

IN THE SUPREME COURT OF OHIO

Mahoning County Bar Association

CASE NO.2013-1253

Relator,

BRIEF IN SUPPORT OF OBJECTIONS

Vs.

TO INDEFINITE SUSPENSION OF

Deneen Marie Marrelli,

RESPONDENT

Respondent.

OBJECTIONS TO INDEFINITE SUSPENSION AND SUPPORTING BRIEF OF RESPONDENT

DENEEN MARIE MARRELLI

Respondent objects to the proposed indefinite suspension of her license for the reasons set forth herein. My address for the purposes of my Supreme Court of Ohio registration has consistently been 46 Walter Street, Campbell, Ohio 44405. See Exhibit A. In May, 2013 I was the Defendant/Tenant in an eviction and was temporarily homeless with my minor daughter. See Exhibit B. I was unaware that my Aunt Carla Nickle had rented the property 46 Walter Street, Campbell, Ohio 44405 and trying to find suitable housing for myself and my daughter before the school term began. Having secured housing on August 30th,2013 I filed a change of address form with the Court and registered for inactive status. I received confirmation to that effect on September 1,2013. See Exhibit C. I have not practiced law since Leaving the State of Ohio in March 2012.

I acknowledge a financial obligation to the Court for publication costs and am currently unable to pay. I have a physical disability consisting of sciatica, stenosis,fused discs, herniated discs, degenerative disc disease, and was recently diagnosed with rheumatoid arthritis and neuropathy. These conditions prevent me from working and often render me unable to stand or walk for periods of up to a week at a time. My income is \$241.00 a month while my disability claim is pending.

I have consistently maintained that at no time did I rent office space from Paris & Paris. Mr. Robison was fully aware that he had retained myself as well as Paris & Paris as his attorneys. See Exhibit D. This case was a vicious custody battle with serious allegations of incest and child abuse. Mr. Robinson had me contact both his alarm service and the local police on multiple occasions believing his ex-wife and former father-in-law were breaking into his residence and meant him physical harm. See Exhibit E.

RECEIVED
MAY 09 2014
CLERK OF COURT
SUPREME COURT OF OHIO

FILED
MAY 09 2014
CLERK OF COURT
SUPREME COURT OF OHIO

I am aware that Paris & Paris have refunded \$1,100.00 to Mr. Robinsons and maintain that the work I did on this case is in excess of \$900.00. See Exhibit F. I prepared and was ready to go forward on this case when Mr. Robinson failed to appear. See Exhibit G.

I respectfully request that the Court permit me a renewed opportunity to comply fully with the disciplinary process and that my license not be indefinitely suspended. I wrongfully believed this matter had been resolved and believed I was placed on inactive status.



Deneen Marie Marrelli (0043728)

2430 Deer Creek Club, Apt 104

Deerfield Beach, Fl 33442

CERTIFICATE OF SERVICE

A copy of the foregoing Response to the Order to Show Cause why respondent should not subject to indefinite suspension has been served upon: Mahoning County Bar Association, Disciplinary Counsel Ronald Slipsky,

114 E. Front Street, Youngstown, Ohio 44503 via express mail this 8th Day of May, 2014.



Deneen Marie Marrelli, Esq.

Exhibit A

April 12, 2013

My address for the purposes of my Supreme Court of Ohio registration has consistently been 46 Walter Street, Campbell, Ohio 44405. When I initially moved to Florida in 2002 my daughter and I had been granted a civil protection order against respondent, my then husband Gerald Marrelli. Prior to relocating to Florida March of 2012 my daughter and I had been granted a civil protection order against respondent Dianne Amon, my mother. For these reasons my address for the purposes of my attorney registration has remained 46 Walter Street Campbell, Ohio 44405.

