

1354 County Highway 21
Halstad, MN 56548
(218) 456-2568
January 3, 2008

Tommy Shelton

Marion, KY 42064

3ABN Officers and Directors
c/o J. Lizette Richards
64 Gothic Street
Northampton, MA 01060

3ABN Officers and Directors
c/o Jerrie M. Hayes
100 Washington Avenue South, Suite 1300
Minneapolis, MN 55401

Dear Tommy and 3ABN Officers and Directors:

Pursuant to Local Rule 15.1 of the District Court for the District of Massachusetts, which concerns amending the pleadings in order to add new parties, we are serving “in the manner contemplated by Fed. R. Civ. P. 5(b), the motion to amend upon the proposed new party at least ten (10) days in advance of filing the motion.”

Please find enclosed our contemplated motion, a memorandum, and the proposed addition to our answer to the plaintiffs’ complaint, which would have the effect of adding you as party plaintiffs if granted by the court.

Since today’s date is the 3rd, the motion would be filed on January 13 (10 days from now), or after the court grants leave to file this motion, whichever is later.

Sincerely,

Bob Pickle

cc: D. Michael Riva

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Three Angels Broadcasting Network, Inc.,)	
an Illinois non-profit corporation, and)	
Danny Lee Shelton, individually,)	Case No.: 07-40098-FDS
)	
Plaintiffs,)	
v.)	
)	
Gailon Arthur Joy and Robert Pickle,)	
)	
Defendants.)	

**DEFENDANTS' MOTION TO JOINDER ESSENTIAL PARTIES TOMMY RAY
SHELTON AND 3ABN OFFICERS AND DIRECTORS**

Pursuant to Federal Rule of Civil Procedure 19, Defendant Joy moves the Honorable Court to joinder essential Party Plaintiffs, Tommy Ray Shelton, retired 3ABN production manager, of Marion, Kentucky, and the officers and directors of Three Angels Broadcasting Network, Inc. (hereinafter "3ABN").

The Defendants have directly related claims against the essential party, Tommy Ray Shelton and the court could not accord complete relief to the Defendants without Tommy Ray Shelton being a named plaintiff. Also, upon information and belief, essential Party Plaintiff Tommy Ray Shelton is materially interested in the issues at bar.

The Defendants have directly related claims against the essential parties, the officers and directors of 3ABN, and the court could not accord complete relief to the Defendants without the officers and directors being named plaintiffs. Also, upon information and belief, these essential Party Plaintiffs are materially interested in the issues at bar.

For the economy of adjudication and to preserve certain statutes of limitations, these essential parties should be joined so that the claims may be heard to afford a complete disposition of the issues at bar.

Therefore, the Defendants pray the Court to joinder an essential Party Plaintiff, Tommy Ray Shelton, the Defendants pray the Court to joinder essential Party Plaintiffs, officers and directors of 3ABN, and the Defendants pray the Court to allow the Defendants to amend their answers to the Plaintiffs' complaint to include, immediately following their Affirmative Defenses and any claims against Third Party Defendants, the text found in Exhibit A.

Respectfully submitted,

Dated: January ____, 2008

Gailon Arthur Joy, *pro se*
P.O. Box 1425
Sterling, MA 01564
Tel: (978) 422-3464
Fax: (206) 203-3751

and

Robert Pickle, *pro se*
1354 County Highway 21
Halstad, MN 56548
Tel: (218) 456-2568
Fax: (206) 203-3751

AFFIDAVIT OF SERVICE

Under penalty of perjury, I, _____, do certify that I am over the age of 18 years of age and on this day I have caused service of this document to the Court and have served by first class mail, postage prepaid, a copy of this document and this Certificate of Service to Plaintiffs' counsel at Siegel, Brill, Greupner, Duffy & Foster, and Fierst, Pucci & Kane, LLP.

Dated: January ____, 2008

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City, State, ZIP+4
Marion, KY 42064

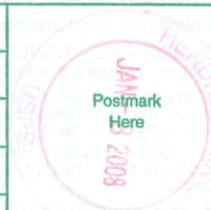
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Sent To: Jerrie Hayes

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