

Robert Scotlund Vaile
PO Box 727
Kenwood, CA 95452
(707) 633-4550
Petitioner in Proper Person

IN THE SUPREME COURT OF THE STATE OF NEVADA

ROBERT SCOTLUND VAILE,

Petitioner,

vs.

THE EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF NEVADA,
IN AND FOR THE COUNTY OF CLARK,
AND THE HONORABLE CHERYL B.
MOSS, DISTRICT JUDGE, FAMILY
COURT DIVISION,

Respondents,

CISILIE A. PORSBOLL,

Real Party in Interest.

Supreme Court Case No: _____

District Court Case No: 98D230385

APPENDIX OF EXHIBITS

IN SUPPORT OF
**EMERGENCY PETITION FOR WRIT
OF MANDAMUS UNDER NRAP 27(e)**

INDEX TO EXHIBITS

- 1: July 11, 2012 Notice of Entry of Court's Decision and Order dated July 10, 2012
- 2: July 17, 2012 Willick Demand for Immediate Payment of Child Support under July 10 Order by July 23, 2012
- 3: February 5, 2008 Email from Mr. Vaile to Ms. Porsboll

EMERGENCY PETITION FOR WRIT OF
MANDAMUS UNDER NRAP 27(E)

EXHIBIT 1

JULY 11, 2012 NOTICE OF ENTRY OF
COURT'S DECISION AND ORDER
DATED JULY 10, 2012

**DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA**


CLERK OF THE COURT

R.S. VAILE,

Plaintiff,

vs.

Case No. 98-D-230385
Dept. No. "F"

CISILIE A. VAILE
Nka PORSBOLL,

Defendant

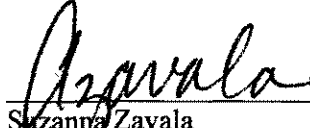
NOTICE OF ENTRY OF COURT'S DECISION AND ORDER

TO: **R.S. VAILE**, Plaintiff In Proper Person

TO: **MARSHAL WILLICK, ESQ.**, Attorney for Defendant

PLEASE TAKE NOTICE that a Court's Decision and Order was entered in the above-entitled matter on the 10th day of July, 2012, a true and correct copy of which is attached hereto.

Dated this 11th day of July, 2012.


Suzanna Zavala
Judicial Executive Assistant to the
HONORABLE CHERYL B. MOSS

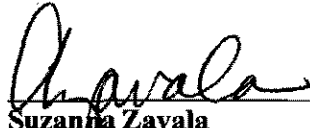
CERTIFICATE OF SERVICE

I hereby further certify that on this 11th day of July, 2012, I caused to be mailed to Plaintiff/Defendant Pro Se a copy of the **Notice of Entry of Court's Decision and Order** at the following address:

R.S. VAILE
P.O. Box 727, Kenwood, CA 95452
Plaintiff In Proper Person

I hereby certify that on this 11th day of July, 2012, I caused to be delivered to the Clerk's Office a copy of the **Notice of Entry of Court's Decision and Order** which was placed in the folders to the following attorneys:

MARSHAL WILLICK, ESQ.
Attorney for Defendant


Suzanna Zavala
Judicial Executive Assistant



CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

R. S. VAILE,

Plaintiff,

Case No. 98-D-230385

vs.

Dept. No. I

CISILIE A. VAILE

nka PORSBOLL,

Defendant.

COURT'S DECISION AND ORDER

The Nevada Supreme Court remanded this case to determine whether Norway's March 17, 2003, modification order is enforceable in Nevada, and for further proceedings on the enforcement of the August 21, 1998, Nevada child support order. Defendant ("Ms. Porsboll") also filed an Amended Motion for Order Show Cause to which Plaintiff ("Mr. Vaile") filed an Opposition.

The Court reviewed the pleadings and heard oral arguments on April 9, 2012, and June 4, 2012. Each side filed supplemental briefs.

The Norway Child Support Order

The State of Nevada adopted the Uniform Interstate Family Support Act (UIFSA) and incorporated its provisions in NRS Chapter 130. Under NRS

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130.10116, Nevada recognizes the country of Norway as a foreign reciprocating country.

In this case, the issue to be decided is whether Norway modified the Nevada child support order and therefore became the controlling order. The Court finds that under NRS 130.611(1)(a), Norway could have modified the Nevada child support order only if it finds that both parents and the children no longer reside in Nevada, that Mr. Vaile, who is a nonresident of Norway petitioned for modification, and that Ms. Porsboll was subject to the personal jurisdiction of Norway.

