

1 CHARLES R. GARRY, ESQ.
2 GARRY, DREYFUS, McTERNAN, BROTSKY,
3 HERNDON & PESONEN, INC.
4 1256 MARKET STREET AT CIVIC CENTER
5 SAN FRANCISCO, CALIFORNIA 94102
6 TEL: 864-3131

7
8 SUPERIOR COURT OF CALIFORNIA

9 IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

10
11 PEOPLES TEMPLE OF THE DISCIPLES)
12 OF CHRIST, a nonprofit corporation,)
13 JEAN BROWN, and JAMES McELVANE,)

14 Plaintiffs,)

15 vs.)

16 TIMOTHY OLIVER STOEN,)

17 Defendant.)

NO.

ORDER TO SHOW CAUSE
AND TEMPORARY
RESTRAINING ORDER

18
19 On reading the Complaint, supporting Declarations,
20 and Points and Authorities on file in this action, and it appearing
21 from these that this is a proper case for issuance of an order to
22 show cause and a temporary restraining order, and that unless a
23 temporary restraining order issues, plaintiffs will suffer
24 irreparable injury before the matter can be heard on notice,
25 IT IS ORDERED that defendant, TIMOTHY OLIVER STOEN,
26 appear before this Court in the courtroom of Department

GARRY, DREYFUS, McTERNAN, BROTSKY,
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1 No. _____, at _____ on _____,
2 then and there to show cause why a preliminary injunction should
3 not be issued enjoining defendant from:

4 1. Soliciting professional employment from ex-members
5 of PEOPLES TEMPLE, relatives of members of PEOPLES TEMPLE, or
6 from any other persons for the purpose of generating suits
7 against plaintiffs or any of them or against any officers,
8 directors or members of plaintiff PEOPLES TEMPLE;

9 2. Accepting professional employment adverse to his
10 former client PEOPLES TEMPLE or to any directors, officers or
11 members of PEOPLES TEMPLE, including all plaintiffs herein,
12 during the course of which employment he will have or might
13 have occasion to use any confidential information obtained in
14 the course of the attorney-client relationship between defendant
15 and PEOPLES TEMPLE;

16 3. Disclosing under any circumstances any confidential
17 information obtained during the course of the attorney-client
18 relationship between defendant and PEOPLES TEMPLE, and between
19 defendant and any officers, directors or members of PEOPLES
20 TEMPLE, including all plaintiffs herein, unless such disclosure
21 is with the written consent of the PEOPLES TEMPLE:

22 4. Prosecuting any complaint already filed which
23 was filed in violation of the attorney-client privilege or the
24 prohibition against accepting employment adverse to a former
25 client, during the course of which defendant will have, or might
26 have, occasion to use any confidential information obtained

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1 during the course of the attorney-client relationship between
2 defendant and PEOPLES TEMPLE.

3 IT IS FURTHER ORDERED that, pending the hearing on
4 the order to show cause, defendant, his agents, officers,
5 employees, and representatives, and all persons acting in concert
6 or participating with him, are hereby enjoined from:

7 1. Soliciting professional employment from
8 ex-members of PEOPLES TEMPLE, relatives of members of PEOPLES
9 TEMPLE, or from any other persons for the purpose of generating
10 suits against plaintiffs or any of them or against any officers,
11 directors or members of plaintiff PEOPLES TEMPLE;

12 2. Accepting professional employment adverse to his
13 former client PEOPLES TEMPLE or to any directors, officers or
14 members of PEOPLES TEMPLE, including all plaintiffs herein,
15 during the course of which employment he will or might have
16 occasion to use any confidential information obtained in the
17 course of the attorney-client relationship between defendant
18 and PEOPLES TEMPLE;

19 3. Disclosing under any circumstances any confidential
20 information obtained during the course of the attorney-client
21 relationship between defendant and PEOPLES TEMPLE, and between
22 defendant and any officers, directors or members of PEOPLES
23 TEMPLE, including all plaintiffs herein, unless such disclosure
24 is with the written consent of the PEOPLES TEMPLE;

25 4. Prosecuting any complaint already filed which was
26 filed in violation of the attorney-client privilege or the

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1 prohibition against accepting employment adverse to a former
2 client, during the course of which defendant will have, or might
3 have, occasion to use any confidential information obtained
4 during the course of the attorney-client relationship between
5 defendant and PEOPLES TEMPLE.

6 IT IS FURTHER ORDERED that a copy of the Complaint,
7 Declarations, and Points and Authorities, together with a
8 copy of this Order to Show Cause and Temporary Restraining
9 Order, be served on defendant not later than

10 _____
11 Dated: _____

12 _____
13 JUDGE OF THE SUPERIOR COURT
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-4- BB-31-6-72

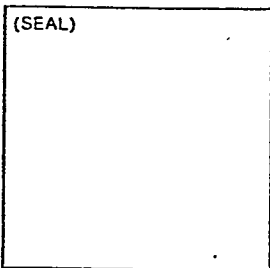
NAME AND ADDRESS OF ATTORNEY: CHARLES R. GARRY, ESQ. GARRY, DREYFUS, McTERNAN, BROTSKY, HERNDON & PESONEN, INC. 1256 Market Street at Civic Center San Francisco, California 94102 ATTORNEY FOR: <u>Plaintiffs</u>	TELEPHONE NO: 864-3131	FOR COURT USE ONLY:
Insert name of court, judicial district or branch court, if any, and Post Office and Street Address: Superior Court of the State of California City and County of San Francisco City Hall, San Francisco, California		
PLAINTIFF: PEOPLES TEMPLE OF THE DISCIPLES OF CHRIST, a nonprofit corporation, JEAN F. BROWN, and JAMES McELVANE		
DEFENDANT: TIMOTHY OLIVER STOEN		
SUMMONS		CASE NUMBER:

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 DEFENDANT: A civil complaint has been filed by the plaintiff against you. (See footnote*)**
- a. If you wish to defend this lawsuit, you must, within 30 days after this summons is served on you, file with this court a written pleading in response to the complaint. (If a Justice Court, you must file with the court a written pleading or cause an oral pleading to be entered in the docket). Unless you do so, your default will be entered upon application of the plaintiff, and this court may enter a judgment against you for the relief demanded in the complaint, which could result in garnishment of wages, taking of money or property or other relief requested in the complaint.
 - b. 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:, Clerk, By _____, Deputy



- 2. NOTICE TO THE PERSON SERVED: You are served**
- a. As an individual defendant.
 - b. As the person sued under the fictitious name of:
 - c. On behalf of:
- Under: CCP 416.10 (Corporation) CCP 416.60 (Minor)
 CCP 416.20 (Defunct Corporation) CCP 416.70 (Incompetent)
 CCP 416.40 (Association or Partnership) CCP 416.90 (Individual)
 Other:
- d. By personal delivery on (Date):

*The word "complaint" includes cross-complaint, "plaintiff" includes cross-complainant, "defendant" includes cross-defendant, singular includes the plural and masculine includes feminine and neuter. A written pleading including an answer, demurrer, etc., must be in the form required by the California Rules of Court. Your original pleading must be filed in this court with proper filing fees and proof that a copy thereof was served on each plaintiff's attorney and on each plaintiff not represented by an attorney. 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.