

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

**NOTICE OF MOTION FOR THE APPLICATION FOR STANDING
OF GIAN SINGH SANDHU**

TAKE NOTICE that the Applicant, Gian Singh Sandhu, hereby applies to this Commission, pursuant to Rule D12 of the *Rules of Procedure and Practice*, for an Order:

1. Allowing Sandhu to testify on record at the Inquiry; or
2. In the alternative allowing into evidence Gian Singh Sandhu's affidavit.

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

3. Gian Singh Sandhu ("Sandhu") is personally applying for status to testify on record at the Commission of Inquiry into the investigation of the Bombing of Air India Flight 182 ("Inquiry");
4. Sandhu founded the World Sikh Organization ("WSO") in 1984 with an objective to foster a healthy integration for Sikhs in Canada, and to promote equality and understanding for the Sikh community;

5. On Tuesday, September 25, 2007, RCMP Inspector Jim Cunningham (“Cunningham”) testified about his 1992 interview with Air India suspect Lal Singh, also known as Manjit Singh. Cunningham’s testimony implicated Sandhu’s involvement with terror suspects;
6. Based on Cunningham’s testimony, Kim Bolan published an article in the Vancouver Sun on Wednesday, September 26, 2007 called “Interview with Air India Suspect made public – RCMP believed alleged plotter’s denial”, which also defames Sandhu personally;
7. Cunningham’s hearsay evidence has therefore defamed Sandhu, and compromised his integrity and position of trust as a representative of the Sikh community for over 35 years. As such, Sandhu seeks to testify on record to challenge these allegations made against him; and
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 in support of this application, the applicant relies upon:

11. The oral evidence of Sandhu;
12. The affidavit of Sandhu; and
13. Such further and other material as counsel may advise and the Honourable Commissioner may permit.

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Dated at Ottawa 12th day of October, 2007

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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