

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

WORLD SERVICE OFFICE, INC., a	:	
Charitable Corporation and	:	
Trustee of the Copyrights,	:	
trademarks and Service Marks	:	
for the Fellowship of	:	
Narcotics Anonymous (WSO)	:	Civil Action No. 90-7631
	:	
Plaintiff	:	
	:	
vs.	:	
	:	
DAVID MOORHEAD,	:	
	:	
Defendant	:	

ORDER FOR
PRELIMINARY INJUNCTION AND EXPEDITED PROCEEDINGS

AND NOW, pursuant to F.R. Civ. P. 65 and upon consideration of the Defendant's Motion to Enforce or Vacate Order, Memorandum in Support as required, Affidavit of the Defendant and after Notice given to the Plaintiff for an Order Preliminarily Enjoining Plaintiff, conference on and hearing thereon, it is hereby ORDERED AND DECREED that the,

World Service Office, Inc., ("WSO"), its agents, servants, employees, and attorneys, and any and all other persons acting in active concert or in participation with it or them, including the World Service Board of Trustees who receive actual notice of this

order, until further Order of this Court after a full hearing on the Defendant's Motion to Enforce or Vacate, are Enjoined from:

1. Using, selling or trading in any manner utilizing the federally registered and common law trademark and service mark "NARCOTICS ANONYMOUS", as its own exclusive property to the exclusion of members of the Fellowship of Narcotics Anonymous.

2. Reproducing, copying, distributing, or selling works identified in the following suspect copyright registrations and amplifications thereto as its sole and exclusive right:

(a) United States Copyright Registration TX2 837 638, entitled "Narcotics Anonymous" (5th Edition);

(b) United States Copyright Registration TX2 254 607, entitled "Narcotics Anonymous" (4th Edition);

(c) United States Copyright Registration TX2 250 588, entitled "Narcotics Anonymous" (3rd Edition Revised);

(d) United States Copyright Registration TX2 342 402, entitled "Narcotics Anonymous" (3rd Edition);

(e) United States Copyright Registration TX2 250 589, entitled "Narcotics Anonymous" (2nd Edition);

(f) United States Copyright Registration TX2 112 598; entitled "Narcotics Anonymous" (1st Edition);

3. Reproducing, distributing, copying or selling works in violation of Fellowship rights in any other proprietary or copyrighted subject matter;

4. Diluting or tarnishing in anyway the Defendant's or other Fellowship members reputation, goodwill and Fellowship

rights in and to the "NARCOTICS ANONYMOUS" literature, service mark and trademark;

5. Using, authorizing, or causing the use of "Narcotics Anonymous" or any colorable imitation thereof, in or on any books, pamphlets, letterhead, business cards, signs, brochures, directories, advertisements, promotional items, or otherwise, as a name or mark purportedly identifying the Plaintiff as the owner or author thereof, except as noted as a trustee or equitable owner under pending claim and at all times subject to the rights of the Fellowship of Narcotics Anonymous; and

6. Proceeding with the World Service Board of Trustees on or about April 25, 1992 or thereafter until further Order of this Court or agreement between the parties, with a vote or other action, (excepting withdrawal or approval of a motion to TABLE), on Motion #8 of the 1992 World Service Conference Agenda Report, which motion #8 is being offered by the Plaintiff, its agents, servants, employs, principals or otherwise, including the World Service Board of Trustees acting in concert therewith, for the approval of a proposed Literature Trust Document known as the "Fellowship Intellectual Property Trust" and which Motion is before the Fellowship at the 1992 Annual Conference of the Fellowship of Narcotics Anonymous for approval as stated:

"To Approve Addendum 3 `The Fellowship Intellectual Property Trust".

AND, it is further ORDERED that the proceedings under the Defendant's Motion to Enforce or Vacate shall be expedited in

accordance with the conference and hearing schedule as hereafter provided to the parties or counsel by this Court.

