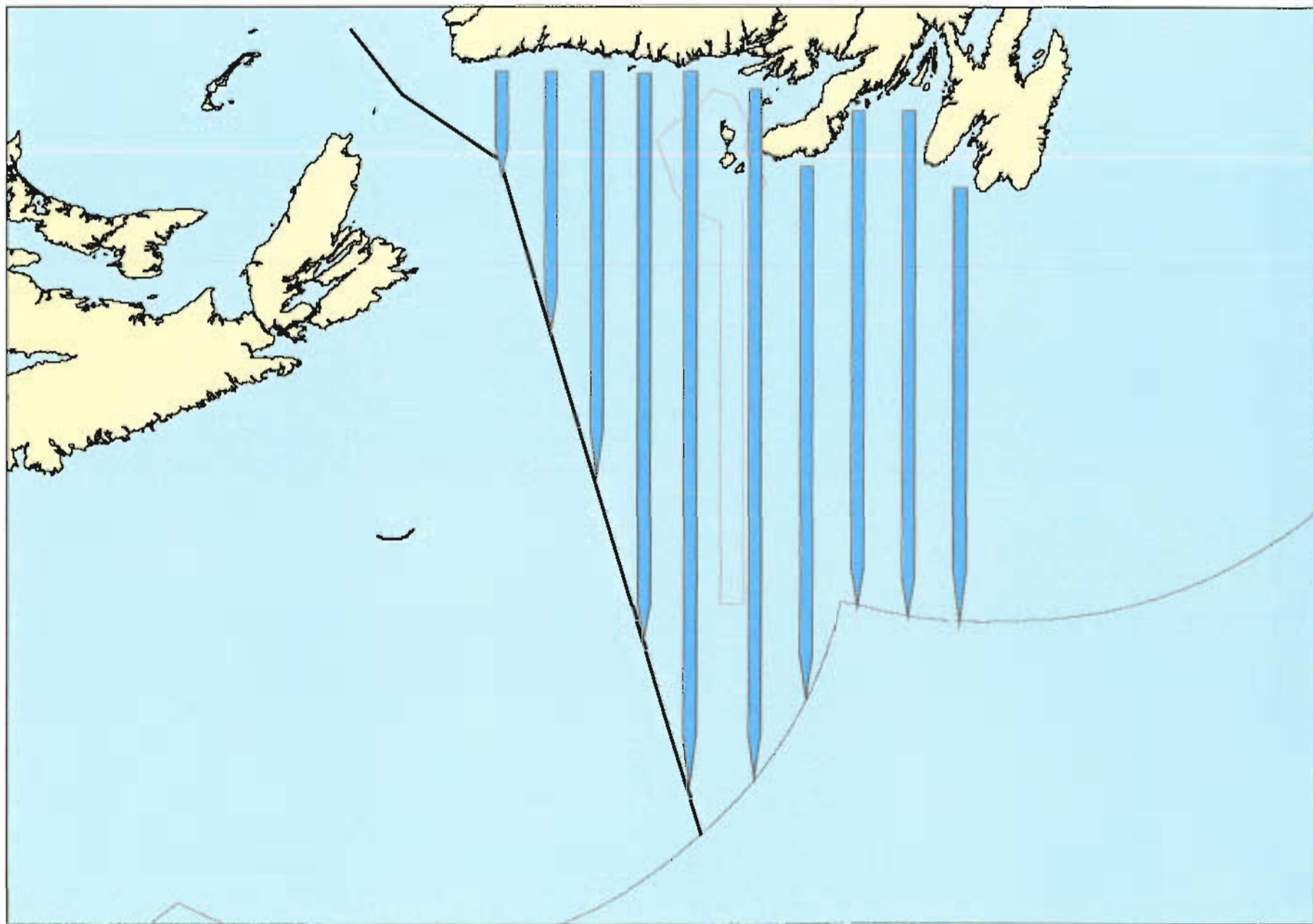
NS Line Completely Blocks the Coastal Projection of the South Coast of Newfoundland



