

**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 TO COMPEL AGAINST NON-PARTY

Plaintiffs have filed a Motion for Sanctions against Narconon International. In that motion Plaintiffs explain that Narconon of Georgia (NNGA) produced a document entitled "Things that Shouldn't Be" on September 13, 2012. Ex. A. This document references communications between Mary Rieser, Maria Delgado and the local Atlanta Church of Scientology regarding the operations of NNGA and Delgado Development.

Accordingly, Plaintiffs served a Subpoena on Deb Danos, who is the Director of Special Affairs (DSA) for the local Scientology Org., and asked for documents related to the operations of NNGA and Delgado Development. Ex. B. Apparently, compliance with that Subpoena was overseen, in part, by the same law firm that has represented

Narconon International in this case. Ex. C. (email from Rick Moxen to Ga counsel regarding Subpoena.)

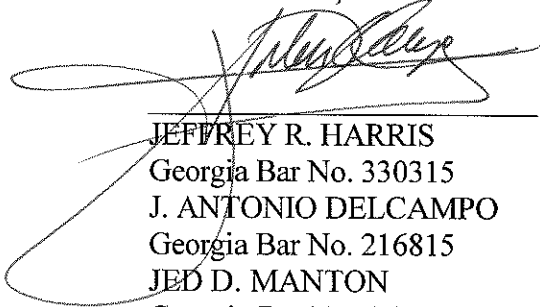
In response to the Subpoena Ms. Danos filed lengthy boilerplate objections and provided certain redacted documents. Plaintiffs counsel wrote to counsel for Ms. Danos and asked whether any documents were being withheld pursuant to the various claims of privilege and if so which specific privileges were being asserted. That request was ignored. See Ex. D.

Plaintiffs have sent a valid Subpoena in this case. In response, Ms. Danos has refused to specify whether any documents are being withheld and if so to identify those documents on a privilege log so that Plaintiffs may determine if the privileges appear to be properly asserted. Moreover, this is not a situation where a disinterested third party is being asked to comply with a non-party Subpoena. Compliance here is being orchestrated, in part, by Narconon International's own lawyers. Narconon International's lawyers certainly know the rules and should be required to abide by them.

Plaintiffs respectfully request that the Court compel Ms. Danos to specify which documents are being withheld pursuant to a claim of privilege and to identify those documents on a privilege log so that Plaintiffs may determine whether further involvement of the Court is required. Further, Ms. Danos has produced a redacted document that does not appear to merit a privilege under Georgia law. Ex. E. Plaintiffs request that the Court compel Ms. Danos to produce an unredacted copy to the Court en camera and to specify the particular privilege which is being claimed to justify these redactions.

This 29th day of October, 2012.

**HARRIS PENN LOWRY
DELCAMPO, LLP**



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Attorneys for Plaintiffs

Dir I and R NN Int
Dir I and R NN EUS
Dir I and R ABLE EUS

14 August 2008

THINGS THAT SHOULDN'T BE

I am sending a box of information that is somewhat of a chronicle about events between Narconon of Georgia and Delgado Development (a company that has provided supportive housing for Narconon of Georgia out patient students – all their clients have come from Narconon). The point of this report is to delineate what has transpired as a result of management lines into Narconon of Georgia becoming crossed, confusing and off policy. It is as much a report about me, the ED who allowed it as those who helped to perpetuate it.

The information is important because date coincident with these occurrences, the student body was cut in half (it is going up now) and the cash bills became crossed by \$100,000 more.

In June of 2007 Narconon of Georgia was finally granted the right to deliver the Sauna program by the state of Georgia. This was after a five year battle with the state. It was no small feat to get full licensure for all portions of Narconon delivery as it meant recognition by the state. Coincident with this has been continuous increased PR with the Governor's office and the legislative body – of obvious benefit to all LRH delivery facilities in the area.

