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#### CHURCH OF GOD IN CHRIST, INC et al

VS.

#### ELDER KENNETH WATTS, et al

# HEARING BEFORE THE HONORABLE JUDGE AMY P. BRODERSEN

August 29, 2024

850-308-5507

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1	IN THE FIRST JUDICIAL CIRCUIT COURT IN AND FOR ESCAMBIA COUNTY, FLORIDA	
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3 4	CHURCH OF GOD IN CHRIST, INC.,CASE NO.NORTHWEST FLORIDA JURISDICTION2021 CA 002	561
5	CHURCH OF GOD IN CHRIST, INC. WEST SIDE CHURCH OF GOD IN CHRIST,	
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7		
8	ELDER KENNETH WATTS,	
9	AND AS CHAIRMAN OF THE BOARD	
10	WESTSIDE MINISTRY, INC.,	
11 12	CHRIST OF ESCAMBIA COUNTY,	
13	COSTON HUFF, and FRANKIE LEE HUFF,	
14	Defendants.	
15		
16	HEARING BEFORE THE HONORABLE	
17	JUDGE AMY P. BRODERSEN	
18		
19	DATE: AUGUST 29, 2024	
20	TIME: 10:31 AM TO 10:59 AM	
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22		
23		
24 25	NOTARY COMMISSION: GEORGIA/W-00	

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2	
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18	Also Present: Bishop Willie Green
19	J. Staffold
20	
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24	Proceedings recorded by digital sound recording;	
25	Transcript produced by transcriptionist.	

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1	PROCEEDING
2	(On the record at 10:31 AM)
3	THE COURT: So we're here this morning on
4	case number 2021 CA 2561. Just for the shorter
5	recitation, it's COGIC versus Westside, and set for
6	hearing before the court today. First is
7	plaintiff's motion to lift stay filed June 14th of
8	2024. Defendant's motion to lift a stay filed on
9	February 15th of 2024, and a case management
10	conference. As counsel know, this is a matter
11	that's had significant litigation before the court
12	for going on three years now. So I'll have council
13	to state your names for the record. We'll start
14	with you, Mr. Gant, who represent the plaintiffs,
15	and then defense counsel. And then I have some
16	questions for you all. Mr. Gant, you are muted.
17	MR. GANT: Is that better?
18	THE COURT: Yes, sir. We can hear you
19	now. Thank you.
20	MR. GANT: Fred Gant for the plaintiffs,
21	judge.
22	MR. JOHNSON: And Christopher Johnson for
23	the defendants.
24	THE COURT: Okay, I think we also have Ms.
25	Regan here as well, correct?

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1	MS. REGAN: That's correct, for
2	defendants.
3	THE COURT: So, looking through the court
4	file, I know there's a number of motions that are
5	pending before the court. I want to address the
6	motions to lift stay first. And as I was reviewing
7	those as well as the court file, I know the
8	plaintiffs on the same day filed motion, and then an
9	amended motion to dismiss the case for lack of
10	jurisdiction, which kind of goes appears to go
11	kind of hand in hand with their motion to lift stay.
12	So, Mr. Gant, I'll start with you, because
13	your motion to lift stay is just a couple pages.
14	And when I was reviewing it, I was trying to
15	determine what may have happened at that April 9th,
16	2024 meeting, mediation with the church. And then
17	when I reviewed your motion to dismiss, that sort of
18	filled me in a little bit, I think, of the basis for
19	your motion.
20	So it's my understanding the church's take
21	on the situation now is this court no long does not
22	have jurisdiction, and that they're requesting that
23	all of the claims be dismissed. Is that right?
24	MR. GANT: Yes. your honor. Motion to
25	lift the stay is based on the fact that the church

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1	has made a determination eclectically about the
2	issues regarding these parties, and that the parties
3	are under church's jurisdiction. And basically,
4	your honor, we will be asking the defendants to
5	comply what they agreed to at the church mediation.
6	We all agree that the church has
7	jurisdictional matters. The church is supreme and
8	issued before themselves in the court. It's a
9	hierarchical church entity here with COGIC, and
10	therefore, we all agree stipulated that we will
11	abide by what COGIC renders. Then they made that
12	rendering. So then we should go by that rendering
13	and take this matter out of the court's hands.
14	But let me say this, if defendants do not
15	comply what they agreed to, but the would agree
16	to it April 9, and unfortunately come back here
17	again to enforce the agreement. But as to issues
18	how they resolved
19	THE COURT: Well, no, I don't think you
20	come back to this court to enforce that agreement.
21	The church has made it very clear, and I feel like
22	it's almost been an abuse of the court system.
23	Because their position is completely 180 of what was
24	argued in front of me numerous times about
25	jurisdiction. I did an enormous amount of research

