

UNDER

THE COMMISSIONS OF INQUIRY ACT 1908

IN THE MATTER OF

CANTERBURY EARTHQUAKES ROYAL COMMISSION

Before:

The Honourable Justice M Cooper
Judge of the High Court of New Zealand

Sir Ron Carter
Commissioner

Associate Professor Richard Fenwick
Commissioner

**APPLICATION OF COUNSEL, ON BEHALF OF SRECKO (ALEC) CVETANOV, TO
CANTERBURY EARTHQUAKES ROYAL COMMISSION - JURISDICTION**

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To Stephen Mills QC, Counsel for the Royal Commission
To Marcus Elliot, Counsel Assisting Families for the Royal Commission

May it please the Commission

1. Counsel, on behalf of Mr Srecko (Alec) Cvetanov, applies to the Commission seeking that:
 - (a) The Commission inquire into the circumstances surrounding, and cause of, Dr Tamara Cvetanova's death (and the deaths of four Filipino women trapped in the third floor of CTV with Dr Cvetanova) in the collapsed Canterbury Television building (CTV) on 23 February 2011 (ToR a(ii), a(iii)(B)).
 - (b) The Commission investigate the circumstances surrounding, and cause of, Dr Tamara Cvetanova's death (and the deaths of four Filipino women trapped in the third floor of CTV with Dr Cvetanova) in the collapsed Canterbury Television building (CTV) on 23 February 2011 (ToR a(ii), a(iii)(B) (e)).
 - (c) The Commission make recommendations as to lessons that may and should be learned from Dr Cvetanova's death (and the deaths of the four Filipino women who died close to her), including as to future legal and best practice requirements for the design, construction and maintenance of buildings in central building districts (ToR a(v), (d), (e)).
 - (d) The Commission investigate and consider the performance and/or failure of the design and availability of safety features, such as escape routes, of the CTV building and make recommendations as to the design and availability of such features in future buildings (ToR a(v) (D)).
2. Upon the grounds contained in:
 - (a) the written submissions of Counsel dated 5 December 2011;
 - (b) the further submissions of Counsel dated 5 March 2012;
 - (c) the oral submissions of Counsel, on 6 March 2012;
 - (d) the witness statement of Srecko (Alec) Cvetanov dated 16 June 2011; and
 - (e) such other grounds as the Commission may identify and rely on, as it sees fit, as a Royal Commission appointed and acting under the Commissions of Inquiry Act 1908 and its Terms of Reference.