

To Carolyn Layton

Law Office Report #33 June 9, 1978 From June page 1

1. Vincent Lopez - Garry did not want to get involved in this case, because of the notoriety which follows him into court: he thinks that this is a case which should be played low, and if he took it on, everyone in the courtroom, the newspaper reporters, etc. would be alerted. They follow him into the courtrooms and ask about his cases. He would prefer that his firm not even get into the case, because sooner or later that if Baker et al pick up on this case and get the media onto it, his firms involvement would make it even more notorious. However, I suggested that I didnt think any outside attorney would have the understanding of our situation as do the attorneys in his firm, and he agreed, and said for me to talk to Jim Herndon about it, the attorney who represented Bjara in his bus accident settlement case.

I talked to Herndon, and Herndon's main reaction was also to play it lowkey, and he stressed that it's not the attorney (Chaikin)'s responsibility to file an accounting, it's the guardian. He suggests that we try to backpedal out of the whole thing by asking the court's permission for Chaikin to withdraw as attorney. He asked me to call the Probate Commissioner and explain that Chaikin out of the country indefinitely and that I had noticed the citation in the file for him to appear and explain why an accounting had not been filed. I should explain that the file shows how over the past several months Chaikin made several attempts to withdraw from the case, and even sent the guardian a substitution of attorneys to sign but there was no response. I should suggest having Chaikin submit an affidavit explaining how he tried to withdraw, and that there is no known estate, that Chaikin never had any control of any estate at all of the child and would not be able to account for any. If the court would allow it, ask for a withdrawal just on the basis of the affidavit. If the court requires a formal appearance, Herndon is willing to help prepare the motion to withdraw and supporting declaration; he says that Chaikin would have to sign it in front of a notary public and most likely have it certified also at the American Consulate in Georgetown, to satisfy California Courts.

Herndon looking at the case in longrange suggests you check out over there the possibility of Vincent filing for emancipation in Guyana; he's been away from his guardian and family for 2 years and he's independent, working, etc. Or, consider the possibility of someone there filing for guardianship in the Guyana court for Vincent. (I didnt mention what I was thinking - that the current pressure in the courts with the TOS case may cause us to not consider other court cases being pursued by us in Guyana.)

JAN
 Probate
 Chaikin
 No date
 on the
 Jim Herndon
 appearance
 the
 the

no
 to
 make
 check out
 the procedure
 the
 files

 I called the Probate Commissioner today (6/9) and spoke to his research assistant, who checked personally with him - decision is: absolutely no continuance, there will be a bench warrant out for Chaikin's arrest if he or someone for him does not appear June 19 and explain why no accounting or present an accounting. I talked with Jim Herndon afterwards; he took the file and will do an appearance for Chaikin June 19. He will call me and have more to say next week.

B4 c (07)

2. Barbara Hoyer - Last year it was determined that due to her sizeable income and her dependents overseas that she would open a checking account and make deposits and send support payments over for her dependents, and reflect this on her tax return at the end of the year. She never got clear directions last year and so nothing was done--same thing is happening this year. A checking account exists; however, neither she nor James know how to proceed on doing the support part. Please give some specific feedback on how to handle this. She has been working heavy overtime to get more income; however, if she ends up having to pay a greater tax on it because of no itemization of support and no documentation to back up such support when she files her 1978 taxes, why bother to work overtime?

Check with Chaikin and Tish on this

Priority

Also, I sent over her 1977 W-2 twice, the first time it was sent back to me, I do not know why since she is married to Tim Carter and requires a joint return be filed with his signature. We have not received that tax return back from Tish yet and would appreciate your checking into it - Barbara would be a 50% contribution, I'm sure... *50% contrib. + Husband only.*

3. Marshall Farris divorce - I must have a psychological block against marriage/divorce because as Chaikin well-knows, I have always managed to ignore needed work on cases involving that kind of legal problem. Marshall's wife sued him for divorce in January, her attorney served him by mail in Guyana, and you sent his reply letter here to be mailed to her attorney with notes from Jan Gurvich directing me to find him an attorney. I mailed his letter to her attorney but then Jan's notes got buried in the tax stuff and I forgot about it. Discovered her directions last week; had someone go down to the courthouse and get copies of the divorce court papers; the wife has now filed request for default, as of June 1 and the attorney for the wife has mailed Marshall a copy. I called Clarence Wilridge who has taken a lot of referrals from Chaikin on personal injury suits, and he said bring the papers in, he will call her attorney and request to put aside the default so he can file a proper response for Marshall Farris. He was quite friendly; I was surprised, considering all the media flak lately. Enclosed for your files (if you have any... that's a joke folks) are copies of all of the divorce papers. The court did not enter the default that was requested; that may be because of the South America address of Marshall Farris - the court may be allowing him time to respond to the request for default - anyway, usually in divorce cases if something like this happens, the other side usually concedes and allows the responding party to respond.

The is taken care of as far as said.

Requires 30 day notice before filing - So we should be OK.

B4c(28)

- 4. We got another letter from Marietta Davis, see attached. *fuck her.*
- 5. Following are notes from yesterday's meeting with Garry - these are piecemeal and should be combined with Jean's - am putting them in this report because I just found out when I came home from work that someone going over tonight...

what written material

The main theme with Garry right now is that he is studying differeng angles of the case and has made no final decision - today (6/9) he said he doesnt think he'll be able to persuade the court to grant change of venue out of Mendocino County in the libel suit. This does not mean he will not try. But he's worried about it. He is waiting for the written material from Guyana before he makes any final decisions.

*NEWS Consolidation
did he get Marietta's stuff about he just had a new the libel*

Also the big news today was that he sent a letter to the Press Democrat enclosing our letter of specific contradictions in the press on the Kathy Hunter episode, and demanded as our attorney that they print our letter of contradictions. This was in reaction to the full page article in the Press Democrat yesterday on Kathy Hunter's "trek" into Guyana...

Garry spoke to the attorney for the SF Examiner re our demand for retraction; the attorney agreed with Garry about our objection to the mention of terrorism in the headline, and the Examiner will be printing some kind of retraction...

Garry ws worried that they have served the corporation. He says he's got to know how much of the property assets in the name of P.T. exist - that would be property (real estate property) recorded in the name of P.T.

He estimates we are 7 to 10 months away from trial.

He wants to get venue changed and out of Mendocino County. He is aware that Stoen is friends with the court there. At first he wanted to get Stoen out of the case, but the more he thinks about it, he is now considering the possibility of keeping Stoen in, who is in his eyes emotional and subjective about the case. If Stoen were disbarred or taken off the case, he's liable to get a professional, calculating good attorney who would make it a whole lot more difficult. He says Stoen has not prepared this lawsuit well. He has not asked for punitive damages well, and he has not alleged malice. Garry does not want to bring up the question of why did he not allege malice, because he would be "educating" the other side, feeding them info.

Info from 6/8

He's considering taking Katsaris' deposition, needs to see Maria's letter. Wats detailed background on Katsaris, personal info, immediately.

Re Kathy Hunter - he wants to know if Jim was physically on the project or up river like Prokes said he was when Prokes told Kathy Hunter he was not on the project. He wants to know what really happened. *send him Tim Carter's*

B.F.C. (27)

done

June 7 1978

The People's Temple
Box 15156
San Francisco
Ca 94115

Dear Sir

I have not received a reply to my letter of April 29 1978 regarding the \$432.72 suit I have had to pay with respect to Brian Davis.

Regarding child support I now attach a schedule showing the amount of \$8625.00 due me as of June 30 1978. Also enclosed again is a copy of the "Stipulation and Settlement Agreement".