A month later, the company that had been delivering the Sauna program before we were licensed to do it (Puro-Cleanse), knowing that they were on their way out demanded huge amounts of money before returning our sauna to over to us as well as the keys to where it was being delivered. This was the place that was licensed by the state for delivery, so we had to deal with this – and we did. It was damaging financially, but because we were expanding, I intended simply to make back quickly.

At the end of August I learned that Don and Maria Delgado were getting a divorce, and this is really where the chronicle begins relating to this box of papers. The point that is important about this divorce is that in the process Maria managed to walk off with the assets of two housing companies – one that had recently closed down (WestCo) and was in the process of being transferred to someone else (of my choice) and one that was already in her name that had been originally started by Don. (This company was 1/3 the size of Westco with almost no assets.) I was told about this at the org in a chaplain's cycle and this was the first of several incidents of bypass by outside terminals regarding Narconon business. It was apparent that this divorce was wanted by org terminals but I am sure that there was no understanding about this asset that was being taken and what the ramifications would be to Narconon survival. I knew and that is why I heavily protested. I was promised a mediation later, which never occurred. I did not own WestCo, but had been delegated by the previous owner as the person to determine who would take it over. This was not really Maria's decision to make, but because it was a



Desmond-D-GA-18745

floating asset at the time it looked like something she could take. Part of the deal was that whoever got this company was supposed to buy the van that came along with it -- at \$20,000 and some furniture which was much cheaper. I had to buy the van, as there was no living without it and Maria made payments on the furniture. With Maria taking over this conglomeration, which she had not created, came extra expense for me. I bought the van, paid all vehicle insurance (which I was not doing before) and paid for more gas than I ever had. It may seem peculiar that I would pay for all these things, but obviously I had started to go effect of this original bypass, done at a time when Narconon stats were high.

It should be understood that all financing of promotion is done by Narconon for students that go to housing and Narconon. We do the websites, blogs, press releases, bulk mail, videos, etc. The Narconon regges sell the program and housing too. We are responsible to the families and we are a customer of Delgado and so are the students. From our hat as customer and as representatives to the families, we have always felt that we had the right to demand good service from the housing.

The divorce was final at the end of September. Our total number of students had increased steadily since we opened in 2001 and had increased bit more quickly after the win with the state. At the beginning of November 2007 the number of students started going down and for the first time since the inception of Narconon the trend itself went down for 8 months, though it would remain stable, as though by force on occasion and would start down again.

Maria had Don Delgado run the housing company for many months while she got auditing in Mexico. The relationship between Don and Narconon was good. Things would stabilize and then destabilize, depending on who was running what at the time. A constant issue seemed to be lack of discipline at housing and a great deal of time at Narconon daily was spent on what happened at housing the night before. I got so embroiled in the day-to-day flaps, refund handlings and the stresses that occur when your money is dwindling away that I did not get exterior enough to the situation to fully handle it. I always knew though, that a lot of the chaos had not been on the lines previous to Delgado takeover. In my stressed-out state I was unaware of a way out as it seemed that any resources to start another housing company were beyond my reach and had been eaten up by the eclipse. I also had almost constant attention on the fact that Delgado did not have insurance at all. Westco had insured the van, had workman's comp and liability. Delgado had none (I paid all van insurance). Maria was told several times where to buy insurance and of the necessity of getting it.

In March, Anonymous was heavily on attack in Georgia, both with Narconon and the Church. In an attempt to ensure that tech was in at Narconon and that legal rudiments were in at housing and Narconon, so as to proof up against attacks, I called a Board of Investigation to investigate certain points. For some reason Maria was upset from the moment the Board was called, even though it was an impartial board to get data. I learned third hand that she had put it on org lines and was upset -- it appeared she did not get the point of what we were doing.

Out tech was found in the sauna and course room and corrected. There were some legal ruds out at Narconon and we did our best to get them in. Housing was noted as not having insurance (a point that was demanded in an Urgent Directive). General neglect was found at housing and Executive Court of Ethics was suggested. The Board of Investigation took a while (with requests for additional time). During this time, nothing seemed to improve at Delgado. There was additional noise on the lines – so much so that the Board concluded that perhaps it was in an attempt to cover up and sent a communication that they were going to ask for a non-enturb, if the noise did not stop.

