

ROBERT BURNS

NUMBER 605.769 DOCKET: 25

19TH JUDICIAL DISTRICT COURT

VERSUS

PARISH OF EAST BATON ROUGE

ARTHRITIS ASSOCIATION OF LOUISIANA,
KAREN KENNEDY, CAROLINE MESSENGER

STATE OF LOUISIANA

MEMORANDUM IN OPPOSITION TO MOTION FOR SUMMARY JUDGMENT

NOW UNTO COURT comes Plaintiff, Robert Edwin Burns, in proper person, who submits to this Honorable Court this Memorandum in Opposition to Defendants' Motion for Summary Judgment which is scheduled for hearing on Monday, April 23, 2012 at 9:30 a.m.

Petitioner will begin by reviewing a basic tutorial he has provided to Defense Counsel regarding proper service procedures in the 21st century. Defense Counsel has been practicing law for 39 years and is a well-respected and esteemed attorney having amassed experience in a very wide-ranging spectrum of litigation over his stellar career. Nevertheless, since being admitted to practice law 39 years ago, the requirements for service have changed dramatically and, in fact, the entire former Code of Practice was replaced by the current Code of Civil Procedure. Defense Counsel could not be reasonably expected to keep up with the ever-changing means for service during that expansive timespan, and those changes have certainly accelerated with the advent of fax machines, the Internet, and a host of other technological advancements such as email and PDF file capability.

Because Petitioner does not have the advantage of a nearly 40-year law career, he had no choice but to look up proper service procedures within the Code of Civil Procedure to ensure he followed them properly. Petitioner provided Defense Counsel with the aforementioned tutorial when, as evidenced in Exhibit P-25, which is attached hereto and made a part hereof, Defense Counsel sent Petitioner an email relaying that Petitioner had failed to follow proper service procedure regarding a Motion for Preliminary Default regarding Burns v. Dow (Docket 603248 pending before Judge Caldwell) and for which Defense Counsel serves in that same capacity in that matter. Defense Counsel stated that, "any pleading that requires a response or appearance is

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PARISH OF EAST BATON ROUGE

required to be served by the sheriff.” As indicated in the Exhibit, Petitioner merely politely responded by referring Defense Counsel to CCP 1313(A)(1) and CCP 1313(B). Defense Counsel then, as evidenced by Exhibit P-26, which is attached hereto and made a part hereof, responded by relaying, “I think the situation is covered by CCP 1155-1201.” Only three very short sections exist in that CCP section range (1155, 1156, and 1201), and none are in any way whatsoever in conflict with CCP 1313(A)(1) and CCP 1313(B). Accordingly, Petitioner responded, as evidenced by Exhibit P-26, by merely stating, “I have no doubt that, if I failed to follow proper procedure on anything, the Court won’t hesitate to make that fact known to us.” The court made no such notification and, as evidenced by Exhibit P-27, which is attached hereto and made a part hereof, the Preliminary Order of Default was signed only one day after the email exchange between Petitioner and Defense Counsel.

Meanwhile, Defense Counsel Rodney Ramsey of the Attorney General’s Office regarding the Burns v. Edmonds case pending before this Honorable Court (Docket 602922), went so far as to plead that Petitioner deployed “improper service” even though he (Ramsey) even placed CCP 1313(A)(1) and 1313(B) into the text of his argument supporting “improper service!” Mr. Ramsey further cited a single case to support his argument (comprised of the same verbatim sentence written by Defense Counsel Brantley and referenced at the top of this page): *Johnson v. Johnson*, 645 So.2d 1260 (La. Ct. App. 1st Cir. 1971), a case which is 40 years old (when Petitioner was in third grade and former Gov. Edwin Edwards was making his first run for Governor) and which transpired well before all of the aforementioned changes to service procedure codes (or even the revamp of Code of Practice into the Code of Civil Procedure as referenced previously).

