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Attorneys for Plaintiffs

Michael Ferguson, Benjamin Unger, 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 PLAINTIFFS' MOTION
TO ENFORCE PERMANENT
INJUNCTION AND FOR DEFAULT
JUDGMENT**

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

PLEASE TAKE NOTICE that, pursuant to *R. 1:10-3*, Plaintiffs Michael Ferguson, Benjamin Unger, Chaim Levin, and Jo Bruck 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 April 12, 2019 for an order to enforce the Court's December 18, 2015 *Order Granting Permanent Injunctive Relief and Awarding Attorneys' Fees* (the "Permanent Injunction"), for default judgment against JONAH, Arthur Goldberg and Elaine Berk for failure to pay the Fee Award as provided for in the Permanent Injunction, and to initiate summary proceedings against Defendants for criminal contempt pursuant to *R. 1:10-2*.

A proposed form of order accompanies this motion. In support of this motion, Plaintiffs will rely upon the Certification of Lina Bensman and the brief submitted herewith.

ORAL ARGUMENT: Plaintiffs request oral argument if this matter is contested.

Dated: March 27, 2019

Respectfully submitted,

/s/ Bruce D. Greenberg

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