



Church Defendants' Ex Parte Application to Shorten Notice of Hearing on Motion re Appeal Bond

Look at the last line ÁïChurch Defendantís motion to substitute real property for...ì

1 the appeal bond or, in the alternative, decrease the amount of the appeal bond, so that said 2 motion may be heard on November 8 or 9, 2012. Pursuant to Department 22 and the Honorable 3 Robert D. McGuiness' standing order, applications are considered only on the moving papers and any written opposition is to be filed within 24 hours of Watchtower filing this application. 4 This application is made pursuant to California Code of Civil Procedure section 128(a)(3), and 5 6 California Rules of Court, Rules 3.1200 through 3.1207. As discussed in the memorandum of points and authorities below, good cause exists for 7 an order shortening notice of hearing on the Church Defendants' motion to decrease the amount 8 of the appeal bond because: (1) the Church Defendants' intend to file a motion to substitute real 9 property as security for the judgment or, in the alternative, to reduce the amount of the appeal 10 11 bond, and the Church Defendants face immediate irreparable harm and hardship if the hearing 12 and ruling on said motion is not completed before November 15, 2012; (2) after an initial good faith "meet and confer" telephone call, Plaintiff's counsel did not communicate Plaintiff's 13 position on this issue until October 17, 2012 when he notified the Church Defendants' counsel 14 that Plaintiff would not agree to substitute real property as security for the judgment; and (3) 15 Plaintiff will not be prejudiced by any shortened notice because her counsel has been aware of 16 17 the instant issue since the Church Defendants' counsel first contacted Plaintiff's counsel during the week of October 8, 2012, and the judgment for Plaintiff will be protected in any event. 18 19 Plaintiff is represented in this action by Richard J. Simons (SBN 72676) and Kelly 20 Kraetsch (SBN 281688) of Furtado, Jaspovice & Simons, 22274 Main Street, Hayward, 21 California 94541, (510) 582-1080. (Egbert Decl., ¶ 2.) The Church Defendants complied with 22 Rules 3,1203 and 3,1204 of the California Rules of Court by giving notice of this application to 23 Mr. Simons and Ms. Kraetsch on October 17, 2012, by e-mail communication. (Id. at ¶ 3-6, 24 Exhs. A-C.) Plaintiff's counsel has stated that he will not oppose this application, but will 25 oppose the substantive motion. (Id. at § 6, Exh. C.) Plaintiff's counsel has also represented that 26 he is available for a hearing in the afternoon of November 8, 2012 or the morning of November 27 9, 2012. (Id.)

The Watchtower Society is asking the Judge to lower the bond because they can ${\rm I}\!{\rm t}$ pay it. The next screenshot shows us the bond amount.

	This ex parte application is based on this application, the memorandum of points and		
1			
2	authorities in support thereof (section II below), the declaration of Douglas M. Egbert (section		
3	III below), and all pleadings and papers on file in this action.		
4	II. MEMORANDUM OF POINTS AND AUTHORITIES		
5	A. Relevant Facts		
6	On or about September 20, 2012, the Church Defendants filed their Notice of Posting		
7	Bond/Undertaking for Appeal of Judgment Under Code of Civil Procedure Section 917.1.		
8	(Egbert Decl., ¶ 8, Exh. D.) As outlined in Exhibit A to the Notice, the bond was for the amount		
9	of \$17,277,299.37, and has a premium of \$86,386.		
10	The Church Defendants' payment of the appeal bond premium is due November 15,		
11	2012. However, the Church Defendants seek to substitute real property defendant Watchtower		
12	owns in Patterson, New York in place of the appeal bond as security for the judgment. (Id. at ¶		
13	9.) To that end, the Church Defendants' counsel contacted Plaintiff's counsel to see if a		
14	stipulation could be reached concerning the substitution of security. (Id.) After a brief		
15	telephone conversation, Plaintiff's counsel's inclination was to not so stipulate, but Plaintiff's		
16	counsel suggested the parties discuss the issue further. After additional "meet and confer"		



The news is that the Watchtower Society is going to ask the Judge during their next court outing Ä8th November 2012) to reduce the bond or free them of it all together.

As Kathleen so eloquently puts it ÏWhat frickin planet are these idiots living on?

Why don't they ask their heavenly father for help? Heck, Jehovah changed Pharaoh is mind, so surely he can sort out a simple Judge in the States?

Just in case you missed it, I jest...

Rating: 8.9/10 (10 votes cast)

Rating: +8 (from 8 votes)

Jaime 91 people like this. Sign Up pour voir ce que vos amis aiment.

Tags: Candace Conti, Child Abuse Court Case, Court Case, Watchtower Law Suits

5 Comments



Pete October 20, 2012 Woohoo! Bring the harlot down!

[Reply]

Rating: 5.0/5 (2 votes cast) Rating: +3 (from 3 votes)



Tim Riches October 20, 2012

The judge will most likely deny the motion to reduce. This is a desperation move on the part of the Watchtower lawyers. It is thoroughly pleasing to see this bunch Eapping out Í, but there will be no quarter given.

[Reply]

Rating: 5.0/5 (1 vote cast)

Rating: +2 (from 2 votes)



Dyllen October 20, 2012

Now the WTS say they are broke? Well, they are not broke YET, but justice has been served and now they are begging the judge to make the bond smaller just so they can keep the rest of their money to themselves! Ifm surprised by these sickos...what planet are they living on?WTS is going down!

[Reply]

Rating: 0.0/5 (0 votes cast)

Rating: +1 (from 1 vote)



Hal October 20, 2012

Those sicko $\hat{\mathbf{p}}$ arasite maggotsí just donít give up. What a menace to civilized society. They certainly are not endeared to me in any forum or platform. Amen



Rating: 0.0/5 (0 votes cast)

Rating: 0 (from 0 votes)



Frank October 20, 2012

This just goes to show all of us here how ignorant, immature and asinine both the JWs and the WTBTS really are. This really doesn't surprise me. If they were smart, they would simply pay the court ordered settlement and keep quiet. Instead, they appeal the court ordered ruling and try to persuade the judge to reverse the order or to simply reduce the court ordered amount to a smaller, much more cheaper dollar amount and are hoping that God will be on their side through all of this. Boy, the JW and WTBTS web is/are really a tangled one(s), aren't they? How can the JWs and the WTBTS expect the courts in California to even think of doing that unrealistic thing? If I were the judge, I would simply tell both the JWs and the WTBTS to simply be quiet and pay the court ordered money due Candace Conti for all of her pain and suffering that she endured when a lowly member of the human race used her as his little sexual play thing for his own pleasure. By doing that, that man made Ms. Conti into a statistic and that is something that no human being wants to be at all.

Not only that, what really takes the cake here is the JWIs and the WTBTS are now saying that this settlement would really bankrupt them if they pay Ms. Conti all of that money. All I can say here is ÏBaloney! They will never ever be without money as their devoted following will always part with much of their hard earned dollars and cents to help keep the WTBTS from sinking and going broke. They will always have money at their disposal no matter what happens in the end.

Not only that, if this appeal drags on and turns into years, the WTBTS will probably have to pay more as interest is also collected on the unpaid money. This 17 million dollar settlement could turn into \$60-70 million or more dollars down the road if the appeal drags on for years. Still, their devoted followers will be there to rescue them if that were to ever happen.

The ${\cal W}\!/\!\!s$ and the WTBTS will never learn and that also doesn't surprise me in the slightest at all, either.

[Reply]

Rating: 0.0/5 (0 votes cast)

Rating: 0 (from 0 votes)

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