

PAUL S. GROSSWALD, ESQ., LLC
 140 Prospect Avenue, Suite 8S
 Hackensack, NJ 07601
 (917) 753-7007
 Attorney for Defendant,
Michele Colón

)	SUPERIOR COURT OF NEW JERSEY
WORLD MISSION SOCIETY)	LAW DIVISION: BERGEN COUNTY
CHURCH OF GOD)	
Plaintiff,)	DOCKET NO. BER-L-5274-12
v.)	<u>Civil Action</u>
)	
MICHELE COLÓN,)	CERTIFICATION OF
)	PAUL S. GROSSWALD
Defendant.)	
)	

I, Paul Grosswald, of full age, hereby certify as follows:

1. I am an attorney at law of the State of New Jersey and am the attorney for Defendant Michele Colón in the above-captioned matter. As such, I am fully familiar with the facts contained herein. I submit this Certification in support of Ms. Colón's Motion to Dismiss and Motion to Strike.
2. Annexed hereto as Exhibit "1" is a true and accurate copy of the Complaint filed by the Plaintiff in the above-captioned action.
3. Annexed hereto as Exhibit "2" is a true and accurate copy of the five-part story, entitled "How the WMSCOG Turned My Life Upside Down," which is referenced in ¶¶ 72 - 87 of the Complaint.
4. Annexed hereto as Exhibit "3" are true and accurate copies of each unpublished opinion cited to in the accompanying brief, pursuant to R. 1:36-3:

- Contel Global Mktg., Inc. v. Dreifuss, 2010 N.J. Super. Unpub. LEXIS 241, *22-23 (App. Div., Feb. 4, 2010);
- Juliano v. ITT Corp., 1991 U.S. Dist. LEXIS 1045 (D.N.J. Jan. 22, 1991);
- Zinn v. Seruga, 2007 U.S. Dist. LEXIS 63693 (D.N.J. Aug. 29, 2007);
- Floorgraphics, Inc. v. News Am. Mktg. In-Store Servs., 2006 U.S. Dist. LEXIS 70834 (D.N.J. Sept. 29, 2006);
- Morris v. Hoffa, 2002 U.S. Dist. LEXIS 5975 (E.D. Pa. Apr. 8, 2002);
- Wilder v. Brewer, 1994 Conn. Super. LEXIS 2386 (Conn. Super. Ct. Sept. 19, 1994);
- Grippi v. Spalliero, 2008 N.J. Super. Unpub. LEXIS 2754 (App. Div. Nov. 24, 2008);
- Art of Living Found. v. Does, 2011 U.S. Dist. LEXIS 63507 (N.D. Cal. June 15, 2011);
- Foxtons, Inc. v. Cirri Germain Realty, 2008 N.J. Super. Unpub. LEXIS 189 (App. Div. Feb. 22, 2008);
- NXIVM Corp. v. Sutton, 2007 U.S. Dist. LEXIS 46471 (D.N.J. June 27, 2007);
- Beaverton Grace Bible Church v. Smith, No. C1121174CV (Cir. Ct. Or. July 23, 2012).
- Landmark Educ. Corp. v. Conde Nast Publication, No. 114814/93, 1994 WL 836356 (N.Y. Sup. July 7, 1993).

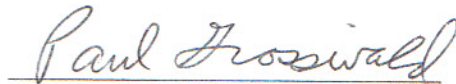
5. I have attempted to locate online each of the challenged statements identified in the Plaintiff's Complaint which are alleged to have been posted to the Internet. I have found some, but not all, of those challenged statements. Annexed hereto as Exhibit "4" is a true and accurate copy of "screenshots" which reflect the contents of webpages containing some of the challenged statements that I was able to locate. Each screenshot has been labeled with the paragraph number or numbers from the Complaint that it corresponds to. Where there is more than one screenshot that corresponds to a single paragraph in the

Complaint the screenshots have been labeled with additional letters, such as an "A" or "B," to assist the Court in distinguishing them. The following screenshots are included in Exhibit 4: Paragraphs 41-42(A), 41-42(B), 44(A), 44(B), 44(C), 44(D), 48(A), 48(B), 48(C), 49, 50(A), 50(B), 56(A), 56(B), 57, 58-59(A), 58-59(B), 60, 61(A), 61(B), 62, 63, 102, 105-121.

6. Annexed hereto as Exhibit "5" is a true and accurate copy of the article entitled "The WMSCOG 'Awarded by President Obama?'" which is referenced in ¶¶ 88 - 97 of the Complaint.
7. Annexed hereto as Exhibit "6" is a true and accurate copy of a webpage from the Ross Institute Archives for the Study of Destructive Cults, Controversial Groups and Movements, which shows that the website offers a link to the WMSCOG's website.
8. Annexed hereto as Exhibit "7" is a true and accurate copy of representative webpages from examiningthewms.com, showing that the website offers links to the WMSCOG's website and sermons.

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.

Dated: August 23, 2012



Paul S. Grosswald