And now 1 and I entered an order on that issue. they're saying, oh, well, Pastor Watts wasn't really 2 3 out of the church, he really was in it. So this court never had jurisdiction. 4 5 This was always an issue for the church, which has never been the plaintiff's position in 6 7 this case, ever. They argued strenuously against that from day one by asking for, just listen to me 8 9 for a second. For Judge Dannheisser to enter the 10 temporary injunction and then for the continued 11 litigation in this case. The way I read what's been 12 filed in the court file is that is the church's 13 position, and that it has been requested that 14 everybody sign this joint stipulation. And that if Pastor Watts and the other 15 defendants don't do it, then they will handle any 16 17 repercussions, including essentially kicking him out of the church or banning him from the church. 18 And that would be how it would be handled if he doesn't 19 20 sign the agreements to address the deed issues. And 21 that would not be something that I'm not in it. Ι 22 don't see how this court would ever be in a position 23 to enforce a directive from the church about that.

24I mean, that's completely outside of this25court's jurisdiction, in my opinion, Mr. Gant and we

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1	may just agree to disagree on that, but I mean, they
2	can't have it both ways.
3	MR. GANT: If I may
4	THE COURT: That's what they tried to do,
5	is do that when it benefited them, have the court
6	involved, but when it didn't, then, oh, we have
7	jurisdiction, the court shouldn't be involved. And
8	I feel like it's like been batting the court back
9	around, back and forth in this I think it's been
10	very unfair and how this has been tried to be
11	presented to the court, again, in a way, it's
12	advantageous for their position at the time. So you
13	know their position and it's in writing, this court
14	has jurisdiction.
15	MR. GANT: If I may judge, if I may judge.
16	What the court just articulated in my view, and I
17	could be wrong, exactly what the defendants have
18	been doing throughout this proceedings, in my
19	opinion. Number one, Judge Dannheisser, on issue of
20	the church property, issue of real property in the
21	State of Florida. Ownership of property rules in
22	our favor on that issue.
23	THE COURT: Right. In all candor, I would
24	not have granted that temporary injunction at the
25	time. I don't think there was sufficient basis to.

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1	But he, he entered that order and that order was in
2	place when I was assigned to this division.
3	MR. GANT: It's the law of the law of
4	the case., your honor. Law of the case. They never
5	did that at the time. Based on the real property
6	she it's there you know, the case.
7	THE COURT: He hasn't decided made any
8	determinations. He just entered a temporary
9	injunction. He's made no determinations about who
10	owns the property. That, that's just not correct.
11	Mr. Gant.
12	MR. GANT: If I may your honor. If we
13	have to, we have to go through all of the pleadings.
14	I could be wrong. And then this doesn't matter how
15	the defendants go back and forth during the course
16	of litigation. Adopted both view points. But this
17	point is not irrelevant. But it's not my view
18	point. They've done that not, not the plaintiff,
19	but nonetheless one thing that is short.
20	They agree to the church requests
21	jurisdiction over the parties and the issues. I
22	said to point blank, we're not backing up in that
23	at all. At all. Okay. And they can, they can,
24	church COGIC can maintain and regulate and run and
25	manage things that involve the church, period. I'm

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1	good with that. As they said in my motion to
2	dismiss. Okay. And we stand by the motion, judge,
3	then we're not working for the motion. We're not
4	doing that. You know, that's the main thing here.
5	So on that issue, we find, judge, we think
6	that is the case. But it all gets conscious and I
7	must make my judge aware. A judge may disagree, but
8	if someone has your property that they should not
9	have, I think that type of issue is something the
10	court can address at some point in time when the
11	facts are. But just simply put, my motion is as it
12	stands, to look, to lift the stay certified by
13	motion. This can be heard by the court.
14	That's our position. Everybody agreed
15	upon it. All parties said April 9th mediation
16	should be binding on all parties. And that's in
17	writing for all the parties. So beyond that, with
18	that being said, Mr. Johnson, the other issues in
19	his motion to stay moot. The only issue is to lift
20	the stay, allow my motion to be heard by the court
21	and then the case should be resolved your honor.
22	THE COURT: But if am I understanding the
23	church's position correctly is, yes they believe
24	both the claims and counterclaims should be
25	dismissed. The court here in Escambia county does

