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March 29, 2011

Attn: Civil Division 1 State Court of Dekalb County 556 North McDonough Street Decatur, Georgia 30030

RE:

Patrick C. Desmond, et al v. Narconon of Georgia, Inc., et al.

State Court of Dekalb County

CAFN:

10A28641 —

Our File No.: 298-2940

Dear Sir or Madam:

Since Judge DelCampo's recent recusal, I don't believe the above-referenced case has been assigned to a new judge. Enclosed is a courtesy copy of the Joint Motion for Dismissal of Sovereign Place, LLC, and Sovereign Place Apartment Management, Inc., which has been filed with the Clerk of Courts, as well as the original proposed Consent Order as it relates to the joint motion. As the attorney who represents Defendants Sovereign Place, LLC, and Sovereign Place Apartment Management, I humbly request that the assigned judge please review the enclosed motion and order and if in agreement with the same, please execute the order and have the same filed with the Clerk of Courts. Thank you for your assistance and should you have any questions, feel free to call me.

Very truly yours,

SHANE E. BARTLETT

SEB/sb Enclosures

cc: Jeff Harris, Esq. (w/enc.)

Rebecca Franklin, Esq. (w/enc.) Kate Whitlock, Esq. (w/enc.) Melanie Eyre, Esq. (w/enc.) Robert Tanner, Esq. (w/enc.)

IN THE STATE COURT OF DEKALB COUNTY STATE OF GEORGIA

PATRICK DESMOND AND MARY)	
DESMOND, INDIVIDUALLY, AND)	
MARY C. DESMOND, AS)	
ADMINISTRATRIX OF THE)	
ESTATE OF PATRICK DESMOND,)	
)	
Plaintiffs,) CIVIL ACTION FILE	
) NO. 10A28641	
v.)	
)	
NARCONON OF GEORGIA, INC.,)	
DELGADO DEVELOPMENT, INC.,)	
SOVEREIGN PLACE, LLC,)	
SOVEREIGN PLACE APARTMENT)	
MANAGEMENT, INC., LISA)	
CAROLINA ROBBINS, M.D., THE)	
ROBBINS GROUP, INC., AND)	
NARCONON INTERNATIONAL,)	
)	
Defendants.)	
)	

JOINT MOTION FOR DISMISSAL OF SOVEREIGN PLACE, LLC, AND SOVEREIGN PLACE APARTMENT MANAGEMENT, INC.

COME NOW Plaintiffs and Defendants, in the above-styled action and, by and through their undersigned counsel of record, and move this Court to allow the dismissal without prejudice of Defendants Sovereign Place, LLC, and Sovereign Place Apartment Management, Inc., from the above-styled civil action pursuant to O.C.G.A. § 9-11-41 and leaving as Defendants in this case Narconon of Georgia, Inc., Delgado Development, Inc., Lisa Carolina Robbins, MD, The Robbins Group, Inc., and Narconon International, and further remove Sovereign Place, LLC, and Sovereign Place Apartment Management, Inc. from the style of this action on any and all future pleadings and filings with the Court.

(Signatures follow)

This 27 day of March, 2011.

Consented to by:

J. Hams LoySES Jeffrey Harris, Esq. / Rebecca Franklin, Esq. (w/express permission by Shane Bartlett) Georgia Bar No. 330315 / 141350 Attorneys for Plaintiffs 400 Colony Square

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Shane E. Bartlett, Esq.

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Stevan Miller, Esq. /Kathryn S. Whitlock, Esq.

(w/express permission by Shane Bartlett) Georgia Bar No. 508375 / 756233 Attorneys for Narconon of GA and

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Robert Tanner, Esq. / Scott Kerew, Esq. (w/express permission by Shane Bartlett) Georgia Bar No. 967650 / 416629 Attorneys for Lisa Carolina Robbins, MD and The Robbins Group, Inc. 950 E. Paces Ferry Road

Suite 3000

Atlanta, GA 30326

(2017年至1987年) (2017年) (24)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing pleading upon all parties by depositing a true copy of the same in the United States Mail, with adequate postage affixed thereon to ensure delivery addressed as follows:

Jeffrey R. Harris, Esq. Harris, Penn & Lowry, LLP 400 Colony Square 1201 Peachtree Street Suite 900 Atlanta, GA 30361

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This 29 day of March, 2011.

SHANE E. BARTLETT Georgia Bar No. 040551 Attorney for Defendants Sovereign Place and Sovereign Place Apt. Mgmt.

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