

STATE OF NORTH CAROLINA
COUNTY OF FORSYTH

IN THE GENERAL COURT OF JUSTICE
DISTRICT COURT DIVISION
NO. 2007-CVD-6565

PROGRAMMES INTERNATIONAUX
D'ECHANGES, ASSE
INTERNATIONAL, INC., and WORLD
HERITAGE, INC.,

Plaintiffs,

v.

VERONICA BEDDICK and DANIELLE
JOYCE GRIJALVA,

Defendants.

PRELIMINARY INJUNCTION ORDER

This matter coming on to be heard, and being heard, on Plaintiff-Intervenors' Motion for Preliminary Injunction, the Court hereby enters the following Preliminary Injunction Order, a violation of which is punishable by the Court's powers of contempt:

FINDINGS OF FACT

1. Plaintiff Programmes Internationaux d'Echanges ("P.I.E.") is a non-profit association organized and existing under the laws of The Republic of France. P.I.E. organizes student exchange programs in France and in other countries. Among other things, P.I.E. arranges for French students to attend educational programs and schools in the United States while staying with volunteer host families, including families in North Carolina.
2. Plaintiff ASSE International, Inc. ("ASSE") is a non-profit corporation organized under the laws of the State of California that arranges and supervises host family and school placements in North Carolina and elsewhere in the United States, by agreement with P.I.E..
3. Plaintiff World Heritage International, Inc. ("World Heritage") is a non-profit corporation organized under the laws of the State of New York, and is an independent student exchange

program that supervises host family and school placements in North Carolina and elsewhere in the United States.

4. Both ASSE and World Heritage provide certain services to P.I.E., including identifying and arranging host families and school placements for exchange students, and providing services in connection with short-term and academic year programs.

5. Defendant Danielle Joyce Grijalva is a resident of the state of California.

6. On December 20, 2007, after notice and opportunity to be heard, this Court entered a preliminary injunction with respect to Plaintiff P.I.E. against Defendant Grijalva ordering her, and those persons acting under her control or in active concert with her, to refrain from the following:

- a. Having any contact, orally, electronically or in writing, with students sponsored by P.I.E.; with the natural families and American host families of such students; or with school officials, administrators or educators regarding P.I.E. sponsored students; or
- b. Disseminating false or misleading information about P.I.E., students sponsored by P.I.E., the natural families or the American host families of such students, or P.I.E.'s placement of students in the United States; or
- c. Including any information specifically related to P.I.E., P.I.E.-sponsored students, their natural families, or their American host families, on her website, addressed as <http://www.csfes.org>.

7. Defendant Grijalva has contacted Plaintiffs' students, natural families, host families, and school personnel, and conveyed false information to them regarding Plaintiffs. Specifically, Defendant Grijalva e-mailed parents of Plaintiffs' students that "all too often students are placed in the homes of convicted felons and registered sex offenders," and that "the French partner has coordinated with a US organization who has violated federal regulations and thus, places its students in jeopardy," when she knew these statements to be false.

8. Defendant Grijalva's actions have caused anxiety and disruption to P.I.E.'s, ASSE's, and World Heritage's students, their natural parents, and their host families. Her actions have further caused damage to P.I.E.'s, ASSE's, and World Heritage's reputations and good standing in the community.

9. Defendant Grijalva has unreasonably interfered with ASSE's and World Heritage's contractual relationships with each other and with P.I.E..

10. Defendant Grijalva has unreasonably interfered with ASSE's and World Heritage's contractual relationships with current and potential exchange students.

11. A bond of \$ 500, is adequate to protect Defendant Grijalva's interest pursuant to Rule 65(c) of the North Carolina Rules of Civil Procedure.

CONCLUSIONS OF LAW

1. The Court has jurisdiction of the parties and of the subject matter.

2. Plaintiffs ASSE and World Heritage will suffer immediate and irreparable injury if this Order is not entered.

3. A preliminary injunction is necessary to protect Plaintiffs ASSE's and World Heritage's rights during the course of the litigation of this matter.

4. In the absence of a preliminary injunction, the injury that Plaintiffs ASSE and World Heritage would suffer, in addition to being one for which Plaintiffs would have no reasonable remedy at law, is one to which Plaintiffs should not be required to submit and which Defendant Grijalva should not be permitted to inflict.

5. The potential harm to Plaintiffs ASSE and World Heritage if a preliminary injunction is not issued substantially outweighs any potential harm to Defendant Grijalva if a preliminary injunction is issued.

6. Plaintiffs ASSE and World Heritage have shown a likelihood of success on the merits of their claims for defamation, civil conspiracy, interference with business relations, and tortious interference with contract.

7. As set forth above, a proper showing has been made for issuance of a preliminary injunction order based upon the affidavits in the file and the arguments and testimony presented at hearing.

Based on the forgoing, it is hereby ORDERED, ADJUDGED, and DECREED as follows:

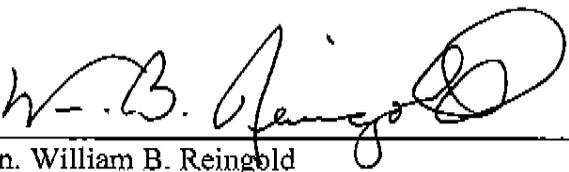
1. That Defendant Grijalva, and those persons acting under her control or in concert with her, are hereby ordered not to engage in any of the following:
 - a. Having any contact, orally, electronically or in writing, with students sponsored by ASSE or World Heritage; with the natural families and American host families of such students; or with school officials, administrators or educators regarding ASSE sponsored students or World Heritage sponsored students; or
 - b. Disseminating false or misleading information about ASSE or World Heritage; students sponsored by ASSE or World Heritage; the natural families or American host families of such students; or ASSE's or World Heritage's placement of students in the United States; or
 - c. Including any information specifically related to ASSE or World Heritage, or ASSE- or World Heritage- sponsored students, their natural families, or their American host families, on her website, addressed as <http://www.csfes.org>.
2. That nothing in this Order shall be interpreted or understood to prohibit defendants, and those acting under their control or in concert with them, from responding to initial communications to the extent necessary to determine if the communication relates to ASSE or World Heritage sponsored students, their natural families, or their American host families. The defendant receiving any such initial communication shall inquire whether the student or student(s) referred to in the communication is or are sponsored by ASSE or World Heritage. If a reasonable person would conclude from the information available that a communication relates

to ASSE or World Heritage sponsored students, their natural families or their American host families, this Order shall be interpreted to require defendants, and those acting under their control or in concert with them, to inform the other party to the communication that defendants, and those acting under their control or in concert with them, are prohibited from engaging in any communication regarding ASSE or World Heritage sponsored students, their natural families, or their American host families.

3. That plaintiffs ASSE and World Heritage jointly post a bond, pursuant to Rule 65(c) of the North Carolina Rules of Civil Procedure, in the amount of \$ 500.

4. Violations of this Preliminary Injunction Order shall be punished by the Court's powers of contempt. This order shall be binding only upon the defendants, their agents, and employees, and upon those persons in active concert or participation with them who receive actual notice of the order by personal service or otherwise.

This the 30 day of May, 2008.



Hon. William B. Reingold
Chief District Court Judge