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8803-01

IN THE SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

DONALD L. BARNETT,)
)
Plaintiff,)
)
v.)
)
JACK A. HICKS, JACK H. DuBOIS and)
E. SCOTT HARTLEY, individually)
and as the Board of Directors)
of COMMUNITY CHAPEL AND BIBLE)
TRAINING CENTER AND COMMUNITY)
CHAPEL AND BIBLE TRAINING)
CENTER,)
Defendants.)

NO. 88-2-04148-2

MOTION FOR ORDER
SHORTENING TIME FOR
DEPOSITIONS

COMES NOW the plaintiff and moves this court as follows:

1. Relief Requested. The plaintiff requests that the court grant an Order setting the depositions of E. Scott Hartley, Jack Hicks and Jack H. DuBois for Wednesday, March 9, 1988 and that said defendants be required to appear and respond pursuant to the Subpoena Duces Tecums and Notice of Depositions provided to their counsel.

2. Statement of Facts. The plaintiff has been the Pastor of the Community Chapel and Bible Training Center up to March 4, 1988. Without the knowledge of the plaintiff, the defendants as the Board of Directors, and contrary to the provisions of the

MOTION FOR ORDER
SHORTENING TIME - 1

1 Articles of Incorporation of Community Chapel and Bible Training
2 Center, as amended, failed to provide notice of a meeting of the
3 Board of Directors and to obtain the concurrence of the plaintiff
4 to changes.

5 Said defendants, amended the Articles of Incorporation and
6 removed therefrom the provision requiring that the plaintiff con-
7 cur in any decision to modify or change the Bylaws of the
8 Corporation. As a result thereof, said defendants have removed
9 the plaintiff from his position as the pastor and president of
10 the corporation.

11 The foregoing ^{information} events became available to the plaintiff when
12 the plaintiff sought a temporary restraining order to prevent the
13 defendants from taking any action contrary to the Articles of
14 Incorporation of the nonprofit corporation. At that time, the
15 plaintiff found that the defendants had taken said action and a
16 restraining order was not issued; however, a show cause order was
17 entered to be heard on Friday, March 11, 1988.

18 In order to support a fact finding hearing, it is necessary
19 that the depositions of the defendants be taken and the plaintiff
20 requests that the court enter an order setting the time of the
21 depositions.

22 3. Statement of Issues. Is the court allowed to set an
23 order shortening the time period for the taking of depositions of
24 the opposing parties.

25 MOTION FOR ORDER
SHORTENING TIME - 2

4. Evidence Relied Upon. The plaintiff relies upon the following evidence:

1. Complaint.
2. Declaration of Donald L. Barnett.
3. Declaration of Brian Brookbank.
4. Declaration of Carol Rockwood.
5. Motion and Temporary Restraining Order.
6. Order (March 4, 1988).
7. Declaration of Rodney G. Pierce.

5. Authority.

Civil Rule 30 provides that when a leave of court, granted with or without notice, must be obtained only if the plaintiff seeks to take a deposition prior to the expiration of 30 days after service of the summons and complaint upon any defendant for service made under Rule 4(e).

6. Proposed Order. Our proposed order is attached hereto.

Dated this 7th day of March, 1988.

LAW OFFICES OF RODNEY G. PIERCE

Rodney G. Pierce
Attorney for Plaintiff

MOTION FOR ORDER
SHORTENING TIME - 3

LAW OFFICES OF
RODNEY G. PIERCE
THE DUNCAN BUILDING
315 SECOND AVENUE SOUTH
SEATTLE, WASHINGTON 98104
(206) 622-7050

1 54/9.0
8803-01

3 IN THE SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

4 DONALD L. BARNETT,)

5 Plaintiff,)

6 v.)

NO. 88-2-04148-2

7 JACK A. HICKS, JACK H. DuBOIS and)
8 E. SCOTT HARTLEY, individually)
9 and as the Board of Directors)
10 of COMMUNITY CHAPEL AND BIBLE)
11 TRAINING CENTER AND COMMUNITY)
12 CHAPEL AND BIBLE TRAINING)
13 CENTER,)
14 Defendants.)