All of this – the Board of investigation, the findings, evidence and notations by the board are included in this box. In fact, the incident below happened before the B of I findings were published.

In late March I ordered that Narconon be on high alert during a specific weekend. Anonymous had been making threats. The org was also on high alert also. Don Delgado was asked to watch guard all night at the org by Maria. I asked that he not do this, as he was the one who would handle situations in the middle of the night at Delgado, including taking people to the ER for bumps and scrapes, etc. I thought with our big field that Narconon could handle its own security and the org theirs. I really had no one else to do those things that Don was doing at the time. (since resolved)

Don did do security on Saturday night at the org and stayed up all night, sleeping in for much of Sunday. On Sunday night Maria started to send enturbulating text messages to me that she was going to fire one of her staff, Allison. I was simply interested in whether the students were safe or not and kept asking this (this is also part of the documents as I saved the entire text messages on my blackberry). Maria was mainly interested in complaining about this girl. In the middle of all this nonsensical text messaging between us, a student at housing took some heroin, passed out and had to be taken by ambulance to the hospital. Don was not at housing as he had been up the night before and Maria was so busy firing Allison that she did not know that she only had one staff member on duty on a night when there should have been more. One of her staff had not even shown up and there were not enough staff supervising. Don went over to housing and the hospital and everything turned out OK. The next day, Don and I handled all the families who had heard about the incident and hired a security firm.

Maria fired the security firm within a few weeks.

Maria did lower conditions on this incident and they seemed pretty thorough.

At some point after this the DSA of the org pulled Maria and I into her office. I had not been speaking to the DSA about anything between Delgado and Narconon, so she must have gotten some information from Maria. The topic of the conversation was the fact that Maria had a right to hire whomever she wanted at her company. I protested this, as her company was housing Narconon students and I thought that we should at least be coordinating on this point. My protest was looked as “acting defensive” and I honestly feel that the facts were not presented at this conversation. Don would no longer be

working at Delgado, which in my mind was a huge mistake. The DSA was in agreement with what Maria wanted and obviously did not have all the data. Though she is very bright, there is no way that she would have enough information to understand the whole dynamics and ramifications of leaving me out of the loop. Obviously, if Maria legally owned a company, she would have certain rights. However, I can see no circumstance where these rights were supersede service to our students and this is the point of view that I would be coming from- and all of this would affect viability. Maria had been gone for much of the year and Don had been running housing with a lot of help from the side from me. Allison was also doing a great deal. Now Don and Allison were going to be gone and I was not in agreement with this decision. Things had been tough enough under the circumstances and now the two best people were going to be gone.

Sometime in April, a badly needed recruitment Mission came to the org. The ED ABLE came along with them, but from another hat (from what I could tell.) I know that first morning they were there, Maria went and spoke to the Mission and told them that the only way she could be on staff was to continue to run housing. She told them that she needed the money also to support her daughters in New York. I do not know what else she told them. To the degree that she relayed any information that had to do with Narconon affairs that would affect their actions towards Narconon, to that degree there was the possibility of wrong information and mixed up command channels. My command channels go through NNEUS. I do know that the first communication with the ED ABLE was about the fact that she had heard that the DED of the org worked at Narconon. I do not know where this came from, but it was asked a few times, even after I stated it was not true. This later was straightened out.

The Mission recruited Mark Web (Maria's fiancé) to be the temporary PES. This was good, because we need a PES. However, his coming on staff somehow became contingent on his working at Delgado. It appeared he was replacing Don. I was not informed of this until after the fact - though if the Mission understood the circumstances and the fact that Narconon had been burdened with dropped housing hats, then I am sure they would have wanted a discussion about this for the safety of the students. They were obviously getting their information from somewhere else. Our public are definitely quite different than org public and it takes a bit to learn about their general tone level and to confront them. The purpose of Narconon and housing seemed to have become to support org staff. If we had enough resources, I would not mind. However, under the circumstances and the already heavy Ideal Org debt it was not possible without more exchange from Delgado. The exchange was simply not in enough to make the scenario viable. Maria was making money during a year she barely worked and I was paying for most of the transportation and having to run over frequently to handle her company.

