

**IN THE STATE COURT OF DEKALB COUNTY  
STATE OF GEORGIA**

PATRICK C. DESMOND AND MARY )  
 C. DESMOND, INDIVIDUALLY, AND )  
 MARY C. DESMOND, AS )  
 ADMINISTRATRIX OF THE ESTATE )  
 OF PATRICK W. DESMOND, )

Civil Action No. 10A28641-2

Plaintiffs, )

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. )

**PLAINTIFFS' MOTION FOR SANCTIONS**

Comes now Plaintiffs Patrick C. Desmond and Mary C. Desmond, individually, and Mary C. Desmond, as Administratrix of the Estate of Patrick W. Desmond, and file this, their Motion for Sanctions against Narconon of Georgia, Inc. For the reasons set forth in Plaintiffs' Brief in Support of Motion for Sanctions filed simultaneously herewith, Plaintiffs' respectfully request that this Court grant this Motion.

This 25<sup>th</sup> day of May, 2011.

400 Colony Square  
 1201 Peachtree St., N.E., Suite 900  
 Atlanta, GA 30361  
 Telephone: (404) 961-7650

**HARRIS PENN LOWRY DELCAMPO, LLP**

  
 \_\_\_\_\_  
 JEFFREY R. HARRIS

Georgia Bar No: 330315  
 DARREN W. PENN  
 Georgia Bar No. 571322  
 LAURA H. SPIRES  
 Georgia Bar No. 002447  
*Attorneys for Plaintiffs*

FILED  
 STATE COURTS  
 DEKALB COUNTY, GA.  
 2011 MAY 25 PM 3:32  
 BY: [Signature]

**CERTIFICATE OF SERVICE**

This is to certify that I have this day submitted **PLAINTIFFS' MOTION FOR SANCTIONS** via U.S. Mail proper postage prepaid, addressed as follows:

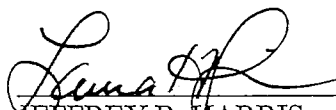
**DREW, ECKL & FARNHAM, LLP**  
STEVAN A. MILLER  
KATHRYN S. WHITLOCK  
880 W. Peachtree Street  
P.O. Box 7600  
Atlanta, Georgia 30357

**BELLI WEIL GROZBEAN & DAVIS**  
MELANIE C. EYRE  
8010 Roswell Road, Suite 200  
Atlanta, GA 30350

**WEINBERG, WHEELER, HUDGINS, GUNN  
& DIAL, LLC**  
ROBERT G. TANNER  
JEFFREY N. AMASON  
3344 Peachtree Road, Suite 2400  
Atlanta, Georgia 30326

This the 25<sup>th</sup> day of May, 2011.

**HARRIS PENN LOWRY DELCAMPO, LLP**



---

JEFFREY R. HARRIS  
Georgia Bar No: 330315  
DARREN W. PENN  
Georgia Bar No. 571322  
LAURA H. SPIRES  
Georgia Bar No. 002447

400 Colony Square  
1201 Peachtree St., NE  
Suite 900  
Atlanta, GA 30361  
Telephone: (404) 961-7650

*Attorneys for Plaintiffs*