

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

**NOTICE OF MOTION TO STRIKE THE AFFIDAVIT OF GWENDOLYN GOSEK
FILED BY
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

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

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 GWENDOLYN GOSEK affirmed April 3, 2012 be struck in on the that they offend the Rules of Evidence on the following grounds:

Objected To	Grounds
Paragraph 10	Hearsay; unqualified opinion
Paragraph 10(u), 2 nd sentence	Hearsay
Paragraph 10(v)	Reliance on undisclosed document
Paragraph 10(w)	Inadmissible opinion
Paragraph 10(x)	Inadmissible opinion
Paragraph 10(z), 2 nd and last sentences	Inadmissible opinion

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

1. the Affidavit of Gwendolyn Gosek, affirmed April 3, 2012;
2. the cross examination of Gwendolyn Gosek, June 1, 2012; and
3. such further and other material as counsel may advise and this Honourable Commission of Inquiry may permit.

June _____, 2012

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