

EXHIBIT

8

VIRGINIA:

IN THE CIRCUIT COURT OF THE COUNTY OF FAIRFAX

_____)	
WORLD MISSION SOCIETY, CHURCH)	
OF GOD A NJ NONPROFIT)	
CORPORATION,)	
)	
Plaintiff,)	CASE NO.: 2011-17163
)	
vs.)	
)	
MICHELE COLON and)	
TYLER J. NEWTON)	
)	
Defendants.)	
_____)	

**PLAINTIFF’S FIRST SET OF INTERROGATORIES
PROPOUNDED TO DEFENDANT TYLER J. NEWTON**

COMES NOW Plaintiff, World Mission Society, Church of God a NJ Nonprofit Corporation (“Plaintiff”), by counsel Dozier Internet Law, P.C., and pursuant to Rule 4:8 of the Rules of the Supreme Court of Virginia, submits this Plaintiff’s First Set of Interrogatories Propounded to Defendant Tyler J. Newton for responses within twenty-one (21) days as required by the Rules of the Virginia Supreme Court:

DEFINITIONS AND INSTRUCTIONS

1. In answering these Interrogatories, you are required to furnish such information as is available to you, however obtained, including hearsay and information known by, or in the possession of, you or your agents, including every attorney representing you. If any Interrogatory cannot be answered in full after exercising due diligence to secure the information, answer to the extent possible, specifying your inability to answer the remainder, stating whatever

9. Identify any legal claims or lawsuits filed by or against you in the last ten (10) years, including the case style, case number, parties, and jurisdiction, agency, or other entity in which such claim or suit was filed.
10. Identify all of what you called in your Answer to Complaint “WMSCOG’s harmful and abusive methods,” including, but not limiting your response to, the specific individuals subjected to any such methods, those who subjected such individuals to such methods, and the dates, times, and locations where any such individuals were subjected to these methods.
11. Identify anyone you claim to be a “victim” and any member of the “families” you claim to have been “administering” as a result of actions of the Plaintiff (*See Answer to Complaint ¶27*).
12. Identify any recordings made by or with your involvement regarding the Plaintiff, the subject matter of this litigation, or any individual or entity believed by you to be associated with the Plaintiff, including, but not limiting your response to the date, location and reasons any such recording was made.
13. Identify and explain in detail what you call “questionable financial practices” and the basis for your statement “they totally have to be laundering money” (*See Answer to Complaint ¶33*).
14. Explain in detail all facts upon which you rely in support of each of the defenses raised in your Answer to Complaint, setting forth each fact which you claim supports each defense.
15. Identify and explain in detail all methods you have used to investigate the truth or falsity of your claims regarding Plaintiff, made directly or by denying in your Answer to Complaint having made any false statements, including, but not limited to, claims that the Plaintiff is a cult, uses harmful and abusive methods, is engaged in questionable financial practices, is laundering money, destroys marriages or families, uses mind control tactics, deceived the Points of Light Institute, uses fear and guilt as tactics, uses sleep deprivation, has a business relationship or financial connection to Big Shine Worldwide, Inc., and lied to the IRS. Include, but do not limit your response to the identity of any individuals with which you have had contact regarding those claims and any communications you have issued or received with regard to those claims.

22. Identify any insurance agreements held by you that may be used to satisfy part or all of a judgment, if any, that may be entered in this action.

PLEASE BE ADVISED THAT YOU MAY BE REQUIRED TO SEASONABLY SUPPLEMENT YOUR RESPONSES.

Dated: 4-16-12

WORLD MISSION SOCIETY, CHURCH
OF GOD A NJ NONPROFIT CORPORATION

By: John W. Dozier, Jr. VSB44586 For JWDTv.

John W. Dozier, Jr., Esq.
VA Bar # 20559
Dozier Internet Law, P.C.
11520 Nuckols Road, Suite 101
Glen Allen, VA 23059
Tel: (804) 346-9770
Fax: (804) 346-0800
email: jwd@cybertriallawyer.com

*Attorneys for Plaintiff
World Mission Society,
Church of God a NJ
Nonprofit Corporation*

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Plaintiff,)	CASE NO.: 2011-17163
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vs.)	
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MICHELE COLON and)	
TYLER J. NEWTON)	
)	
Defendants.)	
_____)	

**PLAINTIFF’S FIRST SET OF REQUESTS FOR PRODUCTION
PROPOUNDED TO DEFENDANT TYLER J. NEWTON**

COMES NOW Plaintiff, World Mission Society, Church of God a NJ Nonprofit Corporation (“Plaintiff”), by counsel Dozier Internet Law, P.C., and pursuant to Rules 4:9 and 4:9(A) of the Rules of the Supreme Court of Virginia, submits this Plaintiff’s First Set of Requests for Production Propounded to Defendant Tyler J. Newton for responses within twenty-one (21) days as required by the Rules of the Supreme Court of Virginia:

DEFINITIONS AND INSTRUCTIONS

1. The term “document” or “documents” shall mean, without limitation, the original and any and all drafts and non-identical copies of all writings of any kind in your possession, custody or control, including, but not limited to, correspondence, scripts, records, reports, electronic mail, electronic mail attachments, web pages, external and internal memoranda, digital voice exchange transcripts or summaries, notes, letters, telegrams, telexes, messages (including, but not limited to, reports of telephone conversations, messages and conferences), studies,

12. Provide copies of any correspondence to or from each and every witness you expect to call in this matter.
13. Provide any expert reports regarding the Plaintiff, the subject matter of this litigation including your defenses, or any individual or entity believed by you to be associated with the Plaintiff.
14. Provide any expert reports upon which you expect to rely in this matter.
15. Provide copies of documents regarding any legal claims or lawsuits filed by or against you in the last ten (10) years.
16. Provide all documents supporting or refuting, or otherwise stating the facts upon which you rely in support of your claim that Plaintiff engages in “harmful and abusive methods.”
17. Provide copies of any communications, including, but not limiting your response to letters, faxes, or emails, to or from anyone you claim to be a “victim” of the Plaintiff and any member of the “families” you claim to have been “administering” as a result of actions of the Plaintiff (*See Answer to Complaint ¶27*).
18. Provide a copy of all recordings in your possession regarding the Plaintiff, the subject matter of this litigation, or any individual or entity believed by you to be associated with the Plaintiff.
19. Provide copies of any recordings made by or with your involvement regarding the Plaintiff, the subject matter of this litigation, or any individual or entity believed by you to be associated with the Plaintiff.
20. Provide all documents supporting or refuting, or otherwise stating the facts upon which you rely in support of your claims that Plaintiff is engaged in what you call “questionable financial practices” and that “they totally have to be laundering money” (*See Answer to Complaint ¶33*).
21. Provide all documents supporting or refuting, or otherwise stating the facts upon which

27. Provide copies of any insurance agreements held by you that may be used to satisfy part or all of a judgment, if any, that may be entered in this action.

PLEASE BE ADVISED THAT YOU MAY BE REQUIRED TO SEASONABLY SUPPLEMENT YOUR RESPONSES.

Dated: 4-16-12

WORLD MISSION SOCIETY,
CHURCH OF GOD A NJ NONPROFIT
CORPORATION

By: John W. Dozier, Jr. USB44586 For JWD Jr.

John W. Dozier, Jr., Esq.
VA Bar # 20559
Dozier Internet Law, P.C.
11520 Nuckols Road, Suite 101
Glen Allen, VA 23059
Tel: (804) 346-9770
Fax: (804) 346-0800
email: jwd@cybertriallawyer.com

*Attorneys for Plaintiff
World Mission Society,
Church of God
a NJ Nonprofit Corporation*