IN THE COURT OF COMMON PLEAS OF DELAWARE COUNTY, PENNSYLVANIA ORPHANS' COURT DIVISION

No. 114-1937

RESIDUARY TRUST UNDER WILL OF GEORGE F. PENNOCK FOR THE BENEFIT OF THE PROHIBITION PARTY

AFFIDAVIT IN SUPPORT OF MOTION FOR SUMMARY DISPOSITION

STATE OF MICHIGAN))SS COUNTY OF MACOMB)

Leroy J. Pletten, being first duly sworn, deposes and says:

1. On Thursday 8 December 2005, after the in-chambers event, Earl F. Dodge spoke with James Hedges in my presence. Mr. Dodge admitted against interest having not notified PNC member Gary R. Van Horn of Dodge's June 2003 meetings at issue in this litigation. Mr. Van Horn's affidavit already in the record shows him as one of the PNC members whom Mr. Dodge did not notify of his June 2003 meetings.

2. Pertinent parliamentary procedure precedents (e.g., *Haines v Readfield* (1856) 41 Me 246 (1856), *Covert v Rogers*, 38 Mich 363 (1 Feb 1878), *Doyle v Mizner*, 42 Mich 332; 3 NW 968 (1879), *People ex rel Carus v Matthiessen*, 193 III App 328; 109 NE 1056 (1915), and *Zachary v Milin*, 294 Mich 622; 293 NW 770 (1940), showing that if a member is excluded, the meeting lacks validity, are both public record and in the case record (Trust Bank Exhibit C); and knowledge of legal duties is presumed in law; so I deem Mr. Dodge aware of the import of his admission against interest, i.e., the voiding of his meetings, and the forced necessity, pursuant to the PNC Bylaws, to convene the requisite "biennial" and contemplated "quadrennial" meetings, whether done with or without a tensignatures petition drive.

3. When I signed the petition to call the September 2003 meetings at issue in this litigation, the literal words and intent were to undo Dodge's invalid June 2003 meetings, to support the majority in taking control, and not to "organize a new group."

Respectfully,

Leroy J. Pletten, Secretary Prohibition National Committee 8401 18 Mile Road #29 Sterling Heights, Michigan 48313-3042 (586) 739-8343

Subscribed and sworn before me, this 12thday of December, 2005, a Notary Public in and for Macomb County, Michigan, Acting in Macomb County

IN THE COURT OF COMMON PLEAS OF DELAWARE COUNTY, PENNSYLVANIA ORPHANS' COURT DIVISION

No. 114-1937

RESIDUARY TRUST UNDER WILL OF GEORGE F. PENNOCK FOR THE BENEFIT OF THE PROHIBITION PARTY

AFFIDAVIT ON ADMISSION OF INTEREST OF EARL F. DODGE

STATE OF MICHIGAN))SS COUNTY OF MACOMB)

Leroy J. Pletten, being first duly sworn, deposes and says:

1. On Thursday 8 December 2005, after the in-chambers event, Earl F. Dodge spoke with James Hedges in my presence. Mr. Dodge admitted against interest having not notified PNC member Gary R. Van Horn of Dodge's June 2003 meetings at issue in this litigation. Mr. Van Horn's affidavit already in the record shows him as one of the PNC members whom Mr. Dodge did not notify of his June 2003 meetings.

2. Pertinent parliamentary procedure precedents (e.g., *Haines v Readfield* (1856) 41 Me 246 (1856), *Covert v Rogers*, 38 Mich 363 (1 Feb 1878), *Doyle v Mizner*, 42 Mich 332; 3 NW 968 (1879), *People ex rel Carus v Matthiessen*, 193 Ill App 328; 109 NE 1056 (1915), and *Zachary v Milin*, 294 Mich 622; 293 NW 770 (1940), showing that if a member is excluded, the meeting lacks validity, are both public record and in the case record (Trust Bank Exhibit C); and knowledge of legal duties is presumed in law; so I deem Mr. Dodge aware of the import of his admission against interest, i.e., the voiding of his meetings, and the forced necessity, pursuant to the PNC Bylaws, to convene the requisite "biennial" and contemplated "quadrennial" meetings, whether done with or without a ten-signatures petition drive.

3. When I signed the petition to call the September 2003 meetings at issue in this litigation, the literal words and intent were to undo Dodge's invalid June 2003 meetings, to support the majority in taking control, and not to "organize a new group."

Respectfully,

Leroy J. Pletten, Secretary Prohibition National Committee 8401 18 Mile Road #29 Sterling Heights, MI 48313-3042 (586) 739-8343

Subscribed and sworn before me, this 12thday of December, 2005, a Notary Public in and for Macomb County, Michigan, Acting in Macomb County

IN THE COURT OF COMMON PLEAS OF DELAWARE COUNTY, PENNSYLVANIA ORPHANS' COURT DIVISION

No. 114-1937

RESIDUARY TRUST UNDER WILL OF GEORGE F. PENNOCK FOR THE BENEFIT OF THE PROHIBITION PARTY

CERTIFICATE OF SERVICE

I hereby certify that on this date, 12 December 2005, I transmitted my AFFIDAVIT ON ADMISSION OF INTEREST OF EARL F. DODGE, by at least first class mail, postage prepaid, to

Clerk of Court Orphans Court Division Court of Common Pleas of Delaware County 201 W Front St Media, PA 19063-2708

Robert A. Carpenter, Esq. 200 North Monroe Street Media, PA 19063-2908

Sue D. Lomas, Esq. (and by fax) Wolf, Block, Schorr, and Solis-Cohn LLP 1650 Arch Street, 22nd Floor Philadelphia, PA 19103-2097

By:

Leroy J. Pletten

Re: Petition No. 114-1937

12 December 2005

Clerk of Court Orphans Court Division Court of Common Pleas of Delaware County 201 W Front Street Media PA 19063-2708

Dear Clerk of Court:

Enclosed for filing is the Affidavit of James Hedges. Three are enclosed:

a. one original for the record

b. one copy for the judge, and

c. one copy for time-stamping and returning in the enclosed pre-addressed postage prepaid envelope.

Thank you. Your assistance is appreciated.

Respectfully,

Leroy J. Pletten 8401 18 Mile Road #29 Sterling Heights, MI 48313-3042 (586) 739-8343

Enclosures: 3 sets of documents, a/s 1 return postpaid envelope