Maria left town for her training as the OES and gave the hat of the housing to Mark. This decision was based on what was needed at the org, which was fine, but Narconon was left out of the loop. Mark often would work late at the org when he was supposed to go to housing. He seemed eager to give good service when he had the time, but he was not hatted and not often available. A bad situation at housing started to get worse. I was expected to be helping at the org more with the Mission there, yet I was constantly PTPed

about the events that were occurring at housing. I would frequently go to the org after work at Narconon and then run by housing late at night. A few times I found liquor and drug paraphernalia. I called the cops about a drug dealer who was dropping off heroin and I was on the prowl around several apartments looking for dealers. I felt the students were in danger and felt pretty alone at handling a dangerous scene. The places were getting very messy. I would try to get them cleaned up in the limited time I had. (These are covered in KR's.) Finally, we decided at Narconon that it was an overt to sell the program and the stats started crashing. Tracy and I felt it was not ethical to sell the product and I did not know where to go to for help. When I asked WISE about mediation, I was told Maria did not need to be a WISE member because she was org staff. I was not allowed to get her ethics in because she worked for a higher org.

Also, it was explained to me that Mark was my senior because I was running the OT committee (by default) and he was the PES. My key hat is that of ED Narconon and again, I have my command channels. Rather than as a customer, being able to demand good service from housing which I felt Narconon was totally supporting without much exchange, I was having to take orders from Mark from another hat. The comm. lines were getting all mixed up and the student numbers were dwindling to what they had been 3 years prior. Narconon was virtually becoming non-existent and I was bypassed so much I was becoming non-existent and even if we had wanted to support the Delgado family, there was no way to do it.

During this time I was trying to explain to the Mission Second about the situation and she explained to me that I was not allowed to give orders to housing. I know that I did not explain the scene to her correctly and she obviously had data from somewhere else. There is no way that anyone would have allowed the circumstances to become what they were. Stats were crashing and NN Int became aware of the actual situation. Eventually there was an order to get another housing company to start providing services for our students. The stats reverted that very week, but the bulk of the students were still at Delgado.

An example of cross decisions and orders is the case of Brad Taylor. Brad Taylor had been sentenced here for a year at Narconon and was working at Delgado. However, there was suspicion that he had given drugs to students, stolen a credit card and broken confidentiality. He was already fired from Narconon, but continued to cause trouble on the lines because he was at Delgado. I told ethics to get him out of the area and told Mark Web that I did not want him anywhere near our students. I did not say this in passing but emphatically. By this time, it had been made clear to Mark and Maria that I had no authority and perhaps that is why I was not listened about Brad Taylor. In fact, Maria called Brad's father in an attempt to "handle" the upset that I had created by my edict and Brad was allowed to stay. Even getting him out of Narconon took some work, but ethics eventually listened to me. However, regrettably, this did not occur for housing.

On June 10th 2008 a student was watching a basketball game late in the evening with Brad in his apartment. They consumed tequila and the student gained access to his cash which was supposed to be locked in that apartment. A sad thing happened later in the

evening. Two days later we drug tested Brad and he was dirty for methadone, PCP, cocaine and methamphetamine.

Additionally, Brad Taylor was kept in the loop about everything that happened that evening, by Maria without coordination from me. While Don and I were able to handle the flap earlier, this went out of control and wound up all over the web. Brad was constantly on his blackberry, knew how to blog and was angry at me for attempting to kick him out. It is logical that he would spread the untrue entheta over the web because it would not be to his advantage for the truth to be known.

At Narconon we have not taken our responsibility in this matter lightly and writing this report is part of taking full responsibility.

