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 Attorney for Defendant,
Michele Colón

WORLD MISSION SOCIETY CHURCH OF GOD) SUPERIOR COURT OF NEW JERSEY
) LAW DIVISION: BERGEN COUNTY
)
Plaintiff,) DOCKET NO. BER-L-5274-12
)
v.) <u>Civil Action</u>
)
MICHELE COLÓN,) SECOND AFFIDAVIT OF
) MICHELE COLÓN IN SUPPORT OF
) MOTION TO DISMISS
Defendant.)
)

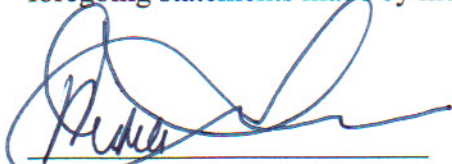
STATE OF NEW JERSEY)
) SS.:
 COUNTY OF PASSAIC)

I, Michele Colón, being duly sworn, deposes and says:

1. I am the Defendant named in the above-captioned case. I make this second Affidavit in support of my Motion to Dismiss.
2. In ¶¶ 102-103 of the Plaintiff's Original Complaint and in ¶¶ 54-58 of the Plaintiff's Proposed First Amended Complaint, the Plaintiff refers to a video entitled, "World Mission Society Church of God – Destroys Families" (hereinafter the "Families Video").
3. I have located the Families Video online.
4. For the Court's convenience, I have transcribed the Families Video.
5. Attached hereto as Exhibit "D" is a true and accurate copy of the transcription that I made

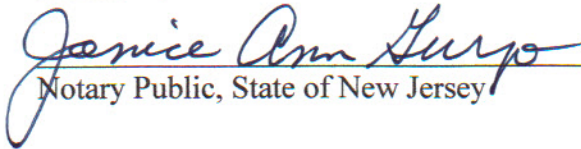
of the Families Video.

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
30th day of November, 2012



Notary Public, State of New Jersey

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