

CAUSE NO. 2012-CI-01272

CHURCH OF SCIENTOLOGY FLAG
SERVICE ORGANIZATION, INC.,

Plaintiff,

v.

DEBRA J. BAUMGARTEN,
AKA DEBBIE COOK BAUMGARTEN,
AKA DEBBIE COOK, AND
WAYNE BAUMGARTEN,

Defendants.

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IN THE DISTRICT COURT

150th JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

AGREED FINAL JUDGMENT

On this day came on to be heard the above-numbered and entitled cause of action, and came the parties, by and through their attorneys of record and asked that the Court enter an Agreed Final Judgment in this matter. The Court, having considered the pleadings on file, the agreement of the parties, and the statements of counsel finds that an Agreed Final Judgment should be entered as follows:

IT IS ORDERED, ADJUDGED and DECREED that:

1. Plaintiff Church of Scientology Flag Service Organization, Inc., take nothing from Defendants Debra J. Baumgarten, aka Debbie Cook Baumgarten, aka Debbie Cook, and Wayne Baumgarten as to Plaintiff's claims and causes of action seeking the recovery of money damages or any other relief except as specifically set forth below from such Defendants;

2. Cross-Plaintiffs and Third-Party Plaintiffs Debbie Cook and Wayne Baumgarten take nothing by way of the claims and causes of action set out in their First

Amended Counterclaim and Original Third-Party Petition and that all actions set out therein be, and the same are, dismissed with prejudice;

3. The Court finds that, if confidential or derogatory information is distributed or disseminated, such information could not likely be immediately retrieved nor its damaging effects avoided, making a monetary judgment ineffectual and inadequate. Accordingly, a permanent injunction is entered as follows:

Defendants Debra J. Baumgarten, aka Debbie Cook Baumgarten, aka Debbie Cook and Wayne Baumgarten, and any of their agents, servants, employees, and those persons acting in concert with them who receive actual notice of this Agreed Final Judgment by personal service or otherwise are permanently and forever enjoined from performing or engaging in any of the following acts:

- A. Disclosing any *non-public information*, data, or knowledge they have learned or will learn about the organization, including internal structure and security systems, of Church of Scientology Flag Service Organization (hereinafter "CSFSO"), Church of Scientology International (hereinafter "CSI"), Religious Technology Center (hereinafter "RTC") or any other entity affiliated with the Scientology religion, their staff or former staff, officers or former officers, directors or former directors, trustees or former trustees, parishioners or former parishioners, or L. Ron Hubbard (collectively "the Church Parties"). Such matters further include, by way of example and not limitation, financial information, private information concerning any of the Church Parties, including their priest-penitent privileged communications, attorney-client privileged information and the contents of any of those Scientology materials known as the "Advanced Technology" or "Upper Level Materials."
- B. Willfully assisting any person, group or organization in any effort to damage, harass or injure any of the Church Parties, and willfully

assisting any person or entity in investigation, litigation, or arbitration against any of the Church Parties whether as a plaintiff or as a defendant, unless compelled to do so by law.

- C. Creating or electronically posting or publishing or attempting to publish, and/or willfully assist another in any fashion to create for publication or posting by means of email, U.S. mail, newspaper story, magazine article, book or other similar form, any writing, or to broadcast, or to willfully assist another to create, write, film or video tape or audio tape, electronically post, any news program, show, program or movie, concerning their experiences with, knowledge of, or information concerning, the Scientology religion, or any of the Church Parties.
- D. Meeting or conferring, either electronically, telephonically or in person, with any person or organization that Defendants know has attacked or disparaged or intends to attack or disparage any of the Church Parties.
- E. Printing, posting, disseminating, circulating, quoting, publicly uttering, or publishing any kind of statement in any form, which is critical of, defamatory or disparaging against any of the Church Parties, either directly or indirectly.
- F. Testifying or otherwise participating in any other judicial, administrative or legislative proceeding adverse to the Scientology religion, any of its parishioners, or any of the Church parties, unless compelled to do so by proper, non-collusive service of a subpoena or other lawful process. Should they be served with such a subpoena or other process by a third party seeking testimony and/or the production of documents concerning any of the Church Parties, Defendants shall notify CSFSO through its corporate secretary or any of its officers within three (3) business days of receipt of such service, and shall furnish him or her with a copy of any such subpoena or process.

