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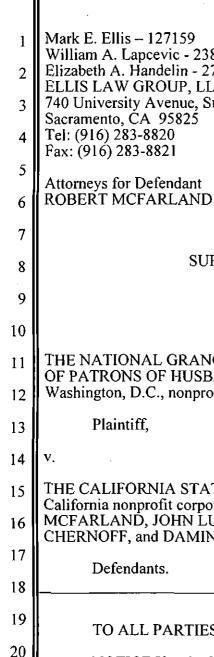
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LEGAL PROCESS #3

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SACRAMENTO

THE NATIONAL GRANGE OF THE ORDER OF PATRONS OF HUSBANDRY, a

Washington, D.C., nonprofit corporation,

Plaintiff.

THE CALIFORNIA STATE GRANGE, a California nonprofit corporation, and ROBERT MCFARLAND, JOHN LUVAAS, GERALD CHERNOFF, and DAMINA PARR,

Defendants.

Case No.: 34-2012-00130439

NOTICE OF MOTION AND MOTION ON RETURN ON ORDER TO SHOW CAUSE RE: PRELIMINARY INJUCTION

March 29, 2013 DATE: TIME: 2:00 p.m.

DEPT: 53

Complaint Filed October 1, 2013

Trial Date: None

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

NOTICE IS HEREBY GIVEN that on March 29, 2013 at 2:00 p.m. or as soon thereafter as counsel may be heard in Department 53 of the Sacramento County Superior Court, located at 800 Ninth Street, Sacramento, California, Defendant Robert McFarland (hereinafter "McFarland") will and hereby does move the Court for an order to show cause why a preliminary injunction should not be granted, enjoining Plaintiff, The National Grange, from proceeding with its internal trial procedures despite its conflict with the current matter before this court.

This motion is made on several grounds. The National Grange has chosen its forum in state court, and has waived its right to proceed internally based upon its own actions. The National Grange,

by holding the internal proceedings, is doing or threatening to be done an act in violation of McFarland's rights respecting the subject of this action, and tending to render ineffectual the order denying the preliminary injunction against McFarland and the other Defendants in the current action. Proceeding internally will cause McFarland and other Defendants irreparable harm. Holding an internal proceeding is futile because the outcome is already known. Finally, the terms of the contract provided the circumstances cannot be enforced because those terms are unconscionable. McFarland has not previously applied for such relief.

This motion is based on the Memorandum of Points and Authorities, the Declaration of William A. Lapcevic and exhibits thereto, the Declaration of Robert McFarland and exhibits thereto, and all pleadings and papers on file in this action, and upon such other oral and documentary evidence as may be presented to the Court on the date of the hearing.

PLEASE TAKE FURTHER NOTICE that the Court will issue a tentative ruling the day before the scheduled hearing, as follows:

"Pursuant to Local Rule 1.06 (A) the court will make a tentative ruling on the merits of this matter by 2:00 p.m., the court day before the hearing. The complete text of the tentative rulings for the department may be downloaded off the court's website. If the party does not have online access, they may call the dedicated phone number for the department as referenced in the local telephone directory between the hours of 2:00 p.m. and 4:00 p.m. on the court day before the hearing and receive the tentative ruling. If you do not call the court and the opposing party by 4:00 p.m. the court day before the hearing, no hearing will be held."

Dated: March 13, 2013

ELLIS LAW GROUP, LL

By William A. Lapcevic

Attorney for Defendant ROBERT MCFARLAND