

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

ALGOMA CENTRAL PROPERTIES INC.

**MOTION FOR STANDING**

Take notice that the Applicant, Algoma Central Properties Inc. (“Algoma”), hereby brings a motion in writing for an Order granting Algoma standing at the Elliot Lake Commission of Inquiry (the “Inquiry”).

**THE GROUNDS FOR THE MOTION ARE:**

1. The *person* applying for standing is:

**Algoma Central Properties Inc.**  
63 Church Street,  
Suite 600  
St. Catharines, ON L2R 3C4

Tel: (905) 687-7888  
Fax: (905) 687-7938

2. The Lawyers representing Algoma are:

Robert J. Howe and Robert J. Richler  
**Davies Howe Partners LLP**  
the Fifth Floor  
99 Spadina Avenue  
Toronto, ON M5V 3P8

Tel: (416) 977-7088  
Fax: (416) 977-6570

3. Algoma has a substantial and direct interest in the subject matter of the Inquiry:
  - (a) Algoma built the Algo Central Mall and owned it from approximately 1978 to 1998;
  - (b) It is expected that several former and/or current employees of Algoma will be called as witnesses at the Inquiry;
  - (c) Algoma's participation would further the conduct of the Inquiry; and
  - (d) Algoma's participation would contribute to the openness and fairness of the Inquiry;
4. Algoma is seeking standing for Part 1 of the inquiry (events prior to the collapse);
5. Algoma is willing to make Oral submissions in support of its motion should the submission require such submissions. However, it does not propose making oral submissions at this time;

6. Algoma 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  
ALGOMA.**

January 18, 2013

**DAVIES HOWE PARTNERS LLP**  
Lawyers  
The Fifth Floor  
99 Spadina Avenue  
Toronto, Ontario  
M5V 3P8

Robert J. Howe  
Robert J. Richler

Tel: 416-977-7088  
Fax: 416-977-8931

Lawyers for Algoma Central  
Properties Inc.

**TO: Elliot Lake Commission of Inquiry**  
1400 Blair Place  
Ottawa ON  
K1J 9B8

Email: [info@elliottlakeinquiry.ca](mailto:info@elliottlakeinquiry.ca)