

Rick Simons

From: Rick Simons
Sent: Saturday, June 16, 2012 11:21 AM
To: Schnack, Robert J. (Sacramento)
Cc: jmccabe@jw.org; jim@mccabelaw.net; JDefibau@jw.org; Kelly Kraetsch
Subject: RE: Jane Doe v. Watchtower, et al - case no. HG11558324

I have no intention of executing on this or any judgment until it is final, as long as Watchtower does not engage in fraudulent transfers of assets that requires my intervention. Provided the language is not unreasonable, we can reach a stipulation I assume and save you the ex parte trip. I'll be in the office shortly if you want to call, although I get the impression no one from the defense is talking to me anymore. That's what happens when you leave court early.

From: Schnack, Robert J. (Sacramento) [<mailto:SchnackR@jacksonlewis.com>]
Sent: Saturday, June 16, 2012 11:10 AM
To: Rick Simons; Kelly Kraetsch
Cc: McCabe James; rmcguinness@alameda.courts.ca.gov
Subject: Jane Doe v. Watchtower, et al - case no. HG11558324

Rick and Kelly:

I write as a courtesy to advise you that Defendants Watchtower and North Fremont Congregation (the "Church Defendants") will file an Ex Parte Application to Stay Enforcement of Judgment in this matter on Tuesday, June 19, 2012, after 10:00 a.m. In that application, the Church Defendants will seek a temporary stay of enforcement of the forthcoming judgment that I anticipate will be entered on the jury's special verdicts of June 13 and 14, 2012. The temporary stay is necessary during the parties' post-trial litigation, which might eliminate, reduce, or otherwise affect the forthcoming judgment. Also, the temporary stay is necessary to allow the Church Defendants to secure the requisite bond for any appeal in this matter.

As noted above, the Church Defendants intend to file their application on June 19, 2012, after 10:00 a.m. Pursuant to the rules of Department 22, applications are considered only on the moving papers and any written opposition. Department 22 rules state that Plaintiff's opposition be filed within 24 hours of the Church Defendants' filing of their application.

I expect to email you copies of the application, my supporting declaration, and proposed form of order later today, but in any event no later than 10 a.m. on Monday, June 18, 2012, as required by the Court's rules.

Finally, I ask that you please notify Mr. McCabe and me whether Plaintiff will stipulate to the requested stay of execution of the forthcoming judgment or whether, instead, Plaintiff intends to oppose the application. Thank you. —
Bob Schnack

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1 After considering the submitted papers, including any response or opposition filed on
2 behalf of Plaintiff, this Court grants the Church Defendants' application as follows:

3 **GOOD CAUSE APPEARING, IT IS HEREBY ORDERED THAT:**

4 (1) Enforcement of the judgment to be entered on the jury's special verdicts of June
5 13 and 14, 2012 shall be temporarily and completely stayed until ten (10) days after the last day
6 on which a notice of appeal may be filed on said judgment; and, *PENDING FURTHER ORDER*

7 *OF COURT*
8 (2) Any existing liens, levies or attachments pertaining to the forthcoming judgment
9 referenced in (1) above are hereby extinguished and *no* new liens, levies or attachments may be
10 created during the pendency of this stay.

11 **IT IS SO ORDERED.**

12 DATED: 6/20, 2012

Robert D. McGuinness
13 HON. ROBERT D. MCGUINNES
14 JUDGE OF THE SUPERIOR COURT

15 (3) THE FOREGOING STAY IS
16 EXPRESSLY CONDITIONED UPON Δ'S
17 THE WATCHTOWER BIBLE AND TRACT
18 SOCIETY OF NEW YORK INC.'S NOT
19 TRANSFERRING, CONVEYING OR CHANGING
20 TITLE TO ANY ^{REAL} PROPERTY IN ISS NAME TODAY
21 PENDING FURTHER ORDER OF COURT
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