

**IN THE MATTER OF
FIRST GLOBAL DATA LTD., GLOBAL BIOENERGY RESOURCES INC.,
NAYEEM ALLI, MAURICE AZIZ, HARISH BAJAJ, AND ANDRE ITWARU**

File No.: 2019-22

**MOTION
OF STAFF OF THE ONTARIO SECURITIES COMMISSION
(Rules 3 and 27)**

A. ORDER SOUGHT

The Moving Party, Staff of the Ontario Securities Commission (**Staff**), requests that the Ontario Securities Commission make an order:

1. Granting leave to Staff to, by no later than September 21, 2020:
 - a. file and serve an updated witness list on each Respondent indicating that KG will testify instead of MG, and
 - b. serve a summary of KG's anticipated evidence on each Respondent;
2. Granting permission to Staff to call KG as a witness instead of MG; and
3. Such further and other orders as counsel may advise and the Commission deems just.

B. GROUNDS

The grounds for the motion are as follows:

1. On November 14, 2019, Staff served and filed a witness list and served witness summaries, including a witness summary for MG, in accordance with the Commission's Order dated October 15, 2019;
2. MG and KG are married. Both are Debenture Holders, as defined in the Statement of Allegations issued on May 31, 2019;

3. KG has requested that she be called as a witness for Staff instead of her husband, MG, because MG has been experiencing medical issues affecting his speech;
4. The content of a witness summary for KG would be substantially the same as the summary delivered for MG. No changes to Staff's hearing brief would be required; and
5. Such further and other grounds as counsel may advise and the Commission deems just.

C. EVIDENCE

The Moving Party intends to rely on the following evidence for the motion:

1. Affidavit of Sherry Brown sworn September 15, 2020; and
2. Such other evidence as counsel may advise and the Commission may permit.

DATED this 16th day of September, 2020.

ONTARIO SECURITIES COMMISSION
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Staff of the Ontario Securities Commission



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Timothy Moseley, Vice-Chair and Chair of the Panel

September __, 2020

ORDER

WHEREAS Ontario Securities Commission held a hearing in writing with respect to a motion brought by Staff of the Commission (**Staff**) for an order permitting Staff to serve and file an updated witness list, removing MG and adding KG, to serve a summary of anticipated evidence of KG and granting permission to Staff to call KG as a witness;

ON READING Staff's Motion Record dated September 16, 2020, with no other party objecting, having been provided with notice of this motion;

IT IS ORDERED THAT:

4. Staff is granted leave to, by no later than September 21, 2020:
 - a. file and serve an updated witness list on each Respondent, and
 - b. serve a summary of KG's anticipated evidence on each Respondent.
5. Staff is granted permission to call KG as a witness instead of MG.

Timothy Moseley