

File #

MOTION

IN THE MATTER OF:

**THE RULES OF THE INVESTMENT INDUSTRY REGULATORY ORGANIZATION
OF CANADA**

(Respondent)

-and-

DOUGLAS JOHN ELEY

(Applicant)

MOTION OF DOUGLAS JOHN ELEY

(For a stay pursuant to ss.21.7(2) and 8(4) of the Securities Act, R.S.O. 1990, c.S.5 as am.)

A. ORDER SOUGHT

The Applicant, Douglas Eley, requests a stay pursuant to ss.21.7(2) and 8(4) of the Securities Act (the "Act"), of the decisions and order of IIROC released on January 28, 2020 and October 6, 2020 until the disposition of the Application for a hearing and review in accordance with s.21.7(1) of the Act.

B. GROUNDS

The grounds for the motion are:

1. That the application for hearing and review involves serious issues in respect of errors of law and mixed fact and law made by the IIROC Hearing Panel;
2. That if a stay were not granted prior to the disposition of the hearing and review, the Applicant will suffer irreparable harm; and
3. That the balance of convenience favours granting a stay.

C. EVIDENCE

The Applicant intends to rely on the following evidence for the motion:

1. The affidavit of the Applicant sworn on October 7, 2020.
2. Such further and other evidence as counsel may advise and the OSC may permit.

DATED this 7th day of October, 2020.

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