

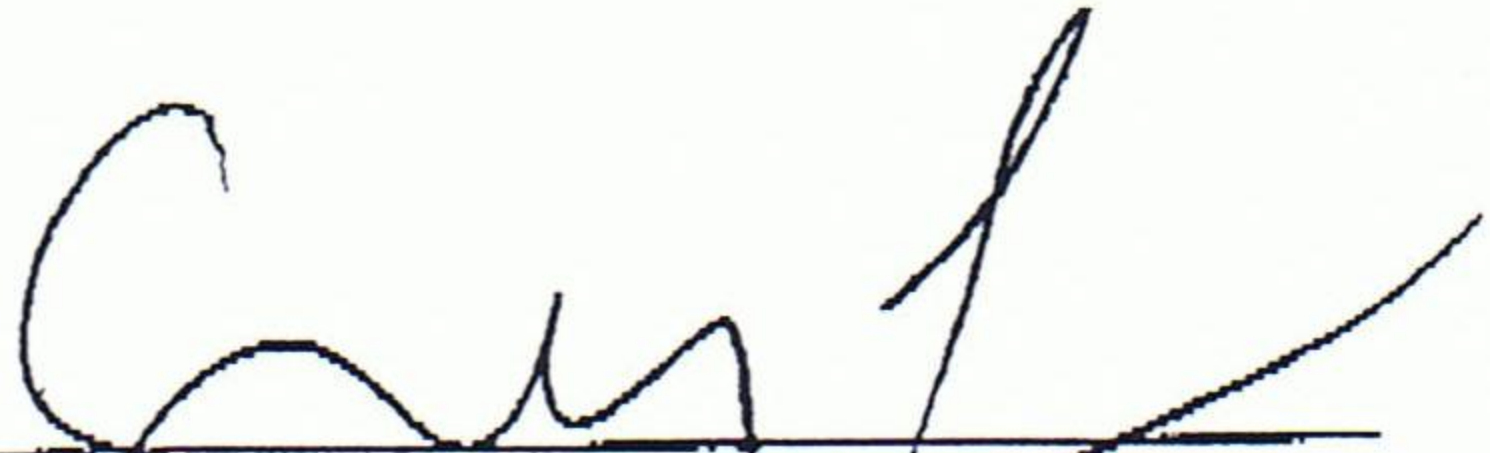
IN THE MATTER OF ORDER IN COUNCIL P.C. 2008-1092,
MADE PURSUANT TO PART I OF THE *INQUIRIES ACT*:
COMMISSION OF INQUIRY INTO CERTAIN ALLEGATIONS
RESPECTING BUSINESS AND FINANCIAL DEALINGS BETWEEN
KARLHEINZ SCHREIBER AND THE RIGHT HONOURABLE
BRIAN MULRONEY

APPLICATION FOR STANDING
RT. HON. BRIAN MULRONEY, P.C., C.C.

1. Pursuant to Order in Council P.C. 2008-1092, the Rt. Hon. Brian Mulroney, P.C., C.C. ("the Applicant") requests full party standing for Part I of the Commission of Inquiry into Certain Allegations Respecting Business and Financial Dealings Between Karlheinz Schreiber and the Right Honourable Brian Mulroney ("the Commission").
2. The Commission's Terms of Reference, as well as the Draft Rules of Procedure and Practice, provide that the Commissioner has the authority to grant an individual full party standing where they have satisfied him that they are directly and substantially affected by the matters being investigated in the Factual Inquiry. The Applicant submits that, on the face of the Terms of Reference, it is clear and obvious that he has a substantial and direct interest in the subject matter of the Factual Inquiry.
3. In further support of this Application, the Applicant relies on the *Ruling on Standing and Funding* issued in the context of the Commission of Inquiry into the actions of Canadian Officials in relation to Maher Arar. In that case, Commissioner O'Connor held that if a person is integrally involved in the events underlying the mandate of the Factual Inquiry, and is specifically named in the Terms of Reference, he/she will have a substantial and direct interest.

4. The Applicant reserves the right to make additional oral submissions in respect of this Application, as well as any Application for Standing filed by other persons or groups, when the Commission holds its hearings for this purpose on or about October 2, 2008.

ALL OF WHICH IS RESPECTFULLY SUBMITTED THIS 24th DAY OF SEPTEMBER, 2008.



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