

January 15, 2024

VIA EMAIL - PJRafuse@irac.pe.ca

Philip J. Rafuse
Appeals Administrator
Island Regulatory and Appeals Commission

Dear Mr. Rafuse:

Re: Grinton v. Town of Three Rivers LA23-019
Witness List / Can Say
Our File No. 35127-001dk

In addition to themselves, the Appellants, Geraldine Johnston-Grinton and Paul Grinton, intend to call the following witness at the hearing on February 6, 2024:

Randy K. MacDonald

Can Say: Mr. MacDonald is the CEO/Founder of RKM FIRE Safety Consulting. It is the Appellants' intention to have Mr. MacDonald qualified as an expert witness. Mr. MacDonald will speak about whether the development permit approved by the Town of Three Rivers was in compliance with the municipal official plan and bylaws, the provincial and national Building Codes Act, Fire Prevention Act and Regulations, and any other applicable legislation.

The Appellants reserve the right to call additional witnesses if it becomes necessary to address something that has been adduced at the hearing.

We trust the foregoing to be satisfactory; however, should you have any questions or comments, please do not hesitate to contact the undersigned at your convenience.

Yours truly,

KEY MURRAY LAW


Shea L. Callaghan
SC/jlg

cc: Melanie McKenna; Derek D. Key, K.C.; Chris Linzel-Waddell; Jessica Gillis;