I have consulted with the District Attorney and he has told me that this non-payment is a very serious matter and one to be pursued with Mr Davis immediately upon his return to the U.S.

I will look forward to hearing from you with regard to your plans for the payment of this child support, and the \$432.72 suit.

Truly

Marietta F. Davis
Marietta F. Davis
111 Laurel Road
Berkeley CA 94701

Copy . Mr Robert Davis, P O Box 893 Georgetown, Guyana, S America
. People's Temple P O Box 214 Ukiah Ca 95470
. District Attorney, Family Support Division,
Hall of Justice, Redwood City, Ca
Case No D-25698 ONO DPO4

*Write her that it
is no obligation of
P.T. but we have
presented her letter
to Mr. Davis.
cc to D.A.*

*DO
NOT
PAY*

B4 c(30)

Child support payments due Marietta F Davis (petitioner)
from Robert E Davis (respondent) as of June 30 1978

Cary Davis

Jan 1 1972 to March 31 1973		
15 months at \$75.00 per month	1125.00 (1)	
Apr 1 1973 to June 30 1978		
63 months at \$75.00 per month	<u>4725.00</u>	5850.00

Kevin Davis

Jan 1 1972 to March 31 1973		
15 months at \$75.00 per month	1125.00 (1)	
April 1 1973 to Dec 31 1973		
9 months at \$75.00 per month	675.00	
1974 - 1975		
Not living with petitioner	--	
Jan 1 1976 to June 30 1977		
18 months at \$75.00 per month	<u>1350.00</u>	<u>3150.00</u>
		9000.00

Less approximately 15 payments of about \$25.00
each received from Mr Davis between 1973-1978,
last payment received on May 31 1978.

375.00
8625.00

- (1) During this period, petitioner only had full care and custody of these two children - this period was prior to formalising of the \$75.00 per month per child agreement, per attached "Stipulation and Settlement Agreement"

Marietta Davis

B4c(31)

(ENDORSED)
FILED

MAR 2 1973
MARVIN CHURCH, County Clerk
By: KAZUYO KODAKARI

Marietta F. Davis
311 27th Street
Berkeley, California 94701
Telephone: 842-5921

In pro per;

IN THE SUPERIOR COURT COUNTY OF SAN MATEO, CALIFORNIA

In re the Services of

Petitioner: MARIETTA F. DAVIS

No. 168110

and

Stipulation and Settlement

Respondent: ROBERT E. DAVIS

Agreement

Petitioner and respondent individually state their agreement with this stipulation and

IT IS HEREBY AGREED:

Spousal Support

Petitioner and respondent waive any claim for spousal support with the understanding that this waiver is final and not subject to modification.

Community Property and Debts

1. All items of clothing, furniture and personal effects now in the possession of petitioner or respondent are set aside to the party so possessing the same as his or her sole and separate property. Each party hereby conveys, assigns, transfers, and releases all his or her right, title, and interest in and to any property now in the possession of or standing in the name of the other party to that party.

2. Any and all property, real or personal, which may hereafter be acquired by petitioner or respondent shall be and remains the sole and separate property of the party so acquiring the same.

3. Petitioner and respondent shall assume responsibility for any and all debts incurred in his or her name respectively since the date of their separation. Neither petitioner nor respondent shall, at any time hereafter, contract any indebtedness whatsoever in the name of the other nor cause the same to be charged against the other party.

Custody of Children

Petitioner and respondent agree to joint legal custody of the

B4 c (30)

1 Stipulation and Settlement Agreement
2 Dissolution of Marriage
3 Davis and Davis
4 San Mateo County Superior Court No. 168110

5 children from this marriage, namely Robert, Brian, and Cary with
6 the physical custody of Robert and Cary remaining with petitioner
7 and Brian remaining with respondent.

8 Support of Children

9 Respondent agrees to provide support for the children
10 remaining with the petitioner in the amount of seventy five
11 dollars (\$75.00) per month per child, until the age of eighteen.

12 Respondent has carefully read this agreement, fully under-
13 stands its terms, and willingly signs it.

14 The foregoing is agreed to by

15 Marietta F. Davis
16 MARIETTA F. DAVIS, Petitioner

17 Robert E. Davis
18 ROBERT E. DAVIS, Respondent

19 Dated: March 22

20
21
22
23
24
25
26
27
28
B4c (33)

COOPER

Name, Address and Telephone Number of Attorney(s)
GLADSTEIN, LEONARD, PATSEY and ANDERSEN
JOHN A. TOKER
1182 Market Street, Suite 320
San Francisco, California 94102
Tel: (415) 626-3077

Space Below for Use of Court Clerk Only
FILED
San Francisco County Superior Court
JUN 7 1978
CARL M. OLSEN, Clerk
BY *D. [Signature]* Deputy Clerk

Attorney(s) for: Petitioner

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO

In re the marriage of
Petitioner: ARGUSTER FARRIS
and
Respondent: MARSHALL FARRIS

Default entered as requested, on.....
By.....
 Default NOT entered as requested (state reason on reverse)
[Signature]

CASE NUMBER 733-087

REQUEST AND DECLARATIONS
RE DEFAULT (MARRIAGE)

PART I. REQUEST TO ENTER DEFAULT

TO THE CLERK: Please enter the default of the respondent who has failed to respond to the petition within the time allowed by law. A completed FINANCIAL DECLARATION in the form prescribed by Rule 1285.50 is attached.

Dated: May 24, 1978

[Signature]
Attorney for Petitioner

PART II. DECLARATION OF MAILING

On the date stated below, a copy of this REQUEST AND DECLARATIONS RE DEFAULT, including any attachments, was mailed (by first-class mail or airmail, postage prepaid) to the respondent's attorney of record or, if none, to respondent at his last known address, addressed as follows:

MARSHALL FARRIS
P.O. BOX 893
GEORGETOWN, GUYANA,
SOUTH AMERICA

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on May 24, 1978 at San Francisco, California.

[Signature]
Signature of Petitioner's Attorney
John A. Toker
(Type/print name)

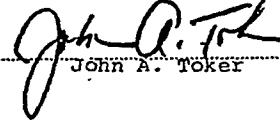
A declaration under penalty of perjury must be executed within California. An affidavit is required if executed outside California

PART III. MEMORANDUM OF COSTS

Clerk's Filing Fees	\$	46.50
Process Server's Fees	\$	
Service by registered mail to Guyana, South America	\$	2.54
.....	\$	
.....	\$	
.....	\$	
.....	\$	
TOTAL	\$	49.04

I am the attorney for the party who claims these costs. To the best of my
(attorney for the/etc.)
knowledge and belief the foregoing items of cost are correct and have been necessarily incurred in this action.

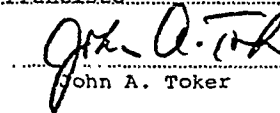
I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed
on May 24, 1978 at San Francisco, California.


John A. Toker (Type/print name)

PART IV. DECLARATION OF NON-MILITARY STATUS

Respondent is not in the military service or in the military service of the United States as defined in Section 101 of
the Soldiers' and Sailors' Relief Act of 1940, as amended, and not entitled to the benefits of such act.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed
on May 24, 1978 at San Francisco, California.


John A. Toker (Type/print name)

A declaration under penalty of perjury must be executed within California. An affidavit is required if executed outside California.

B4c (35)

P.O. Box 893
Georgetown, Guyana, S.A.
21 February, 1978

Mr. John Toker
1182 Market St, Suite 320
San Francisco, Ca. 94102

Mr. Toker:

Thank you for your letter of 26 January, 1978. I am presently arranging for a San Francisco attorney to represent me in the matter of Farris v. Farris. You should be hearing from whoever is retained shortly. I appreciate your keeping in touch with me regarding the divorce.