AND IT IS SO ORDERED,

JUDGE, UNITED STATES DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

WORLD SERVICE OFFICE, INC., a	:	
Charitable Corporation and	:	
Trustee of the Copyrights,	:	
trademarks and Service Marks	:	
for the Fellowship of	:	
Narcotics Anonymous (WSO)	:	Civil Action No. 90-7631
	:	
Plaintiff	:	
	:	
vs.	:	
	:	
DAVID MOORHEAD,	:	
	:	
Defendant	:	

**MOTION BY DAVID MOORHEAD FOR
PRELIMINARY INJUNCTION AND EXPEDITED PROCEEDINGS**

COMES NOW the Defendant, David Moorhead, by and through his legal counsel, Greg B. Emmons, Esquire, who hereby moves this Court, pursuant to F.R. Civ. P. 65, upon consideration of the Defendant's Motion to Enforce or Vacate Order, any required Memorandum in Support, Affidavit of the Defendant and supporting Declarations and after Notice given to the Plaintiff, for an order preliminarily enjoining Plaintiff, World Service Office, Inc., ("WSO"), its agents, servants, employees, and attorneys, and any and all other persons acting in active concert or in participation with it or them, who receive actual notice of this Order, including

the World Service Board of Trustees from:

ACTIONS TO BE ENJOINED

1. Using, selling or trading in any manner utilizing the federally registered and common law trademark and service mark "NARCOTICS ANONYMOUS", as its own exclusive property to the exclusion of members of the Fellowship of Narcotics Anonymous.

2. Reproducing, copying, distributing, or selling works identified in the following suspect copyright registrations and amplifications thereto as its sole and exclusive right:

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rights in and to the "NARCOTICS ANONYMOUS" literature, service mark and trademark;

5. Using, authorizing, or causing the use of "Narcotics Anonymous" or any colorable imitation thereof, in or on any books, pamphlets, letterhead, business cards, signs, brochures, directories, advertisements, promotional items, or otherwise, as a name or mark purportedly identifying the Plaintiff as the owner or author thereof, except as noted as a trustee or equitable owner under pending claim and at all times subject to the rights of the Fellowship of Narcotics Anonymous; and

6. Proceeding with the World Service Board of Trustees on or about April 25, 1992 or thereafter until further Order of this Court or Agreement between the parties, with a vote or other action, (excepting withdrawal or approval of a motion to TABLE), on Motion #8 of the 1992 World Service Conference Agenda Report, which motion #8 is being offered by the Plaintiff its agents, servants, employs, principals or otherwise, including the World Service Board of Trustees acting in concert therewith for the approval of a proposed Literature Trust Document known as the "Fellowship Intellectual Property Trust" and which Motion is before the Fellowship at the 1992 Annual Conference of the Fellowship of Narcotics Anonymous for approval as stated:

"To Approve Addendum 3 'The Fellowship Intellectual Property Trust'.

Intent: To establish a trust that defines how the intellectual properties of the N.A. Fellowship are to be

administered and protected.

Financial Impact: No direct financial impact."

REQUEST FOR EXPEDITED PROCEEDINGS

Defendant, in consideration of the nature of the Plaintiff's action in violation of the Courts Order entered in this matter, the probability of the Defendant's request for relief being granted, the lack of prejudice or permanent harm to the Plaintiff by expediting these proceedings, the severe prejudice to the Defendant and other members of the Fellowship of Narcotics Anonymous and the irreparable injury and harm to them if the claims heard herein are not presented for judicial review immediately, as well as for other just and proper causes and supporting reasons, further moves the Court for an order granting expedited proceedings in this matter by:

(1) providing for an immediate telephone conference between counsel to review the allegations and nature of the relief requested by the Defendant upon probability that a prompt resolution could be agreed to without the necessity of further legal proceedings, and if no such requested amicable resolution can be reached, then,

(2) scheduling a hearing on the Defendant's request herein for a Preliminary Injunction on or before April 24, 1992 for a ruling on the requested interim relief and further rulings on the schedule and continuation of the proceedings in this matter to

establish the rights of ownership, use and benefit of and from the literature, marks and names of Narcotics Anonymous.