Under NRS 130.611(1)(b), Norway may also modify the Nevada child support order if Norway is the residence of the children, or one of the parents reside in Norway, and both parties have filed written consents with the Nevada court.

Here, none of the requirements of NRS 130.611(1) were met. Mr. Vaile did not petition for modification in Norway. Rather, Norway issued its own modification order that is not enforceable in Nevada under UIFSA laws. Further, both parties never filed written consents with the Nevada district court requesting Norway to modify the child support and assume jurisdiction.

IT IS HEREBY ORDERED that the Norway child support order is not the controlling order, and it is unenforceable in Nevada pursuant to UIFSA. The Norwegian order has no bearing on this court's enforcement of the Nevada child

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support order, which remains the controlling order. Further, Nevada retains personal jurisdiction over Mr. Vaile for enforcement of child support.

IT IS FURTHER ORDERED that Mr. Vaile's March 6, 2012, pleading entitled "Notice of Controlling Norwegian Child Support Order" shall be stricken because it does not comply with NRS 130.611 and 130.605.

Mr. Vaile argued that NRS 130.6115 authorizes Norway to modify the Nevada support order. The Court rejects Mr. Vaile's argument and finds that NRS 130.6115 does not apply. This statute specifically refers to modification of a child support order of a foreign country. Here, the child support order sought to be modified was issued in Nevada. Nevada is not a foreign country.

Mr. Vaile raised the issue of applying NRS 130.207. Ms. Porsboll argued that this statute does not apply. The Court finds that NRS 130.207 is inapplicable. This statute deals with determining which support order is the controlling order when two competing child support orders exist.

At the time of the 1998 divorce, there was only one child support order issued in Nevada which is the controlling order. There were no multiple competing orders. Therefore, NRS 130.207 does not apply in this case.

Mr. Vaile argued that Ms. Porsboll's counsel's references to expert opinion, specifically Gary Caswell, Esq., were hearsay and should be disregarded. The Court finds this argument moot. The Court did not rely on Mr. Caswell's opinion letter to reach a decision on the applicability of NRS Chapter 130 and UIFSA.

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Recalculation of Child Support Arrears, Statutory Interest, and Statutory Penalties After Remand

Mr. Vaile argues that he should not have paid child support when he had the children in his care from May 2000 to April 2002. At a hearing on July 21, 2008, the court denied Mr. Vaile's request. The Nevada Supreme Court, in its January 26, 2012, decision, denied all other relief sought by Mr. Vaile in his multiple appeals. Accordingly, the court's decision is res judicata. In addition, the Court rejects Mr. Vaile's arguments of waiver, laches, and prevention.

Principal Child Support Arrears

The Court reviewed the calculations submitted by both sides. As to principal child support arrears, Mr. Vaile claims the total amount accrued through June 1, 2012, is \$149,416.93. Ms. Porsboll claims the amount is \$214,868.09.

Mr. Vaile's chart is erroneous. His child support chart sets the obligation at 18% for 2008, yet the eldest daughter emancipated in May 2009. This is incorrect because the percentage amount of 18% for one remaining child should not be applied until June 2009.

In addition, Mr. Vaile did not include child support when he claimed custody of the children for two years. As noted, the Court previously denied his request on July 21, 2008.

Mr. Vaile claims he paid a total of \$94,049.82 in child support payments. Ms. Porsboll calculated total payments of \$88,551.37. The Court previously ordered on March 8, 2010, that Mr. Vaile direct all child support payments to Ms.

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Porsboll's counsel (The Willick Law Group) if the District Attorney did not collect the full amount via involuntary wage assignment. Mr. Vaile is not entitled to credits for any direct payments he made to Ms. Porsboll.

The Court finds Ms. Porsboll's updated calculations are accurate as set forth in Exhibit A of their Supplemental Exhibits filed June 4, 2012. Therefore, the principal amount of child support arrears, after all payments are credited, is \$126,316.72 through June 1, 2012.

IT IS FURTHER ORDERED that the principal amount of child support arrears, totaling \$126,316.72 through June 1, 2012, is reduced to judgment and collectible by any lawful means.

Statutory Interest on the Child Support Arrears

Statutory interest is mandatory under NRS 17.130 and 99.040. Ms. Porsboll calculated \$62,466.86 of interest.

