

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 04053

In Chancery

Injunction
Temporary Restraining Order

Judge Sophia H. Hall

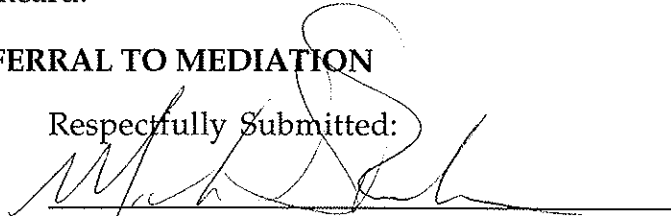
NOTICE OF MOTION

To: Wallace C. Solberg
Barry Goldberg
Quin R. Frazer

On April 8, 2004, at 9:30 AM 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 following motion at which time and place you may appear and be heard.

MOTION FOR REFERRAL TO MEDIATION

Respectfully Submitted:

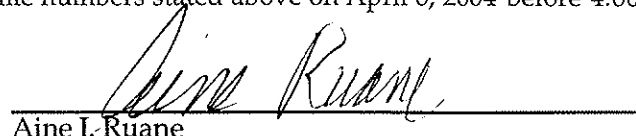


Michael D. Poulos
Attorney for E. Kwan Choi

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 Wallace C. Solberg, Bell, Boyd & Lloyd LLC, Three First National Plaza, 70 West Madison Street, Suite 3300, Chicago, Illinois 60602-4207, 312-807-4263, 312-827-8190 fax, Barry Goldberg, Charitable Trust Bureau, Illinois Attorney General, 100 West Randolph Street, 3rd Floor, Chicago, Illinois 60601, 312-814-2524, 312-814-2596 fax, and Quin R. Frazer, Gardner, Carton & Douglas, 191 North Wacker Drive, Suite 3700, Chicago, Illinois 60606-1698, 312-569-1342, 312-569-3342 fax via facsimile machine pursuant to Supreme Court Rule 11 by sending 3 pages via facsimile machine to the facsimile numbers stated above on April 6, 2004 before 4:00 PM.

Attorney Code 26342
MICHAEL D. POULOS, P.C.
Attorneys for Dr. E. Kwan Choi
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MOTION FOR REFERRAL TO MEDIATION

Now comes the plaintiff, Dr. E. Kwan Choi, by his attorneys, Michael D. Poulos, P.C., individually and on behalf of the Urantia Foundation, *et al.*, and moves for referral of this case to mediation. In support of his motion Dr. Choi states as follows:

1. The parties to this case have engaged in lengthy settlement discussions among themselves and with the court. Although agreement has been reached on many issues, the parties have been unable to come to terms on three issues:

- a. The scope of the indemnification to be given Dr. Choi.
- b. The amount of legal fees to be reimbursed to Dr. Choi.
- c. Whether this case should be resolved by way of a covenant not to sue or a release.

2. It is the opinion of counsel for Dr. Choi, Michael Poulos, that these issues can be resolved through the use of an appropriate mediator. Mr. Poulos has proposed mediation. He has also proposed as mediator a lawyer who is well known to the defendant trustees, the plaintiff, and counsel for the plaintiff and who is familiar with the Urantia Foundation and *The Urantia Book*. This lawyer has

offered his services for free. Alternatively, there are other mediators who might also prove effective.

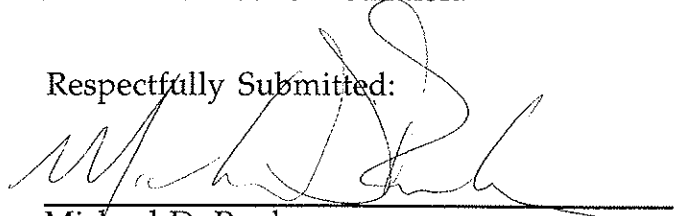
3. Counsel for plaintiff believes the defendant trustees will all be in Chicago April 17, 2004 which would make this a convenient time for mediation.

4. Counsel for plaintiff proposed mediation in a letter dated March 5, 2004 but has received no response.

5. Effective Monday, April 5, 2004, judges in the Law Division were granted the authority to order parties to mediation pursuant to Rule 20.02 of the Circuit Court of Cook County. Although this rule is not yet in effect for the Chancery Division, it is likely the program will be expanded to Chancery in the future. However, Chancery Judges do have broad authority in the exercise of their equitable powers. Dr. Choi submits this is an appropriate circumstance to exercise those powers.

Wherefore, Dr. Choi asks this court to refer this case to mediation.

Respectfully Submitted:



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

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