

**IN THE MATTER OF THE ELLIOT LAKE COMMISSION OF INQUIRY
THE HONOURABLE PAUL R. BELANGER, COMMISSIONER**

MR. BRIAN MacDONALD

MOTION FOR STANDING

Take notice that the Applicant, Brian MacDonald, hereby brings a Motion for and Order granting Brian MacDonald standing at the Elliot Lake Commission of Inquiry (the 'Inquiry').

THE GROUNDS FOR THE MOTION ARE:

1. The person applying for standing is:

Mr. Brian MacDonald
c/o CCI Group Inc.
200 – 7900 Keele Street,
Concord, Ontario L4K 2A4

2. The Lawyer representing Brian MacDonald is:

Scott G. Thompson
Hicks Morley Hamilton Stewart Storie LLP
77 King Street West, 39th Floor
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Toronto, ON M5K 1K8

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3. Brian MacDonald is seeking standing for the balance of Part 1 of the Inquiry in order to make written submissions on or before August 2, 2013 and to participate in the closing submissions for Part 1 on August 12, 13 and 14, 2013.
4. Brian MacDonald has a substantial and direct interest in the subject of the Inquiry:
 - (a) On April 24, 2013 Brian MacDonald gave evidence at the Inquiry with respect to a building assessment conducted by Construction Control Inc. on or about July 6, 2005.

- (b) Brian MacDonald requests the opportunity to make submissions to the Inquiry in order to advance the interests of the Inquiry in a fair and open assessment of the evidence before the Inquiry.
 - (c) In this regard Brian MacDonald's participation in the Inquiry would further the conduct of the Inquiry and contribute to the openness and fairness of the Inquiry.
5. Brian MacDonald does not propose making oral submissions with respect to this application for standing unless the Commission requires oral submissions.
 6. Brian MacDonald requests that the Commission use its discretion to grant this application for standing at this time.
 7. Such further and other grounds as Counsel may advise and this Honourable Commission may permit.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED
BY COUNSEL FOR BRIAN MacDONALD:**

July 18, 2013

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TO: ELLIOT LAKE COMMISSION OF INQUIRY

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