MOTION FOR ORDER
SHORTENING TIME FOR
WITHIN WHICH TO
HEAR A MOTION

12 COMES NOW the plaintiff and moves this court for an order
13 shortening time within which to hear the plaintiff's motion on
14 file herein.

15 The moving party shows as cause for this Motion Shortening
16 Time that unless the the time for hearing the next motion is
17 shortened, the said motion shall be moot and for all practical
18 purposes it will be too late for the requested relief to be
19 effectual. This is necessary for the reasons stated in the
20 Motion for Shortening Time for Taking Depositions and, par-
21 ticularly, because the response to the request for a temporary
22 restraining order and preliminary injunctions shall be heard on
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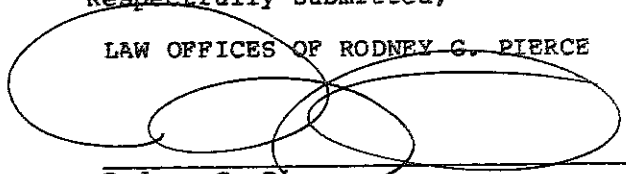
1 March 11, 1988.

2 This motion is brought ex-parte according to Civil Rule 6(d)
3 as based on the files and records herein and upon the subjoined
4 declaration.

5 Dated this 7th day of March, 1988.

6 Respectfully submitted,

7 LAW OFFICES OF RODNEY G. PIERCE

8 
9 _____
10 Rodney G. Pierce
11 Attorney for Plaintiff

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IN THE SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

DONALD L. BARNETT,)
)
Plaintiff,)
)
v.)
)
JACK A. HICKS, JACK H. DuBOIS and)
E. SCOTT HARTLEY, individually)
and as the Board of Directors)
of COMMUNITY CHAPEL AND BIBLE)
TRAINING CENTER AND COMMUNITY)
CHAPEL AND BIBLE TRAINING)
CENTER,)
Defendants.)

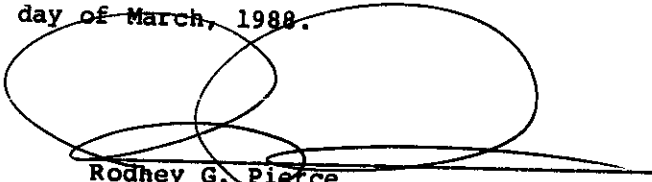
NO. 88-2-04148-2

DECLARATION OF RODNEY
G. PIERCE IN SUPPORT
OF MOTION TO SHORTEN
TIME

I am the attorney for the plaintiff herein and am making this declaration in support of the foregoing motion. I am familiar with the facts and circumstances surrounding this case, know the contents of this Motion Shortening Time and the Motion Shortening Time to Hear a Motion and believe the same to be true.

I declare at Seattle, Washington on the below signed date unde penalty of perjury according to the laws of the State of Washington that the foregoing is true and correct.

Dated this 7th day of March, 1988.



Rodney G. Pierce

DECLARATION IN SUPPORT
OF MOTION FOR ORDER - 1

LAW OFFICES OF
RODNEY G. PIERCE
THE DUNCAN BUILDING
315 SECOND AVENUE SOUTH
SEATTLE, WASHINGTON 98104
(206) 622-7050



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IN THE SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

DONALD L. BARNETT,)
)
Plaintiff,)
)
v.)
)
JACK A. HICKS, JACK H. DuBOIS and)
E. SCOTT HARTLEY, individually)
and as the Board of Directors)
of COMMUNITY CHAPEL AND BIBLE)
TRAINING CENTER AND COMMUNITY)
CHAPEL AND BIBLE TRAINING)
CENTER,)
Defendants.)