At no time did I rent office space from Paris & Paris, John Paris and I would co-counsel on cases of bankruptcy, domestic relations, and criminal law, Paul Robinson retained Paris & Paris and myself as counsel. When I asked John Paris for a fee agreement for Mr. Robinson to sign he informed me that he didn't use fee agreements for this type of matter. Mr. Robinson was fully aware that he had retained myself as well as Paris & Paris as his attorneys. For this reason the notice of appearance, request for continuance, and motion to withdraw bear our names. Mr. Robinson missed several scheduled appointments and most of our communication was conducted by phone. On July 27, 2010 Mr. Robinson did not appear in court, was verbally abusive and requested we withdraw from representation and we accordingly did so. Subsequently Mr. Robinson scheduled several appointments to obtain his file and ex-wives phone and failed to appear.

At no time has correspondence from the Supreme Court of Ohio not been accepted at the Walter Street address and has been forwarded to me with all due haste. I have continued to maintain the Walter Street address since arriving in Florida for the aforementioned reasons.

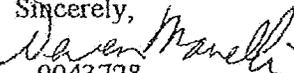
Sincerely,

0043728

Exhibit B

IN THE COUNTY OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

Case No. _____

SRI VENTURES LLC
Plaintiff(s)

-vs-

DENEEN MARELLI
Defendant(s)

COPY
COUNTY CIVIL DIVISION

MAY - 8 2013

SHARON R. BOCK
CLERK & COMPTROLLER

COMPLAINT FOR TENANT EVICTION

COUNT I - TO RECOVER POSSESSION

Plaintiff SRI VENTURES LLC sues

Defendant DENEEN MARELLI and alleges:

1. This is an action to evict a tenant from real property in Palm Beach, Florida
2. Plaintiff owns the following described real property in the county:
5271 STACY STREET, APT # A
WEST PALM BEACH, FL - 33417
3. Defendant has possession of the property under an oral written agreement to pay rent of \$ 775 payable weekly monthly other _____.
4. Defendant failed to pay rent due \$ 3875.
5. Plaintiff served defendant with a notice on 05/02/13 to pay the rent or deliver possession, but defendant refuses to do either.

WHEREFORE, plaintiff demands judgment for possession of the property against the defendant.

SIGNATURE! [Signature]

NAME! SRI VENTURES LLC

ADDRESS! 5002 Blaine Way

CITY, ST, ZIP! PBCH, FL - 33418

TELEPHONE! 561-848-1642

Date:

05/02/13

TO: [Name & address of tenant(s)]

DENBEN MARELLI
5271 STACY STREET, APT A
WEST PALM BEACH, FL 33417

FROM: [Name of landlord]

SRI VENTURES LLC

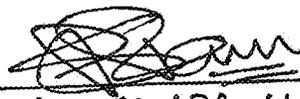
NOTICE TO TENANT PURSUANT TO CHAPTER 83.56 FLORIDA STATUTES

YOU ARE HEREBY NOTIFIED that you are indebted to me in the sum of \$3875.00 Dollars, for the rent and use of the premises located at:

5271 STACY STREET, APT # A
WEST PALM BEACH, FL - 33417

Palm Beach County, Florida, now occupied by you and that I demand payment of the rent or possession of the premises within 3 days (excluding Saturday, Sunday, and legal holidays) from the date of delivery of this notice, to wit: on or before the 7th day of MAY 2013.

Signature:



Name [print]:

SRI VENTURES LLC

Address:

5002 ELPINE WAY

PBC, FL - 33418

Telephone:

561-848-1647

Copy furnished tenant by:

- Personal Delivery Mail Posting

IN THE COUNTY COURT OF THE FIFTEENTH
JUDICIAL CIRCUIT, **CIVIL DIVISION**,
IN AND FOR PALM BEACH COUNTY, FLORIDA

SRI VENTURES

Plaintiff/Landlord,

vs.

DENEEN MARELLI

Defendant/Tenant.

