



PLAINTIFF/PETITIONER: RON LEE, ET AL.	CASE NUMBER: RG07363452
DEFENDANT/RESPONDENT: SHARON BOWLES, ET AL.	

4. b. Provide a brief statement of the case, including any damages. (If personal injury damages are sought, specify the injury and damages claimed, including medical expenses to date [indicate source and amount], estimated future medical expenses, lost earnings to date, and estimated future lost earnings. If equitable relief is sought, describe the nature of the relief.)

Individual plaintiffs, who are voting members and/or officers of plaintiff Our Redeemer Lutheran Church, as well as Our Redeemer Lutheran Church and The California-Nevada-Hawaii District of The Lutheran Church-Missouri Synod, allege that defendants, a splinter faction of Our Redeemer's congregation, have unilaterally purported to oust plaintiff Ron Lee as Our Redeemer's president, have disaffiliated themselves with the Lutheran Church-Missouri Synod, have installed a pastor contrary to District and Our Redeemer Lutheran Church's authority, and illegally claimed the right to exercise control over Our Redeemer's real and personal

(If more space is needed, check this box and attach a page designated as Attachment 4b.)

5. **Jury or nonjury trial**  
The party or parties request  a jury trial  a nonjury trial (if more than one party, provide the name of each party requesting a jury trial):
6. **Trial date**  
a.  The trial has been set for (date):  
b.  No trial date has been set. This case will be ready for trial within 12 months of the date of the filing of the complaint (if not, explain): See attached page.  
c. Dates on which parties or attorneys will not be available for trial (specify dates and explain reasons for unavailability):  
April 13, 2009
7. **Estimated length of trial**  
The party or parties estimate that the trial will take (check one):  
a.  days (specify number):  
b.  hours (short causes) (specify):
8. **Trial representation (to be answered for each party)**  
The party or parties will be represented at trial  by the attorney or party listed in the caption  by the following:  
a. Attorney:  
b. Firm:  
c. Address:  
d. Telephone number:  
e. Fax number:  
f. E-mail address:  
g. Party represented:  
 Additional representation is described in Attachment 8.
9. **Preference**  
 This case is entitled to preference (specify code section):
10. **Alternative Dispute Resolution (ADR)**  
a. Counsel  has  has not provided the ADR information package identified in rule 3.221 to the client and has reviewed ADR options with the client  
b.  All parties have agreed to a form of ADR. ADR will be completed by (date):  
c.  The case has gone to an ADR process (indicate status):

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## 10. d. The party or parties are willing to participate in (check all that apply):

- (1)  Mediation  
(2)  Nonbinding judicial arbitration under Code of Civil Procedure section 1141.12 (discovery to close 15 days before arbitration under Cal. Rules of Court, rule 3.822)  
(3)  Nonbinding judicial arbitration under Code of Civil Procedure section 1141.12 (discovery to remain open until 30 days before trial; order required under Cal. Rules of Court, rule 3.822)  
(4)  Binding judicial arbitration  
(5)  Binding private arbitration  
(6)  Neutral case evaluation  
(7)  Other (specify):

e.  This matter is subject to mandatory judicial arbitration because the amount in controversy does not exceed the statutory limit.f.  Plaintiff elects to refer this case to judicial arbitration and agrees to limit recovery to the amount specified in Code of Civil Procedure section 1141.11.g.  This case is exempt from judicial arbitration under rule 3.811 of the California Rules of Court (specify exemption):

3.811(b)(1), equitable relief

## 11. Settlement conference

 The party or parties are willing to participate in an early settlement conference (specify when):

July, 2008

## 12. Insurance

- a.  Insurance carrier, if any, for party filing this statement (name):  
b. Reservation of rights:  Yes  No  
c.  Coverage issues will significantly affect resolution of this case (explain):

## 13. Jurisdiction

Indicate any matters that may affect the court's jurisdiction or processing of this case, and describe the status.

 Bankruptcy  Other (specify):

Status:

## 14. Related cases, consolidation, and coordination

a.  There are companion, underlying, or related cases.