As used in this judgment, “*non-public information*” means information which has not been authorized to be published or revealed either to general Church of Scientology parishioners, to staff or to the general public. This includes but is not limited to the following:

- a. Church Issues with limited distribution, or information concerning them;
- b. Information relating to security of information or confidential Church premises and locations;
- c. Any and all financial information of any Church of Scientology or any other entity affiliated with the Scientology religion, their staff or former staff, officers or former officers, directors or former directors, trustees or former trustees, parishioners or former parishioners, or L. Ron Hubbard
- d. Personal information regarding staff or executives, or any parishioners, or persons associated with the Church of Scientology Flag Service Organization ("CSFSO"), Church of Scientology International ("CSI"), Religious Technology Center ("RTC") or any Church of Scientology including but not limited to their schedules and activities, including Church events or private events and private counseling, including auditing or use of the Scientology ethics technology and ecclesiastical discipline that has not been authorized by the individual to be published;
- e. Expansion plans or programs of CSFSO, CSI, RTC or any Church of Scientology that have not yet been released to general Church of Scientology staff or public;
- f. Any information which is known by Defendants to be considered by CSFSO, CSI or RTC to be trade secret; including but not limited to any and all Advanced Courses materials;
- g. Any information which relates to subjects concerning proprietary rights of CSFSO, CSI, RTC or any Church of Scientology, such as any copyrights, trademarks and trade secrets;
- h. Any information which relates to computer programming, design and user support for CSFSO, CSI or RTC or other Churches of Scientology; and
- i. Any other information obtained through activities on behalf of CSFSO, CSI or RTC or any Church of Scientology, which relates to the operations or activities of CSFSO, CSI, RTC or any Church of Scientology, whether or not formally designated as "Confidential" which may not be generally known by or available to, the public or which, if disclosed, would tend to injure or otherwise adversely affect CSFSO, CSI, RTC, or any other Churches of Scientology or any of their respective activities, functions, plans, programs or personnel. To the extent there is any question about the confidential status of any such matter, it is incumbent upon the

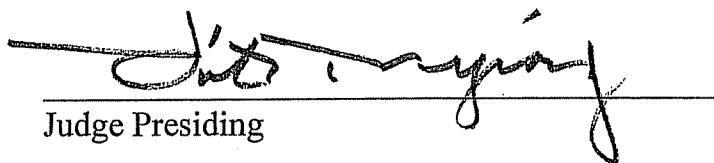
DEFENDANTS to verify this with a qualified CSFSO staff member before making any use or disclosure of it in any fashion;

4. Any relief sought by any party which is not granted herein is denied;

5. This Judgment disposes of all parties and all claims, and is intended by the Court and the parties to be a final, appealable judgment; and

6. Costs of court are taxed against the party who incurred them.

Signed and entered this 23 day of April, 2012.



Judge Presiding

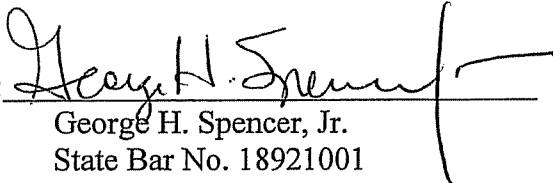
Judge Victor H. Negrón, Jr.
Presiding Judge
438th District Court
Bexar County, Texas

APPROVED AND AGREED TO AS TO FORM AND SUBSTANCE:

CLEMENS & SPENCER
112 E. Pecan Street, Suite 1300
San Antonio, Texas 78205-1512
(210) 227-7121
(210) 227-0732 Facsimile


**CHURCH OF SCIENTOLOGY
FLAG SERVICE ORGANIZATION, INC.**

By: see attached DAG
Printed Name: _____
Title: _____

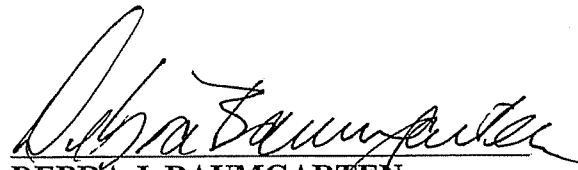
By: 
George H. Spencer, Jr.
State Bar No. 18921001
Mark J. Cannan
State Bar No. 03743800

**ATTORNEYS FOR PLAINTIFF/
CROSS-DEFENDANT, CHURCH OF
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ORGANIZATION, INC.**

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Diana L. Wheeler
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CROSS-PLAINTIFFS/THIRD PARTY
PLAINTIFFS DEBRA J.
BAUMGARTEN, AKA DEBBIE
COOK BAUMGARTEN, AKA DEBBIE COOK
AND WAYNE BAUMGARTEN**



**DEBRA J. BAUMGARTEN,
AKA DEBBIE COOK BAUMGARTEN,
AKA DEBBIE COOK**

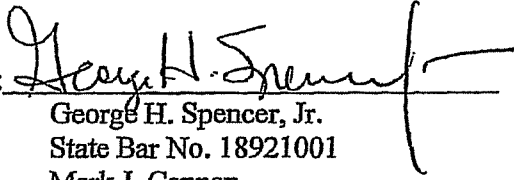

WAYNE BAUMGARTEN

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**CHURCH OF SCIENTOLOGY
FLAG SERVICE ORGANIZATION, INC.**

By: 
Printed Name: PETER MANSELL
Title: DIRECTOR

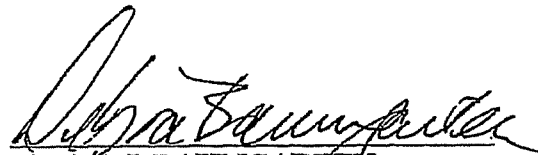
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