

**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.** )

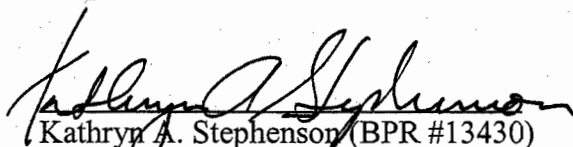
**MOTION BY CENTRAL AND SOUTH AMERICAN WORLD SECTOR  
TO DISMISS AMENDED COMPLAINT FOR FAILURE TO STATE A CLAIM**

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 Amended Complaint as to CSA.

In support of its Motion, CSA would show the Amended Complaint is on its face barred by the applicable statute of limitations, T.C.A. § 28-3-105. Furthermore, the Amended Complaint fails to state a claim against CSA on which relief can be granted in that it fails to allege that CSA made any particular misstatement of fact to Plaintiffs, fails to allege facts demonstrating a conspiracy, and fails to allege that Plaintiffs had an interest in any funds at the time they were "converted." Finally, Plaintiffs lack standing to seek the imposition of a constructive trust, which in any event is a remedy, not a cause of action.

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

Respectfully Submitted,



Kathryn A. Stephenson (BPR #13430)

TRAUGER & TUKE

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

**THIS MOTION IS EXPECTED TO BE HEARD ON JANUARY 20, 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

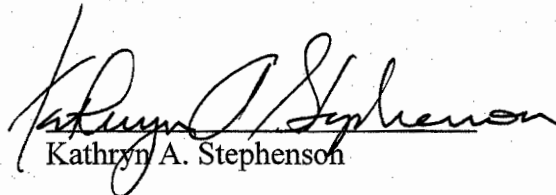
I certify that I have served a copy of the foregoing has been served on the following counsel by the method indicated below on this the 28<sup>th</sup> day of December 2005:

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