

Pennsylvania, on the 4th day of January, 1991,

and by breach IN THE UNITED STATES DISTRICT COURT of January 4,  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
1991.

Service of this order may be made upon the Plaintiff by  
WORLD SERVICE OFFICE, INC., a :  
Charitable Corporation and :  
Trustee of the Copyrights, :  
trademarks and Service Marks :  
for the Fellowship of :  
Narcotics Anonymous : Class Mail

Civil Action No. 90-7631

Plaintiff

vs.

DAVID MOORHEAD,

Defendant

**RULE TO SHOW CAUSE**

On considering the Petition for Rule or Order to Show Cause why Disobeying Party should not be Punished for Contempt; Motion to Enforce or Vacate Order and Exhibits thereto; the Affidavit of David Moorhead and Declarations of Jim Miller, Kathleen Miller and William A. Allen, III, and upon all the proceedings heretofore had herein, it is

ORDERED, that the Plaintiff, by the individuals performing the acts or responsible for the omissions alleged to have occurred in the Defendant's Petition and Motions, appear before this Court, Federal Court Building, 6th and Market, Philadelphia, Pennsylvania in Court Room \_\_\_\_ at \_\_\_\_ on the \_\_\_\_ day of \_\_\_\_, 1992, at \_\_\_\_ .M., of said day, to show cause, if any they have why they and each of them should not be punished for contempt of court for violating and disobeying the order of this Court entered in the office of the Clerk thereof at the Eastern District of

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

Plaintiff

vs

DAVID MOORHEAD,

Defendant

MOTION FOR CONTEMPT

*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*



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  
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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

Plaintiff

vs.

DAVID MOORHEAD,

Defendant

Civil Action No. 90-7631

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ORDERED, that the Plaintiff, by the individuals performing the acts or responsible for the omissions alleged to have occurred in the Defendant's Petition and Motions, appear before this Court, Federal Court Building, 6th and Market, Philadelphia, Pennsylvania in Court Room \_\_\_\_ at \_\_\_\_ on the \_\_\_\_ day of \_\_\_\_, 1992, at \_\_\_\_ .M., of said day, to show cause, if any they have why they and each of them should not be punished for contempt of court for violating and disobeying the order of this Court entered in the office of the Clerk thereof at the Eastern District of

Pennsylvania, on the 4th day of January, 1991,  
and by breaching the parties' Settlement Agreement of January 4,  
1991.

Service of this order may be made upon the Plaintiff by  
serving a copy thereof and a copy of the Petition, Motion and  
accompanying affidavits attached upon the attorney for said  
Plaintiff by U.S. First Class Mail.

WITNESS my hand this \_\_\_\_\_ day of \_\_\_\_\_, 1992.

\_\_\_\_\_  
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)

Plaintiff

vs.

DAVID MOORHEAD,

Defendant

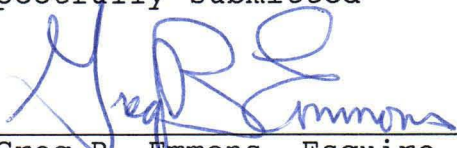
Civil Action No. 90-7631

**MOTION FOR RULE**

DAVID MOORHEAD, Defendant in the above captioned action, by and through his legal counsel, Greg B. Emmons, Esquire, moves this Court for a Rule against Plaintiff, to show cause why it and it's representatives responsible for the acts and omissions alleged as occurring or not occurring as in violation of the Courts Order of January 4, 1992 should not be punished for a Contempt of this Court upon the grounds set forth in the Petition attached hereto and for reasons as heard by this Court in furtherance and in support hereof.

Respectfully submitted

BY:

  
Greg B. Emmons, Esquire  
One Aldie Mansion  
85 Old Dublin Pike  
Doylestown, PA 18901

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	:	

**PETITION FOR RULE OR ORDER TO SHOW CAUSE WHY  
DISOBEDIENT PARTY SHOULD NOT BE PUNISHED FOR CONTEMPT**

TO THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF  
PENNSYLVANIA:

DAVID MOORHEAD, your petitioner, respectfully shows to this  
Court:

1. Petitioner is the Defendant in the above-entitled case  
and has filed a Motion for Enforcement of a prior Order of the  
Court. (Incorporated herein by reference).

