

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

E. Kwan Choi,  
*individually and on behalf of*  
Urantia Foundation, *et al.*,  
*plaintiff,*

*v.*

K. Richard Keeler, *et al.*,  
*defendants.*

No. 02 CH 4053

Hon. Sophia H. Hall

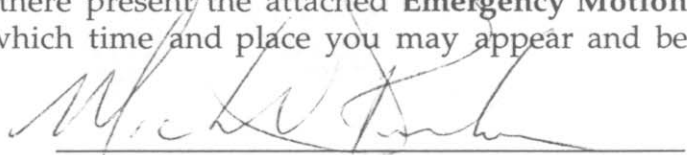
**Suit for Injunction and  
Declaratory Judgment**

**NOTICE OF EMERGENCY MOTION**

To: Wallace C. Solberg  
Gardner, Carton & Douglas  
321 North Clark Street, Suite 3400  
Chicago, Illinois 60610  
312-644-3381

Floyd D. Perkins  
Bureau Chief, Charitable Trust Bureau  
Illinois Attorney General  
100 West Randolph Street, Third Floor  
Chicago, Illinois 60601  
312-814-2596

On April 17, 2002, at 10:30 a.m. I shall appear before the Honorable Sophia H. Hall, or any judge sitting in her stead in Room 2301 of the Richard J. Daley Civic Center, Chicago, Illinois 60602, and then and there present the attached **Emergency Motion to Amend Complaint on its Face**, at which time and place you may appear and be heard.



Michael D. Poulos  
*Attorney for Dr. E. Kwan Choi*

**CERTIFICATE OF SERVICE**

The undersigned under the penalties as provided by law pursuant to paragraph 1-109 of the Illinois Code of Civil Procedure states that he or she served the foregoing on each person to whom it is directed by depositing a copy thereof in the United States mail, postage prepaid and properly addressed at Evanston, Illinois on April 16, 2002 and by facsimile machine pursuant to Supreme Court Rule 11 by sending five pages via facsimile machine to the facsimile numbers stated above on April 16, 2002 at 3:00 pm.



Suzanne M. Poulos

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**EMERGENCY MOTION TO AMEND COMPLAINT ON ITS FACE**

Now comes the plaintiff, Dr. E. Kwan Choi, by his attorneys, Michael D. Poulos, P.C., and moving to amend the complaint on its face, *instanter*, states as follows:

1. The plaintiff moves to amend the complaint on its face in paragraph 23, by replacing the phrase, "voted to remove" with, "voted to commence proceedings under the Bylaws to remove."

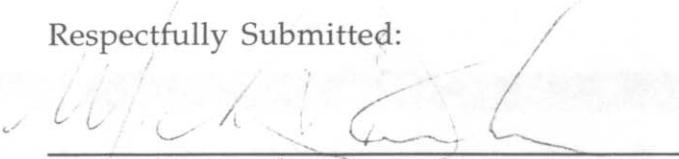
2. After amendment paragraph 23 will read in full: "On September 7, 2001, the defendant trustees conferred by telephone and ~~voted to remove~~ voted to commence proceedings under the Bylaws to remove Dr. Choi as a trustee."

3. This matter is an emergency since the court may address the sufficiency of the complaint on the motion date and the plaintiff could be unduly prejudiced absent amendment.

Wherefore, the plaintiff asks the court to grant leave to amend the complaint on its face *instanter*.

Attorney Code 26342  
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Respectfully Submitted:

  
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*Attorney for Dr. E. Kwan Choi*