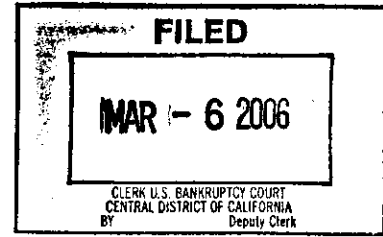


ORIGINAL

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8 Attorneys for Rosendo Gonzalez,
9 Chapter 7 Trustee



10 UNITED STATES BANKRUPTCY COURT
11 CENTRAL DISTRICT OF CALIFORNIA
12 LOS ANGELES DIVISION

13 In re:) Case No. LA 02-35048-BB
14 ROY McNEILL, an individual,) Chapter 7
15) NOTICE OF TRUSTEE'S MOTION FOR
16 Debtor.) ORDER APPROVING COMPROMISE WITH
17) CHURCH OF SCIENTOLOGY FLAG
18) SERVICE ORGANIZATION, INC., CHURCH
19) OF SCIENTOLOGY INTERNATIONAL,
20) CHURCH OF SCIENTOLOGY CELEBRITY
21) CENTRE INTERNATIONAL AND CHURCH
22) OF SCIENTOLOGY RELIGIOUS TRUST
23)
24) Date: April 5, 2006
25) Time: 10:00 a.m.
26) Place: Courtroom 1475
27) United States Bankruptcy Court
28) Edward R. Roybal Federal Building
29) 255 E. Temple Street
30) Los Angeles, CA 90012

31 TO THE HONORABLE SHERI BLUEBOND, UNITED STATES BANKRUPTCY JUDGE,
32 THE UNITED STATES TRUSTEE AND ALL PARTIES-IN-INTEREST HEREIN:

33 PLEASE TAKE NOTICE that on April 5, 2006 at 10:00 a.m., or as soon thereafter as can
34 be heard, in Courtroom 1475 of the United States Bankruptcy Court in the Edward R. Roybal
35 Federal Building at 255 E. Temple Street, Los Angeles, California 90012, Rosendo Gonzalez,
36 Chapter 7 Trustee (the "Trustee") of the bankruptcy estate of Debtor Roy McNeill herein
37 ("McNeill" or the "Debtor") will move and hereby does move (the "Motion") for an order under

1 Rule 9019 of the Federal Rules of Bankruptcy Procedure approving a proposed compromise
2 between the Trustee and Church of Scientology Flag Service Organization, Inc. ("FSO"), Church
3 of Scientology International ("CSI"), Church of Scientology Celebrity City International ("CCP")
4 and Church of Scientology Religious Trust ("CSRT", and together with FSO, CSI and CCI, the
5 "COS Entities") in connection with various claims asserted by the Trustee against the COS
6 Entities arising under, *inter alia*, 11 U.S.C. §§ 542, 544, 548, 549 and 550.

7 Pursuant to the proposed Settlement Agreement and Mutual Release ("Settlement
8 Agreement") entered into between the Trustee and the COS Entities, a copy of which is attached
9 to the Motion, FSO, CCI and CSRT will pay to the Trustee \$75,000 within five (5) business days
10 after approval of the compromise by the Court. The obligation to make the payment is a joint and
11 several obligation of FSO, CCI and CSRT. In exchange for the \$75,000 payment, the estate's
12 claims against CSI, FSO, CCI and CSRT will be released.

13 The Trustee's Motion is based on this Notice, the concurrently filed Trustee's Motion for
14 Order Approving Compromise With Church of Scientology Flag Service Organization, Inc.,
15 Church of Scientology International, Church of Scientology Celebrity Centre International and
16 Church of Scientology Religious Trust; Declaration of Rosendo Gonzalez in Support Thereof, the
17 exhibit thereto, all documents filed herein, and such other evidence which may be presented to the
18 Court with respect to this matter.

19 A copy of the Motion and supporting documents may be reviewed at the Bankruptcy
20 Court, obtained from the Bankruptcy Court or obtained by contacting counsel for the Trustee at
21 the following address:

22 Lidell A. Page, Esq.
23 Andrews Kurth LLP
24 601 South Figueroa St., Suite 3700
25 Los Angeles, CA 90017-5742
26 Telephone: (213) 896-3100
27 Facsimile: (213) 896-3137


28 Copying and postal charges may be required in advance.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Bankruptcy Rule 9013-
1(a)(7), any response or opposition to the Motion shall be in writing in the form required by Local
Bankruptcy Rule 9013-1(a)(7) and shall be filed with the Bankruptcy Court at 300 N. Los Angeles
LOS:107942.1

