

## **Letter to the Blessed Families -- Related to the dismissal of the UCI case**

Hyun Jin Moon  
December 22, 2013

Dear Blessed Families,

We are sure that you have all been very concerned about the UCI lawsuit and that you have been praying for the issue to be resolved. We bow our heads in gratitude before the untold dedication of Jung Sung from all the members. And we ask for continuous Jung Sung from members until all the painful providential issues that have been taking place within and outside of our Unification Movement for the last few years, including the UCI lawsuit, are resolved. Furthermore, we ask for your full support in protecting God's providence, our True Family and True Parents' legacy.

Although there have been "ups and downs" -- some large and some small -- in the process of this lawsuit up to now, we have maintained a prayerful attitude instead of making a lot of noise about it. There are those who misled True Parents and the members by presenting the situation as if they were sure to win this frivolous lawsuit. However, we believed in the conscience and faith of the members and without responding to each of their claims, maintained silence in front of the propaganda and instigation that was driven with such dishonest intent.

Nevertheless, recently a very important development took place in the UCI lawsuit. We heard the news and were made aware of the latest developments, but chose to maintain silence until the top representatives of both the plaintiff and defendant's sides resolved the issue. However, because information regarding the lawsuit is public and because such an important order was granted, the news quickly spread around America and Japan. Unfortunately some inaccurate aspects are being mixed into the "news" that is spreading.

Given this situation we decided to convey to members some of the objective facts about the recent decision in the UCI case. We decided to ask our members to direct their voluntary prayer and Jung Sung for resolving, not only this case, but that through this opportunity we might be able to resolve the most fundamental cause of the general conflict. It is with that in mind that we wish to convey the following to the members:

### **Regarding the dismissal of the UCI lawsuit**

On December 19, 2013, the judge appointed to the UCI case, Anita Josey-Herring, issued an order dismissing the plaintiff's complaint against Hyun Jin Nim and UCI. Her ruling was based on the stated facts that the UCI lawsuit fundamentally pertained to religious matters that are beyond the jurisdiction of the court, and therefore, the court does not have the authority to adjudicate the issues at hand.

The judge Josey ordered that this dismissal order be stayed pending completion of the auxiliary proceedings regarding the document "taint" issue brought forth by the defendants, and the "sanctions" issue brought forth by the plaintiff. The judge issued the dismissal order and released her order memorializing these rulings.

During the court hearing on December 20 the judge reemphasized her decision and once again urged that both sides should reconcile.

It is necessary to elaborate on the judge's December 19 order. Basically, the judge came down with the decision to dismiss the lawsuit; however, the judge decided to hold the order from being rendered until the two remaining outstanding auxiliary proceedings mentioned above, which were presented by both sides (one each) of the UCI case, are finalized.

While the merit phase of the UCI litigation has not begun even now, both the plaintiffs and the defendants had previously raised claims regarding these two issues. The defendants' side claims that the documents and information which Mr. Steinbronn, the plaintiffs' attorney, had previously handed over to the plaintiffs' side had "tainted" the plaintiffs. The plaintiffs' side filed for a "sanction" regarding the sale of real estate against the defendants. While the assigned judge issued the order that the main UCI case is dismissed due to the court lacking jurisdiction over issues of a religious nature, the judge will render the order, which has already been decided, once the two proceedings are concluded.

If one reads the last part of the December 19 order, it states: "It is further ORDERED, that, upon completion of the taint and sanctions discovery proceedings, either party may move to vacate the stay on the entry of this dismissal." This means that once these two smaller proceedings are finished, either side may request for the final order, and, then the judge's order to dismiss the main case takes effect, resulting in the plaintiffs' loss and the dismissal of the case.

While this is our view, perhaps the judge is trying to give some time before rendering the dismissal order with the hope that both parties can truly reconcile and end this lawsuit on their own.

December 22, 2013

Blessed Families Association that loves and protects the Providence and God's Will

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA**  
**Civil Division**

<p><b>THE FAMILY FEDERATION FOR WORLD PEACE AND UNIFICATION, <i>et al.</i>,</b></p> <p style="text-align:center"><b>Plaintiffs</b></p> <p>v.</p> <p><b>HYUN JIN MOON, <i>et al.</i>,</b></p> <p style="text-align:center"><b>Defendants.</b></p>	<p><b>2011 CA 003721 B</b> <b>Judge Anita Josey-Herring</b> <b>Calendar 4</b></p>
<p><b>HYUN JIN MOON,</b></p> <p style="text-align:center"><b>Counterclaim Plaintiff</b></p> <p>v.</p> <p><b>BO HI PAK, <i>et al.</i>,</b></p> <p style="text-align:center"><b>Counterclaim Defendants.</b></p>	<p><b>2011 CA 003721 B</b> <b>Judge Anita Josey-Herring</b> <b>Calendar 4</b></p>

