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Attorneys for Plaintiffs

Michael Ferguson, Benjamin Unger, Sheldon
Bruck, Chaim Levin, Jo Bruck, Bella Levin,

Plaintiffs,

v.

JONAH (Jews Offering New Alternatives for
Healing f/k/a Jews Offering New Alternatives
to Homosexuality), Arthur Goldberg, Alan
Downing, Alan Downing Life Coaching LLC,

Defendants.

SUPERIOR COURT OF NEW JERSEY
HUDSON COUNTY, LAW DIVISION

Docket No. L-5473-12

CIVIL ACTION

**NOTICE OF MOTION TO COMPEL
DEFENDANTS' COMPLIANCE WITH
JUNE 7, 2013 ORDER**

To: Michael P. Laffey, Esq.
Messina Law Firm P.C.
961 Holmdel Road
Holmdel, NJ 07733-2103

Charles S. LiMandri, Esq.
Teresa L. Mendoza, Esq.
Freedom of Conscience Defense Fund
P.O. Box 9520
Rancho Santa Fe, CA 92067

PLEASE TAKE NOTICE that Plaintiffs shall apply to the Honorable Peter F. Bariso, A.J.S.C. at the Superior Court of New Jersey located at 595 Newark Avenue, Jersey City on Friday, August 9, 2013 at 9:30 a.m. for an Order compelling the Defendants to comply with the Court's June 7, 2013 Order and make, in a timely fashion, accurate and complete production of responsive documents in proper form and redacted only to the extent contemplated by the June 7, 2013 Order. Plaintiffs further request that the Court compel Defendants to certify that they made adequate efforts to search for and identify responsive communications and that their process of review, redaction, and production has complied with all relevant rules and obligations. If Defendants are unwilling or unable to produce the listserv communications in the proper form and in a timely manner, then Plaintiffs request that the Court compel Defendants to produce the listserv in its entirety in electronic form subject to any protections the Court deems appropriate to maintaining the confidentiality of the identities of the listserv participants.

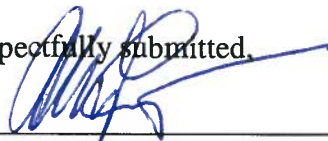
A proposed form of Order is attached. In support of this motion, Plaintiffs will rely upon the Certifications of Scott D. McCoy, Esq. and Lina Bensman, Esq. and brief submitted herewith.

ORAL ARGUMENT: Plaintiffs request Oral Argument if this matter is contested.

DISCOVERY END DATE: The discovery end date is May 23, 2014.

Dated: July 18, 2013

Respectfully submitted,



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