

COPIES

IN THE SUPERIOR COURT OF HENRY COUNTY  
STATE OF GEORGIA

FILED IN OFFICE  
HENRY COUNTY  
SUPERIOR COURT

SEP 17 2007

TIMBERRIDGE PRESBYTERIAN )  
 CHURCH, INC., )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 PRESBYTERY OF GREATER )  
 ATLANTA, INC., )  
 )  
 Defendant. )

*James C. ...*  
CLERK OF SUPERIOR COURT

CIVIL ACTION FILE  
NO.: 07-CV-4142M

PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER

COMES NOW TIMBERRIDGE PRESBYTERIAN CHURCH, INC., Plaintiff in the above-styled action, and, pursuant to O.C.G.A. § 9-11-65, files this motion for entry of temporary restraining order, showing the Court as follows:

1.

Plaintiff brings this motion for the entry of a temporary restraining order until such time that the parties may be heard on Plaintiff's pending motion for interlocutory injunction.

2.

As Plaintiff's verified complaint sets forth, Plaintiff is exposed to immediate and irreparable injury, loss or damage, which exposure exists currently and will continue to exist before Defendant may be heard in opposition.

3.

A supporting memorandum of law which cites the principles of law relevant to the disposition of this motion has been filed with the Court concurrently with the filing of this Motion.

4.

A Certification regarding notice to Defendant has been filed with the Court concurrently with the filing of this Motion.

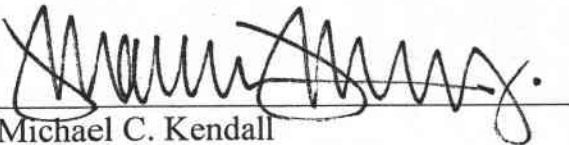
WHEREFORE, Plaintiff prays that this Court enter a temporary restraining order, restraining Defendant and its agents, servants, and employees, and all persons acting by, through, under, in concert with, or for it, from (a) filing any documents in the mortgage and conveyance records of Henry County, in the state of Georgia, the effect of which would be to place a cloud on the title of any property titled in the name of Plaintiff, or otherwise taking any action to claim ownership of local church property whether corporeal or incorporeal, movable or immovable, or real or personal, or a right to determine ownership of local church property, in the possession of, control of, or owned by Timberridge; (b) asserting any rights to the property of Timberridge Presbyterian Church or Timberridge Presbyterian Church, Inc., including but not limited to seeking to change the locks of Timberridge, initiating any disciplinary action against the ministers or members of Timberridge, appointing an administrative commission, or otherwise interfering in any way with the rights and responsibilities of the ministers or other

employees of Timberridge, the governing body of Timberridge (the session), its congregation, or the governing body of its local church corporation Timberridge (the board of trustees); or (c) proceeding in any way in violation of Georgia law and Plaintiff's property rights; and for further relief as this Court may deem just and appropriate.

This 17th day of September, 2007.

Respectfully submitted,

TALLEY, FRENCH & KENDALL, P.C.

A handwritten signature in black ink, appearing to read "Michael C. Kendall", written over a horizontal line.

Michael C. Kendall

Georgia State Bar No. 414030

Maureen E. Murphy

Georgia State Bar No. 530990

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