

By Fax Return To:

ANNE MILGRAM  
ATTORNEY GENERAL OF NEW JERSEY  
Division of Law  
124 Halsey Street - 5<sup>th</sup> Floor  
P.O. Box 45029  
Newark, New Jersey 07101  
Attorney for Plaintiffs

COPY

FILED

JUN 01 2009

CATHERINE M. LANGLOIS, P.J. CH.  
JUDGE'S CHAMBERS  
MORRIS COUNTY COURT

By. Gina M. Betts  
Deputy Attorney General  
(973) 648-3070

ENTERED ON ACMS

SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION  
MORRIS COUNTY  
DOCKET NO. MRS-C-74-09

ANNE MILGRAM, Attorney General of the State  
of New Jersey, and DAVID M. SZUCHMAN,  
Director of the New Jersey Division of Consumer  
Affairs,

Civil Action

Plaintiffs,

v.

DREAMWORKS VACATION CLUB a/k/a,  
DREAMWORKS VACATIONS, a/k/a  
DREAMWORKS, FIVE POINTS TRAVEL  
COMPANY d/b/a BENTLEY TRAVEL, DARYL  
T. TURNER, JANE AND JOHN DOES 1-20,  
individually and as owners, officers, directors,  
shareholders, founders, managers, agents,  
servants, employees representatives and/or  
independent contractors of DREAMWORKS  
VACATION CLUB a/k/a DREAMWORKS  
VACATIONS, a/k/a DREAMWORKS, FIVE  
POINTS TRAVEL COMPANY, d/b/a  
BENTLEY TRAVEL and XYZ  
CORPORATIONS, 1-20,

Defendants.

ORDER TO SHOW CAUSE WITH  
TEMPORARY RESTRAINTS  
PURSUANT TO R. 4:52 -

RETURN DATE

Tuesday June 9, 2009  
- 2:00 pm -

THIS MATTER being brought before the Court by Gina M. Betts, Deputy Attorney General  
in the Consumer Fraud Prosecution Section, for plaintiffs Anne Milgram, Attorney General of the

By Fax Return To:

ANNE MILGRAM  
ATTORNEY GENERAL OF NEW JERSEY  
Division of Law  
124 Halsey Street - 5<sup>th</sup> Floor  
P.O. Box 45029  
Newark, New Jersey 07101  
Attorney for Plaintiffs

By: Gina M. Betts  
Deputy Attorney General  
(973) 648-3070

SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION  
MORRIS COUNTY  
DOCKET NO. MRS-C-74-09

ANNE MILGRAM, Attorney General of the State  
of New Jersey, and DAVID M. SZUCHMAN,  
Director of the New Jersey Division of Consumer  
Affairs,

Plaintiffs,

v

DREAMWORKS VACATION CLUB a/k/a,  
DREAMWORKS VACATIONS, a/k/a  
DREAMWORKS, FIVE POINTS TRAVEL  
COMPANY d/b/a BENTLEY TRAVEL, DARYL  
T. TURNER, JANE AND JOHN DOES 1-20,  
individually and as owners, officers, directors,  
shareholders, founders, managers, agents,  
servants, employees representatives and/or  
independent contractors of DREAMWORKS  
VACATION CLUB a/k/a DREAMWORKS  
VACATIONS, a/k/a DREAMWORKS, FIVE  
POINTS TRAVEL COMPANY, d/b/a  
BENTLEY TRAVEL and XYZ  
CORPORATIONS, 1-20,

Defendants.

Civil Action

**ORDER TO SHOW CAUSE WITH  
TEMPORARY RESTRAINTS  
PURSUANT TO R. 4:52 —**

RETURN DATE

Tuesday June 9, 2009  
— 2<sup>00</sup> pm —

THIS MATTER being brought before the Court by Gina M. Betts, Deputy Attorney General  
in the Consumer Fraud Prosecution Section, for plaintiffs Anne Milgram, Attorney General of the

State of New Jersey, and David M. Szuchman, Director of the New Jersey Division of Consumer Affairs (collectively, "Plaintiffs"), seeking relief by way of temporary restraints pursuant to R. 4:52, based upon facts set forth in the Verified Complaint and supporting Certifications and Brief filed herewith; and it appearing that ~~immediate and irreparable damage will probably result before notice can be given and~~ a hearing held and for good cause shown.

