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 Attorney for Defendant,
Michele Colón

WORLD MISSION SOCIETY)	SUPERIOR COURT OF NEW JERSEY
CHURCH OF GOD)	LAW DIVISION: BERGEN COUNTY
)	
Plaintiff,)	DOCKET NO. BER-L-5274-12
)	
v.)	<u>Civil Action</u>
)	
MICHELE COLÓN,)	SECOND CERTIFICATION OF
)	PAUL S. GROSSWALD
Defendant.)	IN SUPPORT OF DEFENDANT
)	MICHELE COLÓN'S
)	MOTION TO DISMISS

I, Paul Grosswald, of full age, hereby certify as follows:

1. I am an attorney at law of the State of New Jersey and am the attorney for Defendant Michele Colón in the above-captioned matter. As such, I am fully familiar with the facts contained herein. I submit this Second Certification in support of Ms. Colón's Motion to Dismiss.
2. I was also one of the attorneys for Tyler Newton while Mr. Newton was being sued by the Plaintiff in a similar case in Virginia earlier this year. As such, I am fully familiar with the documents related to that case that are contained herein. That case was brought in the Circuit Court of the Commonwealth of Virginia, County of Fairfax, Case No. 2011-17163 (hereinafter the "Virginia Case").
3. Annexed hereto as Exhibit "8" is a true and accurate copy of select pages from the discovery demands (interrogatories and requests for document production) propounded by the Plaintiff against Mr. Newton in the Virginia Case, dated April 16, 2012.

4. Annexed hereto as Exhibit "9" is a true and accurate copy of a letter sent from the Plaintiff's Virginia attorney to Mr. Newton's Virginia attorney, dated May 4, 2012
5. Annexed hereto as Exhibit "10" is a true and accurate copy of a letter opinion and Order handed down by the court in the Virginia case on July 20, 2012.
6. Annexed hereto as Exhibit "11" is a true and accurate copy of an Order handed down by the court in the Virginia case resolving motions that were heard on September 7, 2012.
7. Annexed hereto as Exhibit "12" are true and accurate copies of each unpublished opinion cited to in the accompanying brief, pursuant to R. 1:36-3, minus those opinions that were previously submitted with my first Certification in support of the pending motion:
 - Ciemniecki v. Parker McCay P.A., 2010 U.S. Dist. LEXIS 55661 (D.N.J. June 7, 2010)
 - Graco, Inc. v. PMC Global, Inc., 2009 U.S. Dist. LEXIS 26845 (D.N.J. Mar. 31, 2009)
 - Munoz v. Perla, 2011 N.J. Super. Unpub. LEXIS 3096 (App. Div. Dec. 20, 2011)
 - Oberweis Dairy, Inc. v. Democratic Cong. Campaign Comm., Inc., 2009 U.S. Dist. LEXIS 18514 (N.D. Ill. Mar. 11, 2009)
 - Vasquez v. Addiego, 2010 N.J. Super. Unpub. LEXIS 890 (App. Div. Apr. 23, 2010)
8. Annexed hereto as Exhibit "13" is a true and accurate copy of screenshots showing the results of Google searches with the number of hits circled in red, and a list of Internet sites providing public comment on the Plaintiff.
9. Annexed hereto as Exhibit "14" is a true and accurate copy of the State of Maryland's "Report of the Task Force to Study the Effects of Cult Activities on Public Senior Higher Education Institutions," as published on the website of the International Cultic Studies Association, at:

http://www.icsahome.com/infoserv_articles/mdtaskforce_full.htm

(last visited December 2, 2012), with relevant portions highlighted in yellow.

10. Annexed hereto as Exhibit "15" is a true and accurate copy of the NYU Campus Safety Page, at:

<http://www.law.nyu.edu/housing/oncampushousing/NYU4UWellnessInitiatives/Safety/index.htm>

(last visited December 2, 2012), with relevant portions highlighted in yellow.

11. Annexed hereto as Exhibit "16" is a true and accurate copy of the following law review article: Marc A. Franklin & Daniel J. Bussel, Defamation and the First Amendment: New Perspectives: The Plaintiff's Burden in Defamation: Awareness and Falsity, 25 Wm. & Mary L. Rev. 825 (1984).

12. Annexed hereto as Exhibit "17" is a true and accurate copy of the challenged statement referenced in ¶ 33 of the Plaintiff's Proposed First Amended Complaint, along with a true and accurate copy of the relevant pages from the Form 1023 that is referenced within said challenged statement.

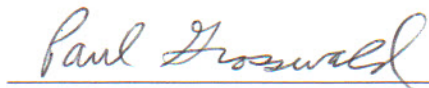
13. Annexed hereto as Exhibit "18" is a true and accurate copy of the challenged statement referenced in ¶ 34 of the Plaintiff's Proposed First Amended Complaint, along with a true and accurate copy of the relevant pages from the Form 1023 that is referenced within said challenged statement.

14. Annexed hereto as Exhibit "19" is a true and accurate copy of the challenged statement referenced in ¶ 36 of the Plaintiff's Proposed First Amended Complaint, along with a true and accurate copy of the relevant pages from the Form 1023 that is referenced within said challenged statement.

15. Annexed hereto as Exhibit "20" is a true and accurate copy of a page from the World Mission Society Church of God ("WMSCOG") website describing the "Home Office."
16. Annexed hereto as Exhibit "21" is a true and accurate copy of pages from the WMSCOG website containing photographs depicting the church's worship services and study groups in which the men and the women are segregated.
17. Annexed hereto as Exhibit "22" is a true and accurate copy of a page from the WMSCOG website containing the stories of the "Sleepy-Head" and the "Four-Hour Driver" referenced in Ms. Colón's accompanying brief, with the relevant sections highlighted in yellow.
18. Annexed hereto as Exhibit "23" is a true and accurate copy of a cover article published in June 1994 by Modern Maturity magazine, entitled "Cults: Forget Kids. Now They're After You."
19. Annexed hereto as Exhibit "24" is a true and accurate copy of pages from the WMSCOG website containing references to the church's practice of fasting, with the relevant sections highlighted in yellow.
20. Annexed hereto as Exhibit "25" is a true and accurate copy of the Complaint filed in the Virginia Case.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: December 3, 2012



Paul S. Grosswald