IT IS FURTHER ORDERED that the total interest amount of \$62,466.86 through June 1, 2012, is reduced to judgment and collectible by any lawful means.

Statutory Penalties on the Child Support Arrears

Ms. Porsboll calculated penalties on the arrears, using the M-Law program, in the amount of \$88,218.75.

The Nevada Supreme Court did not reach a decision on the calculation of penalties issue (M-Law vs. NOMADS). Ms. Porsboll argued the M-Law Program was not invalidated by the Supreme Court. However, neither was the NOMADS Program. The court decided the issue in its April 17, 2009 Decision and Order

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and is compelled to enforce it. The court recognizes that the M-Law Program calculates penalties in the same manner as the NOMADS program, but only up through the first 23 months. After 23, months, the calculations diverge. In this case, the penalties are calculated over a span 12 years.

IT IS FURTHER ORDERED that Mr. Vaile shall obtain an updated audit from the District Attorney's Office as to the penalties calculation by serving the District Attorney with a certified copy of this Decision and Order.

IT IS FURTHER ORDERED that the District Attorney shall file an updated audit in D-230385. Mr. Vaile shall then submit a proposed Order, countersigned by Ms. Porsboll's counsel, indicating the penalties amount through June 1, 2012, with said amount being reduced to judgment and collectible by any lawful means.

Contempt Issues

On March 28, 2012, Ms. Porsboll filed an Amended Order Show Cause asking for contempt against Mr. Vaile for failing to pay child support, for failing to make restitution on prior judgments for attorney's fees, and for failing to timely file a Notice of Change of Address.

NRS 22.010 and NRS 22.030 discuss contempt. An order must be reduced to writing, signed by a Judge, and filed with the Clerk of the Court.

Division of Child Family Svcs. v. Eighth Judicial Dist. Ct. of Nevada, 92 P.3d 1239 (2004). In Cunningham v. Eighth Judicial Dist. Ct., 102 Nev. 551, 559-60 (1986), the Supreme Court held, "An order on which a judgment of contempt is

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based must be clear and unambiguous, and must spell out the details of compliance in clear, specific and unambiguous terms so that the person will readily know exactly what duties or obligations are imposed on him.”

Pertaining to the change of address issue, the court’s order filed October 9, 2008, is clear and unambiguous. Mr. Vaile is required to formally file a Notice of Change of Address in Case Number D-230385 within 30 days of moving. Mr. Vaile asserted that he moved to Michigan in 2011. However, he did not file a Notice of Change of Address until March 6, 2012.

Mr. Vaile's argument that his Virginia counsel notified the Willick Law Group of his new Michigan address does not comply with the court’s order. Mr. Vaile's argument that he did not file a change of address in D-230385 due to the appeal pending is meritless. The change of address requirement was not related to the issues he raised on appeal.

The Court finds Mr. Vaile in contempt of the October 9, 2008 order for failing to file a Notice of Change of Address in Case Number D-230385 within 30 days of moving to a new residence.

IT IS FURTHER ORDERED that Mr. Vaile is sanctioned \$500.00 for failing to file a Notice of Change of Address and serving the Willick Law Group within 30 days of moving to a different residence.

With regard to Mr. Vaile's failure to pay child support since April 2000, the court previously conducted an evidentiary hearing on September 18, 2008.

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Both parties were given notice and an opportunity to fully litigate the contempt issue.

The court made written findings after the September 18, 2008, trial. In conforming with the Nevada Supreme Court's Decision reversing and remanding this case, the court reviewed its prior findings and orders in its October 9, 2008 Decision and Order.

The court's findings of fact and conclusions of law remain unchanged from the September 18, 2008 evidentiary hearing, except as to all references and findings that were inconsistent with the Nevada Supreme Court's Decision. All references and findings as to enforcing the \$1,300.00 fixed monthly child support amount are null and void.

Upon reconsideration after remand, the court makes new and/or revised findings and orders as follows.

1. According to the Decree of Divorce, the parties are required to exchange their tax returns and income information each year for purposes of calculating child support.
2. The parties applied and utilized the mathematical formula contained in the Decree.
3. The facts have not changed with regard to Mr. Vaile having paid nothing for over six years from April 2000 to April 2006.
4. The court finds Mr. Vaile's conduct willful because he understood he had a BASIC duty and obligation to pay child support. In fact, Mr. Vaile voluntarily paid child support from the time the Decree was entered until April 2000.
5. The policy behind NRS 125B.020(1) states that a parent has a duty to support their children.