It is on this 1<sup>st</sup> day of June, 2009 ORDERED that defendants Dreamworks Vacation Club, a/k/a Dreamworks Vacations a/k/a Dreamworks, ("Dreamworks"), Five Points Travel Company ("Five Points Travel") and Daryl T. Turner (Turner") (collectively, "Defendants"), appear and show cause before the Superior Court, Chancery Division, General Equity Part, Morris County, Morristown, New Jersey at 10<sup>00</sup> o'clock in the 2<sup>00</sup> PM on or as soon thereafter as counsel can be heard, on the 9<sup>th</sup> day of June, 2009, why an Order should not be issued preliminarily enjoining and restraining Defendants from

- A. Engaging in, continuing to engage in, or doing any acts or practices in violation of the New Jersey Consumer Fraud Act ("CFA"), N.J.S.A. 56:8-1 et seq., and the Regulations Governing General Advertising ("Advertising Regulations"), N.J.A.C. 13:45A-9.1 et seq., including, but not limited to, the acts and practices alleged in the Verified Complaint;
- B. Engaging in the advertisement and/or sale of vacation club membership packages ("Vacation Packages") to consumers within and outside the State of New Jersey ("New Jersey");
- C. Removing, selling, encumbering, transferring or engaging in any act of disposition of any assets of the Defendants that relate to the subject matter of the Verified Complaint, including but not limited to, all deposits or any monies paid by consumers for Vacation Packages;
- D. Destroying, concealing, altering, transferring, disposing or removing in any manner, directly or indirectly, any books or records, information stored in computer-

maintained form (such as electronic mail) and any other "document," as that term is defined in R. 4:18-1(a), in their possession, subject to their control or available to them, that directly or indirectly relate to the advertisement and/or sale of Vacation Packages;

E. Failing to make and/or keep any books or records, information stored in computer-maintained form (such as electronic mail) and any other "document," as that term is defined in R. 4:18-1(a) that directly or indirectly relate to the advertisement and/or sale of Vacation Packages; and

F. Granting such other relief as the Court deems equitable and just.

**AND IT IS FURTHER ORDERED** that on the return date herein, Defendants appear and show cause why an Order should not be issued:

A. Freezing all assets of Defendants in which they hold a legal or equitable interest including, but not limited to, real property, securities, bonds, notes and monies held in any of their bank accounts, money market accounts, certificates of deposit or safe deposit boxes or held in petty cash, and preventing Defendants from removing, selling, encumbering, assigning, transferring or engaging in other acts of disposition of any such assets. Such assets include the following: (1) Dreamworks accounts with Wachovia Bank bearing account numbers 2000030392799 and 2000030393390; (2) Dreamworks accounts with Bank of America, N.A.; and (3) Turner accounts with Bank of America bearing account numbers 3810 1435 1804 and 3810 1435 1781.

**AND IT IS FURTHER ORDERED** that pending the return date herein, Defendants are temporarily enjoined and restrained from:

A. Engaging in, continuing to engage in, or doing any acts or practices in violation of the New Jersey Consumer Fraud Act ("CFA"), N.J.S.A. 56:8-1 et seq. and the Regulations Governing General Advertising ("Advertising Regulations"), N.J.A.C. 13:45A-9.1 et seq., including, but not limited to, the acts and practices alleged in the Verified Complaint,

B. Engaging in the advertisement and/or sale of Vacation Packages to consumers within and outside New Jersey,

C. Removing, selling, encumbering, transferring or engaging in any act of disposition of any assets of the Defendants that relate to the subject matter of the Verified Complaint, including but not limited to, all deposits or any monies paid by consumers for Vacation Packages;

*Enjoinder Restraints  
Issued -  
only Under  
# D  
# E*

(D) Destroying, concealing, altering, transferring, disposing or removing in any manner, directly or indirectly, any books or records, information stored in computer-maintained form (such as electronic mail) and any other "document," as that term is defined in R. 4:18-1(a), in their possession, subject to their control or available to them, that directly or indirectly relate to the advertisement and/or sale of Vacation Packages;

(E) Failing to make and/or keep any books or records, information stored in computer-maintained form (such as electronic mail) and any other "document," as that term is defined in R. 4:18-1(a) that directly or indirectly relate to the advertisement and/or sale of Vacation Packages; and

~~Granting such other relief as the Court deems equitable and just.~~

**AND IT IS FURTHER ORDERED** that:

1 The Defendants may move to dissolve or modify the temporary restraints herein contained on two (2) days notice to the Plaintiffs' attorney.

2 A copy of this Order to Show Cause, Verified Complaint, Brief and supporting Certifications submitted in support of this application shall be served upon the Defendants personally (~~or by other means~~) within 3 days of the date hereof, in accordance with R. 4:4-3 and R. 4:4-4, this being original process.

3 The Plaintiffs must file with the Court their proof of service of the pleadings on the Defendants no later than three (3) days before the return date.