CASE NO: 502013CC 13005462

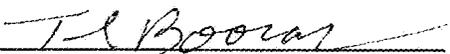
DIVISION: RB

DEFAULT (EVICTION)
(as to possession Count I only)

Defendant/Tenant has failed to deposit any money in the court registry as mandated by section 83.60(2) Fla. Stat. Said statute is not discretionary.¹ The Court is also precluded from scheduling a hearing on this matter by section 83.56(5) Fla. Stat.²

IT IS THEREFORE ORDERED AND ADJUDGED that Default is hereby **ENTERED**.

DONE AND ORDERED in West Palm Beach, Palm Beach County, Florida, this the 20
day of May, 2013.


TED BOORAS
COUNTY COURT JUDGE

Copies:
Parties

SIGNED & DATED

MAY 20 2013

COUNTY COURT JUDGE
TED S. BOORAS

¹Stanley v. Quest Intern. Inv., Inc., 50 So.3d 672 (Fla. 4th DCA 2010)

²Any tenant who wishes to defend against an action by the landlord for possession of the unit for noncompliance of the rental agreement or of relevant statutes shall comply with the provisions in s. 83.60(2). The court may not set a date for mediation or trial unless the provisions of s. 83.60(2) have been met, but shall enter a default judgment for removal of the tenant with a writ of possession to issue immediately if the tenant fails to comply with s. 83.60(2).

Exhib, + C

The Supreme Court of Ohio

09/03/2013

Deneen Marie Marrelli
2430 Deer Creek Club
Apt. 104
Deerfield Beach, FL 33442

0043728

Dear Ohio Attorney:

Thank you for your recent registration. This letter confirms that you have been granted **inactive** status, effective 09/01/2013. Under Gov. Bar R. VI, attorneys who register for inactive status are not entitled to:

- practice law in Ohio;
- hold themselves out as authorized to practice law in Ohio;
- hold nonfederal judicial office in Ohio;
- occupy a nonfederal position in Ohio in which they are called upon to give legal advice or counsel or to examine the law or pass upon the legal effect of any act, document, or law;
- be employed in the Ohio judicial system in a position required to be held by an attorney;
- practice before any nonfederal court or agency of this state on behalf of anyone except themselves.

If you have any questions or believe there has been an error in your registration, please contact the Office of Attorney Services at (614) 387-9320, or e-mail your inquiry to attyreg@sc.ohio.gov. Refer to your registration number 0043728. Please note that Gov. Bar Rule VI, Section 1(D), requires you to notify the Office of Attorney Services of any change of registration information.

Effective September 1, 2007, attorneys who are registered for inactive status will no longer be required to file a biennial Certificate of Registration. Accordingly you will not receive future registration mailings from the Supreme Court of Ohio. You will remain on inactive status until such time as you wish to change your status to active.

Also note that if you return to active status in less than two years from the date you went on inactive status and you had a continuing legal education deficiency at the time you went on inactive status, you may be required to cure such deficiency upon your return to active status and/or be recommended for sanction under Gov. Bar R. X in addition to meeting your other CLE requirements.

The Court appreciates your attention to the attorney registration and continuing legal education rules. If you have any questions, please contact us at 614.387.9320 or at attyreg@sc.ohio.gov.

Attorney Services
Change of Information and Replacement Card Request Form

Attorney registration number 0043728

Attorney name Deneen Marrelli

Section I. Change of Attorney Name

Please change my name on record with the Office of Attorney Services to the name listed below. Name change request should be accompanied by a copy of the name change order, such as marriage license, divorce decree, court order, etc.

