

IN THE MATTER OF  
Xiao Hua (Edward) Gong

File No.: 2022-14

MOTION FOR DIRECTIONS  
BROUGHT BY COUNSEL FOR EDWARD GONG

**A. Order Sought**

Edward Gong respectfully requests that the Panel permit Edward Gong, through counsel, the opportunity to seek disclosure of additional documents and then to file and serve any motion regarding or seeking additional disclosure on or before the Second Attendance date of October 27, 2022.

**B. Grounds**

The grounds for this motion are:

1. Counsel for Edward Gong raised a series of disclosure issues with OSC counsel on October 17, 2022. That was by conference call amongst counsel and in writing following the conference call. That was done to permit OSC counsel an opportunity to respond to the requests rather than OSC counsel being required to respond to a motion for disclosure.
2. Some of the disclosure issues, should they need to be addressed, are sensitive in nature.
3. Rather than filing a substantive notice now, this request is really designed to permit OSC counsel an opportunity to respond and, in addition, to permit the parties to refine the disclosure issues.
4. This request is respectfully intended to allow the parties to try to sort out the issues without the need for a motion to be heard by the Panel, and in any event without delaying the proceedings.

### **C. Evidence**

The Applicant Edward Gong intends to rely upon this Notice of Motion and the anticipated consent of OSC counsel.

**Dated** this 17<sup>th</sup> day of October, 2022

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Counsel for Edward Gong.

**TO:**

**Capital Markets Tribunal**  
Attention: Registrar  
By email to [registrar@osc.gov.on.ca](mailto:registrar@osc.gov.on.ca)

**Messrs. Mark Bailey and Braden Stapleton**  
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