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8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

10	PEOPLES TEMPLE OF THE DISCIPLES)	
	OF CHRIST, a nonprofit corporation,))	
11	JEAN BROWN, and JAMES McELVANE,)	NO. 740531
)	
12	Plaintiffs,)	
)	DECLARATION BY WADE B.
13	v.)	MEDLOCK AND MABEL M. MEDLOCK
)	OPPOSING APPLICATION FOR
14	TIMOTHY OLIVER STOEN,)	PRELIMINARY INJUNCTION
)	
15	Defendant.)	
)	
16	_____)	

17 We, Wade B. Medlock and Mabel M. Medlock, husband and
18 wife, hereby declare as follows:

- 19 1. We are the plaintiffs in a lawsuit entitled WADE B. .
20 MEDLOCK and MABEL M. MEDLOCK vs. JAMES WARREN JONES, PEOPLES TEMPLE,
21 JAMES McELVANE, et al, filed on June 7, 1978, in the Superior
22 Court for the County of Los Angeles, Civil Case No. C243292. A
23 copy of the complaint is attached and made a part hereof. Our
24 attorney is Timothy Oliver Stoen.
- 25 2. This declaration is made in opposition to plaintiff's
26 application for a preliminary injunction. We are requesting that

-138-31-b-105

1 Timothy Oliver Stoen be allowed to remain our attorney and help
2 us get back the money stolen from us by PEOPLES TEMPLE.
3 3. I, Wade B. Medlock, am 71 years old. I, Mabel M. Medlock,
4 am 67 years of age. For 33 years we worked together in our own
5 maintenance business in Los Angeles to acquire equity in two
6 pieces of property as security for our senior years. In February
7 1977, our pastor, Jim Jones, called us into the "council room"
8 of the PEOPLES TEMPLE church in Los Angeles and showed us some
9 papers already filled out. We knew that they were for the sale
10 of our properties, and we did not want to sign. When we hesitated,
11 Jim Jones said to us personally, in front of a number of other
12 people in the room, that if we didn't sign those papers immediately
13 we would "die". We took this as a serious threat we would be
14 killed, and we therefore signed against our will. When the
15 escrow closed in August 1977, we were given \$7,000.00 and PEOPLES
16 TEMPLE took more than \$48,000.00. (Both properties had been sold
17 at prices far below fair market value.) We were heartsick but were
18 afraid for our lives to complain to anyone. Jim Jones then started
19 putting a lot of pressure on us to go to Guyana, where a number
20 of our relatives are. But we did not want to live in any jungle,
21 so we kept refusing.

22 4. Members of PEOPLES TEMPLE kept coming to us and asking
23 us why we did not go to Guyana. In January 1978, an associate
24 PEOPLES TEMPLE minister, Hugh Fortsyn, threatened both of us with
25 the same fate (murder) as had happened to Christopher Lewis. On
26 Easter Sunday of this year JAMES McELVANE threatened that we

1 had better watch out because "what happened to Chris could happen
2 to you."

3 5. On April 25, 1978, ex-members of PEOPLES TEMPLE held a
4 meeting of "Concerned Relatives" at a baptist church in Los
5 Angeles. At the meeting we told the people what PEOPLES TEMPLE
6 and Jim Jones had done to us. Afterwards Steve Katsaris said we
7 should sue the church, and he told us to talk to Tim Stoen. Tim
8 Stoen said to call him the next day, which we did. On April 26
9 we took the papers we had gotten from the escrow company to Tim
10 Stoen to look at. He said we had been "extorted" and that we
11 had a good case against PEOPLES TEMPLE but that they would
12 probably try to sell all their property before we got a judgment.
13 But since we don't have enough to live on, we are not going to
14 give up.

15 6. We asked Tim Stoen not to file the lawsuit until we
16 could move to safer living quarters. We were in constant fear
17 that PEOPLES TEMPLE would send someone into our apartment at
18 night and stab us. When we moved in May, we told Tim Stoen to
19 file the lawsuit, which he did. Since then we have not received
20 any more threats from PEOPLES TEMPLE.

21 7. Tim Stoen never talked with us about selling our
22 property or turning it over to PEOPLES TEMPLE. He very seldom
23 came to Los Angeles. He had nothing to do with our transferring
24 it to the church. We did not even see him from September 1976
25 until the meeting in April 1978.

26 8. Tim Stoen never asked us to sue PEOPLES TEMPLE or JAMES

1 MCELVANE. We asked him to do it for us. We are very glad he
2 did. We do not want him taken off our case.

3 9. We authorize Tim Stoen to disclose all of the
4 information we have given him regarding our lawsuit.

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VERIFICATION

I, the undersigned, say:

~~I am a declarant in this action;~~
the above document is true
of my own knowledge, except as to the matters that are stated in
it on my information and belief, as as to those matters, I believe
them to be true.

Executed on July 24, 1978, at _____
Los Angeles, California.

I declare under penalty of perjury that the above is
true and correct.

Waide B. Medlock
WAIDE B. MEDLOCK

Mabel M. Medlock
MABEL M. MEDLOCK

BB - 31-b-109