- (1) Name of case:  
(2) Name of court:  
(3) Case number:  
(4) Status:

 Additional cases are described in Attachment 14a.b.  A motion to  consolidate  coordinate will be filed by (name party):

## 15. Bifurcation

 The party or parties intend to file a motion for an order bifurcating, severing, or coordinating the following issues or causes of action (specify moving party, type of motion, and reasons):

## 16. Other motions

 The party or parties expect to file the following motions before trial (specify moving party, type of motion, and issues):

The parties believe that a motion for summary judgment may be appropriate after the close of discovery.

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17. Discovery

- a.  The party or parties have completed all discovery.
- b.  The following discovery will be completed by the date specified (*describe all anticipated discovery*):

<u>Party</u>	<u>Description</u>	<u>Date</u>
All	interrogatories, request for production, requests for admissions and depositions	December 1, 2008

- c.  The following discovery issues are anticipated (*specify*):

18. Economic Litigation

- a.  This is a limited civil case (i.e., the amount demanded is \$25,000 or less) and the economic litigation procedures in Code of Civil Procedure sections 90 through 98 will apply to this case.
- b.  This is a limited civil case and a motion to withdraw the case from the economic litigation procedures or for additional discovery will be filed (*if checked, explain specifically why economic litigation procedures relating to discovery or trial should not apply to this case*):

19. Other Issues

- The party or parties request that the following additional matters be considered or determined at the case management conference (*specify*):

20. Meet and confer

- a.  The party or parties have met and conferred with all parties on all subjects required by rule 3.724 of the California Rules of Court (*if not, explain*):
- b. After meeting and conferring as required by rule 3.724 of the California Rules of Court, the parties agree on the following (*specify*): The parties agree to the matters set forth in this statement.

21. Case management orders

Previous case management orders in this case are (*check one*):  none  attached as Attachment 21.

22. Total number of pages attached (*if any*): 1

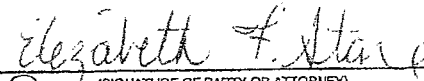
I am completely familiar with this case and will be fully prepared to discuss the status of discovery and ADR, as well as other issues raised by this statement, and will possess the authority to enter into stipulations on these issues at the time of the case management conference, including the written authority of the party where required.

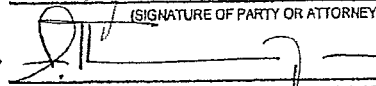
Date: April 25, 2008

Elizabeth F. Stone  
(TYPE OR PRINT NAME)

Audra L. Thompson  
(TYPE OR PRINT NAME)

Defendant: Bowles, ET AL.

  
(SIGNATURE OF PARTY OR ATTORNEY)

  
(SIGNATURE OF PARTY OR ATTORNEY)

Additional signatures are attached

**Attachment 1b.**

Ron Lee, Naomi Gatzke, Joseph Thompson, Jr., Miriam Thompson, Our Redeemer Lutheran Church, a not-for-profit religious corporation, and The California-Nevada-Hawaii District of The Lutheran Church-Missouri Synod, a not-for-profit religious corporation, Plaintiffs vs. Sharon Bowles, Mary-Ann Hill, Portia Ridgeway and Celia Moyer, Defendants

Sharon Bowles, Mary-Ann Hill, Portia Ridgeway and Celia Moyer, Cross-Complainants v. Ron Lee, Cross-Defendant.

**Attachment 4b:**

property, books, accounts, and membership rosters, to the exclusion of the plaintiffs and other faithful communicants of Our Redeemer and The Lutheran Church-Missouri Synod. Plaintiffs seek equitable relief by way of declaratory relief and injunction, including ejection. Defendants allege that their actions were proper and/or justified, that plaintiffs are not officers or directors of Our Redeemer and lack capacity to bring the action in the name of Our Redeemer, and that the California-Nevada-Hawaii District of The Lutheran Church-Missouri Synod has no right, standing or capacity to sue defendants for ejection. Defendants' also allege in a cross-complaint that plaintiff Ron Lee has acted improperly and in violation of the Constitution of Our Redeemer in undertaking the post of both Church President and Treasurer and has wasted, spoiled, converted and improperly distributed the funds and financial assets of Our Redeemer Lutheran Church. Plaintiff Ron Lee has denied the allegations raised in the cross-complaint.

**Attachment 6b:**

The parties have engaged in an extended series of initial pleadings. Because of this, as well as the parties' belief that, after discovery, motions for summary judgment may well be filed on both sides (which entails lead time for the Court's consideration), the parties request that trial of this matter would be set after April 13, 2009.