I am reporting these events only so it can be understood that we must apply standard ethics and admin to our LRH activities and in the long run, it will be of more benefit to the ideal org.

After this event occurred, the Board of Directors met and determined a policy that would set exact guidelines for any housing company that Narconon would be affiliated with. Insurance is required and the new company has it.

The ethics officer was removed from post.

Tech inspections and crams were done on tech staff. I have done frequent tech inspections, written instructs and FESed the folders of students who did not make it through the program during this enturbulating time at Narconon. We have been calling these students – some report they are doing OK and we are working on getting the others in.

We have also worked very hard to handle entheta on Youtube and have been able to move some of the entheta down and some off the first page. There is still more work to do.

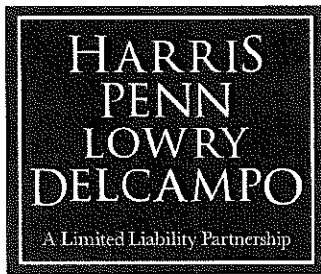
We have done our best to keep the integrity of the command channels in.

As head of the OT committee, I have gotten products and will continue to. However it is a separate hat. I have helped to get a sauna for the org, gotten out 10,000 OCAs in the paper, newspaper ads and have sold books. I have also helped to bring the CF project further along than it has been in years and worked on recoveries. It is not enough and we need more help, but I do wear this hat as I can.

Our goal at Narconon of Georgia is to flourish and prosper and help as many people as we can as we learn from our mistakes against a background of LRH tech.

At the same time, from my hat as OT committee chairman I am dedicated to helping the Atlanta org go ideal.

Mary Rieser
ED NN GA



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September 18, 2012

VIA STATUTORY OVERNIGHT DELIVERY

Church of Scientology of Georgia
c/o Ms. Deb Danos
4588 Winters Chapel Road
Atlanta, GA 30360


Re: Patrick C. Desmond, et al. v. Narconon of Georgia, Inc., et al.
Civil Action File No. 10A28641-2
In the State Court of DeKalb County, State of Georgia

Dear Ms. Danos:

I enclose a subpoena duces tecum for your deposition at our Atlanta office on Tuesday, October 9, 2012, at 10:00 a.m. I also enclose a check in the amount of \$25.00 for your witness fees.

Sincerely,

HARRIS PENN LOWRY DELCAMPO, LLP


Jamie Davis
Paralegal

Enclosures
cc: All counsel of record (w/attach.)



8282



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400 COLONY SQUARE 1201 PEACHTREE STREET
ATLANTA, GEORGIA 30361
(404) 961-7650



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64-10-610

9/18/12

PAY TO THE ORDER OF

Rob Pano

\$ 25.00

Twenty-Five and 00/100

DOLLARS

MEMO

Desmond: Witness Fee

John W. Penn

AUTHORIZED SIGNATURE

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STATE OF GEORGIA
STATE COURT OF DEKALB COUNTY

ACTION NO. 10A08641-2

TO: Ms. Deb Danos

Harris Penn Lowry DeKalb County, GA

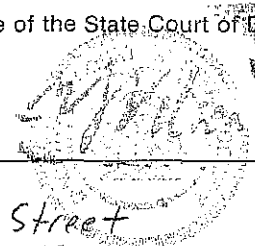
YOU ARE HEREBY COMMANDED, That laying all other business aside, you be and appear at the State Court of DeKalb County to be held in the County aforesaid, on the 9th day of October, 2002, at 10:00 o'clock (A.M.) P.M., next, to be sworn as a witness for the Plaintiffs, in the case of Desmonds vs. Narcoson of Georgia, Inc., et al.

there pending and from term to term.

HEREIN FAIL NOT, under penalty of law.

Witness the Honorable _____, Judge of the State Court of DeKalb County.

This _____ day of _____, _____.