IN SUPPORT HEREOF

Your Defendant sets forth his Affidavit attached hereto, the statements under his verification as made in the underlying Motion to Enforce or Vacate the Order of this Court of January 4, 1991, the supporting exhibits to the statements made by the Defendant in said Motion to Enforce or Vacate, and included therein the supporting Declarations of other members of the Fellowship of Narcotics Anonymous affected by the ongoing actions of the Plaintiff.

Respectfully Submitted,



Greg B. Emmons, Esquire
GREG B. EMMONS AND ASSOCIATES, PC
ONE ALDIE MANSION
85 OLD DUBLIN PIKE
DOYLESTOWN, PA 19801

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

WORLD SERVICE OFFICE, INC., a	:	
Charitable Corporation and	:	
Trustee of the Copyrights,	:	
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for the Fellowship of	:	
Narcotics Anonymous (WSO)	:	Civil Action No. 90-7631
	:	
Plaintiff	:	
	:	
vs.	:	
	:	
DAVID MOORHEAD,	:	
	:	
Defendant	:	

AFFIDAVIT AS BASIS FOR MOTION FOR
PRELIMINARY INJUNCTION AND EXPEDITED PROCEEDINGS

United States of America,	:
Eastern District of PA,	:ss.
Philadelphia County	:

DAVID MOORHEAD, being duly sworn, deposes and says:

1. I am the Defendant in the above-entitled action.
2. On or about the 4th day of January, 1991, an Order was duly entered herein directing the Plaintiff to perform specific acts.
3. A copy of said order was served upon the said Plaintiff, in open Court on January 4, 1991.
4. The Plaintiff has clearly and unequivocally violated said Order and Agreement as specifically set forth in the Defendant's Motion to Enforce or Vacate as filed with this Court.

5. That Plaintiff, (a) upon information and belief and not withstanding notification of objections by the Defendant and other members of the Fellowship of Narcotics Anonymous that the continuing proceeding by the Plaintiff, and its agents, servants and others acting in concert therewith, including the World Service Board of Trustees, to effect ownership rights and control of literary rights as well as the monies earned therefrom as a charitable organization is in need of further Fellowship review and conscience, (b) intends to proceed with acts which are clearly in violation of this Court's Order in this matter and otherwise in direct contradiction to promises, assurances and representations made to the Defendant and other concerned members of the Fellowship as an ongoing part of the parties' performance of the obligations required and assumed of them under the aforesaid Order and Agreement.

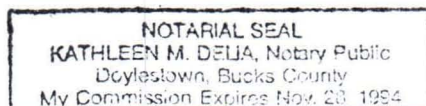
6. The granting of the relief requested will not affect the current claims of property rights by the Plaintiff and the operation of the Plaintiff under the status quo shall not be detrimental or prejudicial to the Plaintiff.

Dated: April 22, 1992

David Moorhead
DAVID MOORHEAD

Sworn to and Subscribed
before me this 22nd day
of April, 1992.

Kathleen M. Delia
NOTARY PUBLIC



IN THE UNITED STATES DISTRICT
COURT FOR THE EASTERN DISTRICT
OF PENNSYLVANIA

WORLD SERVICE OFFICE, INC., a
Charitable Corporation and
Trustee of the Copyrights,
Trademarks and Service Marks
for the Fellowship of
Narcotics Anonymous (WSO)

Plaintiff

vs.

DAVID MOORHEAD

Defendant

MOTION BY DAVID MOORHEAD FOR
PRELIMINARY INJUNCTION AND
EXPEDITED PROCEEDINGS

Law Offices
Greg B. Emmons and Associates, P.C.
One Aldie Mansion
85 Old Dublin Pike
Doylestown, Pa. 18901
Telephone (215) 348-9815 Telefax (215) 348-9817