

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

MR. ROD CAUGHILL

3:21 PM  
FAXED  
MAR 13 2013  
705 848 8064

MOTION FOR STANDING

Take notice that the Applicant, Rod Caughill (herein "Caughill"), hereby brings a Motion for an Order granting Rod Caughill standing at the Elliot Lake Commission of Inquiry (the "Inquiry").

THE GROUNDS FOR THE MOTION ARE:

1. The person applying for standing is:  
     Rod Caughill  
     Sault Ste. Marie, ON
  
2. The Lawyer representing Rod Caughill is:  
     James V. Maloney  
     Hughes Amys LLP  
     Barristers and Solicitors  
     48 Yonge St., Ste. 200  
     Toronto, ON M5E 1G6  
  
     Tel: 416-367-1608  
     Fax: 416-367-8821
  
3. Caughill has a substantial and direct interest in the subject matter of the Inquiry:
  - (a) Caughill was the Development supervisor for Algoma Central Properties Inc. (herein "Algoma");
  - (b) It is expected that several former and/or current employees of Algoma will be called as witnesses at the Inquiry;
  - (c) Caughill's participation would further the conduct of the Inquiry; and,

-2-

(d) Caughill's participation would contribute to the openness and fairness of the Inquiry;

4. Caughill is seeking standing for Part 1 of the Inquiry (events prior to the collapse);

5. Caughill is willing to make Oral submissions in support of his Motion should the Commission require such submissions. However, Caughill does not propose making oral submissions at this time;

6. Caughill requests that the Commission use its discretion to grant this application *nunc pro tunc*; and,

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 ROD CAUGHILL:**

March 4, 2013

**HUGHES AMYS LLP**  
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