NO. 88-2-04148-2

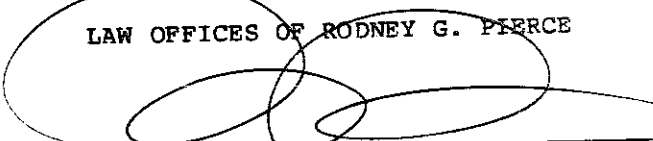
NOTICE OF DEPOSITION
UPON ORAL EXAMINATION

The deposition upon oral examination of the following described person(s) will be taken at the following time, date, and place:

Witness(es): Community Chapel and Bible Training Center
Date: March 9, 1988
Time: 1:30 p.m.
Place: Rodney G. Pierce Law Firm
315 - 2nd Avenue South #300
Seattle, WA 98104

Dated this 7th day of March, 1988.

LAW OFFICES OF RODNEY G. PIERCE


Rodney G. Pierce
Attorney for Plaintiff

NOTICE OF DEPOSITION
UPON ORAL EXAMINATION

LAW OFFICES OF
RODNEY G. PIERCE
THE DUNCAN BUILDING
315 SECOND AVENUE SOUTH
SEATTLE WASHINGTON 98104
(206) 622 7050

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IN THE SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

DONALD L. BARNETT,)
)
 Plaintiff,)
)
 v.)
)
 JACK A. HICKS, JACK H. DuBOIS and)
 E. SCOTT HARTLEY, individually)
 and as the Board of Directors)
 of COMMUNITY CHAPEL AND BIBLE)
 TRAINING CENTER AND COMMUNITY)
 CHAPEL AND BIBLE TRAINING)
 CENTER,)
 Defendants.)

NO. 88-2-04148-2

NOTICE OF DEPOSITION
UPON ORAL EXAMINATION

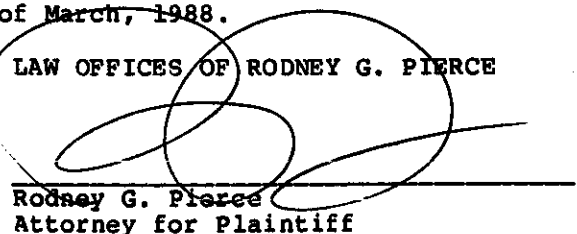
The deposition upon oral examination of the following described person(s) will be taken at the following time, date, and place:

Witness(es): Jacks Hicks
Date: March 9, 1988
Time: 2:00 p.m.
Place: Rodney G. Pierce Law Firm
315 - 2nd Avenue South #300
Seattle, WA 98104

Deponents should bring with them any and all documents identified on the Subpoena Duces Tecum of this date.

Dated this 7th day of March, 1988.

LAW OFFICES OF RODNEY G. PIERCE



Rodney G. Pierce
Attorney for Plaintiff

NOTICE OF DEPOSITION
UPON ORAL EXAMINATION

LAW OFFICES OF
RODNEY G. PIERCE
THE DUNCAN BUILDING
315 SECOND AVENUE SOUTH
SEATTLE, WASHINGTON 98104
(206) 622-7050

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IN THE SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

DONALD L. BARNETT,)
)
Plaintiff,)
)
v.)
)
JACK A. HICKS, JACK H. DuBOIS and)
E. SCOTT HARTLEY, individually)
and as the Board of Directors)
of COMMUNITY CHAPEL AND BIBLE)
TRAINING CENTER AND COMMUNITY)
CHAPEL AND BIBLE TRAINING)
CENTER,)
Defendants.)

NO. 88-2-04148-2

NOTICE OF DEPOSITION
UPON ORAL EXAMINATION

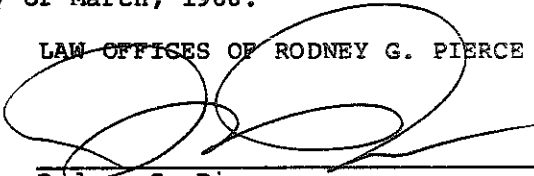
The deposition upon oral examination of the following described person(s) will be taken at the following time, date, and place:

Witness(es): Jack H. DuBois
Date: March 9, 1988
Time: 3:00 p.m.
Place: Rodney G. Pierce Law Firm
315 - 2nd Avenue South #300
Seattle, WA 98104

Deponents should bring with them any and all documents identified on the Subpoena Duces Tecum of this date.