Meanwhile, yet again, Ms. Anna Dow, Louisiana Auctioneer’s Licensing Board (LALB) attorney and with whom Petitioner is also in litigation over the incidents of April 11, 2011 and April 12, 2011 (Docket 603248 pending before Judge Caldwell), also was very emphatic at the November 14, 2011 LALB meeting that she had “no intention” of answering Petitioner’s amended pleadings in that matter and stating to Petitioner at that meeting, “you’ve never served me.” Unbeknownst to her, however, a Preliminary Default Order, Exhibit P-27, had already been signed against her for her very failure to answer which resulted from Ms. Dow’s misguided belief that Petitioner had failed to

properly serve her (as echoed by Defense Counsel in Exhibit P-25). Ms. Dow also apparently hadn't recently communicated with her newly-appointed Defense Counsel since, through him, she had actually answered the Petition almost immediately before the Preliminary Default Judgment was signed. Furthermore, while Ms. Dow and Defense Counsel Brantley preach to Petitioner about proper servicing procedure, Ms. Dow herself sought and failed on a Special Motion to Strike in Judge Caldwell's courtroom and, relative to that particular hearing (which most certainly "required an appearance" by Petitioner), Ms. Dow merely deposited her pleadings into regular U. S. mail

Given that Mr. Brantley has 39 years legal experience, Mr. Ramsey has 23 years legal experience, and Ms. Anna Dow has 32 years legal experience (that's 94 collective years of legal experience), it's obvious to Petitioner that they all are very passionate about arcane service rules which existed at the time they initiated their law careers. To that end, Petitioner is pleased to, as a result of him having no such background to fall back upon and having to look up proper service procedures, bring all three of these attorneys current regarding CCP 1313(A)(1) and CCP 1313(B).

Petitioner must admit that he never ceases to be amazed at how Mr. Brantley has such strong and genuine concern for his best interest. In addition to his misguided efforts to train Petitioner on proper service procedure, Mr. Brantley was also, as evidenced by Exhibit P-28, which is attached hereto and made a part hereof, concerned that Petitioner may appear "silly" for having filed Exhibit P-23 regarding a Louisiana Legislative Auditor's report outlining nearly \$20,000 in alleged improper payments to the Executive Assistant of both the Louisiana Auctioneer's Licensing Board and the State Board of Examiners of Interior Designers. Mr. Brantley openly questioned Petitioner's motives in submitting the filings before the court, and that questioning came on the heels of Mr. Brantley having supplied Petitioner with an email dated November 21, 2011, which is attached hereto and made a part hereof as Exhibit P-29, in which Mr. Brantley admonished Petitioner that "two, if not all of the Defendants will seek damages from you for your actions.....because of your actions, both in and out of court proceedings, are clearly done with forethought and intent, any judgment obtained against you would not be dischargeable in bankruptcy and could haunt you for a long, long time."

Immediately after Ms. Kennedy's generosity of opening the door for Petitioner and welcoming him in for a third such occasion on April 8, 2011, she relaxed while seated on the entrance table, and she and Petitioner casually talked for 3-4 minutes before Petitioner resumed his practice of going to the Boardroom (an area which was leased by no entity, a fact which has not even been disputed in any of the three suits Petitioner has filed regarding these episodes). During that timeframe, Petitioner informed Ms. Kennedy that Paul Gates, investigative reporter for WAFB, Channel 9, had attended the opening of the March 15, 2011 LALB meeting and interviewed Ms. Anna Dow, Board Attorney, with the cameras rolling. Ms. Kennedy inquired of Petitioner as to when the story ran, to which Petitioner responded, "It hasn't. The investigation is ongoing." Petitioner mentioned nothing to Ms. Kennedy regarding the fact that Mr. Patrick Lowery, the Chief of Accountability for the Louisiana State Department of Civil Service, had unequivocally characterized Ms. Edmonds' entire "employment" arrangement with both Boards referenced in the Louisiana Legislative Auditor's report, Exhibit P-23, as "blatant payroll fraud." Furthermore, in a meeting on or around November 20, 2010, it was Mr. Lowery who made the suggestion that Petitioner and Ms. Sherrie Wilks, who also attended the meeting with Mr. Lowery, should contact Mr. Gates and ask him to investigate the "blatant payroll fraud" as alleged by Mr. Lowery. Mr. Gates was actively investigating the matter; however, upon him being diagnosed with Alzheimer's, he informed Petitioner and Ms. Wilks that the Legislative Auditor's Office would "just have to handle this one." In early April of 2011, Mr. Lowery suggested that Petitioner and Ms. Wilks contact "2 On Your Side" to have them investigate; however, neither Petitioner nor Ms. Wilks followed through on that suggestion. Mr. Lowery was making these suggestions out of extreme frustration that, as a result of Ms. Edmonds being unclassified, he had no enforcement authority over Ms. Edmonds and relayed that, if he did have such enforcement authority, he would have immediately proceeded with prosecution of payroll fraud on her part.