2. A Motion for a Preliminary Injunction as well as the  
supporting Motion to Enforce or Vacate and all accompanying  
documentation including Affidavit of the Defendant and Declarations  
of Fellowship Members was served on the Plaintiff and Legal Counsel  
for the Plaintiff pursuant to the Certification of Service attached

hereto and marked Exhibit "A".

3. On information and belief, and despite the founded allegations of continuing violation of this Court Order and the nature of the controversies and disputes that have been longstanding in the fellowship the Plaintiff, has determined to proceed with the approval process of the proposed Fellowship Intellectual Property Trust with full knowledge that said Trust Document is a legally binding document that has not been given adequate review by the Fellowship of Narcotics Anonymous and legal counsel on their behalf and that the effect of the approval will severely if not permanently prejudice the rights and claims of the members of the Fellowship to the ownership and control over copyrights, tradenames and trademarks, being subject to this pending legal action.

4. Petitioner's information is based on first hand knowledge, as well as the official recordings and minutes of the Plaintiff's proceedings at the 1991 World Conference and the telephone conferences held with the Defendant and other members of the Trust Document Working Group, as well as other declarations and statements made or contained in Plaintiffs mailings or otherwise made by the Plaintiff to the Petitioner and other concerned members of the Fellowship of Narcotics Anonymous all of which the Petitioner can and will upon and at time of proper proceeding introduce as evidence.

5. In further support hereof, the Affidavit of David Moorhead and Declarations of William A. Allen, III, Jim Miller and



Kathleen Miller are annexed hereto and marked as Exhibits "B" and "C".

WHEREFORE, petitioner prays that this Court issue a Rule upon the Plaintiff ordering and directing its authorized representative to appear before this Court on the \_\_\_ day of \_\_\_\_\_, 1992, to show cause, if any it has, why it and the individual participants should not be punished for violating the Court Order entered in this matter on January 4, 1991 and furthering proceedings relating approval of the Fellowship Intellectual Property Trust as a to continuing the violation thereof.

Respectfully submitted,

BY: 

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, :  
trademarks and Service Marks :  
for the Fellowship of :  
Narcotics Anonymous (WSO) : Civil Action No. 90-7631  
:  
Plaintiff :  
:  
vs. :  
:  
DAVID MOORHEAD, :  
:  
Defendant :

AFFIDAVIT AS BASIS FOR MOTION FOR CONTEMPT

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, all of which are set forth in a true and correct copy of such Order and accompanying Agreement annexed and marked hereto Exhibit "A".
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 attached Motion to Vacate or Enforce. (Exhibit "B").

5. That Plaintiff continues to violate said Court's Order after notice of Defendant's objection and service upon the Plaintiff of the Motion to Vacate or Enforce together with a copy of the proposed Motion For Contempt on a Notice basis.

Dated: 4/22, 1992

David Moorhead  
DAVID MOORHEAD

Sworn to and Subscribed  
before me this 22<sup>nd</sup> day  
of APRIL, 1992.

Kathleen M. Delia  
NOTARY PUBLIC

NOTARIAL SEAL  
KATHLEEN M. DELIA, Notary Public  
Doylestown, Bucks County  
My Commission Expires Nov. 28, 1994



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 : MOTION TO ENFORCE OR  
:  
vs. : VACATE AND PRELIMINARY  
:  
DAVID MOORHEAD, :  
:  
Defendant :

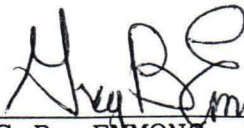
CERTIFICATE OF SERVICE  
AND NOTICE

I hereby certify, that on this 22nd day of April, 1992, a copy of the Motion(s), Order and referenced documents in the attached Notice were served upon the undernamed parties and legal counsel in the manner and at the specified addresses below:

DATE: 4/22/92 Name John T. Synnestredt, Esq  
Address 2600 One Reading Center  
1101 Market Street  
Hand Delivery Philadelphia, PA 18107

DATE: 4/22/92 Name ATTN: LEGAL DEPARTMENT  
Address World Service Office, Inc.  
16155 Wyandotte  
Van Nuys, CA 91406