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1	not have jurisdiction to address the issues that are
2	at play at this time. But that this agreement that
3	was reached on April 9th, if the parties don't
4	comply with it, then they will address it through
5	the church. And that appears to be the way it's
6	written in that Mr. Watts, I guess, can be removed
7	from the church through their procedures and their
8	process that they have in place. That's the way it
9	reads. And so the court has no jurisdiction to
10	enforce some agreement.
11	MR. GANT: Judge. If I may. I'm sorry,
12	judge. When it comes to once the motion to lift is
13	heard, the court rest in motion. It'll be as per
14	the motion. I cannot go verse to verse at this
15	point in time to, I mean, prepare to litigate all
16	the issue nuances of the motion itself, but judging
17	the motion, then we will go with the motion
18	indicates, judge. Yes.
19	THE COURT: Well, it says in the bottom,

19 THE COURT: Well, it says in the bottom, 20 and it's page 25 of your filing from June 14th, the 21 amended motion to dismiss. The bottom of that page 22 says, should the parties one or both refuse or 23 neglect to fully comply with the recommendation of 24 the committee as approved by the General assembly, 25 the executive branch of the Church of God in Christ

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1	Incorporated, since the name of Church of since
2	the name Church of God in Christ, Inc. is listed as
3	plaintiff and the principles operate under the
4	authority of the Church of God in Christ
5	Incorporated, will have leave to exercise its
6	legal authority to include, but not limited to,
7	relieving the principals of their office and
8	instruct the general counsel for the church of God
9	in Christ to take over the case and dismiss it.
10	Executive branch may take over other
11	appropriate action against the parties who neglect
12	to comply with the orders that are binding orders of
13	the General assembly, which are binding. I mean,
14	again, I will tell you, most of the things that have
15	been filed from the General assembly have made very
16	little sense at all. They have not been clear.
17	They have, you know, most of them it's not been
18	easy to determine when they were written, who wrote
19	them, you know, and this case has been challenging
20	for a lot of reasons, because of the documentation
21	that we've been provided from the General assembly.
22	And again, it contradicts, oftentimes what
23	is argued in this court. So I understand, I think
24	your position. Mr. Gant, anything else you need to
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1	MR. GANT: Yes, your honor, the court
2	reporter here. I'm sorry, Mr. Diaz. The court
3	reporter is here for the TLM. Recording the
4	hearing. He's been there all the time he was
5	into the hearing. He's a court reporter, I think is
6	I think Brandon Diaz. I think it is his name.
7	According to the screen, he should be let in judge.
8	THE COURT: Okay, well, I don't normally
9	announce that, but yes, he's been here. I asked him
10	if he could hear me at the very beginning of the
11	hearing, so I knew he was there.
12	MR. GANT: Okay, thanks.
13	THE COURT: Yeah, I don't think has any
14	determination on the court's ruling, but thank you.
15	Yes. To announce on the record, we have a court
16	reporter. I think everybody knew that.
17	MR. GANT: Okay.
18	THE COURT: All right. Mr. Johnson or Ms.
19	Regan, any comment from you regarding your motion to
20	lift stay? Because yours is more it appears to
21	address the pending motions, discovery, and this
22	idea of mediation that took place within the church
23	being different than the mediation that's ordered by
24	the court in our initial case management orders or
25	trial orders.

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1	I certainly agree. There's a very big
2	difference. I don't think this court has any
3	ability to enforce anything that occurs within the
4	church. And it seemed like from the way it was
5	written, that it was only the parties and council
6	weren't permitted to be there at that meeting. Or,
7	I mean, I don't think it was a formal mediation in
8	the sense that we think of mediation the way it was
9	written in your motion, and in the documentation
10	provided by Mr. Gant in his filing. So, if you all
11	could maybe clarify that for me, which one of you is
12	going to be okay Mr. Johnson?
13	MR. JOHNSON: Yes, ma'am. Your honor, we
14	of course, oppose the motion relative to the
15	jurisdictional issues. We do I mean, we
16	stipulate that the court does not have jurisdiction
17	over the church governance issues. Our position is
18	the court does have jurisdiction over the property
19	issues.
20	THE COURT: Okay. And that's very
21	different than what you've argued in front of me.
22	MR. JOHNSON: Yeah
23	THE COURT: and briefed extensively. I
24	mean, it is Mr. Johnson. That's very different,
25	because the church's position is that this isn't a

