

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

**NOTICE OF MOTION TO STRIKE THE AFFIDAVIT OF ELIZABETH MCLEOD
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.**

AIKINS, MacAULAY & THORVALDSON LLP

Barristers and Solicitors
30th Floor – 360 Main Street
Winnipeg MB R3C 4G1

JONATHAN B. KROFT
Telephone: 204-957-4671
Facsimile: 204-957-4253

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 ELIZABETH MCLEOD affirmed April 3, 2012 be struck on the basis that they offend the Rules of Evidence on the following grounds:

Objected To	Grounds
Paragraph 4	Inadmissible opinion; hearsay
Paragraph 15	Hearsay, irrelevant
Paragraph 16	Hearsay, inadmissible opinion

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

1. the Affidavit of Elizabeth McLeod, affirmed April 3, 2012; and
2. such further and other material as counsel may advise and this Honourable Commission of Inquiry may permit.

June _____, 2012

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Barristers and Solicitors
30th Floor - 360 Main Street
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JONATHAN B. KROFT
Tel: 204-957-4671
Fax: 204-957-4253
Solicitor for Canadian Broadcasting Corporation,
CTV Winnipeg, Global Winnipeg and the
Winnipeg Free Press