

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

CHURCH OF SCIENTOLOGY OF GEORGIA, )  
INC., a Georgia Corporation, )  
 )  
Plaintiff, )  
 )  
v. ) CIVIL ACTION  
 ) FILE NO.: 1:10-cv-0082-CAP  
CITY OF SANDY SPRINGS, GEORGIA, )  
et. al. )  
 )  
Defendants. )

**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

COME NOW the City of Sandy Springs, Georgia, and its named elected officials, Defendants in the above-styled action and file this their Motion for Summary Judgment.

This Motion is based on:

1. All pleadings of record;
2. Defendants' Memorandum of Law in Support of Their Motion for Summary Judgment;
3. Defendants' Statement of Material Facts Not in Dispute;
4. Declaration of Nancy J. Leathers;
5. Deposition of Deborah Quinn Danos on May 19, 2010;
6. Deposition of Robert Wright on August 6, 2010;
7. Deposition of Nancy J. Leathers (Leathers I) on June 2, 2010;
8. Deposition of Nancy J. Leathers (Leathers II) on October 14, 2010;

9. Deposition of Mark Moore on May 27, 2010;
10. Transcript of Planning Commission Hearing on November 19, 2010;
11. Transcript of City Council Hearing on December 15, 2010;
12. Notice of Filing Certified Documents; and
13. Notice of Filing Original Discovery and Request for Filing Original Discovery.

Defendants respectfully show that there is no genuine issue of material fact and that Defendants' are entitled to judgment as a matter of law on all claims presented. Wherefore, Defendants pray for judgment in their favor.

Respectfully submitted this 21st day of December, 2010.

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CERTIFICATE OF SERVICE

I hereby certify that on December 21, 2010 I electronically filed the foregoing **DEFENDANTS' MOTION FOR SUMMARY JUDGMENT** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

G. Douglas Dillard, Esq.  
Andrea Cantrell Jones, Esq.  
Lauren M. Hansford, Esq.

/s/ Laurel E. Henderson  
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