New attorney name

| <i>First Name</i> | <i>Middle/1</i> | <i>Middle/2</i> | <i>Last Name</i> |
|-------------------|-----------------|-----------------|------------------|
|-------------------|-----------------|-----------------|------------------|

Section II. Change or Verification of Attorney Address

Please change or verify my address(es) as specified below.

| | | | |
|--|------------------------|--------------------------|--------|
| Residence Address | | Business or Firm Name | |
| <u>2430 Deer Creek C.C. Blvd Apt 104</u> | | | |
| Title or Position | | | |
| <u>Deerfield Bch</u> | <u>Broward</u> | | |
| City | County | Business or Firm Address | |
| <u>Florida</u> | <u>33442</u> | | |
| State | Zip | City | County |
| <u>D.Marrelli@Yahoo.com</u> | | | |
| E-mail address | State | Zip | |
| <u>N/A</u> | | | |
| Fax Number | Business or Firm Phone | | |

Section III. Request for Replacement Card

Please issue a replacement attorney registration card.

I am requesting a replacement card because (check one):

- I have a change of name.
- The card issued for the current biennium has been lost or destroyed.

I certify that the information I am providing on this form is true and accurate.

Deneen Marrelli Signature of Attorney (Required) August 30, 2013 Date

Print Form

REGISTRATION NUMBER: 0043728 BUSINESS OR FIRM NAME: N/A

NAME: Dante Marcelli TITLE OR POSITION:

RESIDENCE ADDRESS: 2430 Deer Creek Ct #404 BUSINESS OR FIRM ADDRESS:

Deer Field Bch Broward CITY: COUNTY: STATE/COUNTRY: ZIP:

Florida FLA COUNTY: 33442 STATE/COUNTRY: ZIP:

DATE ADMITTED TO OHIO BAR: 1989 F GENDER:

DATE OF BIRTH: 8/28/60

E-MAIL (please type or print clearly): D.Marcelli@yahoo.com

INDICATE APPROPRIATE STATUS AND LATE FEE IF APPLICABLE

Active (\$350 fee)

Inactive (No fee)

Corporate (Not applicable if admitted in Ohio; \$350 fee)

\$50 late fee (See Instructions)

\$300 reinstatement fee (See Instructions)

PLEASE CHECK EVERY RACE YOU CONSIDER YOURSELF TO BE

American Indian or Alaska Native

Asian

Black or African American

Native Hawaiian or Pacific Islander

White

ARE YOU HISPANIC/LATINO? Yes No

CERTIFICATION

I certify that the information I am providing on this form is true and accurate.

Signature: Dante Marcelli DATE: Aug 30, 13

SIGNATURE OF ATTORNEY

Make check or money order payable to THE SUPREME COURT OF OHIO

Amount: _____

DO NOT DETACH LOWER PORTION OF FORM.

IOLTA & IOTA Account Registration Form

| | | | |
|---|--|--|---|
| Step 1 | CONFIRM/UPDATE CONTACT INFORMATION | Registration Number: <u>0043728</u> | Attorney Name: |
| Step 2 | <p>Step 2: There are several possible exemptions to the IOLTA and/or IOTA provisions. You may be exempt from IOLTA, but not IOTA, or vice versa, or exempt from both. If exempt from both, check the correct box for the IOLTA and IOTA exemption. IF NOT EXEMPT, PLEASE PROVIDE ACCOUNT INFORMATION IN STEP 3.</p> <p>A. IOLTA: I am exempt from the requirements to maintain and register an IOLTA account under RC §4705.09 because (check one):</p> <p><input checked="" type="checkbox"/> My employer or I do not handle funds owned by my client(s); I am on inactive status with the Supreme Court; I am retired or unemployed, or I am a corporate or government attorney, OR</p> <p><input type="checkbox"/> I am primarily situated outside of Ohio and use my IOLTA account in _____ (state).</p> <p>B. IOTA: I am exempt from the requirements to maintain and register an IOTA account under RC §3953.231 account because:</p> <p><input type="checkbox"/> I am NOT a licensed title insurance agent in Ohio.</p> | | |
| Step 3 | CONFIRM/UPDATE ACCOUNT(S) INFORMATION IF APPLICABLE | | |
| SECTION A: Account Registration | | | |
| First Account | Account Name: | Account Holder | Type |
| | Account Number: | <input type="checkbox"/> Individual <input type="checkbox"/> Firm | <input type="checkbox"/> IOLTA <input type="checkbox"/> IOTA |
| Second Account | Account Name: | Account Holder | Type |
| | Account Number: | <input type="checkbox"/> Individual <input type="checkbox"/> Firm | <input type="checkbox"/> IOLTA <input type="checkbox"/> IOTA |
| Third Account | Account Name: | Account Holder | Type |
| | Account Number: | <input type="checkbox"/> Individual <input type="checkbox"/> Firm | <input type="checkbox"/> IOLTA <input type="checkbox"/> IOTA |
| <input type="checkbox"/> Sheet attached listing additional IOLTA and IOTA accounts. | | | |

