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CHURCH OF SCIENTOLOGY INTERNATIONAL
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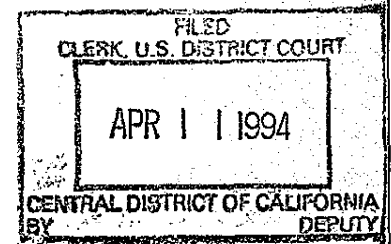
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14 UNITED STATES DISTRICT COURT
15 FOR THE CENTRAL DISTRICT OF CALIFORNIA
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17 CHURCH OF SCIENTOLOGY) CASE NO. CV 91-6426 HLH(Tx)
INTERNATIONAL, a California Non-)
18 Profit Religious Organization,) DECLARATION OF JAMES HALL
19 Plaintiff,)
20 vs.)
21 STEVEN FISHMAN and UWE GEERTZ,)
22 Defendants.)
23

24 I, JAMES HALL, declare as follows:

25 1. I am over the age of 18 and have personal knowledge of
26 the facts herein. If called upon as a witness, I could and would
27 competently testify thereto.

28 2. I am an employee of the Church of Scientology



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1 International. Since 1991, I have held the position of Quality
2 Control for Estates and Services at the location which houses the
3 studios of Golden Era Productions. As part of my duties, I am
4 responsible for ensuring that the grounds of this more than 500-
5 acre facility are professionally maintained to a very high
6 standard of quality. Our property, which is on the site of a
7 former resort, is located in a fertile agricultural area, and
8 with proper care and expertise, the grounds are kept in manner
9 that is both aesthetic and practical. (Ex. A)

10 3. On or about August of 1990, there were severe rainstorms
11 that resulted in a massive mud slide, which overran the highway
12 that goes through our property. This left a huge bed of mud,
13 three feet deep in many places, over acres of our land, including
14 an area of meadows. The extent of this is shown in the attached
15 photographs. (Ex. B) The mud came right up to several units
16 which are reserved for visitors to our property (Ex. C), and this
17 situation required immediate handling. Many of our staff,
18 regardless of their assigned positions, pitched in to assist in
19 clearing the mud from these buildings and in helping to restore
20 the grounds.

21 4. I have been informed that a former construction worker,
22 Andre Tabayoyon, has filed a declaration in which he tries to
23 characterize the re-seeding of these meadows as a "project so
24 that [Tom] Cruise and [Nicole] Kidman could romp there." That
25 assertion is completely false and silly.

26 5. Following the mud slide which destroyed the existing
27 ground cover on the meadows, we seeded the meadows with an
28 inexpensive, fast-growing grass seed. However, this grass did