Dated this 7th day of March, 1988.

LAW OFFICES OF RODNEY G. PIERCE



Rodney G. Pierce
Attorney for Plaintiff

NOTICE OF DEPOSITION
UPON ORAL EXAMINATION

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IN THE SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

DONALD L. BARNETT,)
)
 Plaintiff,)
)
 v.)
)
 JACK A. HICKS, JACK H. DuBOIS and)
 E. SCOTT HARTLEY, individually)
 and as the Board of Directors)
 of COMMUNITY CHAPEL AND BIBLE)
 TRAINING CENTER AND COMMUNITY)
 CHAPEL AND BIBLE TRAINING)
 CENTER,)
 Defendants.)

NO. 88-2-04148-2

SUBPOENA DUCES
TECUM PURSUANT TO
CR 30(b)(6)

THE STATE OF WASHINGTON, TO: Community Chapel and Bible Training
Center

PURSUANT to Civil Rule 30(b)(6) you shall make a designation
of one or more persons to appear:

Date: March 9, 1988
Time: 1:30 p.m.
Place: Law Offices of Rodney G. Pierce
315 - 2nd Avenue South #300
Seattle, WA 98104

for the purpose of giving testimony as to the matters listed
below; and you shall bring with you the following:

1. Any and all tape recordings of congregational meetings, services or community Chapel meetings from January 1, 1988 to present.
2. Any and all documents representing any type of meeting, summary, involved or in any way relating to any one of the defendants in this litigation.

SUBPOENA DUCES TECUM - 1

LAW OFFICES OF
RODNEY G. PIERCE
THE DUNCAN BUILDING
315 SECOND AVENUE SOUTH
SEATTLE, WASHINGTON 98104
(206) 622-7050

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3. Any and all documents representing any type of correspondence or communication to or from any one of the defendants in this litigation representing or in any way relating to the Community Chapel and Bible Training Center.

4. Any and all documents representing or in any way relating to the Articles of Incorporation of Community Chapel and Bible Training Center and any amendments thereto.

5. Any and all documents representing or in any way relating to the Bylaws of Community Chapel and Bible Training Center and any amendments thereto.

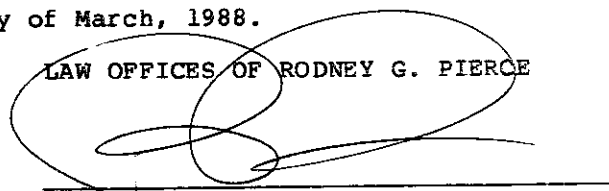
6. Any and all documents in the possession or under the control of any one of the defendants relating in any manner to the removal of the plaintiff as the pastor of the Community Chapel and Bible Training Center.

7. Any and all documents in the possession or under control of any one of the defendants relating in any manner to the removal of the plaintiff as the president of the Community Chapel and Bible Training Center.

8. Any and all documents whether written or oral, representing any type of communication from any person or company which relates in any manner to removal of the plaintiff from his position with the Community Chapel and Bible Training Center.

Dated this 7th day of March, 1988.

LAW OFFICES OF RODNEY G. PIERCE



Rodney G. Pierce
Attorney for Plaintiff

IN THE SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

DONALD L. BARNETT,)
)
 Plaintiff,)
)
 v.)
)
 JACK A. HICKS, JACK H. DuBOIS and)
 E. SCOTT HARTLEY, individually)
 and as the Board of Directors)
 of COMMUNITY CHAPEL AND BIBLE)
 TRAINING CENTER AND COMMUNITY)
 CHAPEL AND BIBLE TRAINING)
 CENTER,)
 Defendants.)

