

STATE OF NORTH CAROLINA **FILED** IN THE GENERAL COURT OF JUSTICE  
 COUNTY OF FORSYTH 07 SEP 21 PM 2:26 DISTRICT COURT DIVISION  
 2007-CVD-6565

FORSYTH COUNTY, C.S.C.

PROGRAMMES INTERNATIONAUX )  
 D'ECHANGES, )

Plaintiff, )

v. )

VERONICA BEDDICK and DANIELLE )  
 JOYCE GRIJALVA, )

Defendants. )

ORDER

This matter coming on to be heard, and being heard, on plaintiff Programmes Internationaux d'Echanges's motion for a temporary restraining order and expedited discovery against defendants Veronica Beddick ("Beddick") and Danielle Grijalva ("Grijalva"), *ex parte*, without notice to defendants, and pursuant to the equitable powers of this Court and Rules 65, 30 and 34 of the North Carolina Rules of Civil Procedure, and after considering the Complaint and the materials in the record, the Court finds as follows:

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. World Heritage International, Inc. ("World Heritage") is an independent student exchange organization, organized and existing as a not-for-profit corporation under the laws of the State of New York. Pursuant to agreement between P.I.E. and World Heritage, World Heritage arranges and oversees host family and school placements in North Carolina and elsewhere in the United States for P.I.E.'s French students.

3. ASSE International, Inc. is a California non-profit corporation which provides services to World Heritage in connection with the placement of P.I.E.'s students in the United States.

4. Defendant Beddick was formerly engaged to work for ASSE in the Forsyth County area as the Administrator of its Language and Cultural Enrichment/Culture and Cultural Events program (the "LCE/CCE Program") in Greensboro, North Carolina, a program attended by some of P.I.E.'s students. Beddick's relationship with ASSE was terminated on August 9, 2007.

5. Defendant Grijalva is a resident of the State of California; she operates and controls the Committee for Safety of Foreign Exchange Students ("CSFES"), a California non-profit corporation with the purported mission to protect foreign exchange students residing in the United States.

6. Since August 9, 2007, Beddick has contacted exchange students sponsored by P.I.E. their natural families in Europe and diplomatic officials, and made false and misleading statements to the effect that the students are not safe, and otherwise interfered with P.I.E.'s program as well as P.I.E.'s relationships with exchange students, their families and others.

7. It appears from the complaint and supporting documents that shortly after ASSE terminated Beddick's employment, Beddick and Grijalva began working in concert to disseminate false and misleading information relating to P.I.E., its students in North Carolina and elsewhere and

its program in the United States.

8. It also appears based on the information before the Court that, in connection with this mutual undertaking, Grijalva has had substantial and intentional contacts with North Carolina, and that this Court therefore has jurisdiction over her pursuant to N.C.G.S.A. § 1-75.4(3) and (4).

9. It appears from the complaint that absent immediate entry of an order precluding further contact by defendants with P.I.E.'s exchange students and their natural parents and further dissemination of false and misleading information, P.I.E. will suffer irreparable harm. Such irreparable harm may particularly result over the coming days, during the crucial first few weeks of the academic year, before there is an opportunity to serve Beddick with a summons and complaint and afford her an opportunity to be heard.

10. A temporary restraining order is necessary to protect plaintiff's rights.

11. Expedited discovery is necessary to provide plaintiff with a fair opportunity to establish its need for a preliminary injunction.

12. In the absence of a restraining order, the injury to plaintiff, in addition to being one for which plaintiff would have no reasonable remedy at law, is one which plaintiff should not have to endure and defendants should not be entitled to inflict.

13. There is good cause to grant the temporary restraining order set forth below because the harm that the remedy is intended to prevent would likely occur if defendants were given prior notice of P.I.E.'s attempts to obtain judicial relief.

14. The potential harm to plaintiff if a temporary restraining order is not issued substantially outweighs any potential harm to defendants if a restraining order is issued.

15. This order should be granted without notice as there is a continuing and immediate

danger that defendants will continue to unlawfully interfere with P.I.E.'s business and contact its students, their families and others.

16. Plaintiff has shown a likelihood of success on the merits of its claims for defamation, conspiracy, interference with business relations and interference with contract.

17. There is good cause to grant the requested relief.

18. A temporary restraining order has been entered in the action of *ASSE International, Inc., v. Veronica Beddick*, Forsyth County District Court Action Number 2007-CVD-5998, a case based on the same or similar facts.

19. A bond of \$ 250.<sup>00</sup> is adequate to protect defendants' interests pursuant to Rule 65(c) of the North Carolina Rules of Civil Procedure.

Now, therefore, it is hereby ORDERED, ADJUDGED and DECREED as follows:

1. That a temporary restraining order is hereby entered barring defendants and those persons acting under their control or in concert with them from having any contact, orally, electronically or in writing, with P.I.E.-sponsored students, their natural families and American host families, and with the educational programs and schools in which they are placed.

2. That defendants shall provide the following expedited discovery:

a. That defendant Beddick appear for a deposition upon oral examination at the offices of Elliot Pishko Morgan P.A, 426 Old Salem Road, Winston-Salem, North Carolina 27101-5283, on October 1, 2007 at 9:30 a.m.;

b. That defendant Grijalva appear for a deposition upon oral examination at a location in California to be determined, but reasonably accessible to her, on October 2, 2007 at 10:00 a.m.;

c. That defendants produce the following documents at the offices of Elliot Pishko Morgan P.A, 426 Old Salem Road, Winston-Salem, North Carolina 27101-5283, on or before September 28, 2007:

i. All e-mails and other documents reflecting communications between defendants during the period August 9, 2007 and the present;

ii. All e-mails and other documents reflecting communications, during the period August 9, 2007 and the present, between or among defendants, or either of them, and exchange students, their natural parents, American host families, schools and/or diplomatic officials, relating to P.I.E.;

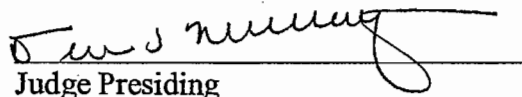
iii. All e-mails and other documents reflecting communications, during the period August 9, 2007 and the present, between or among defendants, or either of them, and exchange students, their natural parents, American host families, schools and/or diplomatic officials, regarding foreign exchange students.

3. That plaintiff post a cash bond, pursuant to Rule 65(c) of the North Carolina Rules of Civil Procedure in the amount of \$ 250<sup>00</sup>.

4. That a hearing be held on plaintiff's motion for a preliminary injunction at 2:00 p. m. on Monday, October 1, 2007, or as soon thereafter as it may be heard, in Courtroom 4C.

5. This order shall expire after 10 days unless extended by the Court.

This the 21 day of September 2007.

  
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Judge Presiding