

**IN THE CHANCERY COURT FOR DAVIDSON COUNTY, TENNESSEE
AT NASHVILLE**

JACK PELHAM and KAY PELHAM,)

Plaintiff,)

v.)

Case No. 05-2259-III

THE NASHVILLE CHURCH, INC.,)

INTERNATIONAL CHURCHES OF)

CHRIST, INC., HOPE WORLDWIDE,)

LTD., and CENTRAL AND SOUTH)

AMERICA WORLD SECTOR, INC.,)

Defendants.)

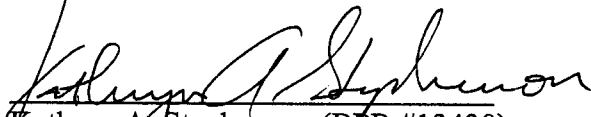
**MOTION BY CENTRAL AND SOUTH AMERICAN WORLD SECTOR
TO DISMISS FOR FAILURE TO STATE A CLAIM**

Pursuant to Tennessee Rule of Civil Procedure 12.02(6), Defendant Central and South American World Sector, Inc. ("CSA"), respectfully moves the Court for an order dismissing the Complaint as to CSA.

In support of its Motion, CSA would show the Court that the Complaint fails to state a claim against CSA on which relief can be granted. The Complaint fails to allege that CSA misstated any facts at any time to Plaintiffs, and therefore fails to state a claim for fraud or negligent misrepresentation. The Complaint fails to allege that CSA provided any information to Plaintiffs in the course of a commercial transaction and for this reason also fails to state a claim for negligent misrepresentation. The Complaint fails to allege an underlying tort and fails to state any facts establishing a conspiracy between CSA and any defendant, and therefore fails to state a claim for civil conspiracy. Finally, Plaintiffs lack standing to seek the imposition of a constructive trust.

In further support of its Motion, CSA relies on its Memorandum of Law, submitted herewith.

Respectfully Submitted,



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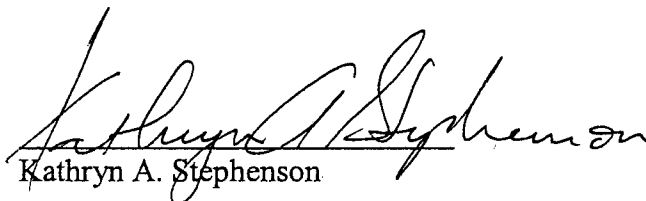
*Attorney for Defendant Central and South
America World Sector, Inc.*

THIS MOTION IS EXPECTED TO BE HEARD ON OCTOBER 7, 2005, AT 9:00 a.m.. FAILURE TO FILE AND SERVE A TIMELY RESPONSE WILL RESULT IN THE MOTION BEING GRANTED WITHOUT FURTHER HEARING.

CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing has been served on on the following counsel by the method indicated below on this the 21 day of September 2005:

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