QUESTIONS: Contact the Ohio Legal Assistance Foundation at www.ohlaf.org or 614.715.8580.

Exhibit D

April 12, 2013

My address for the purposes of my Supreme Court of Ohio registration has consistently been 46 Walter Street, Campbell, Ohio 44405. When I initially moved to Florida in 2002 my daughter and I had been granted a civil protection order against respondent, my then husband Gerald Marrelli. Prior to relocating to Florida March of 2012 my daughter and I had been granted a civil protection order against respondent Dianne Amon, my mother. For these reasons my address for the purposes of my attorney registration has remained 46 Walter Street Campbell, Ohio 44405.

At no time did I rent office space from Paris & Paris. John Paris and I would co-counsel on cases of bankruptcy, domestic relations, and criminal law. Paul Robinson retained Paris & Paris and myself as counsel. When I asked John Paris for a fee agreement for Mr. Robinson to sign he informed me that he didn't use fee agreements for this type of matter. Mr. Robinson was fully aware that he had retained myself as well as Paris & Paris as his attorneys. For this reason the notice of appearance, request for continuance, and motion to withdraw bear our names. Mr. Robinson missed several scheduled appointments and most of our communication was conducted by phone. On July 27, 2010 Mr. Robinson did not appear in court, was verbally abusive and requested we withdraw from representation and we accordingly did so. Subsequently Mr. Robinson scheduled several appointments to obtain his file and ex-wives phone and failed to appear.

At no time has correspondence from the Supreme Court of Ohio not been accepted at the Walter Street address and has been forwarded to me with all due haste. I have continued to maintain the Walter Street address since arriving in Florida for the aforementioned reasons.

Sincerely,

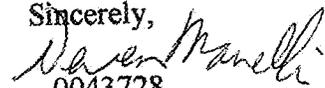

0043728

Exhibit E

DR-06-312259

Paul Robinson correctly states that he was referred to me by my mother. We spoke at length by phone and arranged several appointments to meet at the offices of Paris and Paris. He did not show up and did not call to cancel these appointments. Mr. Robinson was distressed because he believed his minor daughters were in fact the result of an incestuous relationship between his former father-in-law and his ex wife. He wanted custody even though he maintained he was not the natural father of the children. He further maintained that his former father-in-law was desperate that the incestuous relationship not be revealed and that his own life was in jeopardy. He told me that he had reason to believe his attorney Katherine A. Friedall was not zealously representing him and was probably being paid by his former father-in-law to jeopardize his interests.

Paul Robinson also maintained that his former wife was having sexual relations with a minor in the presence of his minor daughters and asserted that the minor daughters were victims of sexual abuse by their mother and grandfather. I informed him that his daughters should be seen by a child psychologist.

On July 20, 2010, Paul Robinson had a scheduled appointment to meet with myself and John Paris. He was 90 minutes late and called to let me know he was downstairs at John Q's and would I please come downstairs. He refused to come upstairs to the office and demanded that I come downstairs. When I did as he requested I was alarmed to see his minor children were present. Due to the sensitive nature of the allegations it was clearly inappropriate to have a meaningful conversation regarding the case in their presence. At this point, Paul Robinson retained myself and John Paris and asked me to request a continuance. He was not staying at his residence and believed his former wife and former father-in-law were conspiring against him. He was taking his daughters out of town. I requested continuance at that time.