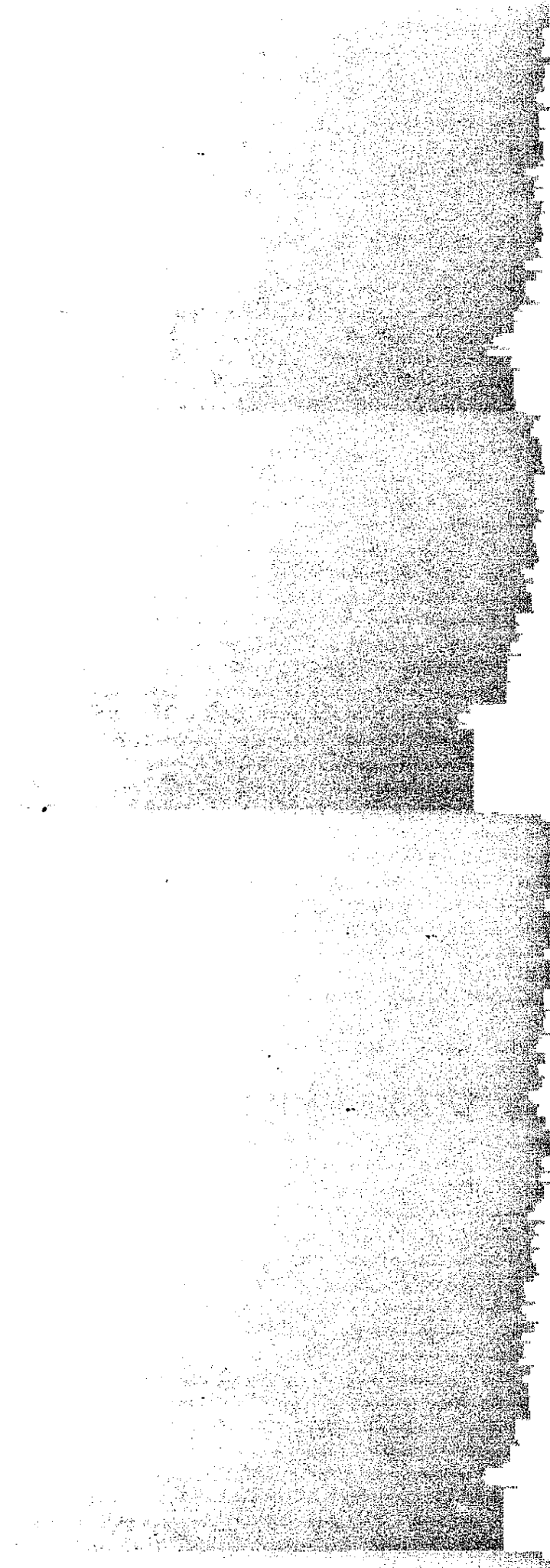
1 not grow well. It was then decided to use wild flowers as the
2 groundcover instead. This is also inexpensive and is a common
3 groundcover used in this area. These flowers grew to a height of
4 3-4 feet, and obviously render the area not fit for "romping" by
5 anyone. The wild flowers allowed many weeds to grow, so we re-
6 tilled the area and successfully re-seeded with better grass
7 seed. The meadows are now up to the high standards of the rest
8 of our property, and we are proud of their appearance. (Ex. D)
9 The rehabilitation of these grounds had nothing to do with Tom
10 Cruise, or anyone else's fanciful whims, but instead represents
11 our efforts to create an aesthetic area for all our staff and
12 artists and the general community to use and enjoy.

13 I declare under penalty of perjury under the laws of the
14 United States of America that the foregoing is true and correct.

