

IN THE MATTER OF an application by William Mullins-Johnson,  
Sherry Sherret-Robinson and seven others for standing and funding at  
the Inquiry Into Pediatric Forensic Pathology in Ontario

(Hereinafter called the Applicants)

---

NOTICE OF MOTION

---

MOTION FOR STANDING AND FUNDING ON BEHALF OF THE APPLICANTS

JAMES LOCKYER  
Lockyer Campbell Posner  
Barristers and Solicitors  
1510-180 Dundas St. West  
Toronto, Ontario  
M5G 1Z8

Ph: (416) 847-2560

Fax: (416) 847-2564

The Applicants will make a motion to the Commissioner on August 8, 2007 at 10:00 a.m. or so soon after that time as the motion can be heard, at the Metropolitan Hotel, 108 Chestnut Street, Toronto.

The Applicants respectfully request an opportunity to make oral submissions with respect to standing and funding in support of this motion.

THE MOTION IS FOR:

1. An Order granting standing to the Applicants as a group throughout the Inquiry;
2. An Order granting funding to the Applicants to permit counsel to represent them as a group at the Inquiry;
3. Such further and other Order as the Applicants may request and the Commissioner permit.

THE GROUNDS FOR THE MOTION ARE:

1. All of the Applicants allege that they were convicted of crimes they did not commit as a result of, in whole or in part, the opinions of Dr. Charles Smith;
2. All of the Applicants have commenced, or intend to commence, a process to have their convictions reviewed and set aside;
3. It is the cases of the Applicants which have, to a significant degree, precipitated the need for this Inquiry;
4. The Applicants therefore have a direct and substantial interest in the subject matter of the Inquiry, and will provide it with a human aspect that cannot be gleaned elsewhere;
5. It is in the public interest that the Applicants receive standing at the Inquiry.

THE FOLLOWING DOCUMENTARY EVIDENCE WILL BE USED AT THE HEARING OF THE MOTION:

1. The affidavit of Charmian Leong

DATED: July 13, 2007

JAMES LOCKYER  
Lockyer Campbell Posner  
Barristers and Solicitors  
1510-180 Dundas St. West  
Toronto, Ontario  
M5G 1Z8

Ph: (416) 847-2560  
Fax: (416) 847-2564  
Email: [jlockyer@lcp-law.com](mailto:jlockyer@lcp-law.com)

To: Commission, The Honourable Stephen T. Goudge  
The Inquiry into Pediatric Forensic Pathology