NO. 88-2-04148-2
SUBPOENA DUCES
TECUM

THE STATE OF WASHINGTON, to: E. Scott Hartley,

GREETINGS:

YOU ARE HEREBY COMMANDED to be and appear at the offices of
Rodney G. Pierce, 300 Duncan Building, 315 Second Avenue South,
Seattle, Washington on the 9th day of March, 1988 at the hour
of 1:00 o'clock p.m., then and there to testify as a witness at
the request of the plaintiff in the above entitled cause, to
remain in attendance upon the undersigned or other Notary Public
until discharged and bring the following documents:

All items listed on attached Appendix "A" made
a part hereto.

HEREIN FAIL NOT AT YOUR PERIL

WITNESS my hand and official this 7th day of March, 1988.

Rodney G. Pierce
Attorney for Plaintiff

LAW OFFICES OF
RODNEY G. PIERCE
THE DUNCAN BUILDING
315 SECOND AVENUE SOUTH
SEATTLE, WASHINGTON 98104
(206) 622-7050

APPENDIX A
TO SUBPOENA DUCES TECUM

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3 The following document in the witness's possession should be
4 brought to and remain available during the deposition.

5 1. Any and all tape recordings of congrega-
6 tional meetings, services or community Chapel
7 meetings from January 1, 1988 to present.

8 2. Any and all documents representing any type
9 of meeting, summary, involved or in any way
10 relating to any one of the defendants in this
11 litigation.

12 3. Any and all documents representing any type
13 of correspondence or communication to or from
14 any one of the defendants in this litigation
15 representing or in any way relating to the
16 Community Chapel and Bible Training Center.

17 4. Any and all documents representing or in
18 any way relating to the Articles of
19 Incorporation of Community Chapel and Bible
20 Training Center and any amendments thereto.

21 5. Any and all documents representing or in
22 any way relating to the Bylaws of Community
23 Chapel and Bible Training Center and any amend-
24 ments thereto.

25 6. Any and all documents in the possession or
under the control of any one of the defendants
relating in any manner to the removal of the
plaintiff as the pastor of the Community Chapel
and Bible Training Center.

7. Any and all documents in the possession or
under control of any one of the defendants
relating in any manner to the removal of the
plaintiff as the president of the Community
Chapel and Bible Training Center.

8. Any and all documents whether written or
oral, representing any type of communication

APPENDIX "A" - 1

1 from any person or company which relates in any
2 manner to removal of the plaintiff from his
3 position with the Community Chapel and Bible
4 Training Center.
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APPENDIX "A" - 2

LAW OFFICES OF
RODNEY G. PIERCE
THE DUNCAN BUILDING
315 SECOND AVENUE SOUTH
SEATTLE WASHINGTON 98104
(206) 622-7050

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IN THE SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

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4 DONALD L. BARNETT,)
5)
6 Plaintiff,)
7)
8 v.)
9)
10 JACK A. HICKS, JACK H. DuBOIS and)
11 E. SCOTT HARTLEY, individually)
12 and as the Board of Directors)
13 of COMMUNITY CHAPEL AND BIBLE)
14 TRAINING CENTER AND COMMUNITY)
15 CHAPEL AND BIBLE TRAINING)
16 CENTER,)
17 Defendants.)
18)
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NO. 88-2-04148-2

SUBPOENA DUCES
TECUM

THE STATE OF WASHINGTON, to: Jack A. Hicks,

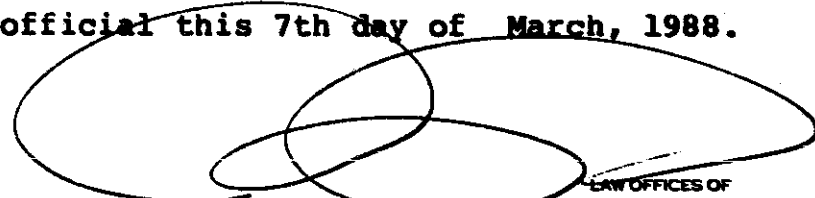
GREETINGS:

14 YOU ARE HEREBY COMMANDED to be and appear at the offices of
15 Rodney G. Pierce, 300 Duncan Building, 315 Second Avenue South,
16 Seattle, Washington on the 9th day of March, 1988 at the hour
17 of 2:00 o'clock p.m., then and there to testify as a witness at
18 the request of the plaintiff in the above entitled cause, to
19 remain in attendance upon the undersigned or other Notary Public
20 until discharged and bring the following documents:

All items listed on attached Appendix "A" made
a part hereto.