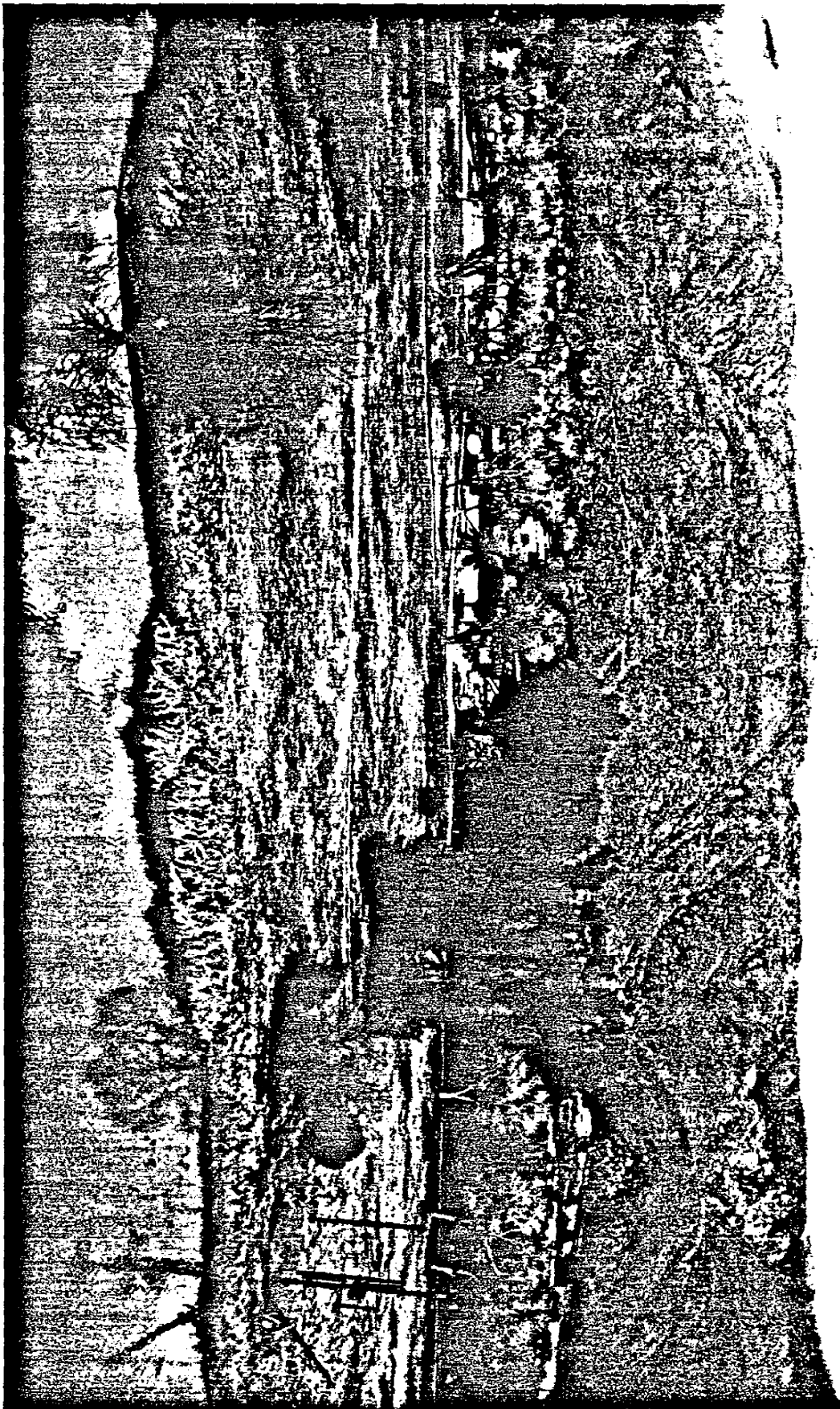
15 Executed this 11 day of April 1994.