Ms. Edmonds clearly was likely nervous regarding all of the payroll records which Petitioner and Rev. Freddie Phillips had requested on behalf of the Legislative Auditor's Office (in fact, one of the table dates within the report of July 18, 2011 was the last spreadsheet obtained by Petitioner and Rev. Phillips and forwarded on to the

Legislative Auditor's Office). As a result, Ms. Kennedy likely mentioned the fact that Petitioner had referenced the Paul Gates visit to Ms. Edmonds (though he mentioned nothing of the focus of Mr. Gates' investigation) which most likely resulted in the bizarre actions of Ms. Edmonds and Ms. Dow which have given rise to all three lawsuits filed by Petitioner. Clearly, Ms. Kennedy is quite likely very close friends with Ms. Edmonds (so much so that she would call her rather than law enforcement to report her so-called "security concerns"), and Ms. Kennedy clearly felt Ms. Edmonds was being unfairly targeted for scrutiny regarding her payroll records. Thus, Ms. Kennedy harbored deep malice toward Petitioner for even revealing any investigative report transpiring regarding the LALB and she didn't hesitate for one second to ally with her **very** close friend, Ms. Sandy Edmonds, in blatantly defaming the character of Petitioner and playing a role in initiating a baseless police investigation which made Ms. Kennedy herself appear rather "silly" (to coin a phrase from Defense Counsel Brantley) in that she failed to alert law enforcement at the very time that she had these so-called "safety concerns," and that, despite having these so-called "safety concerns," she continued a repeated pattern of graciously admitting Petitioner into the building to film the clips to promote the GOHS reunion and explain to classmates how real estate auction differ from traditional real estate transactions. Petitioner finds it ironic that nobody wants to even talk about or espouse in pleadings just what the content of the videos is!! It's funny how that content kind of fades away in terms of significance in all of the various defendants' pleadings!!

Issues of Material Fact Most Certainly DO Exist!

Petitioner will now proceed to addressing the core issue raised in Defense Counsel's Motion for Summary Judgment. Where conflicting affidavits exist regarding a pending Motion for Summary Judgment, the Court isn't permitted to assess the credibility of those conflicting affidavits for purposes of rendering a ruling regarding the Motion for Summary Judgment. Because Petitioner went to great lengths in his initial pleadings to discredit the Affidavit of Ms. Kennedy, he will not repeat that material within this Memorandum. He will merely state that both the Affidavits of Ms. Kennedy, Exhibit B, and Ms. Messenger, Exhibit C, are in direct conflict with the Affidavits of Rev Freddie Phillins, Exhibit P-2, and that of Ms. Sherrie Wilks, Exhibit P-14. Further, Petitioner has demonstrated prima facie that the Affidavit of Beau Box, Exhibit A, has

