

[REDACTED]

From: Greenberg, Douglas <Douglas.Greenberg@[REDACTED]>
Sent: Friday, August 20, 2010 11:28 AM
To: 'Traci Greenberg'
Subject: RE: Notes from Gary Roberts at Schwabe

Thanks. I agree with order.

-----Original Message-----

From: Traci Greenberg [<mailto:traciwilliams@mac.com>]
Sent: Friday, August 20, 2010 11:21 AM
To: Greenberg, Douglas [REDACTED]
Subject: Notes from Gary Roberts at Schwabe

Doug,

Here is a brief synopsis of my conversation with Gary. Please feel free to forward to Peter... I outlined to him the situation. Tell Peter, Gary has great respect for him.

He spoke with Sylvia Stevens at the Bar.

Rule changes fairly recently (2006) applies.

Rule 4.4 in the code of ethics/prof. conduct

If a lawyer receives documents and knows he probably shouldn't have, (may or not have been inadvertant) he is required to promptly notify sender.

No additional duty other than that.

NOT required to destroy.

Actually she said there's an ethically duty to use until stopped.

Time is of the essence.

For example, on Day 1. got docs.

Day 2. notified opposing counsel

Day 3 should file a motion and put the doc to any use want.

They would have to file a motion to stop.

Potentially Hull wouldn't even be able to prevent them from being used, because his negligence in reading what [REDACTED] compiles isn't "inadvertant" it's simply lazy lawyering. A quick glance through the docs would have shown that there were PAGES of info that shouldn't have been sent. If he didn't review and sent docs "en masse" not an excuse...

Gary said the bar takes a more aggressive posture on this type of situation.

He said the issue of threatening to take the kids is important. we have legitimate concerns. He said the real problem is to get custody, but that will not be enough, we need supervised visitation.

He said the info would be helpful in getting a stronger restraining/ stalking order to keep [REDACTED] away from me and my kids.

He said it would Peter's call whether to file a bar complaint - and he would for sure do it afterwards.... Lawyers are supposed to help people, not create problems.

Peter can call him at home: [REDACTED]

Obviously, [REDACTED] well being right now is a priority. Timing wise, as soon as that's taken care of, I want to move forward on the protective order for me and Hannah and Daniel. As I mentioned before, I can't continue to live like this.