**ORDER**

Upon consideration of the Court’s Memorandum Opinion on Defendants’ Motion for Judgment on the Pleadings, filed the same day as this Order, it is this 19th day of December 2013,

ORDERED, that “Defendants’ Motion for Judgment on the Pleadings for Lack of Subject Matter Jurisdiction,” filed October 4, 2012 by UCI, Hyun Jin “Preston” Moon, Richard Perea, Michael Sommer, Jinman Kwak, and Youngjun Kim, is GRANTED. It is further

ORDERED, that Plaintiffs’ Complaint shall be DISMISSED WITH PREJUDICE. It is further

ORDERED, that the dismissal reflected in this Order is STAYED pending completion of the taint and sanctions discovery proceedings before the Special Master. It is further

ORDERED, that, upon completion of the taint and sanctions discovery proceedings, either party may move to vacate the stay on the entry of this dismissal. It is

SO ORDERED.

A handwritten signature in black ink, appearing to read "Anita Josey-Herring". The signature is fluid and cursive, with a large loop at the end of the last name.

Anita Josey-Herring  
Associate Judge  
(Signed in Chambers)

Copies to:

James A. Bensfield, Esq.  
Emmett B. Lewis, Esq.  
Brian A. Hill, Esq.  
Alan I. Horowitz, Esq.  
John C. Eustice, Esq.  
Erik B. Nielsen, Esq.  
MILLER & CHEVALIER, CHARTERED  
655 Fifteenth St. NW, Ste. 900  
Washington, DC 20005  
*Counsel for Plaintiffs/ Counter-Defendants Family Federation for World Peace and Unification International, the Universal Peace Foundation, and the Holy Spirit Association for the Unification of World Christianity (Japan); Counsel for Counter-Defendants Holy Spirit Association for the Unification of World Christianity (USA), Hyung Jin (“Sean”) Moon, Jin In (“Tatiana”) Moon, Kook Jin (“Justin”) Moon, The Tongil Foundation, and The Mission Foundation for the Family Federation for World Peace and Unification*

Benjamin P. De Sena, Esq.  
LAW OFFICES OF DE SENA & PETRO  
197 Lafayette Ave.  
Hawthorne, NJ 07506  
*Counsel for Plaintiffs/ Counter-Defendants Family Federation for World Peace and Unification International, the Universal Peace Foundation, and the Holy Spirit Association for the Unification of World Christianity (Japan); Counsel for Counter-Defendants Holy Spirit Association for the Unification of World Christianity (USA), Hyung Jin (“Sean”) Moon, Jin In (“Tatiana”) Moon, Kook Jin (“Justin”) Moon, The Tongil Foundation, and The Mission Foundation for the Family Federation for World Peace and Unification*

Thomas C. Green, Esq.  
Frank R. Volpe, Esq.  
Meghan Delaney Berroya, Esq.  
George W. Jones, Esq.  
Chanda Betourney, Esq.  
SIDLEY AUSTIN LLP  
1501 K St. NW  
Washington, DC 20005  
*Counsel for Plaintiff/ Counter-Defendant Douglas D.M. Joo*

W. Gary Kohlman, Esq.  
Jeffery R. Freund, Esq.  
Ramya Ravindran, Esq.  
Philip C. Andonian, Esq.  
BREDHOFF & KAISER, PLLC  
805 Fifteenth St. NW, Ste. 1000  
Washington, DC 20005  
*Counsel for Plaintiff/ Counter-Defendant Peter H. Kim*

Danny C. Onorato, Esq.  
Lisa Freiman Fishberg, Esq.  
Schertler & Onorato, LLP  
575 – 7<sup>th</sup> St., NW, Ste. 300 South  
Washington, DC 20004  
*Counsel for Counter-Defendant Bo Hi Pak*

Peter Romatowski, Esq.  
Adrian Wager-Zito, Esq.  
Sean Thomas Boyce, Esq.  
JONES DAY  
51 Louisiana Ave. NW  
Washington, DC 20001  
*Counsel for Defendant/ Counter-Plaintiff Hyun Jin “Preston” Moon*

Steven M. Salky, Esq.  
David A. Reiser  
Blair G. Brown, Esq.  
Amit P. Mehta, Esq.  
ZUCKERMAN SPAEDER LLP  
1800 M St. NW, Ste. 1000  
Washington, DC 20036  
*Counsel for Defendant/ Counter-Plaintiff UCI*

Francis D. Carter, Esq.  
Law Office of Francis D. Carter  
101 S. Street, NW  
Washington, DC 20001-1129  
*Counsel for Defendants Michael Sommer, Richard J.  
Perea, Jinman Kwak, & Youngjun Kim*

Honorable Richard A. Levie (Ret.)  
Judicial Arbitration and Mediation Servs.  
555 13<sup>th</sup> St., NW, Ste. 400 W.  
Washington, DC 20004  
[rlevie@jamsadr.com](mailto:rlevie@jamsadr.com)  
*Special Master* (by electronic mail)