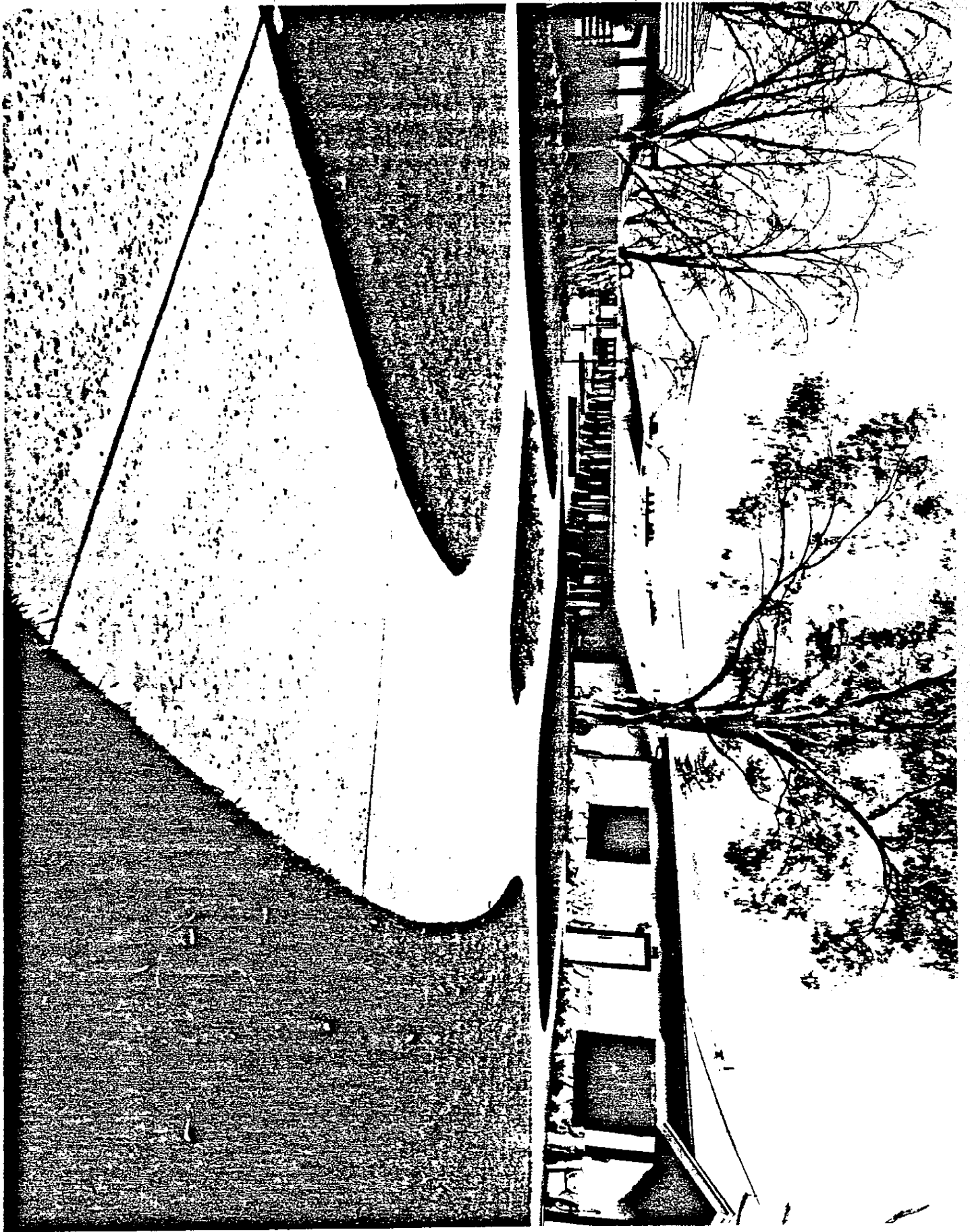
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17 JAMES HALL
