- 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 egents, 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

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