Thank you again.

Very truly yours,

Marshall Farris

MARSHALL FARRIS

B4 c (36)

January 26, 1978.

REGISTERED MAIL

Mr. Marshall Farris
P.O. Box 893
Georgetown
Guyana, South America

Re: Farris and Farris

Dear Mr. Farris:

Your wife, Arguster, came to me in December, 1977, concerning the very difficult problems she has had since you left in July for South America.

She explains to me that, even though she is working, she has had a hard time managing without the approximately \$200.00 per month that you were contributing to household expenses. Included is the mortgage payment, taxes, insurance and maintenance on the house.

Mrs. Farris feels, and I agree with her, that there should be divorce proceedings and a division of your property if you do not intend to return.

Accordingly, a divorce proceeding has been started in the Superior Court of San Francisco.

I am enclosing the following papers:

1. Summons (Marriage).
2. Petition by which divorce proceedings have been started.
3. Petitioner's Financial Declaration. This has been filled in by your wife to give the Court basic financial information as to her income and expenses.

B 4 C (37)

Mr. Marshall Farris
Re: Farris and Farris
January 26, 1978
Page two

4. Respondent's Financial Declaration. This is to be filled in by you to show your own income and expenses. It is then to be filed with the Court.

5. Confidential Counseling Statement. This is also to be filled in by you and returned to the Court.

6. Response. This is the response to the Petition and is the primary document to be filed by you in answer to the Petition.

It should be filed within 30 days.

7. Notice and Acknowledgment of Receipt. This should be sent to me within 20 days showing that you have received the Petition, Confidential Counseling Statement, Response and Financial Declaration.

Please note that in her petition, your wife has asked for spousal support and attorney's fees and costs. I would suggest spousal support of \$200.00 equal to the amount that you were contributing to the household.

I ask that you discuss this matter with a legal adviser or other adviser where you are living. While you may not agree with our specific proposals, something should be arranged for the welfare of your wife of 37 years. This would include a reasonable figure for spousal support, plus agreement for the division of your property. This would seem to consist mostly of your home.

I would like you, therefore, to send me the acknowledgment of receipt form along with an indication of your intention on support and property settlement. You should include a list of your understanding of what the property consists of, as well as of any common debts. When I receive this information I will draft a property settlement agreement for your inspection and that of your adviser.

B4C(3P)

Mr. Marshall Farris
Re: Farris and Farris
January 26, 1978
Page three

I am enclosing an envelope addressed to this firm
for the return of the acknowledgment of receipt.

I suggest that you might want to contact an attorney
in the San Francisco Bay Area to handle this matter for you.

Very truly yours,
GLADSTEIN, LEONARD, PATSEY
and ANDERSEN

By

John A. Toker

JAT:ig
Encls.

B4c (39)

Name, Address and Telephone Number of Attorney(s)
**GLADSTEIN, LEONARD, PATSEY and
 ANDERSEN**
JOHN A. TOKER
 1182 Market Street, Suite 320
 San Francisco, California 94102
 Tel: (415) 626-3077

Space Below for Use of Court Clerk Only

FILED

JAN 19 1978

CARL M. OLSEN, Clerk

Attorney(s) for.....Petitioner.....

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO

In re the marriage of

Petitioner: **ARGUSTER FARRIS**

and

Respondent: **MARSHALL FARRIS**

CASE NUMBER **733**

PETITIONER'S RESPONDENT'S

FINANCIAL DECLARATION

Dated: December 28, 1977

Husband: **MARSHALL FARRIS**

Wife: **ARGUSTER FARRIS**

Age: 70 Social Security No.: 429-05-3245

Age: 65 Social Security No.: 106-20-6214

Occupation: retired warehouseman

Occupation: maid

PART A: INCOME AND EXPENSE STATEMENT

	Husband	Wife
(a) Gross monthly income from:		
Salary and wages (including commissions, bonuses and overtime) payable (weekly/monthly/etc.)	\$	\$ 656.61
Pensions and retirement		
Social security		
Disability and unemployment insurance		
Public assistance (welfare, AFDC payments, etc.)		
Child/spousal support re prior marriage		
Dividends and interest		
Rents		
All other sources: (Specify)		
Total monthly income	\$	\$ 656.61
(b) Itemize deductions from gross income:		
Income taxes (state and federal)	\$	\$ 176.37
Social security		76.83
Unemployment insurance		13.13
Medical or other insurance		20.58
Union or other dues		
Retirement or pension fund		
Savings plan		
Other: (Specify)		
Total deductions	\$	\$ 286.91
(c) Net monthly income	\$	\$ 369.70

Form Adopted by Rule 1285.50 of
 Judicial Council of California
 Effective January 1, 1972

B4 C (40)
 FINANCIAL DECLARATION

(d) Total monthly expenses: (Specify which party is the custodial parent and list name and relationship of all members of the household whose expenses are included)

	Husband	Wife
Rent or mortgage payments (residence) mortgage.....	\$	\$ 111.00
Real property taxes (residence)		40.00
Real property insurance (residence)		15.00
Maintenance (residence)		30.00
Food and household supplies		75.00
Utilities		20.00
Telephone		20.00
Laundry and cleaning		10.00
Clothing		30.00
Medical		10.00
Dental		---
Insurance (life, health, accident, etc.)		---
Child care		---
Payment of child/spousal support re prior marriage		---
School		25.00
Entertainment		25.00
Incidentals		15.00
Transportation		---
Auto expenses (insurance, gas, oil, repair)		---
Auto payments		---
Installment payment(s) (Insert total and itemize below)		30.00
	\$	\$ 456.00

Creditor's Name	For	Monthly Payment	Balance
Sears Roebuck	Furniture	\$ 30.00	\$ 100.00
.....
.....

Other: (Specify)

.....

.....

Total expenses

(e) Other debts and obligations:

Creditor's Name	For	Date Payable	Balance
.....	\$
.....
.....

(f) All property of the parties known to me includes the following:

Cash on hand	\$ ---	Retirement or pension fund	\$ Unknown
Money in checking accounts ..	---	Life insurance cash value	---
Money in savings accounts	677.00	Value of any stocks & bonds	15,000.00
Money in credit union accounts ..	---	Value of real estate	200.00
Money in any other accounts or deposits	---	Value of all other property	\$15,877.00
		Total property	

B4C(4)

PART B. PROPERTY STATEMENT

- There is no property subject to disposition by the court in this proceeding.
- All property otherwise subject to disposition by the court in this proceeding has been disposed of by written agreement of the parties or oral stipulation made in open court.
- The following described property is subject to disposition by the court in this proceeding:

Asset/Obligation	Value of asset	Amount of obligation
	\$	\$
Real property, 1271 Egbert Avenue, San Francisco, Ca.	15,000.00	
Husband's pension fund through International Longshoremen's and Warehousemen's Union	Unknown	
Husband's veteran's benefits	Unknown	
Dodge automobile	-0-	
Household furnishings	200.00	300.00
Wife's savings accounts	677.00	
Other property not as yet ascertained		

- The following described separate property is subject to confirmation by the court in this proceeding:

Asset/Obligation	Value of asset	Amount of obligation
	\$	\$

B4c(42)

Name, Address and Telephone Number of Attorney (s)

GLADSTEIN, LEONARD, PATSEY and ANDERSEN
JOHN A. TOKER
1182 Market Street, Suite 320
San Francisco, California 94102
Tel: (415) 626-3077

Space Below for Use of Court Clerk Only

FILED

JAN 19 1978

CARL M. OLSEN, Clerk

Attorney(s) for.....Petitioner.....

BY.....

