

**BEFORE THE COMMISSIONER OF INQUIRY
INTO THE INVESTIGATION OF THE BOMBING OF AIR INDIA FLIGHT 182**

**NOTICE OF MOTION FOR THE APPLICATION BY THE WORLD SIKH
ORGANIZATION OF CANADA TO CALL GARY BASS AS A WITNESS**

TAKE NOTICE that the WORLD SIKH ORGANIZATION OF CANADA hereby applies to this Commission, pursuant to Rule D12 of the Rules of Procedure and Practice, for an Order:

1. That Commission Counsel call Bass to testify on record at the Inquiry;
2. Allowing the Applicant to call Bass to testify on record at the Inquiry; or
3. Such further and other relief as this Honourable Commission may permit.

AND FURTHER TAKE NOTICE that the Motion shall be made on the following grounds:

4. The World Sikh Organization of Canada ("WSO") is applying to have Gary Bass ("Bass") called as a witness.
5. Bass is the Deputy Commissioner of the Royal Canadian Mounted Police ("RCMP").

6. Due to his role as the head of the RCMP Air India taskforce, Bass possesses extensive knowledge relating to all facets of the Air India investigation.
7. Bass' participation as a witness is therefore crucial, as his testimony would provide insight into whether the RCMP and CSIS properly and adequately addressed the Government of India's possible involvement with the Air India tragedy.
8. Rule C8 of the *Rules of Procedure and Practice* states that the Commissioner is committed to a process of public hearings to the greatest extent possible. Furthermore, the Applicant relies on Rules C6, D14, D16, H26 and H49 of the Inquiry's *Rules of Procedure and Practice*.

AND FURTHER TAKE NOTICE that the following statutory provisions or rules are relied upon by the applicant:

9. The Commission of Inquiry into the Investigation of the Bombing of Air India Flight 182 *Rules of Procedure and Practice*; and
10. Such further and other provisions as counsel may advise and the Honourable Commissioner may permit.

AND FURTHER TAKE NOTICE that the following statutory provisions or rules are relied upon by the applicant:

11. The oral submissions of counsel;
12. The Application from the WSO to have Bass called as a witness; and

13. Such further and other material as counsel may advise and the Honourable Commissioner may permit.

ALL OF WHICH IS RESPECTFULLY SUBMITTED.

Dated at Ottawa, Ontario on 12th October, 2007.

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TO: **COMMISSION OF INQUIRY INTO THE INVESTIGATION INTO THE
INVESTIGATION OF AIR INDIA FLIGHT 182**
The Honourable Mr. Justice John C. Major, Q.C., Commissioner
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