

RECEIVED JUL 12 2002

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION

E. Kwan Choi, individually and on behalf )  
of Urantia Foundation, Urantia Corporation, )  
Urantia Brotherhood Association, Andite )  
Corporation, and Amadon Corporation, )

Plaintiff, )

v. )

K. Richard Keeler, Georges )  
Michelson-Dupont, Mo Siegel, Gard )  
Jameson, and James Ryan, not individually )  
but as Illinois Attorney General, )

Defendants. )

No. 02 CH 4053

Judge Sophia Hall

NOTICE OF MOTION

TO: Assistant Attorney General Floyd D. Perkins  
Charitable Trusts Bureau  
Office of the Illinois Attorney General  
100 W. Randolph Street, Third Floor  
Chicago, Illinois 60601

Michael D. Poulos  
1724 Sherman Avenue  
Evanston, Illinois 60201

PLEASE TAKE NOTICE that on Wednesday the 17th day of July, 2002, at 10:00 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Hall or any Judge sitting in her stead in Room 2301 of the Richard J. Daley Center, Chicago, Illinois 60603, and then and there present the attached Defendants' Motion to File Corrected Affidavit, a copy of which is hereby served upon you.

**DEFENDANTS K. RICHARD KEELER,  
GEORGES MICHELSON-DUPONT,  
MO SIEGEL, AND GARD JAMESON**

By: Wallace C. Solberg  
One of their Attorneys

Michael J. Hayes  
S. Patrick McKey  
Wallace C. Solberg  
GARDNER, CARTON & DOUGLAS  
321 North Clark Street - Suite 3400  
Chicago, Illinois 60610  
(312) 644-3000

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION**

E. KWAN CHOI, individually and on behalf of )  
URANTIA FOUNDATION, URANTIA )  
CORPORATION, URANTIA BROTHERHOOD )  
ASSOCIATION, and ANDITE CORPORATION, )

Plaintiff, )

v. )

K. RICHARD KEELER, GEORGES )  
MICHELSON-DUPONT, MO SIEGEL, GARD )  
JAMESON, AND JAMES RYAN, not individually )  
But as Illinois Attorney General, )

Defendants. )

Case No. 02 CH 4053

Judge Sofia Hall

**DEFENDANTS' MOTION TO FILE CORRECTED AFFIDAVIT**

NOW COME Defendants K. RICHARD KEELER, GEORGES MICHELSON-DUPONT, MO SIEGEL, and GARD JAMESON (collectively, the "Controlling Trustees" or "Defendants"), by their attorneys, Gardner, Carton & Douglas, and request that this Honorable court grant Defendants leave to include an exhibit to the Affidavit of Sherry Dickerson that was inadvertently omitted but is already part of the record. In support of this Motion, Defendants state as follows:

1. On June 12, 2002, Defendants filed their Motion for Summary Judgment, Supporting Memorandum and Statement of Uncontested Facts. Attached as Exhibit 8 to the Motion is the Affidavit of Sherry Dickerson. In paragraph 2 of the Affidavit, Ms. Dickerson states that she prepared the Agenda for the September 7, 2002 meeting and that the Agenda is attached to her Affidavit as Exhibit A.

2. Defendants inadvertently omitted that Exhibit from Ms. Dickerson's Affidavit. However, that same Agenda is already part of the record and is in fact included as Exhibit A to

Trustee Keeler's Affidavit filed with the Motion for Summary Judgment. *See* Keeler Affidavit, Exhibit 3.

3. Defendants request that they be given leave to file a corrected Affidavit which includes as Exhibit A the Agenda which is already a part of the record in these proceedings. A copy of the corrected Affidavit with Exhibit A is attached hereto. Because Exhibit A is already a part of the record, no party will suffer any prejudice whatsoever if this motion is granted.

4. Plaintiff has no objection to the granting of this Motion.

WHEREFORE, for the foregoing reasons, Defendants respectfully request that they be given leave to file the corrected Affidavit of Sherry Dickerson.

**DEFENDANTS K. RICHARD KEELER,  
GEORGES MICHELSON-DUPONT,  
MO SIEGEL, AND GARD JAMESON**

By: Wallace C. Solberg  
One of their Attorneys

Michael J. Hayes  
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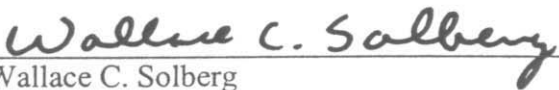
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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he caused a copy of the foregoing **Notice of Motion and Defendants' Motion to File Corrected Affidavit** to be served on the following this 10th day of July, 2002:

Michael D. Poulos  
1724 Sherman Avenue  
Evanston, Illinois 60201  
(Via U.S. Mail)

Assistant Attorney General Floyd D. Perkins  
Chief Charitable Trust Division  
100 W. Randolph Street, Third Floor  
Chicago, Illinois 60601  
(Via U.S. Mail)

  
\_\_\_\_\_  
Wallace C. Solberg

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Defendants.

No. 02 CH 4053

Judge Sophia Hall

STATE OF COLORADO )

) ss

COUNTY OF BOULDER )

AFFIDAVIT

I, Sherry Dickerson, being duly sworn upon oath deposes and states as follows:

1. I live in Broomfield, Colorado. I am Trustec Mo Siegel's personal assistant and have been so employed since January 24, 1994.

2. On August 29, 2001, Mr. Siegel directed me to prepare an agenda document to be sent to all the other Urantia Foundation Trustees in preparation for a telephone conference to be held on September 7, 2001. At this meeting the two agenda items were: "To request that E. Kwan Choi resign his position as a Trustee of the Urantia Foundation"; and (2) "To initiate the removal procedure if E. Kwan Choi chose not to resign." I prepared the Agenda per Mr. Siegel's request. (A copy of the Agenda for the September 7, 2001 Meeting is attached hereto as Exhibit

A.)

3. On August 31, 2001, I mailed the Agenda by regular U.S. mail to all Trustees, including E. Kwan Choi.

FURTHER AFFIANT SAYETH NOT.

Sherry Dickerson  
Sherry Dickerson

Subscribed and Sworn to Before Me  
this 14<sup>th</sup> day of May, 2002.

Steve M. Schweikert  
Notary Public *my commission expires 4/12/06.*



URANTIA FOUNDATION  
TRUSTEES MEETING  
TELECONFERENCE

Friday, September 7, 2001  
8:00 a.m. CDT (Chicago Time)

AGENDA

1. To ask Kwan Choi to resign.
2. To initiate the Removal Procedure if Kwan Choi refuses to resign.

