

6. It was also my understanding that the father in the child-custody trial had many concerns about the Plaintiff and its abusive behavior towards its members, especially with respect to the treatment of children.
7. It was further my understanding that the father did not believe that it would be in the best interests of his child to be raised in the custody of a member of the Plaintiff church.
8. Therefore, I was asked to testify to what I witnessed as a member of the Plaintiff, with respect to the way in which the Plaintiff treated children.
9. All of the testimony I gave was truthful and responsive to the questions I was asked.

Motion to Dismiss / Planning Board Application Withdrawal Letter

10. On August 6, 2012, I made a Freedom of Information Act Request to the Village of Ridgewood, New Jersey.
11. In that request, I asked for, among other things, a "copy of dismissal without prejudice or any other official document that demonstrates that the WMSCOG withdrew their application." A true and accurate copy of that request is attached hereto as Exhibit "A."
12. In response to that request, I received a copy of a letter dated July 3, 2012, from the Plaintiff to the Ridgewood Planning Board in which the Plaintiff stated that it was withdrawing its variance application. A true and accurate copy of that letter is attached hereto as Exhibit "B."

Motion to Dismiss / You Tube Video

13. In ¶ 104 of the Plaintiff's Complaint, the Plaintiff refers to a video entitled, "World Mission Society Church of God - Public Financial Info!" (hereinafter the "Financial Info Video)."
14. The Plaintiff references the contents of the Financial Info Video in ¶¶ 105-121 of its Complaint.

15. I have located the Financial Info Video online.
16. For the Court's convenience, I have transcribed the Financial Info Video.
17. Attached hereto as Exhibit "C" is a true and accurate copy of the transcription that I made of the Financial Info Video.

Motion to Strike / Alleged Harassment of Plaintiff's Members

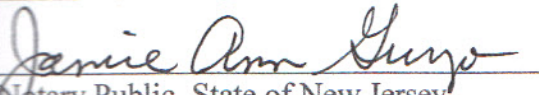
18. The Plaintiff is suing me for four causes of action: defamation, defamation by implication, conspiracy, and trade libel.
19. The Plaintiff is not suing me for harassing it or its members.
20. Nevertheless, ¶ 20 of the Complaint states:

Plaintiff has lost members who have been intimidated by Defendant's attacks on Plaintiff. Members who fear harassment at work and in public have left the Church. Moreover, Plaintiff is losing prospective membership because of Defendant's conduct.
21. The Plaintiff does not allege that I ever made any defamatory statements to any of its members.
22. The Plaintiff does not allege that I ever made any defamatory statements to any person while that person was at work.
23. The allegations in ¶ 20 create the impression that the Plaintiff is accusing me of harassing its members at work and in public.
24. Yet, the Plaintiff does not allege any facts to support such an implied allegation.
25. I have never contacted any member of the Plaintiff without that member's consent.

26. Plaintiff's implication that I have harassed its members at work and in public is entirely irrelevant to the issues of defamation, conspiracy, and trade libel which are the subject of this litigation.
27. The suggestion that I have engaged in harassment of the Plaintiff's members, without any factual support, is abusive to me. Moreover, such an accusation is scandalous.
28. I respectfully request an Order striking ¶ 20 of the Complaint and conditioning any re-filing of the Complaint upon removal of any such scandalous language.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.


Michele Colón

Sworn to before me this
22nd day of August, 2012

Notary Public, State of New Jersey

JANICE ANN GURZO
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Sept. 29, 2016