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1 property issue, it's -- there was a misunderstanding or mistake initially with how things were handled 2 3 with Mr. Watts, is the way I read it, and that this court has nothing to decide. I mean, you had talked 4 5 at the very beginning of the case, or at least when I first was assigned the case, that y'all were gonna 6 redo the language in those deeds and fix everything. 7 I thought that had been addressed a couple years 8 9 I quess it has not still been addressed. ago. 10 MR. JOHNSON: That is correct. And in all 11 candor, we thought it had been addressed and was taking care of itself. Just as a matter of follow 12 13 up on your perception and comments. We made the 14 argument that we did because at that time, we 15 thought that the general assembly had made its decision relative to the defendants membership, if 16 17 you will, within the church. And so then they 18 recanted it. And so that it was really convoluted 19 at that point, because there was a resolution and 20 then a recantation, if you will, of that 21 determination.

Which is really the subject of the motion for leave to amend is we wanted to clarify all of that with the court. And that would be our intention if we move forward on it. But I guess to

1	kind of cut to the chase, your honor, is we believe
2	that what the court ordered when the jurisdictional
3	issue was first addressed is pretty clear. Is that
4	the court certainly acknowledged that do not have
5	jurisdiction over the church governance issues. But
6	the bottom line is, is that the court ordered that
7	you did have jurisdiction over the property issues,
8	applying the neutral principles of law argument, if
9	you will, or position.

10 And so we of course, agree with that. We 11 think that directly applies to the counterclaim. Because, and I think this is just important to note, 12 13 the nature of the counterclaim is simply to quiet 14 title and for ejectment. And ejectment, of course, 15 is because presently COGIC is occupying or otherwise possessing two out of those three properties. 16 And 17 so what we were simply asking the court to do is to 18 quiet title to the properties, give the defendants 19 possession of the properties.

And if the plaintiffs don't have any problem with that, then it seems to me that things could be resolved. But those things are still at issue before the court, quieting title, possession of the property. And we think it's pretty clear under the case law, and of course, the court's prior

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1	ruling that you do have jurisdiction to address
2	those. And that's the heart of it, of why we
3	believe the stay should be lifted, so those issues
4	can be flushed out in the pending motions.
5	THE COURT: Mr. Gant, anything else from
6	you regarding that, sir?
7	MR. GANT: Yes, your honor. This Mr.
8	Johnson has been trying to the court the last
9	couple years, your honor. The all issues involved
10	in this matter, should the church property part of
11	church constitution. They dictated by the church's
12	directives, would they agree to do at the mediation
13	before the general assembly. They agreed to be part
14	of that process. They moved, one second officer,
15	they moved to be a state church. Mr. Watts and
16	his colleagues did.
17	But nonetheless, in issue two The essence
18	of the case is just what Mr. Johnson indicated. The
19	whole matter of all the pleadings talks about the
20	church jurisdiction to regulate, demand his own
21	property, your honor. And that's as clear as
22	glass. The case law is clear. Mr. Johnson is not
23	being disingenuous. (inaudible) is that to the
24	contrary around the State of Florida. COGIC church
25	has a right to maintain its property as church

1 according to -- constitutions. There's no -- I've haven't seen one case 2 3 of Florida that contrary to that position. So we don't talk about case law. That's fine with me, 4 5 your honor. Mr. Johnson knows he's not been disingenuous, your honor. And they've been trying 6 to get that thing back and forth the whole couple of 7 If my motion to dismiss would flush out 8 years. 9 What Johnson is trying to and Johnson is issue. 10 given the court now. It would cover all basic terms 11 of the issue of the church of hierarchical authority in this matter, but also indicate that church 12 13 property is part of the church's mandate, your 14 honor.