On the same date a notice of appearance was filed along with a continuance for the hearing set for July 23, 2010. However this motion was opposed by opposing counsel and Mr. Tom Paris appeared and the case was reset for pretrial July 27, 2010.

I reviewed the file with John Paris and contacted his former attorney Katherine A. Friedall. In confidence she informed me that she believed the children were in danger and should be removed from Mr. Robinson. She stated that she had called Children's Services to facilitate their removal.

On July 27, 2010, I appeared to go forward before Magistrate Kelly. Mr. Robinson was not at court. I called him repeatedly and informed him that Magistrate Kelly demanded that he come to the courthouse. Initially he told me he was on his way to the hospital because his daughter had chicken pox. I found this unusual due to the immunization requirement for school-age children. I spoke to him again and he informed me that Children's Services had blocked him in his driveway and he would be unable to appear for court. He then fired me.

Magistrate Kelly was familiar with the case due to Mr. Robinson's prior dealings with the court because he believed the children were in danger and that I needed protection as well. He called a court reporter and instructed me to file a motion to withdraw as counsel. I went to my office, prepared the motion, returned to court and we went on record.

I spent many hours on the phone with Mr. Robinson. He believed persons were breaking into his house and did not understand why the police were not responding. I also spoke to his alarm service because they were not responding. He also informed me that he had gone to the F.B.I. When the police did go to Mr. Robinson's home he was taken to a facility for psychological evaluations and released. Subsequent to his release he assaulted his mother who obtained a civil protection order. Mr. Robinson also informed me that he and his daughters were subjects of an Amber Alert.

Once again, Mr. Robinson continually did not show up at the office to sign for his file and to collect the cell phone of his ex-wife.

Exhibit F

Paul Robinson
8076 Thornhurst Dr.
North Royalton, OH 44133

STATEMENT

Deneen Marrelli Legal Hours - Document review and Court appearances, and numerous phone consultations.

| | | |
|--|------------------------|------------|
| | 10 HRS @ \$ 150.00/ hr | \$ 1150.00 |
| Thomas Paris Legal Hours - Case review and document review, one court appearance | 3 HRS @ \$ 150.00/ hr | \$ 450.00 |
| Paralegal Hours - Preparation of Motions and research | 3 HRS @ \$ 100.00/ hr | \$ 300.00 |
| John Paris Legal Hours - Case review and document review | 2 HRS @ \$ 150.00/ hr | \$ 300.00 |

Total hours - 18 hours
Total Cost - \$ 2200.00

09/03/2010 N/A SR HEARING SCHEDULED, NOTICE(S) SENT
08/11/2010 N/A SR HEARING SCHEDULED, NOTICE(S) SENT
08/11/2010 N/A SC FULL HEARING SET FOR 09/02/2010 AT 10:00 IN ROOM 142 BEFORE
MAGISTRATE PATRICK R. KELLY. MO.# 303629 FILED ON 07/27/2010
MOTION TO WITHDRAW AS ATTORNEY OF RECORD MO.# 302661 FILED
ON 07/08/2010 MOTION TO TERMINATE SHARED PARENTING MO.# 301351
FILED ON 06/14/2010 MOTION FOR ATTORNEY FEES MO.# 301350 FILED
ON 06/14/2010 MOTION TO SHOW CAUSE (NON-VISITATION) (POST-
DECREE) MO.# 301349 FILED ON 06/14/2010 MOTION TO TERMINATE
SHARED PARENTING MO.# 300108 FILED ON 05/20/2010 MOTION FOR
REFERRAL TO FAMILY CONCILIATION SERVICE MO.# 300107 FILED ON
05/20/2010 MOTION TO APPOINT GUARDIAN AD LITEM MO.# 300106 FILED
ON 05/20/2010 MOTION TO MODIFY PARENTAL RIGHTS &
RESPONSIBILITIES (POST-DECREE) MO.# 299620 FILED ON 05/07/2010
MOTION TO SHOW CAUSE (NON-VISITATION) (POST- DECREE)

