

Form 1
NOTICE OF APPLICATION
(Criminal Proceedings Rules)

ONTARIO
SUPERIOR COURT OF JUSTICE

East
Region

Court File No. (if known)

BETWEEN:

MATTHEW PEGGS
(Regional Commander, RCMP Ontario Division)

Applicant

- and -

Dierdre Moore
(specify name of accused)

Respondent

TAKE NOTICE that an application will be brought on Thurs day, the 19 day of June,
(specify month)

20 25, at 161 Elgin St. 2nd Floor, Ottawa, ON, K2P 2K1
(specify address of court house)

for an order granting

(set out relief sought)

An order granting the application and quashing the subpoena by writ of certiorari on the basis that Matthew Peggs has no material evidence to give.

In the alternative, that Matthew Peggs be permitted to testify by videoconference pursuant to section 714.1.

THE GROUNDS FOR THIS APPLICATION ARE:

1. That There is no valid purpose for the testimony. Matthew Peggs has no direct knowledge of the facts underlying this proceeding.
2. That The documents requested in the subpoena are third-party documents. They may not be disclosed at this stage of the proceeding.
3. Such further and other grounds as counsel may advise and this Honourable Court may permit.

IN SUPPORT OF THIS APPLICATION, THE APPLICANT RELIES UPON THE FOLLOWING:

(set out documents such as transcripts, etc. upon which the Applicant relies)

- 1. The Affidavit of Matthew Peggs, sworn June 17, 2025**
- 2. Written submissions of the Attorney General of Canada, on behalf of Matthew Peggs**
- 3. Criminal Code (R.S.C., 1985, c. C-46) at ss. 698 and 714.1.**

(evidence)

THE RELIEF SOUGHT IS:

1. An Order allowing the application and granting
(indicate particular relief sought)
 1. An order granting the application and quashing the subpoena issued on June 11, 2025 by writ of certiorari on the basis that Matthew Peggs has no material evidence to give.
 2. In the alternative, that Matthew Peggs be permitted to testify by videoconference pursuant to section 714.1.

THE APPLICANT MAY BE SERVED WITH DOCUMENTS PERTINENT TO THIS APPLICATION

1. By service in accordance with rule 5, through
(specify address, telephone number and email)

**Clare Gover and Emily Keilty
Counsel**

clare.gover@justice.gc.ca

**Civil Litigation Section
National Litigation Sector
Department of Justice
50 O'Connor Street, 5th floor
Ottawa, ON K1A 0H8**

DATED at Ottawa, Ontario, this 17th day of June, 20 25

Clare Gover

Signature of applicant or counsel

**Clare Gover, Counsel
Civil Litigation Section
National Litigation Sector
Department of Justice
clare.gover@justice.gc.ca
50 O'Connor Street, 5th floor
Ottawa, ON K1A 0H8**

(set out name and address, as well as telephone number and email)