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO

In re the marriage of

CASE NUMBER

Petitioner: ARGUSTER FARRIS
and

733-087

Respondent: MARSHALL FARRIS

PETITION (MARRIAGE)

1. This petition is for:

- Legal separation of the parties pursuant to
 - Civil Code Section 4506(1)
 - Civil Code Section 4506(2)

Dissolution of the marriage pursuant to:

- Civil Code Section 4506(1)
- Civil Code Section 4506(2)

.....Petitioner.....has been a resident of this state for at least six months and of this county for at least

(Petitioner/Respondent)

three months immediately preceding the filing of this petition.

Nullity of the marriage pursuant to:

- Civil Code Section 4400
- Civil Code Section 4401
- Civil Code Section 4425()

2. Statistical information:

a. Husband's social security number: 429-05-3245 Wife's social security number: 106-20-6214

b. Date and place of marriage: 5-25-40, Camden, Arkansas

c. Date of separation: 7-28-77. The number of years from date of marriage to date of separation is: 37 years, 2 months, 3 days.

d. There are NO children of this marriage including the following minor children:
(Number)

Name

Birthdate

Age

Sex

3. Property statement:

- There is no property subject to disposition by the court in this proceeding.
- All property otherwise subject to disposition by the court in this proceeding has been disposed of by written agreement of the parties.
- The following described property is subject to disposition by the court in this proceeding:

Real property, 1271 Egbert Avenue, San Francisco, California.
 Husband's pension fund through International Longshoremen's
 and Warehousemen's Union
 Husband's veteran's benefits.
 Dodge automobile
 Household furnishings.
 Wife's savings accounts
 Other property not as yet ascertained.

4. Petitioner requests that the following described property be confirmed as petitioner's separate property:

5. Petitioner requests that:

- a. Custody of children be awarded:
(Petitioner/Respondent/Other [Specify])
- b. Support of children be awarded
- c. Spousal support.....be awarded...petitioner.....
(not) (Petitioner/Respondent)
- d. Property rights be determined as provided by law
- e. Attorney's fees and costs.....be awarded....petitioner.....
(not) (Petitioner/Respondent)

and that the court inquire into the status of the marriage and render such judgments and make such injunctive or other orders as are appropriate.

Petitioner declares under penalty of perjury that the foregoing, including any attachments, is true and correct and that this declaration was executed on January 6, 1978 at San Francisco, California.



(Attorney for Petitioner)
 John A. Toker

AR GUSTER FARRIS (Signature)
 Arguster Farris (Type/print name)

A declaration under penalty of perjury must be executed within California. An affidavit is required if executed outside California.

() B4c(44) ()

Name, Address and Telephone No. of Attorney(s)

GLADSTEIN, LEONARD, PATSEY and ANDERSEN
JOHN A. TOKER
1182 Market Street, Suite 320
San Francisco, California 94102
Tel: (415) 626-3077

Space Below for Use of Court Clerk Only

COOPER

FILED

San Francisco County Superior Court

JUN 1 1978

CARL M. OLSEN, Clerk

BY *[Signature]* Deputy Clerk

ATTORNEY FOR: . . . Petitioner

SUPERIOR COURT OF CALIFORNIA, COUNTY OF . . . SAN FRANCISCO

(Insert post office and street address of court or branch court)

In re the marriage of

Petitioner: ARGUSTER FARRIS

and

Respondent: MARSHALL FARRIS

CASE NUMBER

739-037

SUMMONS (MARRIAGE)

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

¡AVISO! Usted ha sido demandado. El tribunal puede decidir contra Ud. sin audiencia a menos que Ud. responda dentro de 30 días. Lea la información que sigue.

1. To the Respondent (See footnote*):

- a. The petitioner has filed a petition concerning your marriage. You may file a written response within 30 days of the date that this summons is served on you.
- b. If you fail to file a written response within such time, your default may be entered and the court may enter a judgment containing injunctive or other orders concerning division of property, spousal support, child custody, child support, attorney's fees, costs, and such other relief as may be granted by the court, which could result in the garnishment of wages, taking of money or property, or other relief.
- c. If you wish to seek the advice of an attorney in this matter, you should do so promptly so that your written response, if any, may be filed on time.

Dated.

~~JAN 16 1978~~

JAN 19 1978

CARL M. OLSEN

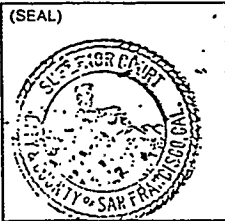
Clerk

By *[Signature]*

P. W. MURPHY

Deputy

(SEAL)



* The response and other permitted papers must be in writing and in the form prescribed by the California Rules of Court. They must be filed in this court with the proper filing fee and proof of service of a copy of each on petitioner. The time when a summons is deemed served on a party may vary depending on the method of service. For example, see CCP 413.10 through 413.49.

PROOF OF SERVICE

(See Instruction Sheet and use separate proof of service for each person served)

I served the summons and Petition (Marriage) Blank Confidential Counseling Statement (Marriage),
 Order to Show Cause (Marriage), Blank Responsive Declaration,
 Blank Financial Declaration, as follows:

1. Name: **Marshall Farris**

4. Date and time of delivery:

2. Person served and title: **Marshall Farris** 5. Mailing date, type of mail and place of mailing: **January 26 1978, registered airmail**

3. Person with whom left and title or relationship to person served: _____ 6. Address, city and state (when required, indicate whether address is home or business):

P.O. Box 893, Georgetown, Guyana, South America

7. Manner of service: (Check proper box):

- (Personal service) By personally delivering copies to the person served. (CCP 415.10.)
- (Substituted service on corporation, unincorporated association (including partnership), or public entity) By leaving, during usual office hours, copies in the office of the person served with the person who apparently was in charge and thereafter mailing (by first-class mail, postage prepaid) copies to the person served at the place where the copies were left. (CCP 415.20(a).)
- (Substituted service on natural person, minor, incompetent, or candidate) By leaving copies at the dwelling house, usual place of abode, or usual place of business of the person served in the presence of a competent member of the household or a person apparently in charge of his office or place of business, at least 18 years of age, who was informed of the general nature of the papers, and thereafter mailing (by first-class mail, postage prepaid) copies to the person served at the place where the copies were left (CCP 415.20(b)). Attach separate declaration or affidavit stating acts relied on to establish reasonable diligence in first attempting personal service.)
- (Mail and acknowledgment service) By mailing (by first-class mail or airmail) copies to the person served, together with two copies of the form of notice and acknowledgment and a return envelope, postage prepaid, addressed to the sender. (CCP 415.30. Attach written acknowledgment of receipt.)
- (Certified or registered mail service) By mailing to address outside California (by registered or certified airmail with return receipt requested) copies to the person served. (CCP 415.40. Attach signed return receipt or other evidence of actual delivery to the person served.)
- (Other—CCP 413.10, 413.30, 417.10—417.30—Attach separate page if necessary): Additional page is attached

8. At the time of service I was at least 18 years of age and not a party to this action.

9. Fee for service \$ Mileage \$ Notary \$ Total \$

(To be completed in California by process server, other than a sheriff, marshal or constable*)

Not a registered California process server (CCP 417.40)
 Registered County, Number

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on (Insert date) **May 24, 1978** at (Insert place) **San Francisco** California (Type or print name, address, and telephone no.)

**John A. Toker, Esq.,
Gladstein, Leonard, Patsey
and Andersen,
1182 Market Street
San Francisco, Ca. 94102
Tel: (415) 626-3077**

Signature

(To be completed in California by sheriff, marshal or constable*)

I certify that the foregoing is true and correct and that this certificate was executed on (Insert date) at (Insert place) California (Type or print name, title, county and, when applicable, Municipal or Justice Court District)

Signature: _____

* This declaration or certificate of service must be executed within California (CCP 2015.5). A proof of service executed outside California must be made by affidavit.

