PAUL S. GROSSWALD 140 Prospect Avenue, Suite 8S Hackensack, NJ 07601 (917) 753-7007 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
- against —	Civil Action
MICHELE COLÓN, Defendant.	CERTIFICATION OF PAUL S. GROSSWALD IN OPPOSITION TO PLAINTIFF'S MOTION FOR A PROTECTIVE ORDER

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

- 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 opposition to Plaintiff's motion for a protective order.
- Annexed hereto as Exhibit "1" is a true and accurate copy of Page 21 of the transcript of the January 11, 2013 hearing held in this matter.
- Every fact contained in ¶ 31 of Solomon Rubin's certification in support of Plaintiff's motion for a protective order is false.
- 4. I have never met Solomon Rubin.
- 5. I have never had any communication or other interaction with Solomon Rubin other than that he has been copied on some of Mr. Miltenberg's emails related to this litigation. The first such email was in late September 2013.

- 6. I have never posted any of the documents pertaining to this litigation online.
- 7. Annexed hereto as Exhibit "2" is a true and accurate copy of the Presidential Volunteer Service Award Article which is described in ¶¶ 49-52 of the Plaintiff's Second Amended Complaint, and which was produced by Plaintiff in response to this Court's February 13, 2013 production order.
- On October 9, 2013, Plaintiff served me with papers pertaining to the instant motion. Those papers did not include a copy of <u>Guthrey v. Cal. Dep't of Corr. & Rehab.</u>, 2012
 U.S. Dist. LEXIS 89174 (E.D. Cal. June 27, 2012), which is the unpublished case referenced in § 80 of Solomon Rubin's Certification.

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.

2

Dated: October 16, 2013

Paul Froswald

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Paul S. Grosswald

EXHIBIT 1

SUPERIOR COURT OF NEW JERSEY LAW DIVISION, CIVIL PART BERGEN COUNTY DOCKET NO. BER-L-5274-12 A.D.# 1 2 WORLD MISSION SOCIETY CHURCH) OF GOD, 3 Plaintiff,) TRANSCRIPT 4 OF 5 vs. MOTION 6 COLON, 7 Defendant.) 8 Place: Justice Center 10 Main St. 9 Hackensack, NJ 07601 10 Date: January 11, 2013 11 BEFORE: 12 HONORABLE RACHELLE L. HARZ, J.S.C. 13 TRANSCRIPT ORDERED BY: 14 ALLISON A. DUGGAN, Paralegal (Nesenoff & Miltenberg, LLP) 15 **APPEARANCES:** 16 MARCO A. SANTORI, ESQ. (Nesenoff & Miltenberg, LLP) 17 DIANA ZBOROVSKY, ESQ. (Nesenoff & Miltenberg, LLP) Attorneys for the Plaintiff 18 19 PAUL S. GROSSWALD, ESQ. Attorney for the Defendant 20 21 Transcriber, Deborah A. Mastrantonio G & L TRANSCRIPTION OF N.J. 22 40 Evans Place Pompton Plains, New Jersey 07444 23 Audio Recorded 24 Recording Operator, 25

Colloquy

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1	forward at this point looking at the allegations put forth
2	in the pleading, it doesn't mean you make it to the jury.
3	MR. SANTORI: At least to discovery Your Honor.
4	MR. GROSSWALD: But Your Honor I just want to
5	point out that as a matter of law I think it's highly
6	inappropriate for this court to say that as a that you
7	can have an emotional distress claim arising out of a
8	family member trying to do an intervention for another
9	family member. Because if that's the precedent that this
10	court establishes, what does that do to every family who
11	has a kid on drugs where they bring the kid to a drug
12	counselor, and the kid says well, I don't have a drug
13	problem your causing me emotion distress, now I have a
14	tort that I can sue you for. Right. Any any person
15	who tries to do a suicide intervention for a family member
16	is going to be accused of inflicting emotional distress,
17	because the person doesn't want the help.
18	I mean I mean it emotional distress the
19	tort is supposed to be for extreme and outrageous
20	behavior. This court should not say that it is extreme
21	and outrageous for a family member to try to do an
22	intervention for another family member in a crisis,
23	because that would just be devastating for families who
24	are trying to get help for loved ones. There has to be
25	something extreme and outrageous.

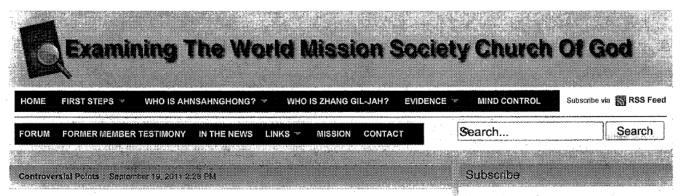
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EXHIBIT



Second Amended Complaint ¶¶ 49 - 52 / Page 1

The WMSCOG "Awarded by President Obama"?



