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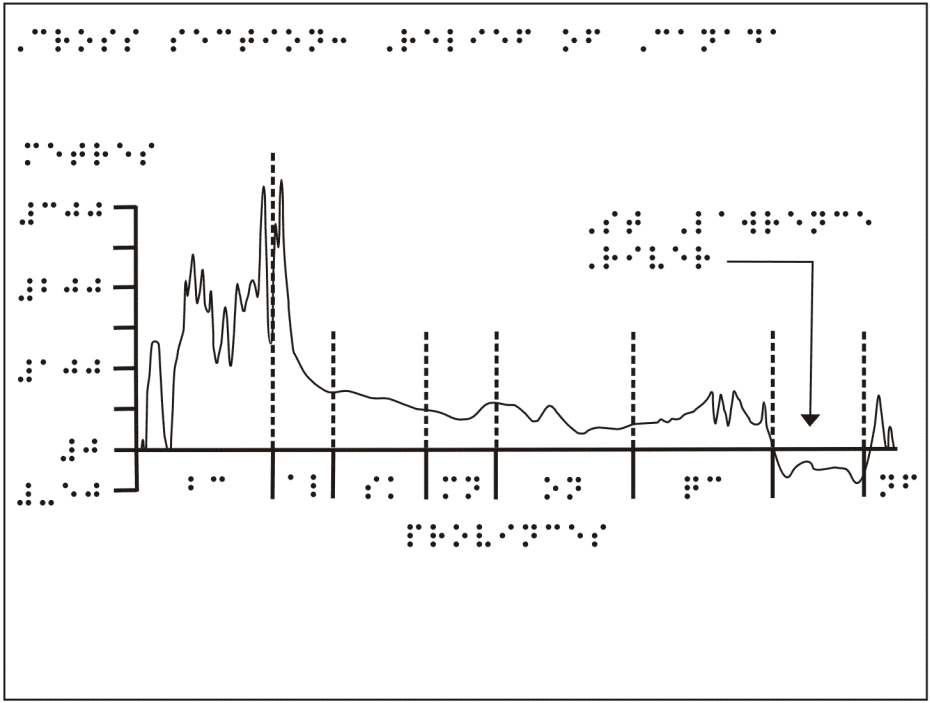
Any transaction under this agreement
shall be deemed to be a private
and not a public transaction
for the purpose of the Income
Tax Act and the Regulations
made thereunder.