() **B4C (46)** ()

To Carolyn Layton

Law Office Report #33

June 9, 1978

from June

page 1

1. Vincent Lopez - Garry did not want to get involved in this case, because of the notoriety which follows him into court: he thinks that this is a case which should be played low, and if he took it on, everyone in the courtroom, the newspaper reporters, etc. would be alerted. They follow him into the courtrooms and ask about his cases. He would prefer that his firm not even get into the case, because sooner or later ~~ixgx~~ if Baker et al pick up on this case and get the media onto it, his firm's involvement would make it even more notorious. However, I suggested that I didn't think any outside attorney would have the understanding of our situation as do the attorneys in his firm, and he agreed, and said for me to talk to Jim Herndon about it, the attorney who represented Ujara in his bus accident settlement case.

I talked to Herndon, and Herndon's main reaction was also to play it lowkey, and he stressed that it's not the attorney (Chaikin)'s responsibility to file an accounting, it's the guardian. He suggests that we try to backpedal out of the whole thing by asking the court's permission for Chaikin to withdraw as attorney. He asked me to call the Probate Commissioner and explain that Chaikin out of the country indefinitely and that I had noticed the citation in the file for him to appear and explain why an accounting had not been filed. I should explain that the file shows how over the past several months Chaikin made several attempts to withdraw from the case, and even sent the guardian a substitution of attorneys to sign but there was no response. I should suggest having Chaikin submit an affidavit explaining how he tried to withdraw, and that there is no known estate, that Chaikin never had any control of any estate at all of the child and would not be able to account for any. If the court would allow it, ask for a withdrawal just on the basis of the affidavit. If the court requires a formal appearance, Herndon is willing to help prepare the motion to withdraw and supporting declaration; he says that Chaikin would have to sign it in front of a notary public and most likely have it certified also at the American Consulate in Georgetown, to satisfy California Courts.

Herndon looking at the case in longrange suggests you check out over there the possibility of Vincent filing for emancipation in Guyana; he's been away from his guardian and family for 2 years and he's independent, working, etc. Or, consider the possibility of someone there filing for guardianship in the Guyana court for Vincent. (I did not mention what I was thinking -- that the current pressure in the ^{Guyana} courts with the ~~case~~ case may cause us to not consider other court cases being pursued by us in Guyana.)

I called the Probate Commissioner today (6/9) and spoke to his research assistant, who checked personally with him - decision is: absolutely no continuance, there will be a bench warrant out for Chaikin's arrest if he or someone for him does not appear June 19 and explain why no accounting or present an accounting. I talked with Jim Herndon afterwards; he took the file and will do an appearance for Chaikin June 19. He will call me and have more to say next week.

B46(47)

2. Barbara Hoyer - Last year it was determined that due to her sizeable income and her dependents overseas that she would open a checking account and make deposits and send support payments over for her dependents, and reflect this on her tax return at the end of the year. She never got clear directions last year and so nothing was done--same thing is happening this year. A checking account exists; however, neither she nor James know how to proceed in doing the support part. Please give some specific feedback on how to handle this. She has been working heavy overtime to get more income; however, if she ends up having to pay a greater tax on it because of no itemization of support and no documentation to back up such support when she files her 1978 taxes, why bother to work overtime?

Also, I sent over her 1977 W-2 twice, the first time it was sent back to me, I do not know why since she is married to Tim Carter and requires a joint return be filed with his signature. We have not received that tax return back from Tish yet and would appreciate your checking into it - Barbara would be a 50% contribution, I'm sure...

3. Marshall Farris divorce - I must have a psychological block against marriage/divorce because as Chaikin well knows, I have always managed to ignore needed work on cases involving that kind of legal problem. Marshall's wife sued him for divorce in January, her attorney served him by mail in Guyana, and you sent his reply letter here to be mailed to her attorney with notes from Jan Gurvich directing me to find him an attorney. I mailed his letter to her attorney but then Jan's notes got buried in the tax stuff and I forgot about it. Discovered her directions last week; had someone go down to the courthouse and get copies of the divorce court papers; the wife has now filed request for default, as of June 1 and the attorney for the wife has mailed Marshall a copy. I called Clarence Wilridge who has taken a lot of referrals from Chaikin on personal injury suits, and he said bring the papers in, he will call her attorney and request to put aside the default so he can file a proper response for Marshall Farris. He was quite friendly; I was surprised, considering all the media flak lately. Enclosed for your files (if you have any... that's a joke folks) are copies of all of the divorce papers. The court did not enter the default that was requested; that may be because of the South America address of Marshall Farris - the court may be allowing him time to respond to the request for default - anyway, usually in divorce cases if something like this happens, the other side usually concedes and allows the responding party to respond.

B4c(48)

June 9, 1978

From June

4. We got another letter from Marietta Davis, see attached.

5. Following are notes from yesterday's meeting with Garry - these are piecemeal and should be combined with Jean's - I'm putting them in this report because I just found out when I came home from work that someone going over tonight...

The main theme with Garry right now is that he is studying different angles of the case and has made no final decision - today (6/9) he said he doesn't think he'll be able to persuade the court to grant change of venue out of Mendocino County in the libel suit. This does not mean he will not try. But he's worried about it. He is waiting for the written material from Guyana before he makes any final decisions.

Also the big news today was that he sent a letter to the Press Democrat enclosing our letter of specific contradictions in the press on the Kathy Hunter episode, and demanded as our attorney that they print our letter of contradictions. This was in reaction to the full page article in the Press Democrat yesterday on Kathy Hunter's "trek" into Guyana...

Garry spoke to the attorney for the SF Examiner re our demand for retraction; the attorney agreed with Garry about our objection to the mention of terrorism in the headline, and the Examiner will be printing some kind of retraction...

Garry was worried that they have served the corporation. He says he's got to know how much of the property assets in the name of P.T. exist - that would be property (real estate property) recorded in the name of P.T.

He estimates we are 7 to 10 months away from trial.

He wants to get venue changed and out of Mendocino County. He is aware that Stoen is friends with the court there. At first he wanted to get Stoen out of the case, but the more he thinks about it, he is now considering the possibility of keeping Stoen in, who is in his eyes emotional and subjective about the case. If Stoen were disbarred or taken off the case, he's liable to get a professional, calculating good attorney who would make it a whole lot more difficult. He says Stoen has not prepared this lawsuit well. He has not asked for punitive damages well, and he has not alleged malice. Garry does not want to bring up the question of why did he not allege malice, because he would be "educating" the other side, feeding them info.

He's considering taking Katsaris' deposition, needs to see Maria's letter. Wants detailed background on Katsaris, personal info, immediately.

Re Kathy Hunter - he wants to know if Jim was physically on the project or up river like Prokes said he was when Prokes told Kathy Hunter he was not on the project. He wants to know what really happened.

no D- from 6/8

June 7 1978

The People's Temple
Box 15156
San Francisco
Ca 94115

Dear Sir

I have not received a reply to my letter of April 29 1978 regarding the \$432.72 suit I have had to pay with respect to Brian Davis.

Regarding child support I now attach a schedule showing the amount of \$8625.00 due me as of June 30 1978. Also enclosed again is a copy of the "Stipulation and Settlement Agreement".

I have consulted with the District Attorney and he has told me that this non-payment is a very serious matter and one to be pursued with Mr Davis immediately upon his return to the U.S.

I will look forward to hearing from you with regard to your plans for the payment of this child support, and the \$432.72 suit.

