

1 Grady Ward
2 Defendant *in pro per, in forma pauperis*
3 3449 Martha Ct.
4 Arcata, CA 95521-4884
5 (707) 826-7712
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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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11 RELIGIOUS TECHNOLOGY CENTER,) NO. C-96-20207-RMW (EAI)
12 a Scientology Corporation,)
13 Plaintiff,)
14 v.)
15 GRADY WARD, an individual,)
16 Defendant.)

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18 I, Robert S. Minton, declare:
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- 20 1. I am over the age of eighteen years and am not a party to the case captioned above.
21 2. On July 13, 1998 I met in Los Angeles, California with Scientology officials Mr.
22 Michael Rinder who represented himself to be the senior executive of the Office of
23 Special Affairs of the Church of Scientology and Mr. Marty Rathbun who on
24 knowledge and belief I believe to be one of the members of the board of Religious
25 Technology Center, Inc.
26 3. During this meeting Mr. Rinder and Mr. Rathbun presented me with a four page
27 agreement titled "Confidential Settlement Agreement between Robert S. Minton and
28 the Church of Scientology."

- 1 4. These gentlemen made it clear that the Church of Scientology investigation and
2 harassment that I, my family and business associates have been suffering would only
3 cease if I were to sign their Settlement Agreement.
- 4 5. Of the fourteen points within the Settlement Agreement, one point specifically dealt
5 with my business relationship with the defendant, Grady Ward. The Church of
6 Scientology demanded that I stop giving Grady Ward any kind of financial
7 assistance and to unilaterally breach a contract I had with him to complete a book
8 regarding scientology.
- 9 6. Mr. Rathbun and Mr. Rinder were very specific on this point: they promised to
10 indemnify me and to defend me using Church of Scientology attorneys at Church of
11 Scientology expense against any possible future suit that Grady Ward might bring
12 for my breaching this book contract with him.

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

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17 Executed this 12th day of November, 1998, at Sandown, New Hampshire.

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21 Robert S. Minton
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