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17 Church and Debra Chiya

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE
NORTH JUSTICE CENTER

29 ANAHEIM JAPANESE FREE
30 METHODIST CHURCH, a California
31 Nonprofit Religious Corporation, DEBRA
32 CHIYA, member, board member and
33 corporate treasurer;

34 Plaintiffs,

35 vs.

36 THE VOICE CHURCH OF ORANGE
37 COUNTY, INC., a California Nonprofit
38 Religious Corporation, TAKA IGUCHI, as
39 an individual and officer; PACIFIC
40 COAST JAPANESE CONFERENCE OF
41 FREE METHODIST CHURCH OF
42 NORTH AMERICA, a California
43 Nonprofit Religious Corporation; and
44 DOES 1 through 50, inclusive,

45 Defendants.

**CASE NO. 30-2023-01322048-CU-PP-
NJC**

**[PROPOSED] ORDER TO SHOW
CAUSE RE PRELIMINARY
INJUNCTION; AND**

**[PROPOSED] TEMPORARY
RESTRAINING ORDER**

Assigned to Hon. Donald F. Gaffney

1 This Order to Show Cause (“OSC”) and supporting papers shall be served on
2 Defendants no later than _____, 2023, by electronic service. Proof of such
3 service shall be filed with the court on or before _____, 2023. The following
4 briefing schedule shall apply:

5 Any return on the OSC shall be filed and served by email on Plaintiffs’ counsel no
6 later than _____ [time] on _____, 2023. Any reply papers by Plaintiffs
7 shall be filed and served on Defendants or their counsel by email no later than
8 _____ [time] on _____, 2023.

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10 **TEMPORARY RESTRAINING ORDER**

11 **IT IS HEREBY ORDERED** that, pending hearing on the above Order to Show
12 Cause, Defendants **THE VOICE CHURCH OF ORANGE COUNTY, INC., TAKA**
13 **IGUCHI, and PACIFIC COAST JAPANESE CONFERENCE OF THE FREE**
14 **METHODIST CHURCH OF NORTH AMERICA** and their officers, agents,
15 employees, employers, representatives, affiliates and all persons acting in concert or
16 participating with them, are restrained and enjoined from engaging in or performing,
17 directly or indirectly, any of the following acts:

- 18 1. Changing the name of the Anaheim Free Methodist Church (“AFMC”); and
- 19 2. Interfering with Plaintiffs’ use and occupation of the property on which AFMC
20 operates; and
- 21 3. Removing the board of directors and other officers of the AFMC; and
- 22 4. Controlling and accessing AFMC’s funds and bank accounts; and
- 23 5. Terminating or replacing any members of the church staff, and
- 24 6. Entering into any contracts that seek to obligate AFMC for payment; and
- 25 7. Altering AFMC’s online accounts (website, and social media); and
- 26 8. Installing “VOICE” marketing materials on AFMC property; and
- 27 9. Merging AFMC into The Voice Church of Orange County.

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IT IS SO ORDERED.

DATED: _____, 2023

Orange County Superior Court Judge