VERNON C. GOINS II (SBN 195461) GOINS & ASSOCIATES 2 3 1330 Broadway, Suite 1530 Oakland, CA 94612 4 Telephone: Facsimile: 5 6 Attorneys for Plaintiffs 7 8 9 10 11 Goins & Associates PLC 1350 Breshway Saie 1570, Daklerd, Californa 94612 78: 631018954-465 Few (510) 895-4228 12 13 GUYANA TRIBUTE FOUNDATION, a 14 16 Plaintiffs. F 17 VS. 18 THE EVERGREEN CEMETERY 19 20 inclusive. 21 22

YASMIN GILANI (SBN 240830) A Professional Law Corporation (510) 893-9465 (510) 893-4228 DR. JYNONA NORWOOD, and GUYANA TRIBUTE FOUNDATION

## SUPERIOR COURT OF CALIFORNIA COUNTY OF ALAMEDA UNLIMITED CIVIL JURISDICTION

No. RG11575036 California non-profit corporation; and JYNONA NORWOOD, an individual;

ASSOCIATION, a California corporation; BUCK KAMPHAUSEN, an individual; RON ) HAULMAN, an individual; and DOES 1-50,

Defendants.

DECLARA DON OF

IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION.

MONHE

Date: May 25, 2011 Time: 9:00 a.m.

Dept.: 22

Res. No.: R-1179749

ASSIGNED FOR ALL PURPOSES TO JUDGE ROBERT MCGUINESS DEPARTMENT 22

, declare as follows:

- 1. I submit this declaration in support of Guyana Tribute Foundation's Motion for Proliminary Injunction scheduled for May 25, 2011.
  - 2. I am a supporter of the Guyana Tribute Foundation. GTF is a public benefit non-

DECLARATION IN SUPPORT OF PLAINTIEFS? MOTION FOR PRELIMINARY INJUNCTION Ciquana Tribute Foundation et al. vs. The Evergreen Cometery Association is al. (Alameda County Superior Court Case No. RG11575036)

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27 28 profit corporation duly organized and existing under the laws of the State of California. The purpose of GTF is to provide assistance, comfort and support to the family members of the victims who were fortured, massacred and killed in Jonestown, Guyana by the People's Temple Church under the direction, guidance and instruction of its Reverend Jim Jones. on or about November 18, 1978.

- 3. I fully support and approve the Cherishing the Children Healing Memorial Wall (hereinafter referred to as "Jonestown Memorial Wall") created by the Guyana Tribute Its design, color, size, height, length, width and thickness appropriately Foundation. memorializes and honors the memory of all of the victims including the 305 children, 40 of which were infants, Congressman Leo Ryan and his UPI news group, who perished during the Jonestown Massacre at the hands of the People's Temple and Jim Jones. It seemed only fitting and appropriate that Evergreen Cemetery would be the home to a physical memorial that would stand as a permanent and painful reminder to future generations of the child victims' families and supporters of the lives of the precious child victims who perished so young.
- On or about, \_\_l found out that Evergreen Cometery had approved plans for another monumeral to be erected on the base and setting originally approved for Jonestown Memorial Wall. This monument was proposed by the surviving People's Church, led by Fielding McGehee and Jim Jones, Jr., and proposes to include the name of Jim Jones himself as a victim of the Jonestown Massacre (hereinaster referred to as the "Jim Jones Honor Wall").
- I believe that the Jim Jones Honor Wall desecrates the victims of the Jonestown Massacre which was initiated by Jim Jones himself. Specifically, the name of "Jim Jones" is etched on the Jim Jones Memorial is repulsive and insulting to the memory of the victims.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed in

(Your City & State).

DECLARATION IN EUPPORT OF PLAINTIFFS MOTION FOR PROLIMINARY INJUNCTION Guyana Tribute Foundation et al. vs. The Evergreen Computery Association et al. (Alameda County Superior Court Case No. RG11575036)