Overnight Mail  
Federal Express  
No. 7141446421

BY:   
GREG B. EMMONS, ESQUIRE  
GREG B. EMMONS & ASSOCS  
ATTORNEY I.D. #28110  
ATTORNEY FOR DEFENDANT

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.	:	MOTION TO ENFORCE OR
	:	VACATE AND PRELIMINARY
DAVID MOORHEAD,	:	INJUNCTION
	:	
Defendant	:	

NOTICE

TO: WSO AND ITS LEGAL COUNSEL

The enclosed Motion to Enforce or Vacate, Motion and Petition for Preliminary Injunction and Expedited Proceedings, together with Affidavits, Verifications, Declarations, Exhibits and Proposed Orders as well as my Entry of Appearance on behalf of the Defendant, are served pursuant to the Federal Rules of Civil Procedure and all other federal and local rules governing service of process of parties and legal counsel in a pending action.

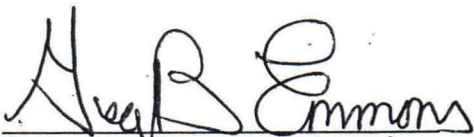
Please be advised that counsel for the Defendant will be making a formal request for a telephone conference with Judge Pollak on or before April 24, 1992 between legal counsel, as well as Defendant's intention to request an expedited hearing on the

Motion for Preliminary Injunction, or in the alternative upon unwillingness to participate in conferences and expedited proceedings, an Exparte Emergency Preliminary Injunction, and an Expedited Hearing on the Motion to Enforce or Vacate the Order of this Court of January 4, 1991. Memoranda of Support thereof will be filed upon further requirement under law and rule of Court.

Further, you are cautioned that additional acts or omissions in violation of the Court Order of January 4, 1991 may result in an appropriate Contempt Action being commenced in the form and nature of the Motion for Rule and Petition for Contempt served herein for NOTICE purposes only.

I declare, under penalty of perjury, that this Notice and Motion to Enforce or Vacate Order, Motion for Preliminary Injunction and Expedited Proceedings, Declarations, Exhibits and Proposed Orders were served as set forth in the attached Certificate of Service.

DATE: 4/22/92

  
Greg B. Emmons, Esquire  
GREG B. EMMONS & ASSOCS., PC  
ONE ALDIE MANSION  
85 OLD DUBLIN PIKE  
DOYLESTOWN, PA 18901



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

CERTIFICATE OF SERVICE AND  
NOTICE

*Law Offices*

*Greg B. Emmons and Associates, P.C.*

*One Aldie Mansion*

*85 Old Dublin Pike*

*Doylestown, Pa. 18901*

EXHIBIT "A"

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

WORLD SERVICE OFFICE, INC., a	:	
Charitable Cooperation 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	:	

DECLARATION OF JIM & KATHLEEN MILLER

We have been members of the Fellowship of Narcotics Anonymous since 1979 and 1981 and are aware of the nature and extent of the Fellowship concerns regarding the literature of the Fellowship. Jim was a member of the WSC Literature committee from 1979 through 1984, participated in the writing of the basic text, many of the NA pamphlets, and is sole author of the NA pamphlet "One Addict's Experience with Acceptance, Faith, and Commitment", as well as co-chairman/ editor of the NA Way magazine in 1982 & 1983. Kathleen was a member of the WSC NA Way committee and attributes much of her recovery from addiction to early use of an NA Basic Text which was printed in her home area and given to her free.

We, as aware members of the Fellowship with special experience, were asked to be part of a volunteer group of members to work on the development of the Fellowship Literature Trust Document.



We first participated in discussions regarding this Trust Document, along with other members of the Fellowship as well as employees from the Fellowship's primary service center, WSO inc., being Stu Toordeman and George Hollahan, in Harrisburg, Pa. in February of 1991.

At that time the legal action against David Moorhead who was challenging the claim of exclusive rights to NA Fellowship Literature, had just been "settled". We have known David Moorhead eight years and know him to be an informed, active NA member and a man of integrity, and good moral character, who was complying 100% with the court order. Mr. Moorhead and the stated WSO inc. employees were working on a solution to the literature dispute, being a Trust agreement acceptable Fellowship-wide.

The purpose of the discussions we had were to heal the division of the Narcotics Anonymous Fellowship which resulted in the David Moorhead litigation.

We were to be part of the working group that was to draft the Intellectual Property Trust document which would accurately describe the origin, ownership, and purpose of Narcotics Anonymous Literature and the bond of trust between the Fellowship of Narcotics Anonymous and it's service boards , committees, and service office.

