



## Application Form | Request for Standing to Participate

*Town of Collingwood Judicial Inquiry into the 50% share sale of Collingwood Utility Services Corporation to PowerStream Inc.*

Note: This application form must be submitted electronically to [info@collingwoodinquiry.ca](mailto:info@collingwoodinquiry.ca) or in writing to the Town of Collingwood Judicial Inquiry Office located at Town of Collingwood | 97 Hurontario Street | PO Box 275 | Collingwood, ON | L9Y 3Z5

All applications must be received by the Inquiry no later than 4:00 PM on Friday, July 20, 2018

### THE APPLICANT:

I. Individual \*

Name: \_\_\_\_\_

Email Address: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

II. Corporation or Organization \*

Name: **BLT Construction** \_\_\_\_\_

Contact Person [name and position] **Mark Watts** \_\_\_\_\_

Email Address: **mwatts@bltconstruction.com** \_\_\_\_\_

Mailing Address: **953 A Eglinton Avenue East, Toronto, ON, M4G 4B5** \_\_\_\_\_

Telephone Number: **(416) 677-0948** \_\_\_\_\_

\* IF REPRESENTED BY COUNSEL:

Name: **William Trudell (assisted by co-counsel Eric Neubauer)** \_\_\_\_\_

Firm: **William Trudell Professional Corporation** \_\_\_\_\_

Email Address: **wtrudell@simcoechambers.com** \_\_\_\_\_

Mailing Address: **Simcoe Chambers, 116 Simcoe Street, Suite 100, Toronto, ON, M5H 4E2** \_\_\_\_\_

Telephone Number: **(416) 803-2245** \_\_\_\_\_

**CRITERIA FOR PARTICIPATION [STANDING]**

Participation is based on the following criteria. Check that all apply to you.

- a) I have a substantial and direct interest in the subject matter of the inquiry.
- b) I am likely to be notified of a possible finding of misconduct.
- c) My participation would further the conduct of the Inquiry.
- d) My participation would contribute to the openness and fairness of the Inquiry.

Explain below how you satisfy the criteria you checked off:

**BLT Construction has a substantial and direct interest in the subject matter of the Inquiry in Phase II. This application was deliberately not brought in Phase I, though Phase I was monitored by BLT. Having now monitored Phase I, its participants, and the evidence called, it has now become clear to Counsel that BLT's full participation will be of assistance to the Inquiry and an application for standing should be made. BLT built the Sprung structure recreational facilities that will be the subject of discussion during Phase II. The Principals of BLT are anticipated witnesses in Phase II who will be able to provide background and invaluable insight into how the construction contract was awarded and the work involved in its implementation. BLT being granted full participation rights will advance the goals of the Inquiry and contribute to the openness, fairness and thoroughness of the Inquiry.**

**TYPES OF PARTICIPATION SOUGHT:**

If given the right to participate in the Public Hearings, which of the following types of participation do you seek? Check all that apply.

- Deliver written submissions
  - Seat at Counsel table
  - Make an opening statement
  - Lead evidence
  - Lead expert evidence
  - Cross-examine witnesses
  - Make closing submissions
  - Other  \_\_\_\_\_
- Please Note: Participation in some of these items (for example, the making of an opening statement, or leading expert evidence) may be unnecessary after discussions with Commission Counsel.**

The Inquiry aims to avoid duplication and to encourage efficiency. Please indicate if you have a common interest with any other individual or company that may be seeking standing. If so, specify their name and indicate your position on whether the Inquiry should grant you shared standing.

Common interest with individual(s)  \_\_\_\_\_

Common interest with company(ies)  \_\_\_\_\_

Indicate below your position on whether the Inquiry should grant shared standing to you and those with whom you have a common interest.

BLT's position is unique and its participation is important to understanding the issues in the terms of reference pertaining to Phase II. Counsel will ensure that BLT's involvement does not create duplication and promotes efficiency.

**FUNDING**

Will you be seeking a recommendation for funding for legal counsel from the Town of Collingwood in order to be able to participate in the Town of Collingwood Judicial Inquiry?

Yes

No

If you checked yes, complete the next questions.

Recommendations for funding will consider the following criteria. Check that all apply to you.

- a) I will not be able to participate in the Inquiry without funding.
- b) I have a unique perspective that will not be presented to the Inquiry if I do not participate.
- c) I have an established record of concern for and a demonstrated commitment to the interest I seek to represent.
- d) I have a special experience or expertise in respect of the Inquiry's mandate.
- e) I have a proposal as to the use of funds and how I will account for funds.
- f) I can be part of a group with similar interests.

**Explain below how you satisfy the funding criteria you checked off:**



**July 23, 2019**

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Signature

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Date (month/day/year)

**Per William Trudell and Eric Neubauer  
On Behalf of BLT Construction**