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6. Mr. Vaile actually paid child support from August 1998 to April 2000. This means he understood during this time period that he had a duty to support their children.
7. Mrs. Porsboll signed no written agreements for waiver of child support.
8. Mr. Vaile willfully refused to pay child support from April 2000 to July 2006.
9. Mr. Vaile is in contempt of the Decree of Divorce.
10. Mr. Vaile was on notice under the Decree of Divorce to pay child support.
11. Mr. Vaile paid \$1,300.00 per month from August 1998 to April 2000.
12. There were no payments until the District Attorney's Office commenced wage withholding on July 3, 2006.
13. All child support payments since July 3, 2006 have been collected involuntarily.
14. Under NRS 22.010, the Court, in its discretion, could monetarily sanction Mr. Vaile up to \$500.00 for every month he willfully did not pay child support. He did not pay from April 2000 to July 2006 or a total of 76 months. The maximum amount is potentially $\$500.00 \times 76 = \$38,000.00$.
15. The Court finds Mr. Vaile in contempt for non-payment of child support for six years.
16. Under NRS 22.010, the Court has discretion to impose up to 25 days incarceration for every month Mr. Vaile willfully refused to pay child support.
17. Here, the child support PRINCIPAL ARREARS total \$126,316.72 through June 1, 2012.
18. The STATUTORY INTEREST on the arrears amounts to a total of \$62,466.86 through June 1, 2012.
19. The combined total is substantial -- \$188,783.58.

IT IS FURTHER ORDERED that Mr. Vaile is found in contempt for non-payment of child support for six years from March 2000 through June 2006.

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Accordingly, he is sanctioned \$38,000.00 under NRS 22.010. Said amount is reduced to judgment and collectible by any lawful means. Previously, the Court did not award sanctions because it believed the Decree provision on calculating child support on a yearly basis was not clear and not unambiguous. The Nevada Supreme Court reasoned and found to the contrary in its January 26, 2012 Decision. Accordingly, upon reconsideration and remand, there is a basis to award sanctions.

The Court finds that because Nevada lacks jurisdiction to modify the child support order, Mr. Vaile is obligated to pay CURRENT child support of \$2,754.15 per month in accordance with the Decree of Divorce. Under NRS 125B.100, the obligor parent shall continue to pay support for an emancipated child until all arrearages are paid. Mr. Vaile's child support was \$2,870.13 for two children. The eldest child was emancipated on June 1, 2009.

IT IS FURTHER ORDERED that in accordance with the Decree of Divorce, Mr. Vaile's child support obligation is \$2,870.13 per month. Of this amount, \$2,754.15 is applied towards current child support for the one remaining minor child, due and owing from July 1, 2011 to June 30, 2012. The difference between \$2,870.13 and \$2,754.15 shall be applied against the arrearages for this time period. On July 1 of each year, while the youngest child is still a minor, the child support amount is adjusted per the Decree of Divorce and any remainder between the \$2,870.13 and the adjusted amount shall be applied toward the arrearages. The youngest child will emancipate on

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June 1, 2013. After said date, the entire amount of \$2,870.13 shall be applied toward arrearages until paid in full.

With regard to incarceration contempt, the court previously ordered Mr. Vaile to make eight (8) monthly installments of \$2,000.00 towards the purge amount of \$16,000.00 as reflected in the October 9, 2008 Decision and Order. According to Exhibit A of Defendant's Supplemental Exhibits filed June 4, 2012, Mr. Vaile made all payments totaling \$16,000.00. Therefore, the Court finds that Mr. Vaile is purged out of the jail contempt through the date of the last payment due and owing which was June 15, 2009.

Concerning Ms. Porsboll's latest request for contempt for failure to pay child support after June 15, 2009, the Court finds that zero child support was paid for eleven (11) specific months, namely May 2010 to October 2010 inclusive, July 2011 to September 2011 inclusive, and May 2012 to June 2012. See Exhibit A of Defendant's Supplemental Exhibits filed on June 4, 2012.

Under due process, if a party is facing incarceration and sanctions for contempt, the Court is required to hold an evidentiary hearing pursuant to NRS 22.010.

Mr. Vaile is admonished to resume child support payments and pay the amount of \$2,870.13 per month in accordance with the non-modifiable Decree of Divorce support order and pursuant to NRS 125B.100.

