

**IN THE MATTER OF: Commission of Inquiry into the Circumstances  
Surrounding the Death of Phoenix Sinclair**

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**AFFIDAVIT OF EVELYN WOTHERSPOON  
SWORN THE 13 DAY OF April, 2012**

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IN THE MATTER OF:

Commission of Inquiry into the Circumstances Surrounding  
the Death of Phoenix Sinclair


AFFIDAVIT OF EVELYN WOTHERSPOON

I, EVELYN WOTHERSPOON, of the City of Calgary, in the Province of Alberta,

MAKE OATH AND SAY AS FOLLOWS:

1. I have been retained by Garth Smorang on behalf of the Manitoba Government and General Employees' Union to provide expert evidence pertaining to a motion brought by the MGEU for an order prohibiting any form of publication of the identities of social workers who will be testifying at the Inquiry.
2. For the purposes of review, I have been provided with the following documentation:
  - a) Notice of Motion of the Manitoba Government and General Employees' Union (MGEU) dated August 18, 2011
  - b) Affidavit of Janet Kehler affirmed June 27, 2011
  - c) Order in Council No. 89/2011
3. Attached hereto and marked as Exhibit "A" to this my affidavit is a copy of my Curriculum Vitae.
4. Attached hereto and marked as Exhibit "B" to this my affidavit is my opinion letter to Mr. Smorang containing the evidence which I am providing to the Inquiry concerning the motion brought by MGEU.
5. The contents of this Affidavit and the contents of the attached exhibits are true.

SWORN BEFORE me at the City of Calgary, )  
in the Province of Alberta, this 18<sup>th</sup> day of )  
April, 2012. )

  
A Notary Public in and for the Province of  
Alberta. *British Virgin Islands*

  
Evelyn Wotherspoon

