



Carly Fidler

Partner, Disputes

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Toronto

(416) 862-4282

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Bar Admission: Ontario, 2011 | New York, 2012

Areas of Expertise

Tax Disputes

Tax Litigation

Banking and Financial Services

Infrastructure

Construction Disputes

Disputes

Construction

Tax

Corporate and Commercial Disputes

Carly is an advocate who provides strategic counsel to clients facing complex legal challenges, particularly in business-critical corporate and commercial disputes, construction and infrastructure disputes, and tax litigation. She is dedicated to client service and has a proven track record of understanding and advancing clients' interests with a strategic and persistent focus on achieving their objectives.

Carly's diverse group of clients include major financial institutions, government entities, and multinational public and private corporations. She has represented clients in the construction and infrastructure industry in a wide variety of disputes involving construction liens and trusts, bond and insurance claims, contract interpretation, delay and extras claims, professional negligence, and also advises on the avoidance and management of risk in the administration of construction contracts.

Carly also advises Canadian and foreign-based corporations doing business in Canada on all aspects of avoiding, managing, and litigating tax disputes at all stages of interaction with the Canada Revenue Agency. She has particular experience with transfer pricing, issues of deductibility of settlement payments and other types of expenses, and the general anti-avoidance rule.

Highlights of Carly's most recent work include: representing Wheaton Precious Metals in its transfer pricing appeal in the Tax Court of Canada; representing the City of Toronto in complex multi-party litigation arising out of the Union Station Revitalization Project; and representing Canadian Imperial Bank of Commerce in its transfer pricing and deductibility of settlement payments appeal in the Tax Court of Canada.

While seconded to Osler's New York office, Carly was involved in cross-border issues.

Carly is also passionate about access to justice, and a committed Pro Bono Ontario supporter and volunteer.

Carly is admitted to the Bars of Ontario and New York.

Awards and Recognition

- **Benchmark Litigation Canada:** Recognized as "Future Star"; "40 & Under List"

Community Involvement

- Law Help Ontario, Ontario Superior Court of Justice and Small Claims Court Duty Counsel Projects
- African Services Committee, Volunteer (2009)

Credentials

Education

- Osgoode Hall Law School, J.D.
- Dalhousie University, B.A.

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Languages

- English

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Professional Affiliations

- Ontario Bar Association
- Canadian Bar Association
- American Bar Association
- New York State Bar Association
- The Advocates' Society
- Osgoode Society for Canadian Legal History