

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

**NOTICE OF MOTION TO STRIKE THE AFFIDAVIT OF SHIRLEY COCHRANE
FILED BY THE
CANADIAN BROADCASTING CORPORATION, CTV WINNIPEG,
GLOBAL WINNIPEG AND THE WINNIPEG FREE PRESS
Hearing Date: July 4, 5 and 6, 2012 at 10:00 a.m.**

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File No. 1103444

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NOTICE OF MOTION

THE CANADIAN BROADCASTING CORPORATION, CTV WINNIPEG, GLOBAL WINNIPEG AND THE WINNIPEG FREE PRESS (the "Media), will make a motion before Commissioner Hughes, the Commissioner for the Inquiry into the Circumstances Surrounding the Death of Phoenix Sinclair, on the 4th day of July, 2012 at 10:00 a.m., in the Pan Am room at the Winnipeg Convention Centre, 375 York Avenue, Winnipeg Manitoba.

THE MOTION IS FOR:

1. an Order that the portions of the Affidavit of SHIRLEY COCHRANE affirmed April 3, 2012 be struck in on the that they offend the Rules of Evidence on the following grounds:

Objected To	Grounds
Paragraph 20	Hearsay
Paragraph 21(a)-(i)	Hearsay; inadmissible opinion
Paragraph 22, 4 th /5 th sentences	Hearsay
Paragraph 24, 3 rd / 4 th sentences	Inadmissible opinion
Paragraph 32	Hearsay; inadmissible opinion
Paragraph 42, 1 st , 3 rd , 4 th , 5 th sentences	Inadmissible opinion
Paragraph 44, 5 th / 6 th sentences	Hearsay; inadmissible opinion

THE FOLLOWING DOCUMENTS will be used at the hearing of the motion:

1. the Affidavit of Shirley Cochrane, affirmed April 3, 2012;
2. the cross examination of Shirley Cochrane, May 24, 2012: and
3. such further and other material as counsel may advise and this Honourable Commission of Inquiry may permit.

June 14, 2012

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