

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

MOTION BRIEF OF WITNESS SOR #3

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1. The issues that arise with respect to the motion made by SOR #3 are substantially the same as those addressed in the motion brought by SOR #5 and SOR#6.
2. It is our position that SOR #3 qualifies as an informant under Section 18.1(1) of *The Child and Family Services Act*.
3. Consistent with the arguments advanced by counsel to SOR #5 and SOR #6 it is submitted that the relief sought in the motion for SOR #3 should be granted.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 6th day of June, 20112



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