4 Defendants shall file and serve a written response to this Order to Show Cause and the request for entry of injunctive relief and proof of service by JUNE 8, 2009. The original documents must be filed with the Clerk of the Superior Court in the county listed above. A list of these offices is provided. You must send a copy of your opposition papers directly to Honorable Catherine M. Langlois, P.J. Ch., Morris County Superior Court, Washington & Court Streets., P.O.

Box 910, Morristown, New Jersey 07963-0910. You must also send a copy of your opposition papers to the Plaintiffs' attorney whose name and address appears above, or to the Plaintiffs, if no attorney is named above. A telephone call will not protect your rights; you must file your opposition and pay the required fee of \$\_\_\_\_\_ and serve your opposition on your adversary, if you want the court to hear your opposition to the injunctive relief the Plaintiffs are seeking.

5. The Plaintiffs must file and serve any written reply to the Defendants' Order to Show Cause opposition by \_\_\_\_\_, 2009. The reply papers must be filed with the Clerk of the Superior Court in the county listed above and a copy of the reply papers must be sent directly to the Chambers of Judge Langlois.

*no Reply to be filed*

6. If the Defendants do not file and serve opposition to this Order to Show Cause, their application will be decided on the papers on the return date and relief may be granted by default, provided that the Plaintiffs file a proof of service and a proposed form of Order at least three (3) days prior to the return date.

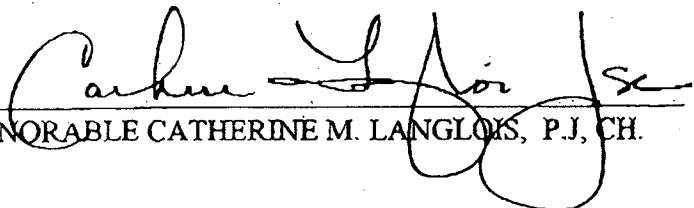
7. If the Plaintiffs have not already done so, a proposed form of Order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the Court no later than three (3) days before the return date.

8. Defendants take notice that the Plaintiffs have filed a lawsuit against them in the Superior Court of New Jersey. The Verified Complaint attached to this Order to Show Cause states the basis of the lawsuit. If you dispute this Complaint, you, or your attorney, must file a written Answer to the Complaint and proof of service within thirty-five (35) days from the date of service of this Order to Show Cause; not counting the day you received it.

These documents must be filed with the Clerk of the Superior Court in the county listed above. A list of these offices is provided. Include a \$ \_\_\_\_\_ filing fee payable to the "Treasurer State of New Jersey." You must also send a copy of your Answer to the Plaintiffs' attorney whose name and address appear above, or to the Plaintiffs, if no attorney is named above. A telephone call will not protect your rights; you must file and serve your Answer (with the fee) or judgment may be entered against you by default. Please note: Opposition to the Order to Show Cause is not an Answer and you must file both. Please note further: if you do not file and serve an Answer within 35 days of this Order, the Court may enter a default against you for the relief Plaintiffs demand.

9 If you cannot afford an attorney, you may call the Legal Services office in the county in which you live. A list of the Legal Services offices in New Jersey is provided. If you do not have an attorney and are both eligible for free legal assistance you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

10. The Court will entertain argument, but not testimony, on the return date of the Order to Show Cause, unless the Court and parties are advised to the contrary no later than 2 day before the return date

  
HONORABLE CATHERINE M. LANGLOIS, P.J., CH.

*Court has not issued all  
Ex parte restraints —*

*As such action  
may affect rights  
outside of jurisdiction  
of the State — Defendants  
have right to heard  
before assets are  
frozen — There is no showing of  
immediate transfers of property*

**NOTICE TO INDIVIDUAL DEFENDANTS AS REQUIRED BY R. 4:4-2**

If you are unable to obtain an attorney, you may communicate with the New Jersey Bar Association (800) 792-8315 or the appropriate County Bar Association Lawyer Referral Service listed on the following pages. If you cannot afford an attorney, you may communicate with the appropriate County Legal Services provider listed on the following pages.

