

To: Scott J. Fields, Esquire
Synnestvedt & Lechner
2600 One Reading Center
1101 Market Street
Philadelphia, PA 19107

July 22, 1992

Re: World Service Office, Inc v. David Moorhead
S & L File No. 17047

Dear Scott,

I have been advised that my client David Moorhead has died on July 14, 1992. Since his death, I have been contacted by several concerned Fellowship Members who are willing to step forward as a substituted party defendant to proceed on David's behalf under Federal Rule 25.

The necessity of continuing this action would be for the Court to monitor the WSO compliance with the January 1991 Settlement Order and the April, 1992 Motion to Commit the Intellectual Property Trust Document as done under the Court's supervision.

Over the last weekend, I met with several members of the Fellowship and had the opportunity to hear at great length the dissatisfaction with the manner in which the World Service Office has proceeded with compliance under the Motion committing the Fellowship Intellectual Property Trust.

The Motion quite specifically requires that the World Service Board and a RSR-Working Group "solicit" additional input on the Fellowship Intellectual Property Trust for presentation to the Fellowship in the 1993 Conference Agenda Report.

There has been no know effort made to schedule any workshops, there has been no know mailings submitted to the RSR's respecting the manner and procedure that the home groups can submit review and input for the Trust Document nor has the NA Way or World mailings even mentioned solicitation of input.

George Hollahan in his letter to me of June 3, 1992, sets forth a deadline for input of October 1, 1992, however, provides no instruction on how input can be submitted and to whom.

I am concerned that your client is not acting in good faith. Please have your client advise as to what steps are being taken to solicit input and how input can be received.

Further, in George Hollahan's letter dated June 3, 1992. Mr. Hollahan provided me with copies of draft "Minutes" of several pages of day Four of the WSC and also several pages of day Five of the 1992 WSC.

I also received a cassette tape of the proceedings that took place at the conference on Wednesday morning, April 29, 1992. I was literally shocked by the representation made by your clients that their legal counsel had instructed them that the Moorhead legal action had no affect whatsoever on their ability to go forward with the submission and approval by the Conference of the World Service Board of Trustees Motion No. 8, "The Fellowship Intellectual Property Trust".

I do not understand whether this

claim by your clients is indicative of the lack of communication between legal counsel and the WSO, a simply blatant disregard for the authority of the Court while a legal action in the nature of a Motion for Preliminary Injunction was pending.

This concern is compounded when one considers the strong feelings Judge Pollak expressed initially and were again clearly evident during the Court conference call session held the morning of the vote on the Motion to approve the Intellectual Trust Document. (I enclose a copy of the transcript).

Finally, last week I received an Order entered by Judge Pollak in a drafted form setting forth that my client's Motion for Expedited Proceeding be denied. Was this Order generated by your request without advance notice to me or was it Court generated? In any event, Judge Pollak correctly modified the Order to add the words "as moot" to the denial of the Preliminary Injunction and Expedited because of the result of the conference vote on Wednesday, April 29, 1992.

I would be suspect that the Court will entertain a conference call to be made aware of the progress of your client receiving input and the documented disregard for the authority of the Court under the continuing jurisdiction.

Please advise as to your availability.

Very truly yours,

Greg B. Emmons

Greg B. Emmons and Associates, PC