IN THE MATTER OF the *Inquiries Act*, R.S. c-5-13 AND IN THE MATTER of the Commission of Inquiry into the Investigation of the Bombing of Air India Flight 182

APPLICATION RECORD

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TABDESCRIPTION OF DOCUMENTS

- 1. Application for Standing made by Aleem Quraishi on his own behalf and on behalf of Sanjeeda Baig, Shakeel Shahzad Quraishi, Nadeem Naushad Quraishi, Shaheen Shahbaz Quraishi, Muneerunissa Begum, Syed Abdul Rahman, Syeda Mehboob Salma, Syeda Ahmedunissa Saleha, and Syeda Fatimaunissa Sadiqa
- 2. Affidavit of Aleem Quraishi, sworn January 25, 2007.

Date: February 2, 2007

HIMELFARB, PROSZANSKI LLP

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IN THE MATTER OF the *Inquiries Act*, R.S. c-5-13 AND IN THE MATTER of the Commission of Inquiry into the Investigation of the Bombing of Air India Flight 182

APPLICATION FOR STANDING MADE BY ALEEM QURAISHI ON HIS OWN BEHALF AND ON BEHALF OF THE INDIVIDUALS LISTED IN SCHEDULE "A" TO THIS APPLICATION

THE APPLICANT hereby makes this Application for Standing to the Commission of the Commission of Inquiry into the Investigation of the Bombing of Air India Flight 182 pursuant to paragraphs f. and h. of the Terms of Reference and Section D of the Rules of Procedure and Practice.

THE APPLICANT makes this Application for Standing on a *nunc pro tunc* basis upon the following grounds:

- (a) The Applicant was not made aware of the Rules of Procedure and Practice and the requirement to submit the Application for Standing until after July 18 and 19, 2006.
- (b) The Applicant represents a distinct family group consisting of family members of victims of the bombing of Air India Flight 182 residing in the City of Dubai in the United Arab Emirates.

(c) The Applicant is directly and substantially affected by the mandate of the Inquiry and is interested in all of the questions set forth in the Terms of Reference.

THE APPLICANTS submit with this Application the Affidavit of Aleem Quraishi of the City of Dubai.

February 2, 2007

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SCHEDULE "A"

Relationship with Victims of Air India Flight 182 Crash

1.	Aleem Quraishi
2.	Sanjeeda Baig
3.	Shakeel Shahzad Quraishi
4.	Nadeem Naushad Quraishi
5.	Shaheen Shahbaz Quraishi
6.	Muneerunissa Begum
7.	Syed Abdul Rahman Quadri
8.	Syeda Mehboob Salma
9.	Syeda Ahmedunissa Saleha
10.	Syeda Fatimaunissa Sadiqa

Shaiesta Quadri's Brother Shaiesta Quadri's Sister Shaiesta Quadri's Brother Shaiesta Quadri's Brother Shaiesta Quadri's Brother Shaiesta Quadri's Mother Ather Quadri's Sister Ather Quadri's Sister Ather Quadri's Sister

IN THE MATTER OF the Inquiries Act, R.S. c-5-13 and

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Investigation of the Bombing of Air India Flight 182

APPLIATION FOR STANDING

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AFFIDAVIT OF ALEEM EHTESHAM QURAISHI

I, ALEEM EHTESHAM QURAISHI, of the City of Dubai, in the United Arab Emirates, HEREBY MAKE OATH AND SAY AS FOLLOWS:

- My name is Aleem Ehtesham Quraishi. I am a surviving family member of my sister and her entire family who were victims of the Air India Flight 182 bombing. My sister Shaiesta Quadri ("Shaiesta") and her husband Syed Qutubuddin Quadri ("Ather") and their three children Rubeena Quadri, Arshiya Quadri and Atif Quadri were all killed as a result of the bombing.
- 2. Sanjeeda Baig is Shaiesta's sister. Myself, Shakeel Shahzad Quraishi, Nadeem Naushad Quraishi and Shaheen Shahbaz Quraishi are Shaiesta's brothers. My mother is Muneerunissa Begum. Syed Abdul Rahman Quadri is Ather's brother. Syeda Mehboob Salma, Syeda Ahmedunissa Saleha and Syeda Fatimaunissa Sadiqua are Ather's sisters.
- I have been appointed by the above-mentioned family members to represent their interest and make an Application for Standing before the

Commission of Inquiry into the Investigation of the Bombing of Air India Flight 182.

- 4. The Air India tragedy and the loss of my sister and her family had and continues to have a devastating impact on all of our lives as we have had to live with loss of Shaiesta and Ather and their children through two decades without understanding why or how such a tragedy could have occurred.
- 5. We were devastated by the acquittal of those charged with the murder of our family members and the other passengers of Air India Flight 182 and by the apparent inability of the Government of Canada to bring the wrongdoers to justice.
- 6. We have been frustrated throughout the years by the failure of the Government of Canada to properly investigate the bombing and explain to the families of the victims why and how it could have happened. We are now pleased and gratified to see that the Government of Canada has appointed this Commission to investigate the circumstances surrounding the bombing of Air India Flight 182, the unsuccessful prosecution of those at fault and to make recommendations to help in the prevention of future terrorist activities.

- 7. Unfortunately, as I reside in Dubai, and the rest of the members are residing in India and some Saudi Arabia, we have had limited contact and involvement with respect to the various investigations into the tragedy and, until recently, have had limited knowledge or understanding as to the role of this Commission of Inquiry.
- 8. It was not until after the Applications for Standing in July of 2006, that we became aware of the Rules of Procedure and Practice of the Commission and our right to apply for Standing just as other family groups have applied for and have been granted Standing.
- 9. The only documentation that I received from the Commission was a form that I completed and submitted to the Commission and which I attach hereto and mark as Exhibit "A" to this Affidavit. I understood when I submitted that form that it was for the purposes of obtaining Standing but have since been advised by counsel for the Commission that that is not so.
- 10. I have now had an opportunity to speak with Commission Counsel and counsel for three of the entities that did obtain Standing, Richard P. Quance, and am now aware that a formal Application has to be submitted for Applications for Standing in July of 2006. However, as indicated above I was not aware of that procedure until recently.

- 11. I have now had extensive discussions with Mr. Quance and have retained Mr. Quance and his firm to represent myself and the other family members throughout the scheduled hearings. I am not seeking any additional funding with respect to Mr. Quance's representation and I have been advised by Mr. Quance and do verily believe that he will represent the interest of myself and my family without any cost to us to the same extent that he is representing the interests of the other parties that he represents.
- 12. I and the other family members who I represent believe that this Commission presents us with the only opportunity we will have to play a direct role in the events and investigations relating to the Air India bombing. We now wish to participate fully as a distinct and separate Family Group before the Commission and accordingly make this Application for Standing.

SWORN BEFORE ME at the City of I)(BA) In the Province of Durai U.A.E. this 25 day of JAN. 2007 an NOTARY PL BLIC

ALEEM QURAISHI

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AFFIDAVIT OF ALEEM QURAISHI

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