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IT IS FURTHER ORDERED that an evidentiary hearing date shall be set for **October 22, 2012 at 1:30 p.m. (stack #1)**

IT IS FURTHER ORDERED that for any remainder amounts due for child support each month not collected via wage assignment by the District Attorney's Office, Mr. Vaile shall continue to send those payments directly to Ms. Porsboll's counsel payable to "The Willick Law Group". At the hearing on March 8, 2010, the court ordered Mr. Vaile to send all payments for child support not collected by the District Attorney to The Willick Law Group. Mr. Vaile is under an affirmative duty to comply with court orders. Since March 8, 2010, Mr. Vaile paid zero child support for 11 months. See Exhibit A to Defendant's Supplemental Exhibits filed June 4, 2012. Mr. Vaile is to show cause at the evidentiary why he should not be held in contempt.

IT IS FURTHER ORDERED that the involuntary wage withholding by the District Attorney for the payment of current child support shall continue.

IT IS FURTHER ORDERED that the prior award of \$15,000.00 attorney's fees to Ms. Porsboll in the October 9, 2008, Decision and Order stands, but any references or findings as to the enforcement of the \$1,300.00 per month amount is deemed null and void. Said amount is reduced to judgment and collectible by any lawful means.

With regard to Ms. Porsboll's request to enforce the prior judgments for attorney's fees, the court stated at previous hearings that said judgments were already reduced to judgment and collectible by any lawful means.

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IT IS FURTHER ORDERED that Ms. Porsboll's request to enforce payment of prior judgments of attorney's fees and costs was already granted by the Court at the March 8, 2010 hearing. The court's order still stands and any employer of Mr. Vaile shall withhold the maximum amount allowed by Nevada law, not to exceed 50% of his wages.

IT IS FURTHER ORDERED that as to Ms. Porsboll's latest request for attorney's fees filed February 27, 2012, mandatory fees shall be awarded pursuant to NRS 125B.140 as Mr. Vaile still owes child support arrears. The Willick Law Group shall file a Memorandum of Fees and Costs and a redacted billing statement no later than August 10, 2012, and submit a proposed order.

IT IS FURTHER ORDERED that additional fees requested on the contempt issues reserved for the evidentiary hearing are deferred.

SO ORDERED.

Dated this 10th day of July, 2012.


CHERYL B. MOSS
District Court Judge

EMERGENCY PETITION FOR WRIT OF
MANDAMUS UNDER NRAP 27(E)

EXHIBIT 2

JULY 17, 2012 WILLICK DEMAND FOR
IMMEDIATE PAYMENT OF CHILD SUPPORT
UNDER JULY 10 ORDER BY JULY 23, 2012

WILLICK LAW GROUP

A DOMESTIC RELATIONS & FAMILY LAW FIRM
3591 EAST BONANZA ROAD, SUITE 200
LAS VEGAS, NV 89110-2101
PHONE (702) 438-4100 • FAX (702) 438-5311
WWW.WILLICKLAWGROUP.COM

ATTORNEYS

MARSHALS. WILLICK *†‡❖
KARI T. MOLNAR **
TREVOR M. CREEL

- * ALSO ADMITTED IN CALIFORNIA (INACTIVE)
- ** ALSO ADMITTED IN FLORIDA
- † FELLOW, AMERICAN ACADEMY OF MATRIMONIAL LAWYERS
- ‡ FELLOW, INTERNATIONAL ACADEMY OF MATRIMONIAL LAWYERS
- ❖ NEVADA BOARD CERTIFIED FAMILY LAW SPECIALIST
- Ⓜ BOARD CERTIFIED FAMILY LAW TRIAL ADVOCATE
BY THE NATIONAL BOARD OF TRIAL ADVOCACY



LEGAL ASSISTANTS

LEONARD H. FOWLER III
FAITH FISH
TISHA A. WELLS
DEISY MARTINEZ-VIERA
MARY STEELE
RICHARD L. CRANE
BRENDA GRAGEOLA

FIRM ADMINISTRATOR

SETH WILLICK

E-MAIL ADDRESSES:

(FIRST NAME OF INTENDED RECIPIENT)@WILLICKLAWGROUP.COM

July 17, 2012

Mr. Robert Scotlund Vaile
P.O. Box 727
Kenwood, CA 95452

Re: Immediate Payment of Child Support

Dear Mr. Vaile:

In light of the *Decision* filed on July 10, 2012, and noticed on July 11, 2012, we provide the following to assist you in your obligation to pay support.

