

2. The written words and recorded spoken words of L. Ron Hubbard are regarded by CST (and Scientologists generally) as being not simply persuasive or influential writings but, rather, as actually being "Scriptures." (Complaint para. 16.) 3/ CST asserts that its principal purpose is to preserve Mr. Hubbard's writings (Complaint paras. 36, 42), so that access to his writings by future generations will not be impeded by the passage of a thousand years (Compl. paras. 44, 47, 48, 49) or by "man-made or natural disasters, especially nuclear war" (Compl. para. 44).

3/ See also Founding Church, infra, 188 Ct. Cl. at 501 ("Hubbard's views, writings, and instructions respecting Scientology are regarded by plaintiff and its members, ministers, and staff as authoritative").