serious credibility issues via Exhibits P-15 through P-22. Petitioner will also point out another slight flaw in Defense Counsel's material for his Motion for Summary Judgment. Because Defense Counsel appears to have merely used the same Word files of Defense Counsel Rodney Ramsey in the Burns v. Edmonds case and merely added a few sentences at the end to fit the applicable needs of his clients, he neglected to adequately proofread the Affidavit of Ms. Kennedy, Exhibit B, and remove material that became completely nonsensical in reference to his filing. Specifically, in Paragraph XII of Ms. Kennedy's Affidavit, Exhibit B, Defense Counsel makes parenthetical reference to an email drafted by Petitioner dated July 20, 2011 which was said to be "attached hereto as 'Exhibit A.'" In reality, Exhibit A of Defense Counsel's Memorandum is the Affidavit of Beau Box! Again, however, this oversight on the part of Defense Counsel regarding failing to detect such a glaring discrepancy likely results merely from him having failed to adequately modify the Word file he obtained from Defense Counsel Ramsey in the Burns v. Edmonds matter and should not reflect adversely upon Defense Counsel's nearly 40-year stellar legal career.

The core issue at hand is simple, and it is this: Defendants content no issue of material fact exists in that, Defendants claim, Mr. Box did not obtain complaints regarding Petitioner which originated from them. Petitioner contends that Mr. Box did receive complaints which originated from Defendants. Mr. Box's Affidavit, Exhibit A, is eerily silent on exactly who did make these complaints that caused Mr. Box to sever his joint venture business relationship with Petitioner on April 12, 2011 (see Exhibit P-10). Petitioner contends that, while Ms. Kennedy and Ms. Messenger may not have directly made those complaints to Mr. Box, they certainly originated their complaints to an intermediary, with the most likely prospect for serving as that intermediary being Mr. Chuck Mock (Mr. Box's agent who had the listing for sale of the building and who served as property manager for the building). In fact, Ms. Sandy Edmonds, Defendant in Burns v. Edmonds (Docket # 602922 pending before this Honorable Court) has **already admitted** in an interrogatory that she called Mr. Mock who, in turn, relayed Ms. Edmonds complaints to Mr. Box. Given the short list of tenants at Summa Court and the fact that Mr. Box's email, Exhibit P-10, references "numerous" complaints he's received (albeit it indirectly through his agent, Chuck Mock), there can be little doubt whatsoever

that Mr. Box did in fact receive complaints which originated from Defendants and resulted in significant damage to the personal and business reputation of Petitioner for which the present suit seeks recompense.

In the days after the police incidents of April 11, 2011 and April 12, 2011, Mr. Box certainly didn't return Petitioner's phone calls seeking the identity of the complainants. The fact that Petitioner had no other dealings with any of Mr. Box's clients aside from Defendants in the 60-90 days leading up to the incidents of April 11, 2011 and April 12, 2011 (as reflected in Petitioner's email response to Mr. Box of April 12, 2011, Exhibit P-10) only further strengthens Petitioner's contention that Ms. Kennedy and Ms. Messenger (along with Ms. Edmonds) were unequivocally the sources of origin of the complaints. Further, the timing of Mr. Box's email to Petitioner severing the relationship, which was less than three (3) hours before the Louisiana State Police Terrorism Unit visited Petitioner's home regarding known complaints by Ms. Kennedy, Ms. Messenger, and Ms. Edmonds as reflected in the EBRP Police Report, Exhibit P-5, certainly lends strong and compelling credence to the fact that the complaints Mr. Box referenced in his email to Petitioner, Exhibit P-10, did in fact originate from Ms. Kennedy and Ms. Messenger (intermediary notwithstanding).