Make checks payable to the: WILLICK LAW GROUP Trust Account

Address the envelope as follows:
WILLICK LAW GROUP
3591 E. Bonanza Road, Suite 200
Las Vegas, Nevada 89110
Attn: Child Support

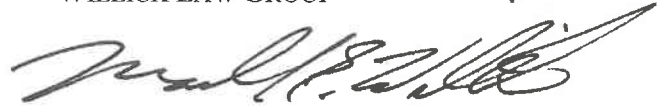
We expect the full payment for the month of July no later than July 23, 2012. All future months payments will be made by the fifth of each month thereafter. Refusal to pay or late payments will be used as evidence against you at your upcoming contempt hearing and can result in a longer term of incarceration and/or additional financial sanctions.

We expect that you shall contact the District Attorney's Office within the next five days as required by the Court.

Mr. Robert Scotlund Vaile
July 16, 2012
Page 2

Your compliance with the Court *Order* is mandatory.

WILICK LAW GROUP

A handwritten signature in black ink, appearing to read 'Marshal S. Willick', written in a cursive style.

Marshal S. Willick, Esq.

cc: Ms. Cisilie Porsboll

P:\wp13\VAILE\00006344.WPD

EMERGENCY PETITION FOR WRIT OF
MANDAMUS UNDER NRAP 27(E)

EXHIBIT 3

FEBRUARY 5, 2008 EMAIL FROM
MR. VAILE TO MS. PORSBOLL

Subject: Vaile Update

From: legal@infosec.privacyport.com

Date: Tue, 05 Feb 2008 15:38:20 -0800

To: Kjetil Porsbøll <kjetil.porsboll@bluegarden.no>, Cisilie Porsbøll <cisilieporsboll@hotmail.com>

Kjetil/Cisilie,

I recently spoke to my Bishop who relayed a concern of yours that you had had difficulty ascertaining my address. I am a little confused because I have updated my address with the court, and copied your attorney with every address that I have lived at since leaving Texas. I am attaching the most recent of these filings, which I made to the Ninth Circuit Court of Appeals after we returned to California from school in Virginia. You will see that this notice includes both my mailing and physical address. Is there any more information you require? Mr. Willick has been using these addresses in sending correspondence to me here. Also, Kaia has used my address several times to purchase items in the US which I have then forwarded to you in Norway. If you have any question of how to get a hold of me, you can simply send me an email or speak to me when I call to speak with the girls.

I considered that it was possible that your attorney had not, for some reason, forwarded to you the information that I provided to him. This makes me wonder if there is other information that your attorney has not provided you. I have been unable to ascertain whether you are playing any part in the actions of your attorney in recent years. For example, are you aware of the letters that Mr. Willick and his firm sent to my school and the accrediting organization for my school? Was Mr. Willick representing your wishes in sending these letters, or did you know about them at all?

Another action which I am unsure as to whether you are aware is that Mr. Willick filed paperwork in the Nevada state court wherein he argued that Nevada was the only court with jurisdiction to determine child support. I understood from your deposition, Cisilie, that you desired that Norway should play that role. Is Mr. Willick operating in accordance with your knowledge and instruction, and did you change your mind on this matter? If you had wanted to determine child support under our original agreement, you need only to have notified me of this. I am happy for us to continue to uphold all aspects of this agreement. Unless you inform me that the opposite is true, I must assume that Mr. Willick is following your instructions. As such, I ask that you would please provide me all the documentation regarding your gross income over the last eight years in accordance with the relevant sections of our separation agreement so that we (you and I together) can determine the appropriate amount of past and future child support due under the agreement. I will happily provide the same documentation to you. Lastly, can I assume that you have notified the Norwegian child support office that they are without jurisdiction in this matter and that you desire support through the Nevada courts and original separation agreement? If you would prefer, I can provide the information contained in your filings in Nevada to them. Let me know what you prefer.

Finally, I wanted to ask you both if, in your opinions, I have done all in my power to attempt negotiation and resolution of any outstanding issues between us? I have been seriously contemplating if there is anything else I might attempt, short of traveling to Norway, or paying you great sums of money that I do not have, which might persuade you to participate in a dialog aimed at building a peace between us. I would be happy to have a neutral third party, or our bishops, participate in this process. Let me know if I can do anything further to convince you to participate in this process.

I look forward to hearing from you soon.

Regards,

Scotlund

2007 09 11 Notice of Address Change.pdf	Content-Type: application/pdf Content-Encoding: base64
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Plaintiff's
Exhibit
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