HEREIN FAIL NOT AT YOUR PERIL

WITNESS my hand and official this 7th day of March, 1988.



LAW OFFICES OF
Rodney G. Pierce
 Attorney for Plaintiff
 THE DUNCAN BUILDING
 315 SECOND AVENUE SOUTH
 SEATTLE, WASHINGTON 98104
 (206) 622-7050

"Document" means all written, printed, typed, punched, taped, filmed or graphic matter, however produced or reproduced, of every kind and description, now or formerly in your actual or constructive possession, custody, trust, care or control, including but not limited to any correspondence (including letters, cables, telegrams, TWSx, and telexes); memoranda and notes, memoranda of conversations, conferences or telephone conversations; reports, data compilations or analyses; logs and records; photographs; books; papers; manuals; handbooks; bulletins; advisories; messages; magazines; periodicals; film strips or movies; press releases; newspaper clippings; pamphlets; studies; notations; working papers; charts; graphs; plans; drawings; diagrams; computer printouts; indexes; minutes; transcripts; contracts; agreements; leases; legal pleadings; invoices; billings; statements; accounting books or records; financial data of any kind; journals; ledgers; diaries; tax returns; bylaws; rules; regulations; constitutions; annual reports; programs; certifications; resolutions; any electronic or other recording of any kind or nature and any mechanical or electronic sound recordings or transcripts thereof, however produced or reproduced; and all copies or facsimilies of documents by whatever means made.

"Person" or "persons" means all entities, including, without limiting the generality of the foregoing, all individuals, associations, companies, partnerships, joint ventures, corporations, trusts or estate, public agencies, departments, bureaus, commissions and boards.

IN THE SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

DONALD L. BARNETT,)
)
 Plaintiff,)
)
 v.)
)
 JACK A. HICKS, JACK H. DuBOIS and)
 E. SCOTT HARTLEY, individually)
 and as the Board of Directors)
 of COMMUNITY CHAPEL AND BIBLE)
 TRAINING CENTER AND COMMUNITY)
 CHAPEL AND BIBLE TRAINING)
 CENTER,)
 Defendants.)

NO. 88-2-04148-2
 AMENDED SUBPOENA
 DUCES TECUM

THE STATE OF WASHINGTON, to: Jack H. DuBois,

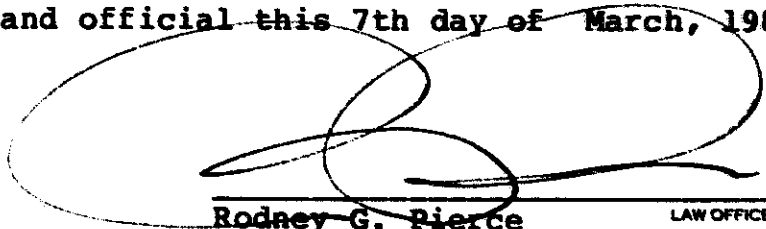
GREETINGS:

YOU ARE HEREBY COMMANDED to be and appear at the offices of
 Rodney G. Pierce, 300 Duncan Building, 315 Second Avenue South,
 Seattle, Washington on the 9th day of March, 1988 at the hour
 of 3:00 o'clock p.m., then and there to testify as a witness at
 the request of the plaintiff in the above entitled cause, to
 remain in attendance upon the undersigned or other Notary Public
 until discharged and bring the following documents:

All items listed on attached Appendix "A" made
 a part hereto.

