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11 GUYANA TRIBUTE FOUNDATION

12 **SUPERIOR COURT OF CALIFORNIA**
13 **COUNTY OF ALAMEDA**
14 **UNLIMITED CIVIL JURISDICTION**

15 GUYANA TRIBUTE FOUNDATION, a)
16 California non-profit corporation; and)
17 JYNONA NORWOOD, an individual;)
18)
19 Plaintiffs,)

20 vs.)

21 THE EVERGREEN CEMETERY)
22 ASSOCIATION, a California corporation;)
23 BUCK KAMPHAUSEN, an individual; RON)
24 HAULMAN, an individual; and DOES 1-50,)
25 inclusive,)
26 Defendants.)

No. RG11575036

DECLARATION OF

**IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION.**

Date: May 25, 2011

Time: 9:00 a.m.

Dept.: 22

Res. No.: R-1179749

**ASSIGNED FOR ALL PURPOSES TO
JUDGE ROBERT MCGUINNESS
DEPARTMENT 22**

27 I, _____, declare as follows:

28 1. I submit this declaration in support of Guyana Tribute Foundation's Motion for Preliminary Injunction scheduled for May 25, 2011.

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2. On or about November 18, 1978, I lost my

_____ (hereinafter collectively referred to as “victims”)

because they were killed in Jonestown, Guyana by the People’s Temple Church under the direction, guidance and instruction of its , Jim Jones (hereinafter referred to as the “Jonestown Massacre”). These victims were led to their death by Rev. Jim Jones.

3. These lost loved ones and friends were flown back to the United States and eventually laid to rest in a mass grave located at the Evergreen Cemetery, located 6450 Camden Street Oakland, California (hereinafter referred to as “Evergreen Cemetery”).

4. The Guyana Tribute Foundation provides me with assistance, comfort and support with regard to helping me understand and manage the tremendous loss and tragedy that I have suffered since 1978 and caused by Jim Jones. I rely on this organization to serve as my voice in preserving the memory of the victims.

5. I fully support and approve the Cherishing the Children Healing Memorial Wall (hereinafter referred to as “Jonestown Memorial Wall”) created by the Guyana Tribute Foundation. Its design, color, size, height, length, width and thickness appropriately memorializes and honors the memory of all of the victims including the 305 children, 40 of which were infants, Congressman Leo Ryan and his UPI news group, who perished during the Jonestown Massacre at the hands of the People’s Temple and Jim Jones. It seemed only fitting and appropriate that Evergreen Cemetery would be the home to a physical memorial that would stand as a permanent and painful reminder to future generations of the child victims’ families and supporters of the lives of the precious child victims who perished so young.

6. I have authorized and provided consent to Guyana Tribute Foundation to etch the names of the relatives and friends that I lost at the Jonestown Massacre.

7. I first became aware that Evergreen Cemetery promised to provide Guyana Tribute Foundation with a base and setting for the Jonestown Memorial Wall on or about

1 _____ . I am part of the Coalition to Erect the Jonestown
2 Memorial Wall/Guyana Tribute Foundation.

3 8. On or about, _____ I found out that Evergreen Cemetery had
4 approved plans for another monument to be erected on the base and setting originally approved
5 for Jonestown Memorial Wall. This monument was proposed by the surviving People’s Church,
6 led by Fielding McGehee and Jim Jones, Jr., and proposes to include the name of Jim Jones
7 **himself** as a victim of the Jonestown Massacre (hereinafter referred to as the “Jim Jones Honor
8 Wall”).

9 9. I believe that the Jim Jones Honor Wall desecrates the victims of the Jonestown
10 Massacre which was initiated by Jim Jones himself. Specifically, the name of “Jim Jones” is
11 etched on the Jim Jones Memorial is repulsive and insulting to the memory of the victims.

12 10. Additionally, I have not provided the Defendants, Fielding McGehee, Jim Jones
13 Jr. or the People’s Temple Church the right or authority to control, sell, lease, license, distribute,
14 advertise, publicize, promote, and otherwise use, exploit any of the victims’ names nor have I
15 provided them with the right, consent or authority to allow for the victims’ name to be etched
16 into the Jim Jones Honor Wall.

17 I declare under penalty of perjury under the laws of the State of California that the
18 foregoing is true and correct and that this declaration was executed in
19 _____, _____ (Your City & State).

20 Dated: _____
