# COMMISSION OF INQUIRY INTO THE SPONSORSHIP PROGRAM AND ADVERTISING ACTIVITIES

## **NOTICE OF MOTION**

THE RIGHT HONOURABLE JEAN CHRÉTIEN will make a motion to the Commissioner on Friday, May 20, 2005, at 9:30 a.m. or on an earlier date to be fixed by the Commission.

THE MOTION SEEKS an order from the Commissioner, the Honourable John Gomery, granting leave to call as witnesses the Honourable Ralph Goodale and the Honourable Don Boudria.

#### THE GROUNDS FOR THE MOTION ARE AS FOLLOWS:

- 1. The Honourable Ralph Goodale will give evidence in respect of the role played by the Right Honourable Jean Chrétien in instructing him and supporting his actions as Minister of Public Works on and after May 26, 2002, in determining what needed to be corrected and implementing the necessary reforms; a Will-Say statement in respect of the expected evidence of Mr. Goodale will be provided prior to the hearing of the motion.
- 2. The Honourable Don Boudria is expected to testify in accordance with the Will-Say statement, attached.

3. Reliance will be placed upon the provisions of Rule 28 of the *Rules of Procedure* and *Practice*.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the motion:

- (a) the Will-Say statement of the Honourable Ralph Goodale;
- (b) the Will-Say statement of the Honourable Don Boudria;
- (c) documents to be referred to in the evidence of the Honourable Don Boudria, to be provided at the hearing

DATE: May 18, 2005

BORDEN LADNER GERVAIS LLP Barristers and Solicitors 1100 - 100 Queen Street Ottawa ON K1P 1J9

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Solicitors for the Plaintiffs

TO: COMMISSION OF INQUIRY INTO THE

SPONSORSHIP PROGRAM AND

ADVERTISING ACTIVITIES PO Box 1388, Station B Ottawa ON K1P 5R4

and

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Bernard Roy, Commission Counsel

Neil Finkelstein, Co-Counsel Guy Cournoyer, Co-Counsel AND TO: All other parties to the Inquiry

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