Truly

Marietta F. Davis
Marietta F Davis

*111 Laurel Road
Burlingame CA 94010*

Copy . Mr Robert Davis, P O Box 893 Georgetown, Guyana, S America
. People's Temple P O Box 214 Ukiah Ca 95470
. District Attorney, Family Support Division,
Hall of Justice, Redwood City, Ca
Case No D-25698 ONO DPO4

B46 (50)

Child support payments due Marietta F Davis (petitioner)
from Robert E Davis (respondent) as of June 30 1978

Cary Davis

Jan 1 1972 to March 31 1973

15 months at \$75.00 per month 1125.00 (1)

Apr 1 1973 to June 30 1978

63 months at \$75.00 per month 4725.00 5850.00

Kevin Davis

Jan 1 1972 to March 31 1973

15 months at \$75.00 per month 1125.00 (1)

April 1 1973 to Dec 31 1973

9 months at \$75.00 per month 675.00

1974 - 1975

Not living with petitioner --

Jan 1 1976 to June 30 1977

18 months at \$75.00 per month 1350.00 3150.00

9000.00

Less approximately 15 payments of about \$25.00
each received from Mr Davis between 1973-1978,
last payment received on May 31 1978.

375.00

8625.00

(1) During this period, petitioner only had full care
and custody of these two children - this period
was prior to formalising of the \$75.00 per month
per child agreement, per attached "Stipulation
and Settlement Agreement"

Marietta Davis

B4 C (51)

(ENDORSED)
FILED
MAR 21 1973
MARVIN CHURCH, County Clerk
By KAZUYO KODAKARI
12-17-72

1 Marietta F. Davis
2 111 Arbundel
3 Burlingame, California 94010
4 Telephone: 342-5921

5 In pro per;

6
7
8 IN THE SUPERIOR COURT COUNTY OF SAN DIEGO, CALIFORNIA
9 In and to the service of

10 Petitioner: MARIETTA F. DAVIS

11 and

12 Respondent: ROBERT E. DAVIS

No. 16-110
Stipulation and Settlement
Agreement

14 Petitioner and respondent individually state their agreement
15 with this stipulation and
16 IT IS HEREBY AGREED:

Spousal Support

17 Petitioner and respondent waive any claim for spousal
18 support with the understanding that this waiver is final and not
19 subject to modification.

Community Property and Debts

20 1. All items of clothing, furniture and personal effects
21 now in the possession of petitioner or respondent are set aside
22 to the party so possessing the same as his or her sole and
23 separate property. Each party hereby conveys, transfers,
24 and releases all his or her right, title, and interest in and to
25 any property now in the possession of or standing in the name of
26 the other party to that party.

27 2. Any and all property, real or personal, which may here-
28 after be acquired by petitioner or respondent shall be and remains
the sole and separate property of the party so acquiring the same.

29 3. Petitioner and respondent shall assume responsibility for
30 any and all debts incurred in his or her name respectively since
31 date of their separation. Neither petitioner nor respondent shall,
32 at any time hereafter, contract any indebtedness whatsoever in the
33 name of the other nor cause the same to be charged against the
34 other party.

Custody of Children

35 Petitioner and respondent agree to joint legal custody of the

B4c (32)

1 Stipulation and Settlement Agreement
2 Dissolution of Marriage
3 Davis and Davis
4 San Mateo County Superior Court No. 168110

5 children from this marriage, namely Robert, Brian, and Cary with
6 the physical custody of Robert and Cary remaining with petitioner
7 and Brian remaining with respondent.

8 Support of Children
9 Respondent agrees to provide support for the children
10 remaining with the petitioner in the amount of seventy five
11 dollars (\$75.00) per month per child, until the age of eighteen.

12 Respondent has carefully read this agreement, fully under-
13 stands its terms, and willingly signs it.

14 The foregoing is agreed to by

15 Marietta F. Davis Robert E. Davis
16 MARIETTA F. DAVIS, Petitioner ROBERT E. DAVIS, Respondent

17 Dated: March 12

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27
28

B7c(33)

COOPER

Name, Address and Telephone Number of Attorney(s)
GLADSTEIN, LEONARD, PATSEY and ANDERSEN
JOHN A. TOKER
1182 Market Street, Suite 320
San Francisco, California 94102
Tel: (415) 626-3077

Space Below for Use of Court Clerk Only
FILED
San Francisco County Superior Court
JUN 1 1978
CARL M. OLSEN, Clerk
BY *D. Olsen*
Deputy Clerk

Attorney(s) for: Petitioner

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO

In re the marriage of
Petitioner: ARGUSTER FARRIS
and
Respondent: MARSHALL FARRIS

Default entered as requested, on
By
 Default NOT entered as requested (state reason on reverse)
John A. Toker

CASE NUMBER 733-087

REQUEST AND DECLARATIONS
RE DEFAULT (MARRIAGE)

PART I. REQUEST TO ENTER DEFAULT

TO THE CLERK: Please enter the default of the respondent who has failed to respond to the petition within the time allowed by law. A completed FINANCIAL DECLARATION in the form prescribed by Rule 1285.50 is attached.

Dated May 24, 1978

John A. Toker
Attorney for Petitioner

PART II. DECLARATION OF MAILING

On the date stated below, a copy of this REQUEST AND DECLARATIONS RE DEFAULT, including any attachments, was mailed (by first-class mail or airmail, postage prepaid) to the respondent's attorney of record or, if none, to respondent at his last known address, addressed as follows:

MARSHALL FARRIS
P.O. BOX 893
GEORGETOWN, GUYANA,
SOUTH AMERICA

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on May 24, 1978 at San Francisco, California.

John A. Toker
Signature of Petitioner or Attorney

John A. Toker
(Type/print name)

A declaration under penalty of perjury must be executed within California. An affidavit is required if executed outside California.

Form Adopted by Rule 1286 of

REQUEST AND DECLARATIONS
RE DEFAULT (MARRIAGE)

California Newspaper Service Bureau, Inc.
Established 1924

PART III. MEMORANDUM OF COSTS

Clerk's Filing Fees	\$ 46.50
Process Server's Fees	\$
Service by registered/air mail to Guyana, South America	\$ 2.54
.....	\$
.....	\$
.....	\$
.....	\$
TOTAL	\$ 49.04

I am the attorney for the party who claims these costs. To the best of my
(attorney for the/etc.)
knowledge and belief the foregoing items of cost are correct and have been necessarily incurred in this action.

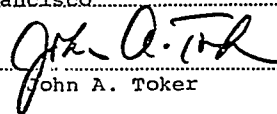
I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed
on May 24, 1978 at San Francisco California.


..... (Signature)
John A. TOKER (Type/print name)

PART IV. DECLARATION OF NON-MILITARY STATUS

Respondent is not in the military service or in the military service of the United States as defined in Section 101 of
the Soldiers' and Sailors' Relief Act of 1940, as amended, and not entitled to the benefits of such act.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed
on May 24, 1978 at San Francisco California.


..... (Signature)
John A. Toker (Type/print name)

A declaration under penalty of perjury must be executed within California. An affidavit is required if executed outside California.

B 42 (55)

P.O. Box 893
Georgetown, Guyana, S.A.
21 February, 1978

Mr. John Tokar
1182 Market St, Suite 320
San Francisco, Ca. 94102

Mr. Tokar:

Thank you for your letter of 26 January, 1978. I am presently arranging for a San Francisco attorney to represent me in the matter of Farris v. Farris. You should be hearing from whoever is retained shortly. I appreciate your keeping in touch with me regarding the divorce.

Thank you again.

Very truly yours,

Marshall Farris

MARSHALL FARRIS

B4c(56)

January 26, 1978.

