In the matter of the Public Inquiries Act, R.S.O. 1990, c. P. 41

And in the matter of the Order-in-Council 826/2007 and the Commission issued effective April 25, 2007, appointing the Honourable Stephen Goudge as Commissioner

And in the matter of an Application by seven Unnamed Persons for a Publication Ban prohibiting the publication of their identities

NOTICE OF MOTION ON BEHALF OF SEVEN PERSONS GRANTED STANDING (THE SEVEN APPLICANTS) FOR A BAN ON PUBLICATION OF THEIR IDENTITIES

JAMES LOCKYER LOCKYER CAMPBELL POSNER 180 Dundas Street West, Suite 1515 Toronto, Ontario M5G 2E9 Tel: (416) 847-2560

Fax: (416) 847-2564

Counsel for the Seven Applicants

NOTICE OF MOTION

Counsel for the Seven Applicants will make a motion on October 19, 2007, at 9:00 a.m. at the

Inquiry hearing room 20th floor, 180 Dundas Street West, Toronto, Ontario.

PROPOSED METHOD OF HEARING: The motion will be heard orally.

THE MOTION IS FOR:

A ban on the publication of the identities of any of the Seven Applicants. 1.

2. A ban on the publication of information that might result in revealing the identities of any

of the Seven Applicants.

3. Such further and other order as may be granted.

THE GROUNDS FOR THE MOTION ARE:

1. The identities of the Seven Applicants merit protection in all the circumstances.

AND TAKE NOTICE that in support of the Application will be read the Factum of the Seven

Applicants.

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Counsel for the Seven Applicants