


FILED

1 Helena K. Kobrin, SBN 152546  
 2 Ava M. Paquette, SBN 165375  
 3 MOXON & KOBRIN  
 4 3055 Wilshire Blvd., Suite 900  
 5 Los Angeles, California 90010  
 6 Telephone: (213) 487-4468  
 7 Fax: (213) 487-5385

03 MAR -5 PM 3: 53  
 CLERK U.S. BANKRUPTCY COURT  
 CENTRAL DISTRICT OF CALIFORNIA  
 BY:  DEPUTY

5 Attorneys for Defendants  
 6 ELVIRA MORGAN, YVONNE KELLERHALS,  
 7 ALEX GUEVERA, VIRGINIA FAIR, COBIE FAIR,  
 8 WHITNEY FAIR, JOSHUA FAIR AND JANA FAIR

8 UNITED STATES BANKRUPTCY COURT  
 9 CENTRAL DISTRICT OF CALIFORNIA  
 10 NORTHERN DIVISION

<p>11 12 13 14 15 16 17 18 19 20 21 22</p>	<p>In re:  REED E. SLATKIN,   Debtor.</p>	<p>) Bk No: ND 01-11549-RR        )        ) CHAPTER 11        )        ) MOTION OF ADVERSARY        ) DEFENDANTS ELVIRA MORGAN,        ) YVONNE KELLERHALS, ALEX        ) GUEVERA, VIRGINIA FAIR, COBIE        ) FAIR, WHITNEY FAIR, JOSHUA        ) FAIR AND JANA FAIR'S TO        ) SHORTEN TIME ON MOTION TO        ) VACATE ORDERS PURSUANT TO        ) FED.R.BANKR.P. 2004 FOR        ) EXAMINATION OF VARIOUS        ) CHURCHES AND RELIGIOUS        ) ORGANIZATIONS        )        ) Date:        ) Time:        ) Ctrm: Hon. Robin Riblet        ) 1415 State Street        ) Courtroom 201        ) Santa Barbara, CA 93101</p>
--	---	--

23  
 24 Elvira Morgan, Yvonne Kellerhals, Alex Guevera, Virginia Fair, Cobie Fair,  
 25 Whitney Fair, Joshua Fair and Jana Fair ("Adversary Defendants"), defendants in  
 26 Adversary Proceeding Nos. 02-01210RR and 02-01255RR hercin, hereby move the Court

MOTION OF ADVERSARY DEFENDANTS TO SHORTEN TIME  
 ON MOTION TO VACATE ORDERS FOR 2004 EXAMINATIONS

1068  
 97

1 for an Order pursuant to Local Bankr. Rule 9075-1(b) shortening time on their Motion to  
 2 Vacate the Orders entered on February 27, 2003 allowing the Rule 2004 videotaped  
 3 examinations of Religious Technology Center, Church of Scientology International, Flag  
 4 Service Organization, Inc., International Association of Scientologists, Advanced  
 5 Organization Los Angeles, American Saint Hill Organization and Church of Scientology  
 6 Celebrity Center International and the Production of Documents ("Rule 2004 Orders"),  
 7 which is lodged herewith. The Adversary Defendants seek an Order setting the Motion to  
 8 Vacate for March 21, 2003, the next regularly-scheduled hearing date for motions brought  
 9 in this matter.

10 The counsel for the opposing party is the counsel for the Trustee who brought the  
 11 Rule 2004 Motion, Kirkland & Ellis.

12  
 13 **MEMORANDUM OF POINTS AND AUTHORITIES**

14 Local Bankr. R. 9075-1(b)(1) provides that a motion to shorten time may be  
 15 granted for good cause shown. There is good cause to grant the instant request because  
 16 the examination dates set forth in the Rule 2004 Orders are from March 25 through April  
 17 2, and the Motion to Vacate needs to be heard on shortened time in order to precede the  
 18 earliest of those dates. As the Adversary Defendants raised important legal issues  
 19 concerning the Rule 2004 Orders in their Objection, but were prevented from having  
 20 them heard by the fact that the Court had issued the Rule 2004 Orders before the

21 ///  
 22 ///  
 23 ///  
 24 ///  
 25 ///  
 26 ///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

Objection was filed, and they now seek a hearing on those objections by way of their Motion to Vacate, it is appropriate to advance the hearing of that Motion.

Dated: March 5, 2003

Respectfully submitted,

MOXON & KOBRIN

By: Helena K. Kobrin  
Helena K. Kobrin

Attorneys for Defendants  
ELVIRA MORGAN, YVONNE  
KELLERHALS, ALEX GUEVERA,  
VIRGINIA FAIR, COBIE FAIR,  
WHITNEY FAIR, JOSHUA FAIR  
AND JANA FAIR