REGISTERED MAIL

Mr. Marshall Farris
P.O. Box 893
Georgetown
Guyana, South America

Re: Farris and Farris

Dear Mr. Farris:

Your wife, Arguster, came to me in December, 1977, concerning the very difficult problems she has had since you left in July for South America.

She explains to me that, even though she is working, she has had a hard time managing without the approximately \$200.00 per month that you were contributing to household expenses. Included is the mortgage payment, taxes, insurance and maintenance on the house.

Mrs. Farris feels, and I agree with her, that there should be divorce proceedings and a division of your property if you do not intend to return.

Accordingly, a divorce proceeding has been started in the Superior Court of San Francisco.

I am enclosing the following papers:

1. Summons (Marriage).
2. Petition by which divorce proceedings have been started.
3. Petitioner's Financial Declaration. This has been filled in by your wife to give the Court basic financial information as to her income and expenses.

B4C(57)

Mr. Marshall Farris
Re: Farris and Farris
January 26, 1978
Page two

4. Respondent's Financial Declaration. This is to be filled in by you to show your own income and expenses. It is then to be filed with the Court.

5. Confidential Counseling Statement. This is also to be filled in by you and returned to the Court.

6. Response. This is the response to the Petition and is the primary document to be filed by you in answer to the Petition.

It should be filed within 30 days.

7. Notice and Acknowledgment of Receipt. This should be sent to me within 20 days showing that you have received the Petition, Confidential Counseling Statement, Response and Financial Declaration.

Please note that in her petition, your wife has asked for spousal support and attorney's fees and costs. I would suggest spousal support of \$200.00 equal to the amount that you were contributing to the household.

I ask that you discuss this matter with a legal adviser or other adviser where you are living. While you may not agree with our specific proposals, something should be arranged for the welfare of your wife of 37 years. This would include a reasonable figure for spousal support, plus agreement for the division of your property. This would seem to consist mostly of your home.

I would like you, therefore, to send me the acknowledgment of receipt form along with an indication of your intention on support and property settlement. You should include a list of your understanding of what the property consists of, as well as of any common debts. When I receive this information I will draft a property settlement agreement for your inspection and that of your adviser.

B4 c. (58)

Mr. Marshall Farris
Re: Farris and Farris
January 26, 1978
Page three

I am enclosing an envelope addressed to this firm
for the return of the acknowledgment of receipt.

I suggest that you might want to contact an attorney
in the San Francisco Bay Area to handle this matter for you.

Very truly yours,
GLADSTEIN, LEONARD, PATSEY
and ANDERSEN

By

John A. Toker

JAT:ig
Encls. .

B4c (59)

Name, Address and Telephone Number of Attorney(s)
**GLADSTEIN, LEONARD, PATSEY and
 ANDERSEN**
JOHN A. TOKER
 1182 Market Street, Suite 320
 San Francisco, California 94102
 Tel: (415) 626-3077

Space Below for Use of Court Clerk Only

FILED

JAN 19 1978

CARL M. OLSEN, Clerk

Attorney(s) for.....Petitioner.....

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO

In re the marriage of

Petitioner: **ARGUSTER FARRIS**

and

Respondent: **MARSHALL FARRIS**

CASE NUMBER

PETITIONER'S

RESPONDENT'S

FINANCIAL DECLARATION

Dated: December 28, 1977

Husband: **MARSHALL FARRIS**
 Age: 70 Social Security No.: 429-05-3245
 Occupation: Retired warehouseman

Wife: **ARGUSTER FARRIS**
 Age: 65 Social Security No.: 106-20-6214
 Occupation: maid

PART A: INCOME AND EXPENSE STATEMENT

	Husband	Wife
(a) Gross monthly income from:		
Salary and wages (including commissions, bonuses and overtime) payable (weekly/monthly/etc.)	\$	\$ 656.61
Pensions and retirement		
Social security		
Disability and unemployment insurance		
Public assistance (welfare, AFDC payments, etc.)		
Child/spousal support re prior marriage		
Dividends and interest		
Rents		
All other sources: (Specify)		
Total monthly income	\$	\$ 656.61
(b) Itemize deductions from gross income:		
Income taxes (state and federal)	\$	\$ 176.37
Social security		76.83
Unemployment insurance		13.13
Medical or other insurance		20.58
Union or other dues		
Retirement or pension fund		
Savings plan		
Other: (Specify)		
Total deductions	\$	\$ 286.91
(c) Net monthly income	\$	\$ 369.70

(d) Total monthly expenses: (Specify which party is the custodial parent and list name and relationship of all members of the household whose expenses are included)

	Husband	Wife
Rent or mortgage payments (residence) . mortgage.....	\$	\$ 111.00
Real property taxes (residence)		40.00
Real property insurance (residence)		15.00
Maintenance (residence)		30.00
Food and household supplies		75.00
Utilities		20.00
Telephone		20.00
Laundry and cleaning		10.00
Clothing		30.00
Medical		10.00
Dental		---
Insurance (life, health, accident, etc.)		---
Child care		---
Payment of child/spousal support re prior marriage		---
School		---
Entertainment		25.00
Incidentals		25.00
Transportation		15.00
Auto expenses (insurance, gas, oil, repair)		---
Auto payments		---
Installment payment(s) (insert total and itemize below)		30.00
Total expenses	\$	\$ 456.00

Creditor's Name	For	Monthly Payment	Balance
Sears Roebuck	Furniture	\$ 30.00	\$ 100.00
.....
.....

Other: (Specify)

.....

.....

Total expenses

(e) Other debts and obligations:

Creditor's Name	For	Date Payable	Balance
.....	\$
.....
.....

(f) All property of the parties known to me includes the following:

Cash on hand	\$ ---	Retirement or pension fund	\$ Unknown
Money in checking accounts	---	Life insurance cash value	---
Money in savings accounts	677.00	Value of any stocks & bonds	---
Money in credit union accounts	---	Value of real estate	15,000.00
Money in any other accounts or deposits	---	Value of all other property	200.00
		Total property	\$15,877.00

B4C (61)

PART 8. PROPERTY STATEMENT

- There is no property subject to disposition by the court in this proceeding.
- All property otherwise subject to disposition by the court in this proceeding has been disposed of by written agreement of the parties or oral stipulation made in open court.
- The following described property is subject to disposition by the court in this proceeding:

Asset/Obligation	Value of asset \$	Amount of obligation \$
Real property, 1271 Egbert Avenue, San Francisco, Ca.	15,000.00	
Husband's pension fund through International Longshoremen's and Warehousemen's Union	Unknown	
Husband's veteran's benefits	Unknown	
Dodge automobile	-0-	
Household furnishings	200.00	300.00
Wife's savings accounts	677.00	
Other property not as yet ascertained		

- The following described separate property is subject to confirmation by the court in this proceeding:

Asset/Obligation	Value of asset \$	Amount of obligation \$

B4c (62)

Name, Address and Telephone Number of Attorney(s)
 GLADSTEIN, LEONARD, PATSEY and ANDERSEN
 JOHN A. TOKER
 1182 Market Street, Suite 320
 San Francisco, California 94102
 Tel: (415) 626-3077

Space Below for Use of Court Clerk Only

FILED
 JAN 19 1978
 CARL M. OLSEN, Clerk

Attorney(s) for.....Petitioner.....

SUPERIOR COURT OF CALIFORNIA, COUNTY OF.....SAN FRANCISCO

In re the marriage of

Petitioner: ARGUSTER FARRIS
 and

Respondent: MARSHALL FARRIS

CASE NUMBER

733-087

PETITION (MARRIAGE)

1. This petition is for:

- Legal separation of the parties pursuant to
 - Civil Code Section 4506(1)
 - Civil Code Section 4506(2)

- Dissolution of the marriage pursuant to:
 - Civil Code Section 4506(1)
 - Civil Code Section 4506(2)

.....Petitioner.....has been a resident of this state for at least six months and of this county for at least
 (Petitioner/Respondent) PRESIDING JUDGE.
 three months immediately preceding the filing of this petition.