08/04/2010 D2 CS CLERK FEE MOTION TO TERMINATE SHARED PARENTING FILED 6/10/10
08/04/2010 D1 CS COMPUTER FEE
08/04/2010 D1 CS CLERK FEE MOTION TO SUSPEND VISITATION FILED 7/8/10
07/29/2010 D JE PLTF'S MOTION TO WITHDRAW #303481 IS HEREBY GRANTED. COST TO
PLTF O.S.J. NOTICE ISSUED

07/27/2010 D1 MO D1 PAUL ROBINSON MOTION TO WITHDRAW AS PLTF'S COUNSEL DENEEN
MARRELLI 0043728

07/27/2010 D JE MOTION IS GRANTED: IT IS ORDERED THAT THE MATTER IS SCHEDULED
ON 07/27/2010 01:30 PM BEFORE MAGISTRATE PATRICK R KELLY ROOM
142 O.S.J. NOTICE ISSUED.

07/23/2010 N/A SR HEARING SCHEDULED, NOTICE(S) SENT
07/23/2010 N/A SC FINAL PRETRIAL SET FOR 07/27/2010 AT 01:30 IN ROOM 142 BEFORE
MAGISTRATE PATRICK R. KELLY. MO.# 302661 FILED ON 07/08/2010
MOTION TO TERMINATE SHARED PARENTING MO.# 301351 FILED ON
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06/14/2010 MOTION TO SHOW CAUSE (NON-VISITATION) (POST- DECREE)
MO.# 301349 FILED ON 06/14/2010 MOTION TO TERMINATE SHARED
PARENTING MO.# 301347 FILED ON 06/14/2010 MOTION FOR EVALUATION
MO.# 300108 FILED ON 05/20/2010 MOTION FOR REFERRAL TO FAMILY
CONCILIATION SERVICE MO.# 300107 FILED ON 05/20/2010 MOTION TO
APPOINT GUARDIAN AD LITEM MO.# 300106 FILED ON 05/20/2010 MOTION
TO MODIFY PARENTAL RIGHTS & RESPONSIBILITIES (POST-DECREE)

07/22/2010 D2 OT D2 JAYME ROBINSON NOTICE TO EXERCISE OF PARENTING TIMES. JILL
FRIEDMAN HELFMAN 0038846

07/21/2010 D2 BR D2 JAYME ROBINSON BRIEF IN RESPONSE TO PLTF'S "NOTICE TO COURT
REGARDING INCONSISTENCY"; BRIEF IN OPP TO PLTF'S MOTION TO
SUSPEND DEFT'S POSSESSION. JILL FRIEDMAN HELFMAN 0038846

07/21/2010 D2 BR D2 JAYME ROBINSON BRIEF OPPOSING PLTF'S MOTION FOR
CONTINUANCE. JILL FRIEDMAN HELFMAN 0038846

07/20/2010 D1 OT D1 PAUL ROBINSON ENTRY OF APPEARANCE. JOHN T PARIS 0029670

07/20/2010 D1 MO D1 PAUL ROBINSON MOTION FOR CONTINUANCE JOHN T PARIS 0029670

07/16/2010 D JE MOTION IS GRANTED AND KATHERINE A. FRIEDEL AND THE FIRM OF
SCHOONOVER & ROSENTHALL LLC SHALL NO LONGER REPRESENT PLTF.
O.S.J. NOTICE ISSUED

07/14/2010 D2 OT D2 JAYME ROBINSON NOTICE OF PLACE TO EXERCISE PARENTING
TIMES. JILL FRIEDMAN HELFMAN 0038846

Exhibit G

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