15 And lastly, they stipulate that the church would make the call on these issues in their 16 17 pleadings, your honor. Now they want to back out 18 They trying the back out from their -from that. 19 as of this year, your honor. This is -- Regan 20 motion to look to state appropriate proceedings. 21 Indicate just that, your honor. Look at it clearly. 22 That's what she said. The church has the authority 23 to make these decisions before them. Then now 24 they're turning the other way. Contrary to what 25 they planned, your honor, previously. So it is

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1	confusing because they keep going. I think they
2	keep going back and forth to what they want.
3	They want something else here and there.
4	We can, anyway. So we think that the church has
5	jurisdiction on all issues in this matter. And we
6	want to get my motion dismissed. It was filed
7	procedures, your honor. It was filed so we could.
8	And motion dismiss could get heard. That's why I
9	filed motion to lift the stay. But that very point.
10	And we're confident once that motion's heard, it
11	will elucidate
12	THE COURT: Well, I'm prepared to address
13	that motion today because I have
14	MR. GANT: It's not this is that motion
15	to dismiss
16	THE COURT: If I feel it's appropriate to
17	rule on it, then I will with on the papers. I can
18	do that, Mr. Gant. Because it's become abundantly
19	clear to me that this court absolutely does not have
20	jurisdiction to address any of these matters that
21	have been raised for the last three years. I mean,
22	the statement from the church clearly says that.
23	That this case arose out of a dispute with a local
24	pastor and a bishop without exhausting all the
25	remedies in the ecclesiastia and without leave of

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the church to do so.

And upon being made aware that the parties 2 3 petitioned the church, through the bishop and the other parties, to bring resolution, and this matter 4 5 was presented to the assembly and there was a vote and there was an order entered addressing all of the 6 issues that are before the court. 7 So I do not believe that I have jurisdiction at this point in 8 The church has made their decision that they 9 time. 10 have jurisdiction to address all of these issues, 11 that this is not a property matter, this is a matter within the jurisdiction, in control of the church. 12

13 It was presented to me in a very narrow 14 issue of the deeds to the properties, but that has 15 changed since that was first argued in front of me. And as I said to you, the church has done what's 16 17 convenient for them, and they have wanted the church 18 to have control at certain points in time, and they've wanted the court to. And I feel like it 19 20 has, in a lot of ways, been disingenuous on how it's 21 been handled. And so I understand the motions that 22 are before me today, but based on all of the 23 information provided to me and what's in the court 24 file, I do not believe this, this court has jurisdiction any further. 25

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1	And I'm inclined to dismiss the entire
2	case, including the counterclaims. And it can be
3	addressed through the church, because that is
4	certainly their position on it and how they believe
5	it should be handled. And if the parties don't sign
6	this joint agreement that apparently was discussed
7	at a meeting or mediation of some form, then the
8	church has the ability to take whatever action they
9	feel is appropriate under their laws and their
10	jurisdiction. That is what they have said in these
11	documents that are in the court file.
12	And I had a hearing the other day on
13	another unrelated case in some respects, and I ruled
14	that this court didn't have jurisdiction to address
15	it and I dismissed it. So, you know, and the other
16	thing, I know that you filed a motion to
17	consolidate. I mean, the, this isn't family law,
18	Mr. Johnson I'm talking right now, Mr. Gant. So
19	it's not the same thing as far as there's no formal
20	notice of related cases in civil jurisdiction.
21	And, you know, I've been addressing a very
22	narrow issue within this case. I mean, there's a
23	number of motions that are outstanding that quite
24	honestly, I don't believe this court needs to
25	address based on this jurisdictional issue that has

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1	certainly been brought to the court in a very
2	different fashion than it was argued previously.
3	But I mean, that's sort of where I think this case
4	has taken us at this point. And I felt
5	MR. GANT: We agree judge.
6	THE COURT: Well, I understand the defense
7	has a different position. They have counterclaims,
8	but they're all related to what this church document
9	here has said that they have control and are in
10	charge of. Not this court. I mean, Mr. Johnson,
11	I'll certainly hear anything else anything else,
12	sorry, that you have to say, but that's the way I
13	read these documents.
14	MR. JOHNSON: Yeah, I understood, your
15	honor. Yeah, I mean, I won't belabor it or test
16	court's patience with it. It just we were under
17	the impression that the court's initial order, of
18	course, reserved jurisdiction over the property
19	issues. And at the end of the day, if the court
20	dismisses both the underlying complaint and the
21	counterclaim, then we're going to be left in a
22	position where the deeded owners of the properties
23	in this county don't even possess two out of the
24	three properties. Because of Judge Dannheisser's
25	early order is COGIC, the plaintiff in the case, now