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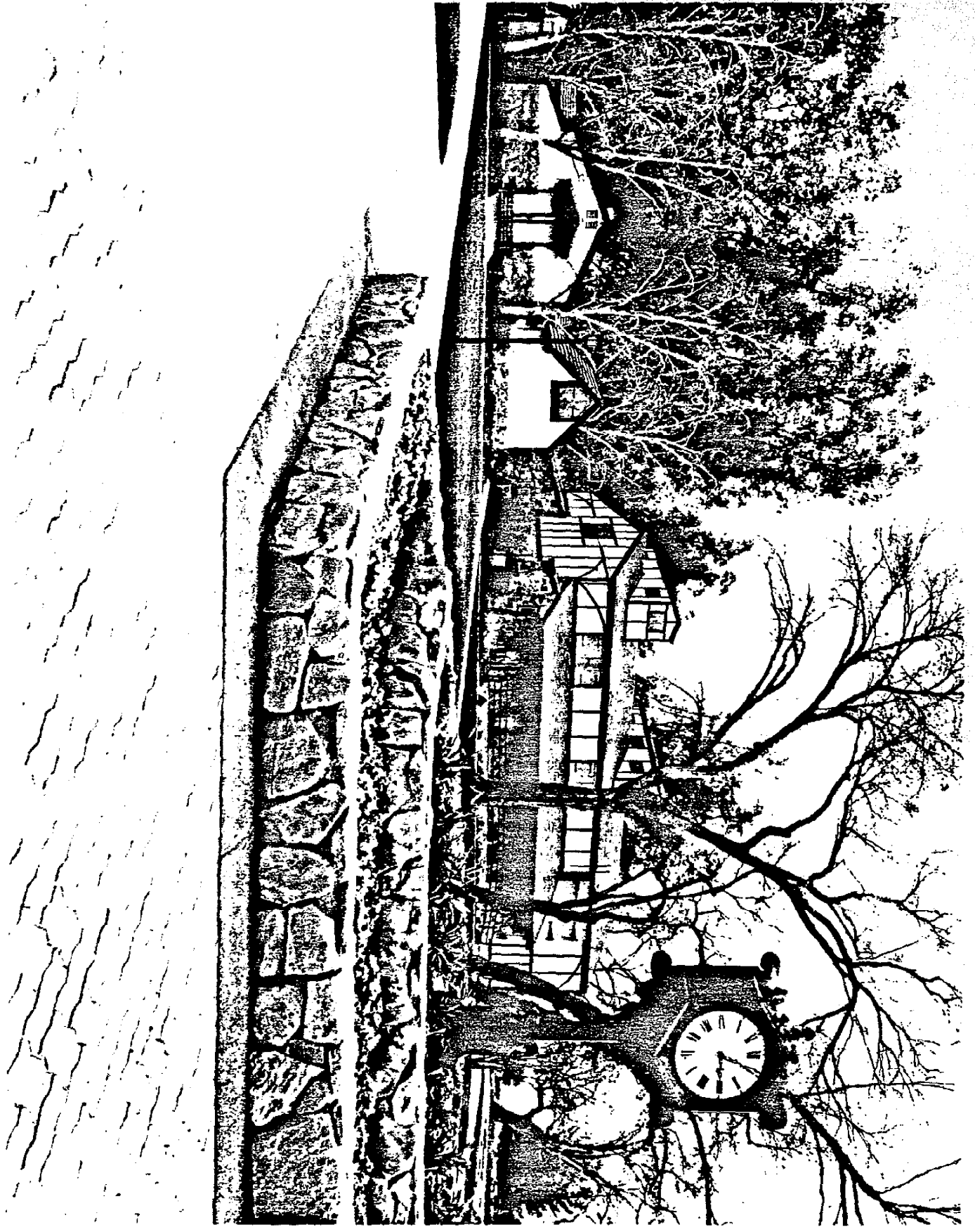
28 H:\FISHMAN\DECLARE\HALL.DEC