The issue of whether Ms. Kennedy and Ms. Messenger were the originators of the complaints against Petitioner is certainly one of material fact which forms the basic core of the damages incurred by Petitioner. Petitioner never would have invested the extensive time and financial outlays building and nurturing the joint venture relationship had he possessed advanced knowledge that Defendants would stoop to such levels to sabotage those efforts. Therefore, Defendants' contention that Petitioner incurred no damages as a result of Defendants' actions is patently absurd! Further, Defendants' complaints very likely included the specificity that the Louisiana State Police Terrorism Unit had been contacted and that they were being dispatched to Petitioner's home that very day. Any reasonable man, upon receiving such a shocking revelation, would sever a business relationship with anyone so portrayed. As evidenced by the report prepared by the Louisiana State Police, Exhibit P-24, which has been submitted to this court through a Memorandum dated March 12, 2012, the State Police Terrorism Unit did in fact visit Petitioner's home and Investigator Tina Rushing, after having the benefit of a plethora of

reports run on Petitioner, assessed the matter as: **“Priority: Low; Significant: No.”** Nevertheless, as outlined in the narrative of the final page of Exhibit P-24, a colossal waste of Louisiana State Police resources took place as evidenced by the following laundry list of reports run on Petitioner as a result of Defendants’ outlandish actions: **“4/13/2011 – 13:06 hrs – Emailed the following information on subject Robert Burns to Inv. Bart Morris: Photo, LA DL, OMV driving record, OMV vehicle information, LACCH, NCIC, IRS checks, LA Sex Offender Database checks, CAJUN, MOTION checks, LA Secretary of State records, and a CLEAR report.”**

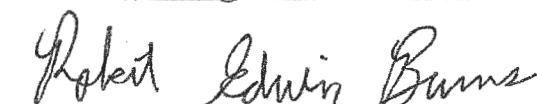
The fact that Petitioner could be subjected to this level of scrutiny given that, as mentioned in his initial pleadings, he has not even had so much as a parking ticket on his record in the last 21 years is astounding, and the collective Defendants in all three lawsuits Petitioner has filed should be forced to repay the Louisiana State Police for the expense and manpower wasted on this absurd incident!

The bottom line is this: Defendants assert no issues of material fact exist in that they assert Beau Box did not receive complaints from Defendants which defamed Petitioner’s character, and Petitioner asserts that a major issue of material fact does exist in contending that Mr. Box did receive such complaints, and that is **all** that Petitioner is required to demonstrate for purposes of defeating Defendants’ Motion for Summary Judgment. Therefore, Petitioner urges that this Honorable Court find that issues of material fact do in fact exist in the present case.

WHEREFORE, petitioner, ROBERT EDWIN BURNS, prays that this Honorable Court deny Defendants’ Motion for Summary Judgment.

Respectfully Submitted,

Robert Edwin Burns, in proper person
President, Auction Sells Fast, LLC
4155 Essen Lane, Ste 228
Baton Rouge, LA 70809-2152
(225) 201-0390 (office) (225) 235-4346
E-mail: Robert@AuctionSellsFast.com



Certificate of Service:

I certify that a copy of the foregoing has been served upon counsel for all parties to this proceeding by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 9th day of April 2012.

Robert Edwin Burns

Robert Burns

From: Robert Burns <Robert@AuctionSellsFast.com>
Sent: Monday, November 07, 2011 6:23 PM
To: 'Joseph Brantley'
Subject: RE: Burns Vs. Dow
Attachments: Motion_Order_Preliminary_Default_Anna_Dow.pdf

Beaver:

See CCP 1313(A)(1) and 1313(B): <http://www.legis.state.la.us/lss/lss.asp?doc=111174>, both of which were referenced in the memorandum in support of preliminary default.

For your convenience, I have attached a PDF copy of the motion and order.

Thanks.



Robert Edwin Burns
Real Estate Broker / Certified Real Estate Auctioneer
Auction Sells Fast / BWW Realty
4155 Essen Lane, Ste 228
Baton Rouge, LA 70809-2152
(225) 201-0390 (225) 235-4346
LA Lic. #: 1536
www.AuctionSellsFast.com

From: Joseph Brantley [<mailto:jpbiv@mac.com>]
Sent: Monday, November 07, 2011 5:08 PM
To: Robert Burns
Subject: Burns Vs. Dow
Importance: High

Robert,

I just got back to Baton Rouge and received an email from Anna Dow in connection with the suit against her in Judge Caldwell's division. She advised that although she has never been served with the supplemental pleadings, you have filed a preliminary default. You may want to check on that because any pleading that requires a response or appearance is required to be served by the sheriff. If you would like, I will accept service for her and you can have me served. I probably will not need an extension after being served since I have obtained the original and supplemental pleadings.