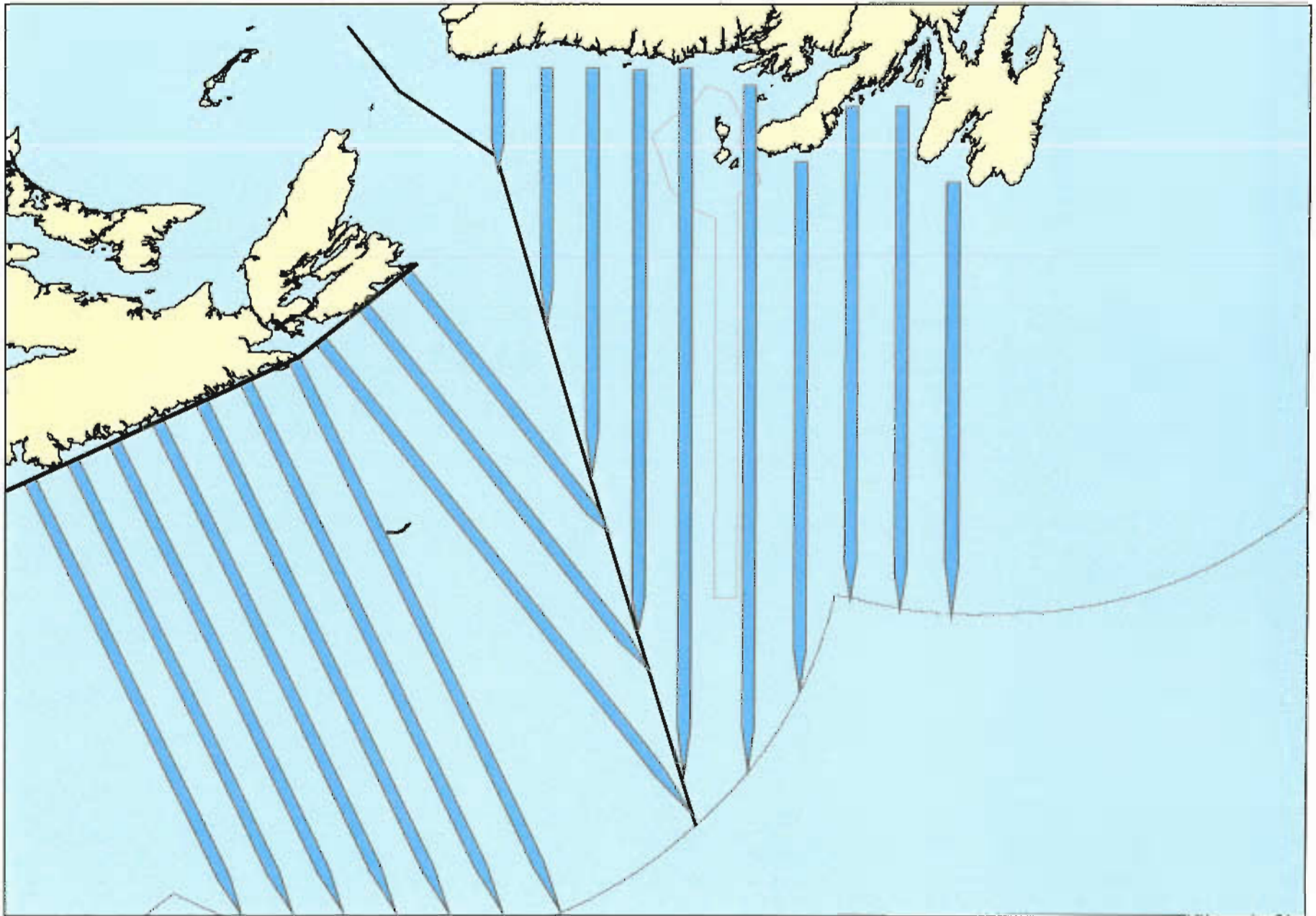
NS Line Completely Blocks the Coastal Projection of the South Coast of Newfoundland