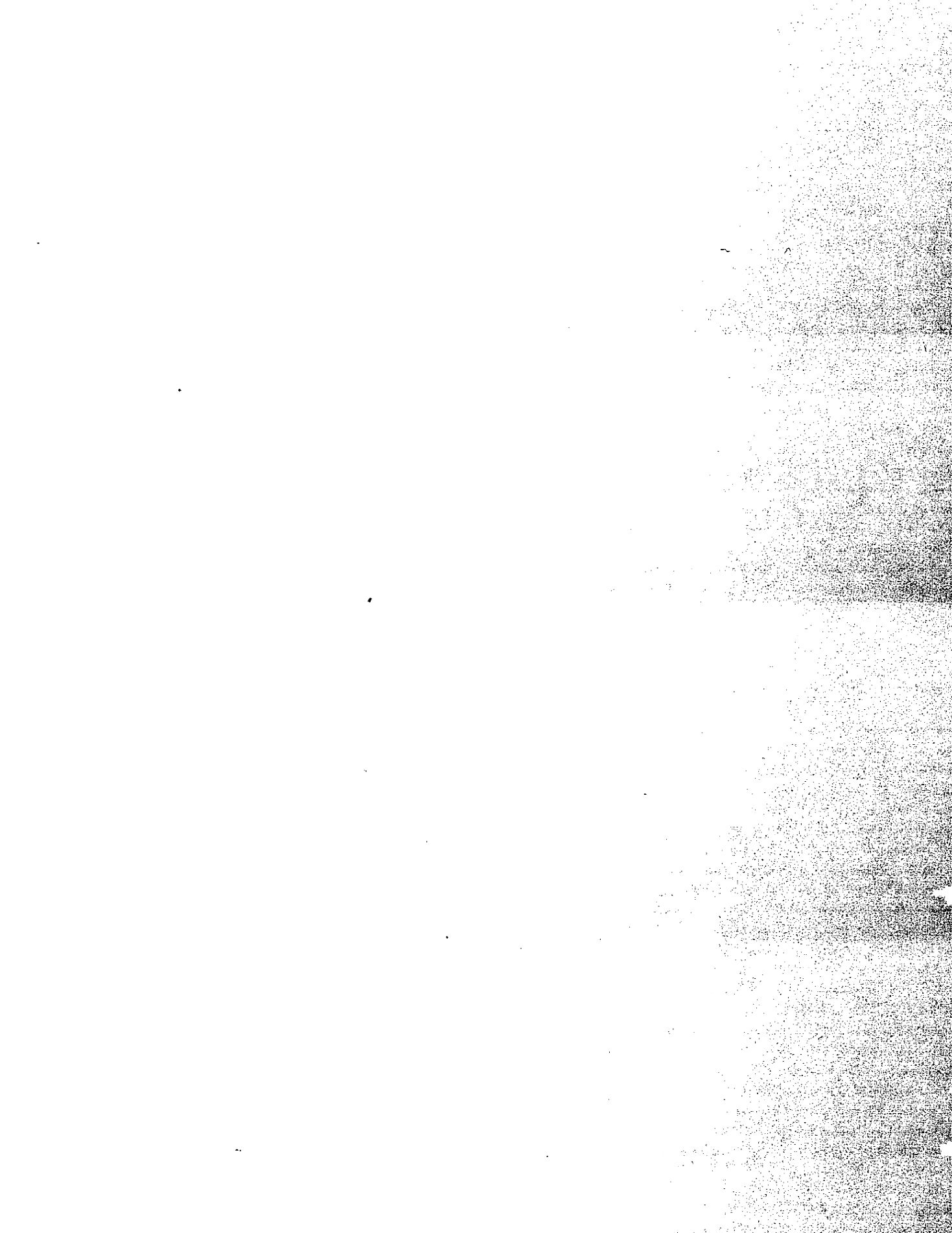












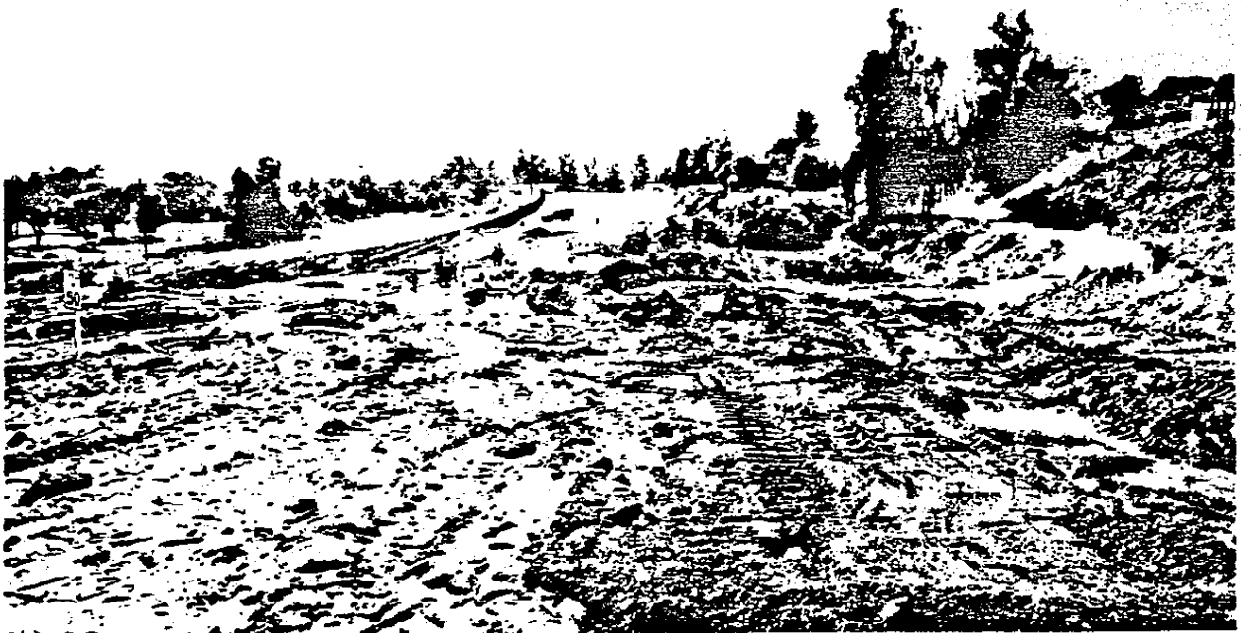


EXHIBIT C

