

violation of this Agreement, Plaintiff Joe Alarcon spoke to the media about the settlement, breaching the bargained-for confidentiality clause, as well as disparaging not only the Kanakuk Defendants, but also his own former attorney. Because the Agreement is a binding and enforceable contract, the Kanakuk Defendants request this Court enforce the Agreement and its own Order issued on April 29, 2013 requesting presentation of a final judgment. The Kanakuk Defendants also request this Court sanction Plaintiffs for violating the Agreement and permanently enjoin them from further breaching its provisions. Finally, the Kanakuk Defendants pray for such other and further relief, both at law and in equity, to which they may show themselves justly entitled.

Respectfully Submitted,

THE BERRY FIRM, P.L.L.C

By: /s/ Wendy Hermes
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**ATTORNEYS FOR DEFENDANTS
KANAKUK MINISTRIES, KANAKUK
HERITAGE, INC. AND JOE T. WHITE**

CERTIFICATE OF SERVICE

On the 4th day of June, 2013, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

Via E-Service

[REDACTED]

Via CMRRR

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[REDACTED]

Joe and Brandi Alarcon

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/s/ Wendy Hermes
Wendy Hermes

CERTIFICATE OF CONFERENCE

Wendy Hermes has conferred with Steve Sharp and Pro Se Plaintiffs Joe and Brandi Alarcon regarding the merits of Kanakuk Defendants' Motion to Enforce Settlement Agreement and Motion for Sanctions for Violation of Said Agreement. Steve Sharp cannot agree nor oppose at this time. Joe and Brandi Alarcon are opposed.

/s/ Wendy Hermes
Wendy H. Hermes