

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

**MR. ROBERT LEISTNER**

**MOTION FOR STANDING**

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

**THE GROUNDS FOR THE MOTION ARE:**

1. The person applying for standing is:

Robert Leistner  
St. Catharines, ON

2. The Lawyer representing Robert Leistner is:

James V. Maloney  
Hughes Amys LLP  
Barristers and Solicitors  
48 Yonge St., Ste. 200  
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3. Leistner has a substantial and direct interest in the subject matter of the Inquiry:
  - (a) Leistner was the Vice-President 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) Leistner's participation would further the conduct of the Inquiry; and,

- (d) Leistner's participation would contribute to the openness and fairness of the Inquiry;
4. Leistner is seeking standing for Part 1 of the Inquiry (events prior to the collapse);
  5. Leistner is willing to make Oral submissions in support of his Motion should the Commission require such submissions. However, Leistner does not propose making oral submissions at this time;
  6. Leistner 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 ROBERT LEISTNER:**

March 20, 2013

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