Clerk

Suite 900
REPORT TO ROOM _____ ~~DeKalb County Courthouse~~
~~556 N. McDonough St.~~
~~Decatur, Georgia 30030~~

1201 Peachtree Street
400 Colony Square
Atlanta, GA 30361

**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' NOTICE TO TAKE DEPOSITION DUCES TECUM OF DEB DANOS

TO: Church of Scientology of Georgia
c/o Ms. Deb Danos
4588 Winters Chapel Road
Atlanta, GA 30360

PLEASE TAKE NOTICE that on October 9, 2012, beginning at 10:00 a.m., and continuing until completion, at Harris Penn Lowry DelCampo, LLP, 1201 Peachtree Street, Suite 900, Atlanta, GA 30361, Plaintiffs will take the deposition upon oral examination of Deb Danos, before a Notary Public or some other officer authorized to administer oaths, for discovery and all other purposes allowable under the Georgia Civil Practice Act. Plaintiffs' attorneys will provide for the services of a court reporter.

You are to give your deposition upon oral examination in the referenced case pending in this Court, and to have with you at that time and place the following:

1. All correspondence of any kind, including but not limited to email exchanges, between you and any representative of Narconon of Georgia ("NNGA"), Narconon International,

ABLE and/or any other institution affiliated in any way with the Church of Scientology that discuss any of the following topics: *[Note that this request includes attachments to responsive email exchanges and other responsive correspondence]*.

- A) The death of Patrick Desmond;
- B) The circumstances surrounding the death of Patrick Desmond;
- C) Investigations into the death of Patrick Desmond;
- D) Actions taken in response to the death of Patrick Desmond;
- E) Delgado Development's housing operations;
- F) Board of Investigation(s) that examined the operations of Delgado Development;
- G) Urgent Directives that relate to Delgado Development;
- H) Claims by anyone that NNGA or was holding itself out as operating a residential and/or in-patient treatment facility;
- I) State licensing issues pertaining to NNGA;
- J) Actions taken against Maria Delgado related to housing operations;
- K) Complaints about drug use at Delgado housing;
- L) Complaints about the lack of supervision at Delgado housing;
- M) On-site visits and/or inspection of NNGA and/or Delgado housing;
- N) NNGA's representation(s) to representative(s) of drug court(s) about any aspect of the program; and
- O) The lawsuit referenced in the caption above, and as captioned for DeKalb State Court.

2. All documents in your possession, custody and/or control that relate to the following topics in any way:

- A) The death of Patrick Desmond;
- B) The circumstances surrounding the death of Patrick Desmond;
- C) Investigations into the death of Patrick Desmond;
- D) Actions taken in response to the death of Patrick Desmond;
- E) Delgado Development's housing operations;
- F) Board of Investigation(s) that examined the operations of Delgado Development;
- G) Urgent Directives that relate to Delgado Development;
- H) Claims by anyone that NNGA is or was holding itself out as operating a residential and/or in-patient treatment facility;
- I) State licensing issues pertaining to NNGA;
- J) Actions taken against Maria Delgado related to housing operations;
- K) Complaints about drug use at Delgado housing;
- L) Complaints about the lack of supervision at Delgado housing;
- M) On-site visits and/or inspections of NNGA and/or Delgado housing;
- N) NNGA's representation(s) to representative(s) of drug court(s) about any aspect of the program; and
- O) The lawsuit referenced in the caption above, and as captioned for DeKalb State Court.

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. **You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production.** You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. **You may mail or deliver**

the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before the production by giving written notice to the attorney whose name appears on this subpoena. **IF YOU PROVIDE THE REQUESTED DOCUMENTS IN ADVANCE, THIS WILL NOT BE A DEPOSITION, AND NO TESTIMONY WILL BE TAKEN.**

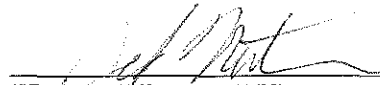
If you fail to:

1. Appear as specified; or
2. Furnish the records instead of appearing as provided above; or
3. Object to this subpoena,

You may be in contempt of court. You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed.

Herein fail not, under penalty of law. This the 18th day of September, 2012.

