

A TRUE COPY
Ma Prem Sangeet

W.G.
MR
MH
KD
PR
BM
J. S. 11

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF WASCO

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3 KELLY MC GREER, et al.,)
4 Plaintiffs,)
5 v.)
6 CITY OF RAJNEESHPURAM, et al.,)
7 Defendants.)
8

CC 83-202

AFFIDAVITS IN SUPPORT OF
REQUEST FOR PERMIT
APPROVAL

Received in
ADMINISTRATION
SEP 21 1984

Building Codes Division

9 Defendant City of Rajneeshpuram has requested a hearing
10 before this court, to determine if two permits proposed to be
11 issued by the City are allowed under this Court's injunction. The
12 attached affidavits are submitted in support of that request.

13 Dated: September 18, 1984

Respectfully submitted,

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15 Ma Prem Sangeet
16 Ma Prem Sangeet
17 Attorney for Defendant
18 City of Rajneeshpuram
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AFFIDAVIT

STATE OF OREGON)
) ss.:
COUNTY OF WASCO)

I, Ma Dolma, being duly sworn, say:

I am one of the coordinators of Chuang Tzu Temple which is the part of Rajneesh Neo-Sannyas International Commune ("Commune") Responsible for building. Under an agreement with Rajneesh Investment Corporation, the Commune plans to add extensions to two existing structures.

The specifications for each extension are for all practical purposes the same. One extension is to be built onto Magdalena 7, a mobile home, the other onto an A-frame quadraplex situated in Jesus Grove. Both extensions are to be constructed so as to be removable if needed. The total area for each extension is less than 500 square feet.

Each extension consists of a wooden framed structure attached to the existing building by a short passageway. The extra addition including the passageway is on a removable concrete block foundation similar to other mobile home blocking.

Each addition provides for two bedrooms (approximately 12' x 12') with individual bathrooms. Access to each bathroom is from the passageway which connects to the main building.

Only minimal electrical plumbing and sewer connections are required and will be connected to the lines serving the

existing structures. A separate gas heating system is to be installed in each extension.

The foregoing is within my personal knowledge and if called as a witness I would testify competently thereto.

Ma Dolma

Subscribed and sworn to before me this _____ day of
September, 1984.

Notary Public for Oregon
My commission expires:

AFFIDAVIT

STATE OF OREGON)
) ss.:
COUNTY OF WASCO)

I, Swami Krishna Deva, being duly sworn, say:

On June 18, 1984 I accompanied the Rajneesh-
puram City Attorney, Ma Prem Sangeet, to Hood River
in order to seek clarification of the preliminary injunc-
tion in CC 83-202. I helped Ma Prem Sangeet and Wil
Carey, attorney for Wasco County, develop language to
present to Judge Jelderks on this issue.

We met in the jury room of the Hood River
County Courthouse. We discussed the specific language
of section 1-c at length before presenting it to Judge
Jelderks. We all agreed that this language would allow
additions of bedrooms, bathrooms and the like. Mr. Carey
was concerned that the City would approve 500 such permits.
However, we all agreed that an approval of that magnitude
would violate the intent of the clarification and that
the county would be protected by its ability to object
and to delay any city proposal until a court determination.

We specifically told Mr.' Carey that we expected requests for additional bedrooms and he stipulated to Sangeet that he had no problem with that as long as it wasn't large numbers of additions, such as 500.

The foregoing is within my personal knowledge and if called as a witness I would tectify competently thereto.

Swami Krishna Deva

Subscribed and sworn to before me this day
of September, 1984.

Notary Public for Oregon
My Commission expires:

AFFIDAVIT

STATE OF OREGON)
) ss.:
COUNTY OF WASCO)

I, Ma Prem Sangeet, being sworn, say:

On June 18, 1984 I met with Wilford Carey,
attorney for Wasco County, to discuss a stipulation for
clarification of the preliminary injunction in McGreer
v. Rajneeshpuram, CC 83-202.

We agreed that additions of 500 square feet
or less to existing structures would include such things
as decks, porches, bathrooms and bedrooms. We agreed
that the County would object if it felt too many additions
were being approved by the City.

In discussion with Judge Jelderks I stated
that the provision for 500 square foot additions would
cover small additions such as decks or porches. That
language was added to the order. I did not understand
that to change in any way the agreement I had with Mr.
Carey, and Mr. Carey did not indicate to me that he
believed our agreement to be changed.

I believe the permits which the City has proposed to approve are within the understanding I had with Mr. Carey and are permissible under the court's order of clarification.

The foregoing is within my personal knowledge and if called as a witness I would testify competently thereto.

Ma Prem Sangeet

Subscribed and sworn to before me this day
of September, 1984.

Notary Public for Oregon
My Commission expires:

CERTIFICATE OF SERVICE

On the 19th day of September, 1984, I served the foregoing AFFIDAVITS IN SUPPORT OF REQUEST FOR PERMIT APPROVAL on:

Robert D. Durham
Kulongoski, Heid, Durham &
Drummonds
Attorneys at Law
1020 SW Taylor, Suite 530
Portland, OR 97205

Allen L. Johnson
915 Oak Street, Suite 200
Eugene, OR 97410

Robert Stacey
1000 Friends of Oregon
400 Dekum Building
519 SW Third Ave.
Portland, OR 97204

Larry Thomson
Assistant Attorney General
State Office Building
Salem, OR 97310

Wilford Carey
P.O. Box 325
Hood River, OR 97031

by mailing to each as addressed above a true copy thereof,
contained in a sealed envelope, with postage prepaid, deposited
in the United States Post Office at Rajneeshpuram, Oregon.

MA PREM SANGEET
ATTORNEY AT LAW

Ma Prem Sangeet