HEREIN FAIL NOT AT YOUR PERIL

WITNESS my hand and official this 7th day of March, 1988.



Rodney G. Pierce
 Attorney for Plaintiff

LAW OFFICES OF
 RODNEY G. PIERCE
 THE DUNCAN BUILDING
 315 SECOND AVENUE SOUTH
 SEATTLE, WASHINGTON 98104
 (206) 622-7050

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8803-01

IN THE SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

DONALD L. BARNETT,)
)
Plaintiff,)
)
v.)
)
JACK A. HICKS, JACK H. DuBOIS and)
E. SCOTT HARTLEY, individually)
and as the Board of Directors)
of COMMUNITY CHAPEL AND BIBLE)
TRAINING CENTER AND COMMUNITY)
CHAPEL AND BIBLE TRAINING)
CENTER,)
Defendants.)

NO. 88-2-04148-2
ORDER FOR MOTION
SHORTENING TIME
WITHIN WHICH TO
HEAR A MOTION

Pursuant to the foregoing motion and good cause appearing for the entry hereof, the plaintiff's Motion for Order Shortening time within which to Hear a Motion be and the same is hereby set for hearing on the Civil Motions Calendar before the Civil Motions Judge in the King County Courthouse, on the 9th day of March 1988 at 9:30 o'clock a.m. or as soon thereafter as the matter may be heard; and the moving party shall cause a conformed copy of this Motion and Order and the Motion for Order Shortening Time for Depositions to be served upon opposing counsel as soon as is practical.

DONE IN OPEN COURT this 7th day of March, 1988.


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MAR 7 1988

JACK A. RICHY
JUDGE / COURT COMMISSIONER

Presented by:

LAW OFFICES OF RODNEY G. PIERCE

BY 
Rodney G. Pierce,
Attorney for Plaintiff

ORDER SHORTENING TIME - 2

LAW OFFICES OF
RODNEY G. PIERCE
THE DUNCAN BUILDING
315 SECOND AVENUE SOUTH
SEATTLE, WASHINGTON 98104
(206) 622-7050

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IN THE SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

DONALD L. BARNETT,)
)
 Plaintiff,)
)
 v.)
)
 JACK A. HICKS, JACK H. DuBOIS and)
 E. SCOTT HARTLEY, individually)
 and as the Board of Directors)
 of COMMUNITY CHAPEL AND BIBLE)
 TRAINING CENTER AND COMMUNITY)
 CHAPEL AND BIBLE TRAINING)
 CENTER,)
 Defendants.)

NO. 88-2-04148-2

ORDER FOR SHORTENING
TIME FOR TAKING
DEPOSITIONS

THIS MATTER having come on for hearing before the undersigned Judge in the above entitled court on the motion of the plaintiff to allow for the depositions of the defendants prior to the expiration of the time period set forth in the Court Rules and the court having reviewed the records and files herein and deems itself fully advised on the premises, now, therefore, it is hereby

ORDERED that the depositions of the defendants may be taken prior to 30 days pursuant to court rules and plaintiff may take

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1 depositions on Wednesday, March 9, 1988 pursuant to the Subpoenas
2 and Notice of Depositions on file herein; provided that, for ①

3 DONE IN OPEN COURT this 9th day of March, 1988.

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JUDGE/COURT COMMISSIONER

7 Presented by:

8 LAW FIRM OF RODNEY G. PIERCE

9
10 By 
11 Rodney G. Pierce
Attorney for Plaintiff

12 ① purposes of 3/9/88 deposition, documents in
13 the subpoena duces tecum item 1 shall be
14 limited to tapes of meeting of 2/26,
15 2/28, 3/4, 3/6 and meetings starting
16 on 1/25/88 regarding removal, item 3
17 shall exclude letters to attorneys
18 regarding suits pending against
19 Community Chapel and item 2 shall
20 be limited to documents from
21 10/1/87. RGP

22
23 JS copy received, James Shul
24
25 JS