HARRIS PENN LOWRY DELCAMPO, LLP



JEFFREY R. HARRIS
Georgia Bar No: 330315
JED D. MANTON
Georgia Bar No. 868587

400 Colony Square
1201 Peachtree St., NE
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Inquiries should be directed to:

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400 Colony Square
1201 Peachtree Street, NE

Suite 900
Atlanta, Georgia 30361
(404) 961-7650 (T)
(404) 961-7651 (F)
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

This is to certify that I have this day submitted **PLAINTIFFS' NOTICE TO TAKE DEPOSITION DUCES TECUM OF DEB DANOS** via U.S. Mail proper postage prepaid, addressed as follows:

David E. Root, Esq.
Cheryl H. Shaw, Esq.
Carlock Copeland & Stair, LLP
191 Peachtree Street, NE
Suite 3600
Atlanta, GA 30303

Attorneys for Narconon International

Stevan A Miller, Esq.
Drew, Eckl & Farnham, LLP
880 W. Peachtree Street
P.O. Box 7600
Atlanta, Georgia 30357

Attorneys for Narconon of Georgia, Inc.

This the 18th day of September, 2012.

HARRIS PENN LOWRY DELCAMPO, LLP



JED D. MANTON
Georgia Bar No. 868587

Andrea Jones

From: kmoxon@earthlink.net
Sent: Monday, October 22, 2012 7:07 PM
To: Andrea Jones
Subject: Desmond case document production - 1 of 3
Attachments: Urgent Directive.pdf; Plaintiffs' first doc prod request to NIV Int.pdf; Plaintiffs' first request for admissions to Sovereign Place Apt..pdf; Plaintiffs' first interogs to Sovereign Place Apt..pdf; Plaintiffs' first interogs to Robbins Group.pdf; Plaintiffs' first interogs to NN GA.pdf; Plaintiffs' first doc prod request to Sovereign Place Apt..pdf; Plaintiffs' first doc prod request to Lisa Robbins.pdf; Motion for appointment of J. Basham.pdf

Andrea,

Please find responsive records for Deb Danos pursuant to the Desmond case subpoena. Please note the subpoena was to her, not the church for purposes of any transmittal cover letter or filing.

Rick Moxon
MOXON & KOBRIN
818-827-7104

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Jamie Davis

From: Jeff Harris
Sent: Monday, October 29, 2012 3:32 PM
To: Jamie Davis
Subject: FW: danos response

On 10/23/12 4:47 PM, "Jeff Harris" <Jeff@hpllegal.com> wrote:

>Andrea:

>

>What documents are being withheld under a claim of privilege and what
>is the privilege that is being asserted to justify the redactions. Thank you.

>

>Jeff Harris

>

>On 10/23/12 4:24 PM, "Andrea Jones" <andrea@glawgp.com> wrote:

>

>>Jeff, Documents to follow. Andrea

>>

>>Andrea Cantrell Jones

>>The Galloway Law Group, LLC

>>3500 Lenox Road, NE

>>Suite 760

>>Atlanta, GA 30326

>>Ph: 404-965-3686

>>Fax 404-985-3670

>>andrea@glawgp.com

>>

>>

>>-----Original Message-----

>>From: ricohscans@glawgp.com [<mailto:ricohscans@glawgp.com>]

>>Sent: Tuesday, October 23, 2012 4:13 PM

>>To: Andrea Jones

>>Subject: danos response

>>

>>This E-mail was sent from "RNP01BF6F" (Aficio MP C7501).

>>

>>Scan Date: 10.23.2012 16:13:11 (-0400) Queries to:

>>ricohscans@glawgp.com

>



CERTIFICATE OF SERVICE

This is to certify that I have this day submitted **PLAINTIFFS' MOTION TO COMPEL AGAINST NON-PARTY** via U.S. Mail proper postage prepaid, addressed as follows:

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This the 29th day of October, 2012.

**HARRIS PENN LOWRY
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