N&L Line Reduces the Cut-Off of the Newfoundland Coast



N&L Line Shares the Cutoff Between the Parties



The Newfoundland and Labrador Line

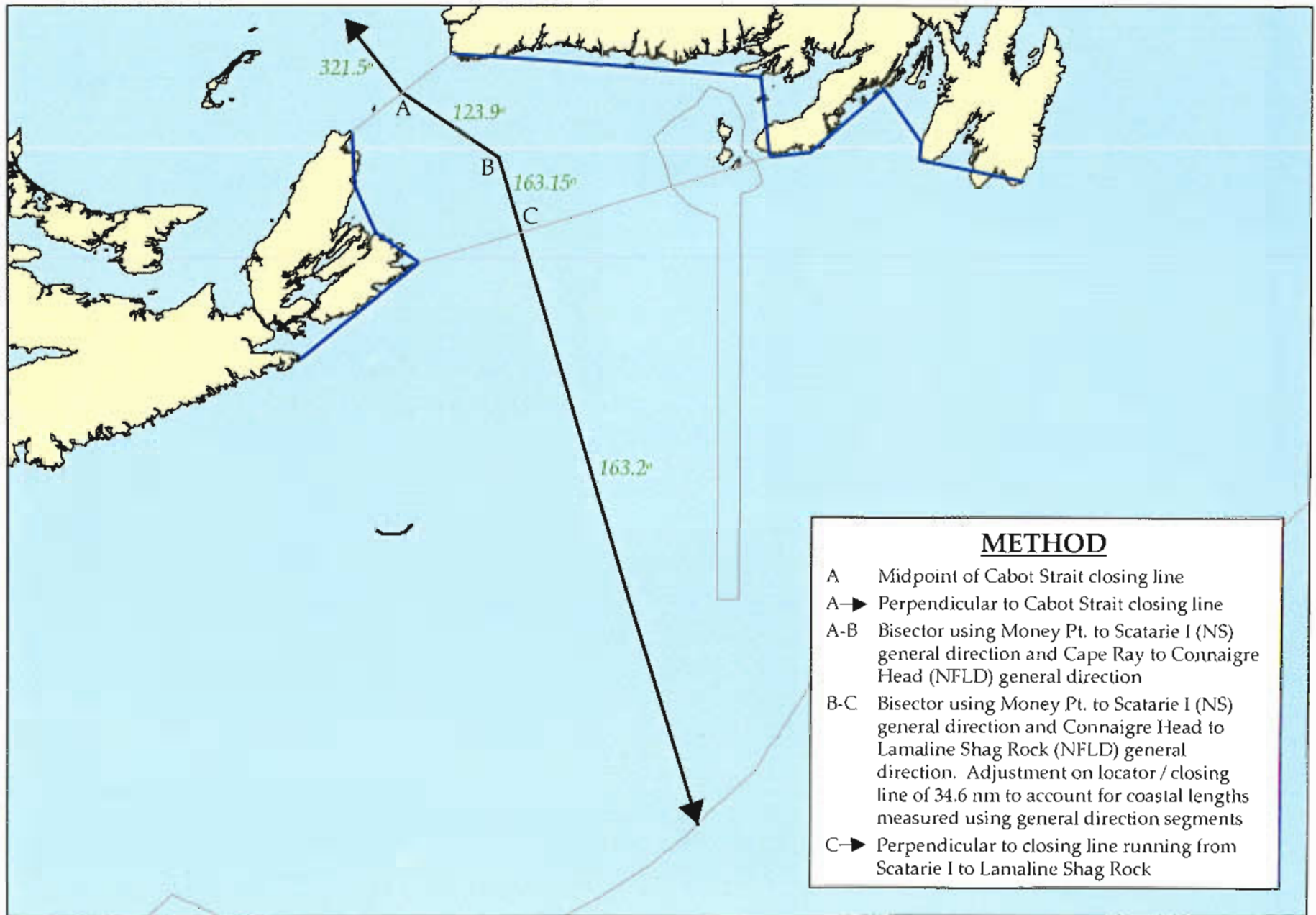


Figure 22, N&L Memorial, Phase Two.

The Issues That Divide The Parties

Newfoundland and Labrador

Nova Scotia

Basis of Title

The basis of title is derived from the coasts from which the maritime area projects

The basis of title is derived from the limited form of jurisdiction that the provinces have under the Accords legislation

Geography

Adopts relevant coasts from Canada-France case and defines the relevant area by use of perpendiculars from the outer limits of those coasts

Includes an extensive array of coasts and areas which face away from the area to be delimited

Conduct

*Conduct of officials in 1964, 1972 and later, disclose no acquiescence or estoppel
Permits demonstrate uncertainty, inconsistency and contradiction*

*Conduct is at the heart of N.S. claim
The events of 1964 & 1972 are to rise again to bind the parties even though they did not do so in Phase One*

Nova Scotia's Case is Founded on an Erroneous Basis of Title

***Inverted
Hierarchy
of Relevant
Circumstances***

***Coastal
Framework
Adopted in
Canada –
France is
Rejected***

***Coasts that
Face Away
From the
Delimitation
Area Are Still
Regarded by
Nova Scotia
as relevant***

***Designates
a Relevant
Area That is
Well Beyond
the Area in
Which the
Delimitation
is to Take
Place***

***Claim to
an Equal
Division of
Overlapping
Entitlements***

***Relative
Wealth as
a Relevant
Consideration***

Basis of Title Derived From Accords

Nova Scotia's Case is Founded on an Erroneous Basis of Title

Inverted Hierarchy of Relevant Circumstances

Coastal Framework Adopted in Canada – France is Rejected

Coasts that Face Away From the Delimitation Area Are Still Regarded by Nova Scotia as relevant

Designates a Relevant Area That is Well Beyond the Area in Which the Delimitation is to Take Place

Claim to an Equal Division of Overlapping Entitlements

Relative Wealth as a Relevant Consideration

Basis of Title

NOT DERIVED From Accords