During the discussions in February, we understood Stu Toordeman to clearly state that the WSO inc. would not suggest any definitive action regarding the copyrights on NA literature during the World Service Conference in April of 1991 and that there would be no motions made to approve such ownership and exclusive rights of control. He reaffirmed this promise during a phone call in April prior to the conference.

When suggestions were made regarding the WSO's reference in the World Service Conference Agenda report about such actions and work in progress on literature-copyrights, he responded that "we will keep things status-quo until we get finished with the trust document"

Stu Toordeman broke his promise to us when, during the WSO's report at the World Service Conference he proceeded with what he called "AFFIRMATIONS" not motions and even had the attorney address the conference. He moved for the approval of the exclusive right to use the Fellowship Literature despite his promise, and he and the WSO attorney failed to advise the Fellowship about the Trust Document Working Group.

We have now read a certain Motion to Enforce or Vacate the court Order in this case and can affirm that to the best of our information and belief that the allegations contained therein are true and correct.

We declare under penalty of perjury under the laws of the United States, California and Pennsylvania, that the foregoing statements are true and correct and that this declaration sets forth our own statement of just some of the ongoing statements, assurances and representations given to us from WSO inc. employees that have subsequently turned out to be false.

Date: April 20, 1991

Jim Miller  
Kathleen Miller

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 : Civil Action No. 90-7631  
:  
Plaintiff :  
:  
vs. :  
:  
DAVID MOORHEAD, :  
:  
Defendant :

DECLARATION Of WILLIAM M. ALLEN III

I have been a member of the Fellowship of Narcotics Anonymous since 1979 and am aware of the nature and extent of the Fellowship concerns regarding the literature of the Fellowship.

At MARLCNA, in February of 1991, at a second meeting of the Trust Group, I met with Stu Toordeman and George Hollahan, employees of WSO, and David Moorhead, Jim Miller, Katleen Miller, Bo Sewell, Carl Diehl and Oma Jackson as concerned memers of the Fellowship who desired to participate in the literature trust document approval process.

At that time, both Stu and George clearly stated that the WSO would not proceed further with any attempts to obtain exclusive rights over the N.A. Literature including the Basic Text, but rather wait until the Fellowship approved the Trust Document.

At the time there was concern that the 1991 Conference Agenda Report contained, in the section from WSO Inc., written by Stu Toordeman, an appearant request from the WSO Board of Directors that the Conference confer exclusive rights to NA



Stu Toordeman assured us that no Motion was being submitted on the issue and that the status quo would be maintained until after the Trust Document review group completed its task.

After the initial discussions between members of the WSO and concerned members of the Fellowship who participated in the Trust Document Review Group, it became apparent that the WSO did not want to communicate with us. It became necessary for me to make phone calls to them to obtain documents that were promised and then mail would not arrive to me by the time of our scheduled phone conferences.

I participated in two extensive phone conferences to discuss the proposed Trust Document and significant objection was raised to the draft presented to us.

In response to the objections, Stu and George advised that the Trust Document would be revised until it was agreeable and would be submitted to the Fellowship for comment and review of no less than one (1) year.

George also advised us, after the 1991 World Conference vote on the literary affirmations that became very controversial, that once the Trust Document was approved, the affirmations would be superceded.

In June, without ever completing the review among the members of the group, the WSO advised that our input would no longer be necessary and that they were stopping the group due to lack of funds.

Once the Conference Agenda Report was issued and the proposed trust was published to the Fellowship a significant amount of controversy developed with more concerns about the impact of the trust document coming to the focus.

In March of 1992, I attended the South Florida Spring Service Break Conference and heard Bob McD, the chairperson of the Board of Directors of the WSO represent to the members of the Fellowship in attendance that the proposed trust document had met the approval of the members of the trust working group.

It became necessary for me to stand up and voice my objection to his misleading and totally inaccurate remarks. I have knowledge that similar presentations were made at other conferences and workshops however no member of the working group was able to confront and correct the misrepresentation.

I declare under penalty of perjury under the laws of the United States, California and Pennsylvania, that the foregoing statements are true and correct.

Date: April 20, 1991

*William M. Allen III*

EXHIBIT "B"