

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
REF NO.: 99-007430-CI-8
UCN: 521999CA007430XXCICI

CHURCH OF SCIENTOLOGY FLAG
SERVICE ORGANIZATION, INC.,
Petitioner,

vs.

LISA MCPHERSON TRUST INC., a
Florida for-profit corporation,
JESSE PRINCE, GRADY WARD,
ROBERT S. MINTON, JR., STACY BROOKS,
JEFF JACOBSON, PATRICIA GREENWAY,
PETER ALEXANDER, MARK BUNKER, AND
TROY BEAZIAN,
Respondents.

MOTION TO DISSOLVE INJUNCTION

Respondent, by and through his undersigned counsel, hereby moves this Honorable court for an order dissolving the injunction issued in the above matter for the following grounds:

(1) A permanent injunction was issued against the respondent, after hearing, by the Honorable Judge Thomas Penick, Jr. on July 27, 2001. The respondent was one of ten individuals or corporations affected by this injunction.

(2) There have been no violations brought against the respondent for violation of the injunction since its inception.

(3) The respondent has recently moved into a condominium in Clearwater and he was advised that a complaint was filed with the condominium Association requesting that they disallow him from being a tenant. The reason given was that the injunction, which is the subject of this motion, stated on page 7, paragraph 3 that he was permanently enjoined "from coming within 10 feet of any member of the Church of Scientology". The complainant (presumably a Scientologist) therefore objected to the respondent moving in because he could come within 10 feet of them.

(4) The respondent finds himself in a position of having to know every member of the Church of Scientology that might come within his presence. This is a factual impossibility. Scientologists don't necessarily look any different from other people walking the streets of Clearwater nor do they wear any clothing which states they are a member of the church (like the FBI would wear a jacket with "FBI" on it, for example).

(5) The respondent, since 2001, worked for three years in the news division of a TV station in San Diego California. He then took a job with a Fox affiliate and worked there for another four years. He started as a video editor and then he moved up to writing, segment producing and gathering news in the field for air and the web.

(6) Respondent won an Emmy award in 2006 for a story on border issues and a piece that he edited for television about a teen horribly injured in an illegal street race won an Emmy for reporter Charlotte Starck in 2005.

(7) More recently, respondent has been writing, producing and directing a documentary on Scientology entitled "Knowledge Report". He travels the country interviewing former members of the church including top executives. He has also interviewed people who worked side-by-side with Scientology founder L. Ron Hubbard. Specifically, he interviewed Hannah Whitfield who was the captain of one of Hubbard's ships at the beginning of Scientology's Sea Organization. He has also interviewed members of law enforcement, attorneys, experts in psychiatry and cult practices, journalists, actors and musicians.

(8) The respondent has resided peacefully in towns where Scientologists live and work. There have been no occasions of physical violence or conduct which would result in proceedings which would cause the respondent to be found in violation of the injunction that he now seeks to dissolve.

(9) Permanent injunctions are not favored in law or equity unless there are proven grounds for their continued existence.

(10) Respondent, The Lisa McPherson Trust, Inc. ceases to exist.

(11) The remaining respondents Jesse Prince, Grady Ward, Stacy Brooks, Jeff Jacobson, Patricia Greenway, Peter Alexander and Troy Bezazian all no longer live in the Pinellas County area.

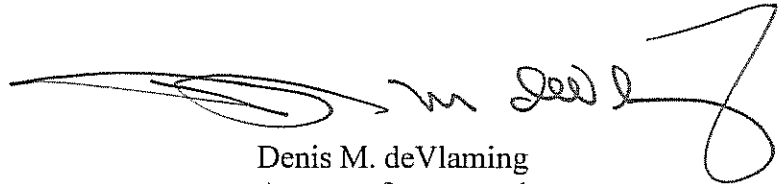
(12) Respondent Robert S. Minton, Jr., the founder and financial backer behind the Lisa McPherson trust is deceased.

(13) There is no longer any viable reason to continue the existence or enforcement of the injunction which is the subject of this motion.

(14) It has now been over 12 years since the injunction has been placed in effect and is no longer needed.

Wherefore, respondent moves this Honorable court for an order dissolving the injunction placed against him in the above matter.

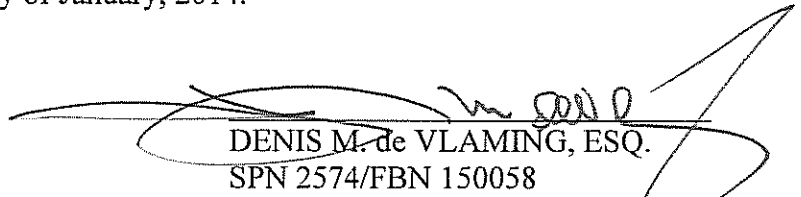
Respectfully submitted,



Denis M. deVlaming
Attorney for respondent

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by V.S. MAIL to F. Wallace Pope, Jr., Johnson, Pope, Bokor, Ruppel & Burns LLP, 911 Chestnut Street, Clearwater, Florida 33756-5643, this 3rd day of January, 2014.



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