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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

RONALD E. DeWOLF, : : x
 : :
 Plaintiff, : Civil Action No. 87-2339 (HLS)
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 : AFFIDAVIT OF RONALD E. DEWOLF
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LYLE STUART, INC., : : x
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STATE OF NEVADA)
) **ss.:**
COUNTY OF CARSON)

RONALD E. DEWOLF, being duly sworn, deposes and says:

1. I am the plaintiff in this action. I make this affidavit in support of my application for expedited discovery and a temporary restraining order and in opposition to defendant's motion to dismiss.

2. It was never my understanding with Bent Corydon that Corydon would do the actual writing of the book and that my role as co-author was to supply information and insight. Rather, it was my understanding that I was to be Corydon's co-author in

every sense of the word; I would write certain sections of the book and I would make editorial changes and add my own written material to the sections of the book that Corydon would write.

3. In fact, my understanding of how it would work is supported by my April 28, 1985 letter to Corydon which Corydon attached to his affidavit as Exhibit C. In this letter, I asked Corydon to send me his draft so that I would make my own written contributions to it.

Bring and/or send a print-out and/or disks. I'll do the same, but my book is in my head and so is our book. I work very fast and very hard. Very focused. So send me all your stuff so I can add mine out of my head...[para] So, download to me all your book stuff and I'll add my stuff out of my head and upload to you fast and into the hands of your agent friend (Corydon Exh. c¹).

4. In addition, it was always my intention to make my own written contributions and editorial changes to the first two sample chapters. As I wrote in my April 28, 1985 letter, [y]ou probably have enough for the requested first two chapters. I'll add to it and really blow the publisher's socks off (Corydon Exh. C).

However, when I finally received the chapters from Corydon during the summer of 1985 I was physically incapable of making my own written contributions and of editing Corydon's drafts. During the spring and summer of 1985, I had been suffering from gall bladder attacks. On July 5, 1985, I underwent gall

¹ References to the June 23, 1987 affidavit of Bent G. Corydon will be cited as "Corydon Para. _____."

bladder surgery. I am a diabetic and am therefore very slow to heal and recover from surgery. In addition, I developed blood clots, was placed in intensive care and hospitalized from July 5 until July 16, 1985.

5. I never agreed with Bent Corydon or with Lyle Stuart, Inc. that I would be identified as the co-author of the purported biography of my father L. Ron Hubbard even if I made no written contributions to the book. Corydon and I understood that I was going to do some of the writing of the book and would add to and edit other portions of the book written by Corydon. This understanding was shared with Lyle Stuart, Inc.

6. Corydon is simply wrong when he states that we taped our conversations on March 28 and 29, 1985 so that we could begin our collaboration on a book about my father (see Corydon para 5-6). We did not tape those conversations for a book. Those conversations were taped so that Corydon could pay them for classes at his Mission in Riverside, California.

7. Contrary to Corydon's implication (*id.* para 5-8, Exhs. A,B), the reference in my April 2, 1985 letter to "sit[ting] down and talk[ing] some real hardcore, straightforward, nuts and bolts business" had nothing to do with writing a book together about my father. Instead I was referring to coming down to Corydon's Riverside Mission to teach some classes. In that same letter I stated that I would be teaching "major Special Training Courses" overseas and in the United States to reinforce my willingness to participate in the business of teaching classes at Corydon's Riverside Mission.

8. Corydon is also inaccurate in describing the conversation where I informed him that I was withdrawing from the book project and that I didn't want any of the manuscripts I had written to be used and that I didn't want my name to be used or associated with the book project in any way (See id. para 18). Corydon did not mention the payment issue in this conversation, while Corydon had made several previous promises to send me my share of the money, he did not speak of money in this conversation (and he never sent me the money). Corydon did say, however, that he was going to force me to do it (presumably, be associated with the book) whether I liked it or not.

9. Corydon is wrong about the number of conversations we had about my father (See id. Para 12). We did not talk at least once a week during the period from mid-June, 1985 to May, 1986. At most we talked twelve times during that period.

10. Corydon's misstatements include his discussion of my so-called contributions to the book (id. para 16). Many of the things Corydon claimed to be hearing from me for the first time for this book were publicly known from my July, 1983 Penthouse interview which was well-known to Corydon: e.g. the false charge about my father and drugs; the speculation about my brother Quentin's death; the stories I had weaved about my childhood; and my father's so-called harassment and manipulation of others. In addition, I told Corydon that my father had written the Church of Scientology's "standard tech" or "Brainwashing Manual" only to dispute the claim that Corydon had

told me was being made by others that my father had not written the tech.

11. I will never be able to recover -- either professionally or personally -- from having my name associated with this purported biography of my father which I did not write. Lyle Stuart, Inc. is continuing to identify me as the co-author because, as L. Ron Hubbard's son, my name adds instance credibility to the book's charges and, in addition, leads the reader to believe that he is getting inside information available only to intimate family members. As a result of this false representation about my contributions to the book I will be held responsible by the book-buying public for a scurrilous attack on my father which I did not write, which I do not endorse and which I publicly disavow. I will be subjected to criticism for something I did not do and over which I had no control whatsoever. Not only did I not write any part of this book, I am not even being permitted to read the manuscript bearing my name prior to publication! In the past, I have said and written things about my father which I deeply regret and which caused him and me great pain. The Penhouse interview is an example. But Penhouse by its nature has a limited circulation and a dubious reputation. Lyle Stuart, Inc., in contrast, is a reputable publisher and is obviously marketing this book to a nationwide audience. My national reputation then is forever dependent upon a book which I did not write and which will prevent me from ever making my peace with my deceased father, our family and his Church. If this book is released with my name on it even though I made no written

contribution to the book, I will never be able to stop my public display of filial disloyalty and put it all behind me.


RONALD E. DEWOLF

Sworn to before me this
1st day of July, 1987


FLOYD R. JOHNSON
NOTARY PUBLIC