Beaver

P-25

Robert Burns

From: Robert Burns <Robert@AuctionSellsFast.com>
Sent: Tuesday, November 08, 2011 9:24 AM
To: 'Joseph Brantley'
Subject: RE: Burns Vs. Dow
Attachments: Dow RB Letter to Force Answer 09.01.11.pdf

Beaver:

Although I see nothing in the CCPs you provided to contradict those I referenced to you, I have no doubt that, if I failed to follow proper procedure on anything, the Court won't hesitate to make that fact known to us.

Regarding timeframe for answer, I think I'd made that pretty clear in the attached certified letter dated September 1, 2011 and which Ms. Dow received on Tuesday, September 6, 2011 at 1:43 p.m. (I'm sure she's provided you with it by now); however, we are where we are.

I see continuance was agreed upon on the trial you had scheduled for Thursday. I had plans to come watch you in action. Guess I have to wait another 60 days, huh?

Thanks, Beaver.



Robert Edwin Burns
Real Estate Broker / Certified Real Estate Auctioneer
Auction Sells Fast / BWW Realty
4155 Essen Lane, Ste 228
Baton Rouge, LA 70809-2152
(225) 201-0390 (225) 235-4346
LA Lic. #: 1536
www.AuctionSellsFast.com

From: Joseph Brantley [<mailto:jpbiv@mac.com>]
Sent: Monday, November 07, 2011 6:44 PM
To: Robert Burns
Subject: Re: Burns Vs. Dow

Robert,

I think the situation is covered by CCP 1155-1201. Notwithstanding that, if it is OK, I can have an answer filed by next Monday, at the outside. Let me know if that works.

Beaver

P-26

ROBERT BURNS

COST OK Amt. \$ 41 ^{per case} NUMBER 603,248 DOCKET: 24
19TH JUDICIAL DISTRICT COURT

VERSUS

Ret: 87304
NOV - 3 2011
PARISH OF EAST BATON ROUGE

ANNA DOW

BY TESTED
DE. CLERK OF COURT
NOV 04 2011
STATE OF LOUISIANA

MOTION AND ORDER FOR PRELIMINARY DEFAULT

Considering the Memorandum in Support of Motion and Order for Preliminary Default, and on motion of Robert Burns, in proper person, it is ordered by this Honorable Court that a PRELIMINARY DEFAULT be entered herein.

CERTIFIED TRUE COPY

Baton Rouge, Louisiana.
Granted and signed this 9th day of Nov., 2011.

FILED
2011 NOV - 3 PM 3:15
EAST BATON ROUGE PARISH, LA

DEPUTY CLERK OF COURT
[Signature]
DEPUTY CLERK OF COURT

[Signature]

JUDGE, 19TH JUDICIAL DISTRICT COURT

Respectfully Submitted,
Robert Edwin Burns, in proper person
President, Auction Sells Fast, LLC
4155 Essen Lane, Ste 228
Baton Rouge, LA 70809-2152
(225) 201-0390 (office) (225) 235-4346
E-mail: Robert@AuctionSellsFast.com

[Signature]

Robert Edwin Burns

Certificate of Service:

I certify that a copy of the foregoing has been served upon counsel for all parties to this proceeding by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 3rd day of November 2011.