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1	possesses two out of those out of those three
2	properties. And that's why we're simply asking this
3	court to just quiet title and put the parties back
4	into their proper place relative to ownership and
5	control of the properties.
6	THE COURT: Well, control is different
7	than ownership.
8	MR. JOHNSON: Correct.
9	THE COURT: Because he didn't, through
10	that temporary injunction, to my recollection,
11	decide ownership. It was a possession issue on a
12	temporary basis.
13	MR. JOHNSON: Right.
14	THE COURT: So but it appears the
15	church has formulated a plan on to effectuate what
16	you're talking about. Now, I understand your
17	clients, maybe, even though I guess they were there
18	and agreed to all of this and agreed to sign this,
19	and now they're not. I don't know exactly, because
20	it's a little bit unclear on how everything played
21	out. I mean, were you and Ms. Regan and Mr. Gant at
22	these meetings?
23	MR. JOHNSON: No, ma'am.
24	THE COURT: Again, showing completely that
25	the church is in control of the issues that are

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1 before this court.

2 MR. JOHNSON: I agree that that appears to 3 be their position. I guess our position on that 4 would be that the church itself cannot divest the 5 court of the court's jurisdiction just because --

THE COURT: I don't think they can. 6 But it's clear to me that this should have never been 7 brought before the court based on their position. 8 9 It should never have been brought before the court 10 This should have been addressed in the hearing. church from the beginning. Now, to some degree, I 11 12 think that was attempted to be done several years 13 ago. And I've told you before, that issue regarding 14 jurisdiction in this particular case was a very 15 challenging, complicated decision to make.

And I spent a lot of time on it reading a 16 17 lot of case law, because a lot of these issues are 18 very distinguishable depending on the specific facts of these situations. But that is, I believe, where 19 20 I am at this point, based on how everything has 21 played out in this case and the church's continued 22 involvement and their position that they have the 23 ability to address all issues that have been raised 24 in this case. And so, because of that, I'm inclined 25 at this point to dismiss this case.

1 So the motions before the court, I don't 2 think, need to be, be addressed any further, as well 3 as the other pending motions that I know that we 4 were going to talk about getting some hearing, 5 hearing dates set. And, you know, I certainly hope that through the control and direction of the 6 7 church, these issues can be resolved between the It looks like there is a plan for that to 8 parties. 9 happen. According to the documents that they have 10 filed with the court that are in the court file. 11 MR. GANT: Yes, your honor. We agree. 12 THE COURT: I'll prepare an order. 13 Thank you, judge. MR. GANT: 14 THE COURT: Thank you. Y'all have a good 15 day. 16 MR. JOHNSON: Thank you. 17 MS. Regan : Thank you for your time. 18 (Off the record at 10:59 AM) 19 20 21 22 23 24 25

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CERTIFICATE OF DIGITAL REPORTER I, BRANDON DIAZ, a Digital Reporter and Notary public within the State of Georgia, do hereby certify: That on August 29th, 2024, I digitally reported the proceedings had and the evidence given, together with the objections of counsel thereto, and that said testimony was accurately captured with annotations by me during the proceeding, taken at said time and place. I further certify that I am not related to any of the parties to this action by blood or marriage and that I am in no way interested in the outcome of this matter. IN WITNESS THEREOF, I have hereunto set my hand the 30th day of August 2024. andon Diaz Brandon M. Diaz Notary Commission Georgia/W-00605668 Commission Expires: May 3rd, 2027

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#### CERTIFICATE OF TRANSCRIPTIONIST

I, Mario Barredo, a Legal Transcriptionist do hereby certify:

That the foregoing is a complete and true transcription of the original digital audio recording of the testimony and proceedings captured in the above-entitled matter. As the transcriptionist, I have reviewed and transcribed the entirety of the original digital audio recording of the proceeding to ensure a verbatim record to the best of my ability.

12 I further certify that I am neither attorney 13 for nor a relative or employee of any of the parties 14 to the action; further, that I am not a relative or 15 employee of any attorney employed by the parties 16 hereto, nor financially or otherwise interested in the 17 outcome of this matter.

IN WITNESS THEREOF, I have hereunto set my hand this 4th day of September, 2024.

Nario Barredo

Mario Barredo

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