

# **EXHIBIT A**

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September 13, 2007

**VIA FACSIMILE / U.S. MAIL**

Laird Heal, Esq.  
3 Clinton Road  
P.O. Box 365  
Sterling, MA 01564

**Re: Three Angels Broadcasting Network, Inc. and Danny Lee Shelton vs.  
Gailon Arthur Joy and Robert Pickle  
Court Docket No. 07-40098-FDS  
Our File No. 24,681-D-002**

Attorney Heal:

It has come to our attention that Gailon Joy has filed for bankruptcy protection and that you are serving as his attorney for the bankruptcy. (U.S. Bkcty. Ct. File # 07-43128 (D. MA.)). Under our reading of all applicable bankruptcy statutes and rules, the automatic stay suspends all pending activity involving Gailon Joy in the matter of 3ABN v. Joy and Pickle, thus prohibiting any additional pleadings by Mr. Joy and precluding Mr. Joy's involvement in discovery and pre-trial practice in this case. We also believe the automatic stay applies until such time as relief from the automatic stay is ordered by the Bankruptcy Court upon Plaintiffs' motion for such. I therefore write to inform you that **the deposition of Gailon Joy, previously scheduled for Thursday, Sept. 20, 2007 is hereby suspended indefinitely.**

If your client's interpretation of the bankruptcy code differs from ours, I would appreciate you providing us with Mr. Joy's understanding as to his ongoing involvement in the 3ABN v. Joy and Pickle matter and all statutory and case law authority in support of his understanding.

I also write to point out what appears to be an irreconcilable and unwaivable conflict of interest on your part in representing both Gailon Joy in the above-referenced bankruptcy proceeding and Robert Pickle in the matter of 3ABN v. Joy and Pickle. By his bankruptcy petition, Joy seeks to discharge his responsibility for money damages to 3ABN and Danny Shelton, for which he is jointly liable with Robert Pickle. This concurrent conflict cannot be reconciled, even with a written waiver, for it goes to the very nature of the representation and to

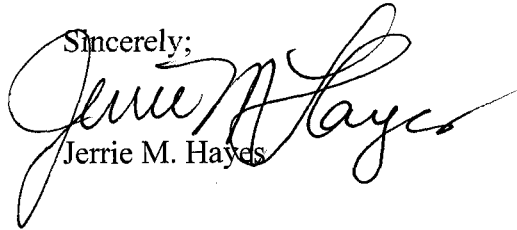
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the inherent fact that, by claiming bankruptcy, Joy has leveled a claim against Pickle as to liability for a jointly-held obligation. This conflict has rendered you unable to fairly represent either Mr. Pickle or Mr. Joy in either proceeding. We would expect to see your Notice of Withdrawal and Substitution of Counsel as to both matters in the very near future.

We await Mr. Joy's statement as to his continued involvement in the 3ABN v. Joy and Pickle matter and would anticipate such information would be provided on or before **September 21, 2007**.

Sincerely;



Handwritten signature of Jerrie M. Hayes in cursive script.

Jerrie M. Hayes

JMH/cg

cc: Gailon A. Joy