

IN THE MATTER OF the *Town of Collingwood Judicial Inquiry*

AND IN THE MATTER OF the *Public Inquiries Act*, S.O., 2009

AND IN THE MATTER OF the *Municipal Act*, 2001, S.O. 2001

APPLICATION RECORD

FREDERICK W. CHENOWETH

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Counsel for Edwin Houghton

## INDEX

TAB	DOCUMENT
1	Notice of Application of Edwin Houghton dated May 26, 2019
2	Affidavit of Edwin Houghton dated May 26, 2019

**TAB 1**

IN THE MATTER OF the *Town of Collingwood Judicial Inquiry*  
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NOTICE OF APPLICATION

TAKE NOTICE that an Application will be made before the Commissioner, Associate Chief Justice Frank N. Marrocco, by counsel on behalf of Edwin Houghton, on a date to be arranged and advised by the Commission at the Collingwood Town Hall, 97 Hurontario Street, Collingwood, Ontario for the following relief:

- a. For an order pursuant to Rule 33 of the Commission's Amended Rules of Procedure, directing that Mr. Houghton shall be at liberty to have his evidence led by his own counsel;
- b. Such further and other relief as counsel may advise and the Honourable Commissioner deem just.

AND TAKE NOTICE THAT in support of the Application will be filed the Affidavit of Edwin Houghton dated May 26th, 2019, and such further and other material as counsel may advise and the Commissioner may permit.

Dated at the Town of Collingwood, Ontario, this 26th day of May, 2019.

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**TAB 2**

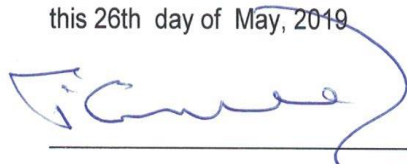
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AND IN THE MATTER OF the *Municipal Act, 2001, S.O. 2001*

**AFFIDAVIT OF EDWIN HOUGHTON**

I, EDWIN HOUGHTON, of the Town of Collingwood, in the Province of Ontario,  
make oath and say as follows:

1. I am a party with standing at the Collingwood Judicial Inquiry, the hearings for which are in progress and have been since April 15, 2019. As such, I have knowledge of the matters hereinafter deposed to.
2. I am advised by my counsel and verily believe that I may be called as a witness before the Commission on or about June 3, 2019.
3. I am concerned about the potential prospect of a Notice of Misconduct being served on me by the Commission. In the face of that potential prospect, I would wish to have the benefit of full procedural fairness, including the right to have my evidence led by my own counsel.
4. This Affidavit is made in support of my Application for an Order that I be at liberty to have my evidence, before the Commission, led by my own counsel.

SWORN BEFORE ME at the Town of )  
Collingwood, in the Province of Ontario, )  
this 26th day of May, 2019 )

  
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COMMISSIONER FOR TAKING AFFIDAVITS  
Frederick W. Chenoweth

  
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EDWIN HOUGHTON