The WMSCOG "Awarded by President Obama"?

[Translate]



On July 7, 2011 a World Mission Society Church of God member named "STAR" made the following comment below the "Top 10 Reasons People Cease To Believe in the WMSCOG" article:

"President Obama just awarded the Church of God with a Call into Service Plaque. What is your church doing to recieve such a high reward."

What Award Did The WMSCOG Receive?

According to the <u>"awards list" section of the official WMSCOG site</u> (click on "WHITE HOUSE WASHINGTON"), the WMSCOG received the President's Volunteer Service Award this year. The <u>Presidential Service Awards website</u> describes the purpose of the award as "a way to thank and honor Americans who, by their demonstrated commitment and example, inspire others to engage in volunteer service". What are the requirements for the award? How did the WMSCOG go about being recognized and receiving this award?

President's Volunteer Service Award Requirements

According to the Presidential Service Awards website any individual, family, or group can receive Presidential recognition for volunteer hours earned over a 12-month period or over the course of a lifetime at home or abroad. There are bronze, silver, gold and lifetime awards for those individuals or groups that have completed the required number of hours for each. It is important to note that lifetime awards cannot be awarded to groups, and groups that are awarded with any of the other three (bronze, silver, gold) awards must assure that the each individual in the group has contributed a minimum of 25 volunteer hours to the total. Individuals must submit their hours to a **certifying organization** that will **review**, **verify** hours served, **order** and **distribute** the award.

Who Can Become A Certifying Organization?

Nonprofit, community and faith-based organizations, businesses, schools and colleges, membership and trade associations, and federal, state or local government agencies can all Your email: Enter email address...

Comments

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admin: Interesting point. Now let's look further into why God chose to have mercy

Forum

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ttr: John, Attending a church affects one's morality, and therefore the relatio

mother of the son: How is it the parents fault? I had NO problem with my son

admin: I understand that you may not agree with the opinion of the author of this

John: What is the religion? The religion is belief systems that relationship betw

truthwillsetmefree: good question :)

MountainMom: Your story is so similar to that of mine with my son, and so many others th

Site Map

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The WMSCOG "Awarded by President Obama"?

serve as certifying organizations. In order to become a certifying organization, the entity is required to fill out a <u>short application</u> that will be reviewed within 10-15 business days. Once approved, the certifying organization orders the awards and present them to the nominees. The cost of each award varies between \$1.00-\$4.75 each. Click <u>here</u> for a list of award packages.

The WMSCOG Is Their Own Certifying Organization?

A representative of the Presidential Volunteer Services Award office informs us that the WMSCOG registered to be a certifying organization and that the registered agent on their account is Tara Byrne Whalen, WMSCOG missionary of the Ridgewood, New Jersey location. The World Mission Society Church of God certified and ordered President's Volunteer Service Awards and numerous bronze, silver, and gold pins for the following 15 WMSCOG locations:

- 1. Boston, MA
- 2. Delaware
- 3. Long Island, NY
- 4. Manhattan, NY
- 5. Queens, NY
- 6. Louisville, KY
- 7. Maryland
- 8. New Hampshire
- 9. Philadelphia, PA
- 10. Puerto Rico
- 11. Richmond, VA
- 12. Washington, DC
- 13. Central New Jersey
- 14. Bogota, NJ
- 15. Ridgewood, NJ

According to the representative of the Presidential Volunteer Service Award office, the WMSCOG should not have nominated their Ridgewood, New Jersey location for the award since the "certifying organization" would in essence be awarding themselves.

The WMSCOG added their award to the English site <u>here</u> (click on "THE WHITE HOUSE WASHINGTON") and in contrast to their English site, the WMSCOG added the award they presented to Joo Cheol Kim on their official Korean site <u>here</u>. Why did they choose to **omit Joo Cheol Kim's award from their English site**? Could it be because one of the requirements of the award is that the volunteer <u>must be a U.S. Clitzen</u>?

Conclusion

What did the WMSCOG announce to its members regarding this award that would lead someone like "STAR" to walk away with the impression that President Obama had recognized the organization? I seriously doubt that President Obama is even aware of the WMSCOG's existence. Are WMSCOG members wearing the pins that the Ridgewood location ordered for them when they are out recruiting? Does the WMSCOG consider the hours that members spend recruiting as volunteering in the community?

After investigating the details of this award, "STAR", apparently my church isn't signing up to nominate itself "to receive such a prestigious award".

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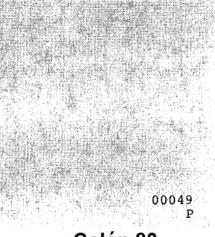
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