- Nullity of the marriage pursuant to:
 - Civil Code Section 4400
 - Civil Code Section 4401
 - Civil Code Section 4425()

2. Statistical information:

a. Husband's social security number: 429-05-3245 Wife's social security number: 106-20-6214.....

b. Date and place of marriage: 5-25-40, Camden, Arkansas.....

c. Date of separation: 7-28-77..... The number of years from date of marriage to date of separation is: 37 years, 2 months, 3 days.

d. There are.....NO.....children of this marriage including the following minor children:
 (Number)

Name Birthdate Age Sex

3. Property statement:

- There is no property subject to disposition by the court in this proceeding.
- All property otherwise subject to disposition by the court in this proceeding has been disposed of by written agreement of the parties.
- The following described property is subject to disposition by the court in this proceeding:

Real property, 1271 Egbert Avenue, San Francisco, California.
 Husband's pension fund through International Longshoremen's
 and Warehousemen's Union
 Husband's veteran's benefits.
 Dodge automobile
 Household furnishings.
 Wife's savings accounts
 Other property not as yet ascertained.

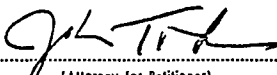
4. Petitioner requests that the following described property be confirmed as petitioner's separate property:

5. Petitioner requests that:

- a. Custody of children be awarded:
(Petitioner/Respondent/Other [Specify])
- b. Support of children be awarded
- c. Spousal support.....be awarded...petitioner.....
(not) (Petitioner/Respondent)
- d. Property rights be determined as provided by law
- e. Attorney's fees and costs.....be awarded....petitioner.....
(not) (Petitioner/Respondent)

and that the court inquire into the status of the marriage and render such judgments and make such injunctive or other orders as are appropriate.

Petitioner declares under penalty of perjury that the foregoing, including any attachments, is true and correct and that this declaration was executed on...January 6...1978...at...San Francisco...California.



(Attorney for Petitioner)
 John A. Toker

AR GUSTER FARRIS

(Signature)
 Arguster Farris (Type/print name)

A declaration under penalty of perjury must be executed within California. An affidavit is required if executed outside California.

() B4C(64) ()

Name, Address and Telephone No. of Attorney(s)
GLADSTEIN, LEONARD, PATSEY and ANDERSEN
JOHN A. TOKER
 1182 Market Street, Suite 320
 San Francisco, California 94102
 Tel: (415) 626-3077

Space Below for Use of Court Clerk Only
COOPER FILED
 San Francisco County Superior Court
JUN 1 1978
CARL M. OLSEN, Clerk
 BY *[Signature]*
 Deputy Clerk

ATTORNEY FOR: Petitioner

SUPERIOR COURT OF CALIFORNIA, COUNTY OF . . . SAN FRANCISCO . . .

(Insert post office and street address of court or branch court)

In re the marriage of
 Petitioner: **ARGUSTER FARRIS**
 and
 Respondent: **MARSHALL FARRIS**

CASE NUMBER
733-087
SUMMONS (MARRIAGE)

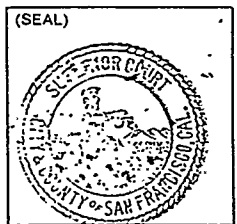
NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

¡AVISO! Usted ha sido demandado. El tribunal puede decidir contra Ud. sin audiencia a menos que Ud. responda dentro de 30 días. Lea la información que sigue.

1. To the Respondent (See footnote*):
 - a. The petitioner has filed a petition concerning your marriage. You may file a written response within 30 days of the date that this summons is served on you.
 - b. If you fail to file a written response within such time, your default may be entered and the court may enter a judgment containing injunctive or other orders concerning division of property, spousal support, child custody, child support, attorney's fees, costs, and such other relief as may be granted by the court, which could result in the garnishment of wages, taking of money or property, or other relief.
 - c. If you wish to seek the advice of an attorney in this matter, you should do so promptly so that your written response, if any, may be filed on time.

w) Dated. ~~JAN 16 1978~~
JAN 19 1978

CARL M. OLSEN . . . Clerk
 By *[Signature]* . . . Deputy
P. W. MURPHY



* The response and other permitted papers must be in writing and in the form prescribed by the California Rules of Court. They must be filed in this court with the proper filing fee and proof of service of a copy of each on petitioner. The time when a summons is deemed served on a party may vary depending on the method of service. For example, see CCP 413.10 through 415.40.

B4c (65)

PROOF OF SERVICE

(See Instruction Sheet and use separate proof of service for each person served)

I served the summons and Petition (Marriage) Blank Confidential Counseling Statement (Marriage), Order to Show Cause (Marriage), Blank Responsive Declaration, Blank Financial Declaration, as follows:

1. Name: Marshall Farris

4. Date and time of delivery:

2. Person served and title: Marshall Farris

5. Mailing date, type of mail and place of mailing: January 26 1978, registered airmail

3. Person with whom left and title or relationship to person served:

6. Address, city and state (when required, indicate whether address is home or business):

P.O. Box 893, Georgetown, Guyana, South America

7. Manner of service: (Check proper box):

- (Personal service) By personally delivering copies to the person served. (CCP 415.10.)
(Substituted service on corporation, unincorporated association (including partnership), or public entity) By leaving, during usual office hours, copies in the office of the person served with the person who apparently was in charge and thereafter mailing (by first-class mail, postage prepaid) copies to the person served at the place where the copies were left. (CCP 415.20(a).)
(Substituted service on natural person, minor, incompetent, or candidate) By leaving copies at the dwelling house, usual place of abode, or usual place of business of the person served in the presence of a competent member of the household or a person apparently in charge of his office or place of business, at least 18 years of age, who was informed of the general nature of the papers, and thereafter mailing (by first-class mail, postage prepaid) copies to the person served at the place where the copies were left. (CCP 415.20(b). Attach separate declaration or affidavit stating acts relied on to establish reasonable diligence in first attempting personal service.)
(Mail and acknowledgment service) By mailing (by first-class mail or airmail) copies to the person served, together with two copies of the form of notice and acknowledgment and a return envelope, postage prepaid, addressed to the sender. (CCP 415.30. Attach written acknowledgment of receipt.)
(Certified or registered mail service) By mailing to address outside California (by registered or certified airmail with return receipt requested) copies to the person served. (CCP 415.40. Attach signed return receipt or other evidence of actual delivery to the person served.)
(Other--CCP 413.10, 413.30, 417.10-417.30--Attach separate page if necessary): Additional page is attached.

8. At the time of service I was at least 18 years of age and not a party to this action.

9. Fee for service \$ Mileage \$ Notary \$ Total \$

(To be completed in California by process server, other than a sheriff, marshal or constable*)

[X] Not a registered California process server (CCP 417.40).
Registered: County.
Number.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on (Insert date). May 24, 1978 at (Insert place). San Francisco, California. (Type or print name, address, and telephone no.)

John A. Toker, Esq., Gladstein, Leonard, Patsey and Andersen, 1182 Market Street San Francisco, Ca. 94102 Tel: (415) 626-3077

Signature: [Handwritten Signature]

(To be completed in California by sheriff, marshal or constable*)

I certify that the foregoing is true and correct and that this certificate was executed on (Insert date) at (Insert place) California (Type or print name, title, county and, when applicable, Municipal or Justice Court District)

Signature: _____

* This declaration or certificate of service must be executed within California (CCP 2015.5) A proof of service executed outside California must be made by affidavit

B4C(66)