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Attorney for Defendant,
Michele Colón

WORLD MISSION SOCIETY)	SUPERIOR COURT OF NEW JERSEY
CHURCH OF GOD,)	LAW DIVISION: BERGEN COUNTY
)	
Plaintiff,)	DOCKET NO. BER-L-5274-12
)	
v.)	<u>Civil Action</u>
)	
MICHELE COLÓN,)	CERTIFICATION OF
)	MICHELE COLÓN
Defendants.)	IN OPPOSITION TO PLAINTIFF'S
)	MOTION FOR PROTECTIVE ORDER

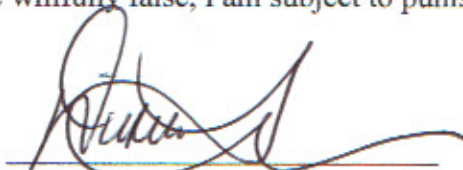
I, Michele Colón, of full age, hereby certify as follows:

1. I am the Defendant named in the above-captioned case. I make this Certification in opposition to Plaintiff's motion for a protective order.
2. Every fact contained in ¶ 31 of Solomon Rubin's certification in support of Plaintiff's motion for a protective order is false.
3. I have never met Solomon Rubin.
4. I have never had any communication or other interaction with Solomon Rubin other than through my lawyer in the context of this litigation.
5. I am willing to agree that prior to disclosing any document produced by Plaintiff in this litigation, I will redact all personal information contained therein which pertains to third parties. For purposes of this paragraph, "personal information" will be defined to include social security numbers, phone numbers, home addresses, and email addresses. In return,

I expect that Plaintiff will be fully compliant with its discovery obligations and will produce all of its discovery materials in unredacted form.

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: October 16, 2013



Michele Colón