**STATEWIDE**

**LEGAL SERVICES OF NEW JERSEY, INC.**  
(732) 572-9100

**ASSOCIATION OF TRIAL LAWYERS - N.J.**  
**LAWYER REFERRAL SERVICE**  
(800) 367-0089

<p><b>ATLANTIC COUNTY</b></p> <p>South Jersey Legal Services (609) 348-4200</p> <p>Atlantic County Bar Association Lawyer Referral Service (609) 345-3444</p>	<p><b>CAMDEN COUNTY</b></p> <p>South Jersey Legal Services, Inc. (609) 964-2010</p> <p>Camden County Bar Association Lawyer Referral Service (856) 482-0618</p>
<p><b>BERGEN COUNTY</b></p> <p>Northeast New Jersey Legal Services (201) 487-2166</p> <p>Bergen County Bar Association Lawyer Referral Service (201) 488-0044</p>	<p><b>CAPE MAY COUNTY</b></p> <p>South Jersey Legal Services, Inc. (609) 465-3001</p> <p>Cape May County Lawyer Referral Service (609) 463-0313</p>

<p align="center"><b>BURLINGTON COUNTY</b></p> <p>South Jersey Legal Services, Inc. (609) 261-1088</p> <p>Burlington County Bar Association Lawyer Referral Service (609) 261-4862</p>	<p align="center"><b>CUMBERLAND COUNTY</b></p> <p>South Jersey Legal Services, Inc. Administrative Offices (856) 451-0003</p> <p>Cumberland County Lawyer Referral Service (856) 825-2001</p>
<p align="center"><b>ESSEX COUNTY</b></p> <p>Essex-Newark Legal Services (973) 824-3000</p> <p>Essex County Legal Aid Association (973) 622-0063</p> <p>Essex County Bar Association Lawyer Referral Service (973) 533-6775</p>	<p align="center"><b>MERCER COUNTY</b></p> <p>Central New Jersey Legal Services (609) 695-6249</p> <p>Mercer County Bar Association Lawyer Referral Service (609) 585-6200</p>
<p align="center"><b>GLOUCESTER COUNTY</b></p> <p>South Jersey Legal Services, Inc. Administrative Offices (856) 848-5360</p> <p>Camden Regional Legal Services, Inc (609) 848-5360</p> <p>Gloucester County Bar Association Lawyer Referral Service (856) 848-4589</p>	<p align="center"><b>MIDDLESEX COUNTY</b></p> <p>Central New Jersey Legal Services (732) 249-7600</p> <p>Middlesex County Bar Association Lawyer Referral Service (732) 828-0053</p>

<p><b>HUDSON COUNTY</b>  Legal Services of Northeast Jersey  (201) 792-6363</p> <p>Hudson County Bar Association  Lawyer Referral Service  (201) 798-2727</p>	<p><b>MONMOUTH COUNTY</b>  Ocean-Monmouth Legal Services, Inc.  (732) 866-0020</p> <p>Legal Aid Society of Monmouth County  (732) 776-7733</p> <p>Monmouth Bar Association  Lawyer Referral Service  (732) 431-5544</p>
<p><b>HUNTERDON COUNTY</b>  Legal Services of Northwest Jersey  (908) 782-7979</p> <p>Hunterdon County Lawyer Referral Service  (908) 735-2611</p>	<p><b>MORRIS COUNTY</b>  Legal Aid Society of Morris County  (973) 285-6911</p> <p>Morris/Sussex Bar Association  Lawyer Referral Service  (973) 267-5882</p>
<p><b>OCEAN COUNTY</b></p> <p>Ocean-Monmouth Legal Services, Inc.  (732) 341-2727</p> <p>Ocean County Bar Association  Lawyer Referral Service  (732) 240-3666</p>	<p><b>SUSSEX COUNTY</b></p> <p>Legal Services of Northwest Jersey  (973) 383-7400</p> <p>Morris/Sussex/Warren County  Bar Association  Lawyer Referral Service  (973) 267-5882</p>
<p><b>PASSAIC COUNTY</b></p> <p>Legal Services of Northeast Jersey  (973) 523-2900</p> <p>Passaic County Bar Association  Lawyer Referral Service  (973) 278-9223</p>	<p><b>UNION COUNTY</b></p> <p>Union County Bar Association Legal Aid  (908) 527-4769</p> <p>Union County Legal Services Corp.  (908) 354-4340</p> <p>Union County Bar Association  Lawyer Referral Service  (908) 353-4715</p>

<p align="center"><b>SALEM COUNTY</b></p> <p>South Jersey Legal Services, Inc.  Administrative Offices  See Cumberland County</p> <p>Salem County Bar Association  Lawyer Referral Service  (856) 935-5629</p>	<p align="center"><b>WARREN COUNTY</b></p> <p>Legal Services of Northwest Jersey  (908) 475-2010</p> <p>Warren County Bar Association  Lawyer Referral Service  (908) 387-1835</p>
<p align="center"><b>SOMERSET COUNTY</b></p> <p>Legal Services of Northwest Jersey  (908) 231-0840</p> <p>Somerset Bar Association  Lawyer Referral Service  (908) 685-2323</p>	