[Signature]

Robert Edwin Burns

REC'D C.P.
NOV 07 2011

P-27

REC'D C.P.
NOV 10 2011

EBR982040

Robert Burns

From: Joseph P. Brantley <jpbrantley@gmail.com>
Sent: Tuesday, March 13, 2012 5:14 PM
To: Burns Robert Edward
Subject: Your recent filings

Robert,

What possible reason could you have for your recent filings? If anything you are only setting yourself up for future claims that may be made against you, when I was hoping everything was settling down. If you feel that what you are doing is supportive of your position in either case, I think you are woefully mistaken. Notwithstanding the procedural deficiencies, I think the courts will look upon your motive as being highly suspect.

As you may or may not know as to the raise issue, the basis for this was a series of Executive Orders over the years, starting with Foster, which banned the payment of leave to part-time employees in the governor's office. The merit raise ban was issued this year and is an Executive Order, but it only covers merit raises, not promotions or money for extra work.

The Governor's office has advised Purpera that his legal conclusions on leave were incorrect because the Boards are not covered by the Executive Order. It is my understanding from the executive counsel that the EO would be revised and reissued to clear up the matter.

Now, don't you think you look a little silly?

Beaver

Joseph P. Brantley, IV
Brantley & Associates, APLC
6513 Perkins Road
Baton Rouge, Louisiana 70808
Ph: (225) 769-9555
Fax: (225) 769-0023 or (225) 769-9222
Mobile: (225) 907-7777
Toll Free: (888) 604-4004
Skype: thebeav47
Personal email:
jpbiv@mac.com or jpbiv@brantley.com
Web Site: www.lawyers.com/brantleylaw

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P-28

Robert Burns

From: Joseph P. Brantley <jpbrantley@gmail.com>
Sent: Monday, November 21, 2011 11:47 AM
To: Burns Robert Edward
Subject: Request for Dismissal

Robert,

As you know I not only represent Anna Dow but additionally what I will refer to collectively as the Arthritis Foundation Defendants. For the purpose of this email I will refer to everyone as the "Defendants".

You recently had unfavorable rulings in both Judge Caldwell's division in Anna Dow's case and Judge Fields' division in SandyEdmonds case. Not only have I read your pleadings, amended pleadings, and the respective exceptions, but I have looked at the affidavits of Beaux Box, Anna Dow, Ken Comer, and Karen Kennedy which are in true affidavit form, unlike other submittals.

Based upon what all I have seen, the witnesses I have spoken with and the law I have reviewed, I do not believe you have a cause of action supported under Louisiana law. You have essentially been told as much by two judges who have graciously allowed you time to amend your pleading to attempt to articulate a colorable claim. You may well be able to state a claim that may get you around an exception, but I do not believe you will ever be able to get around summary Judgments.

My purpose in writing the above is to respectfully request that you reevaluate your position and to seriously consider dismissing all claims. Your decision to do such is clearly yours and yours alone.

That being said, I think that you need to be aware that in the event that I am correct, there is an extreme likelihood that at least two if not all of the Defendants will seek damages from you for your actions. They will clearly have causes of action for which they can recover provable damages. Likewise, because of your actions, both in and out of court proceedings, are clearly done with forethought and intent, any judgment obtained against you would not be dischargeable in bankruptcy and could haunt you for a long, long time.

Although I would not be the attorney to pursuit claims against you, there are numerous attorneys standing in line who would take the cases on a contingency fee basis. From my over 35 years of practicing law, I can tell you this is not a road you want to go down, win or lose.

I am not asking to you make an immediate decision, but suggesting that if you do not feel my request is in good faith and with everyone's best interests in mind, I would greatly urge you to consult with an attorney who practices in the areas referenced in your suits, to see what he/she would recommend.

Sometime after Thanksgiving, please let me know your decision.

Beaver

Joseph P. Brantley, IV
Brantley & Associates, APLC
6513 Perkins Road
Baton Rouge, Louisiana 70808
Ph: (225) 769-9555
Fax: (225) 769-0023 or (225) 769-9222
Mobile: (225) 907-7777
Toll Free: (888) 604-4004
Skype: thebeav47
Personal email:
jpbiv@mac.com or jphrantley@gmail.com
Web Site: www.lawyers.com/brantleylaw

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