1 Street, First Floor, Los Angeles, California 90012, and served upon counsel for the Trustee at the
2 address listed in the upper left-hand corner of page one of this Notice and upon the Office of the
3 United States Trustee, 725 S. Figueroa Street, 26th Floor, Los Angeles, California 90017, at least
4 fourteen (14) days before the date the hearing on the Motion. **ANY WRITTEN RESPONSE OR**
5 **OPPOSITION NOT TIMELY FILED AND PROPERLY SERVED WILL BE DEEMED**
6 **LATE.**

7 DATED: March 3, 2006

C. JOHN M. MELISSINOS
LIDELL A. PAGE
ANDREWS KURTH LLP

9
10 By 
11 Lidell A. Page
12 Attorneys for Rosendo Gonzalez,
13 Chapter 7 Trustee
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CERTIFICATE OF SERVICE

STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 601 South Figueroa Street, Suite 3700, Los Angeles, California 90017-5742.

On March 6, 2006, I served the foregoing document described as

NOTICE OF TRUSTEE'S MOTION FOR ORDER APPROVING COMPROMISE WITH CHURCH OF SCIENTOLOGY FLAG SERVICE ORGANIZATION, INC., CHURCH OF SCIENTOLOGY INTERNATIONAL, CHURCH OF SCIENTOLOGY CELEBRITY CENTRE INTERNATIONAL AND CHURCH OF SCIENTOLOGY RELIGIOUS TRUST

on the parties having appeared in this action:

[SEE ATTACHED SERVICE LIST]

X by placing true copies (___ the original) thereof enclosed in sealed envelopes addressed as stated on the attached mailing list;

X BY MAIL:

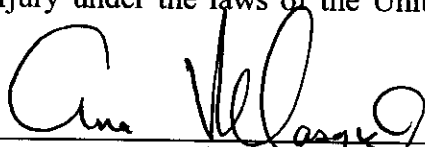
___ I deposited such envelopes in the mail at Los Angeles, California. The envelopes were mailed with postage thereon fully prepaid.

X As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the United States Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Executed on March 6, 2006, at Los Angeles, California.

___ STATE: I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

X FEDERAL: I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.



Ana Velasquez

MASTER MAILING LIST

In re Roy McNeill,
Case No. LA 02-35048-BB

Office of the United States Trustee
Ernst & Young Plaza
725 S. Figueroa St., 26th Floor
Los Angeles, CA 90017

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212 Spalding Dr.
Beverly Hills, CA 90212

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Ivanjack & Lambirth
500 S. Grand Ave., 21st Floor
Los Angeles, CA 90071

National City Bank of Ohio
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Cleveland, OH 44141

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Coldwell Banker
Leisure Real Est.
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3293 Main Street
Mammoth Lakes, CA 93545

Barbara L. McNeill
18320 Clifftop Way
Malibu, CA 90265-5628

Bank of America
10850 White Rock Road
Rancho Cordova, CA 95670

Chapter 7 Trustee
Rosendo Gonzalez, Trustee
Gonzalez & Associates, PLC
515 S. Figueroa St., Suite 1970
Los Angeles, CA 90071

Trustee for Reed E. Slatkin
R. Todd Neilson, Trustee
Neilson Elggren LLP
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Los Angeles, CA 90067

Attys for Derek S. Graham, Christopher P.
Houge and The 1031 Store, Inc.
Susan L. Vaage
Graham Vaage & Cisneros
500 North Brand Blvd. Suite 1030
Glendale, CA 91203

Bank of America
P.O. Box 26012
NC4-105-03-14
Greensboro, NC 27420

Coldwell Banker
Residential Broker
c/o Mary B. Wood
11538 San Vicente Blvd.
Los Angeles, CA 90049

National Loan Investors, LP
Attn: Brenda Brown Clemenz
3030 N. West Expressway, Ste. 1313
Oklahoma City, OK 73112

U.S. Bank
P.O. Box 790167
Saint Louis, MO 63179-0167

Franchise Tax Board
Special Procedures
P.O. Box 2952
Sacramento, CA 95812

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Carmela Tan
Robinson, Diamant & Wolkowitz
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Costa Mesa, CA 92626-1947

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300 N Los Angeles St., Rm 4062
Los Angeles, CA 90012-9903

U.S. Bank National Association
c/o Ivanjack & Lambirth
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Los Angeles, CA 90071

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D 8335
Chicago, IL 60674-8335

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