



August 22, 2011

SENT BY FAX

TO ALL MEDIA OUTLETS

***RE: Phoenix Sinclair Inquiry
Notice of Motion by Manitoba Government and General Employees' Union***

I represent the Manitoba Government and General Employees' Union (MGEU) which is a party with standing at the Commission of Inquiry into the circumstances surrounding the death of Phoenix Sinclair.

My client will be bringing a motion before the Commissioner on Monday, September 19, 2011 at 9:30 a.m. in the Pan Am Room, Winnipeg Convention Centre, 375 York Avenue, Winnipeg, Manitoba.

The nature of my client's motion is to request that the Commissioner prohibit any form of publishing, broadcasting or otherwise communicating by television, internet, radio, in print or by any other means the name, face or identity of any witness at the Inquiry who is or as a social worker as well as the name of any social worker identified in documents produced at the Inquiry.

In the alternative, my client will be seeking an order from the Commissioner to prohibit video or audio recording and broadcasting of testimony given by social workers at the Inquiry.

The documents in support of my client's motion including the Notice of Motion, the Affidavit in support of the Motion, and our Motion Brief are available for download from the Commission website home page at www.phoenixsinclairinquiry.ca.

In the event that you wish to take a position with regard to our motion on September 19th, your material is to be filed and served by September 6, 2011.

Yours truly,

MYERS WEINBERG ^{LLP}

GARTH H. SMORANG, Q.C.

cc/MGEU