

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

JOHN B. THOMPSON,

Plaintiff,

v.

Case No. 07-21256 (Judge Adalberto Jordan)

THE FLORIDA BAR and
DAVA J. TUNIS,

Defendants.

**PLAINTIFF'S FURTHER AND HOPEFULLY FINAL RESPONSE IN
OPPOSITION TO KENT'S MOTION TO INTERVENE IN THIS ACTION**

COMES NOW plaintiff, John B. Thompson, hereinafter Thompson, as an attorney on his own behalf, and hereby responds further to Norm Kent's motion to intervene, stating:

1. Norm Kent, noted disseminator to the general public of material which this court calls "obscenity," seeks now to intervene in this action by his motion filed at 10:30 pm, October 8, literally on the eve of this court's hearing the next day on its then stayed show cause order against Thompson.

2. The court's vacating of that order after its hearing thereon, does not end the intervention issue, even though Mr. Kent was seeking, nonsensically, this court's order that it instruct the *Ad Hoc* Committee to allow him to address it about Thompson's alleged ethics lapses. The Bar asserts that Mr. Kent has nothing to do with Thompson's ethics prosecution. Mr. Kent's bizarre motion and his presence in the courtroom on a matter that The Bar says does not involve Mr. Kent indicate otherwise. The Bar, in the state proceedings denies discovery by Thompson about Kent's collaboration with it Mr. Kent.

3. Kent, of course, should know that it *was* up to the Committee to decide who would appear before it, not this court. After all, that is what committees are for—to do their own business that is before them. Now they have no business as to Thompson, so this court need not allow an intervention to order the Committee to allow Mr. Kent to appear about a matter that does not exist.

4. But Mr. Kent still wants this court to allow him to intervene so that he can secure the three photos that were in this court file because he was disseminating them by means of his official, Bar-regulated law firm web site, www.normkent.com, and his www.nationalgaynews.com and www.justusboys.com.

Mr. Kent *specifically* represents to this court that he does not have those pictures, and he now wants to see them because law enforcement has them. He wants specifically, he tells this court, to intervene in this action so that the court will unseal those pictures and give them to him. **He represents to this court that he does not have them.**

5. Thompson would be happy to provide them to Mr. Kent, but as is so often the case with Mr. Kent, he has now been caught in a prevarication now embodied in his very motion to intervene. **Thompson in fact sent these materials that Kent says he does not have to Mr. Kent's lawyer, Alvin Entin, who responded to receiving all these materials, that are now under seal by this court, as follows:**

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ENTIN & DELLA FERA, P.A.
A Professional Association

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ALVIN E. ENTIN
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**Also admitted Washington and New York
Guatemala

OF COUNSEL:
*MARIO PERMUTH
JOSHUA M. ENTIN
ROBERT L. SWITKES
* Only Admitted

September 28, 2007

3. While in your serial and myriad responses to this Rule to Show Cause, you have labored to indicate that the public would have to go through some trouble to find the revolting pictures you attached. Such was not the case with the correspondence that you have seen fit to forward to my office which has been unfortunately seen by my secretaries and staff. They appreciate it as little as Judge Jordan did. Candidly, if you want to keep this garbage up of filing meritless Bar complaints, the next complaints out of my office will come from my secretarial staff who have been inundated with your unwelcomed emails, faxes, and images. They did not have to labor to be exposed to this garbage. They only had to go to the fax machine.

6. So here we have Mr. Kent telling this court he does not have something that in fact he does have, all in order to engage in an intervention subterfuge.

7. In passing, it is interesting that Mr. Entin is so exercised that his secretaries are supposedly offended by the images that he has received, yet Mr. Entin, who has since written Thompson twice and asserted twice that this court has found Thompson to be “an obscenity trafficker,” has apparently not suggested to Mr. Kent that he might do well not to make such materials available to children. Mr. Entin has been informed that his client’s dissemination of these materials to the general public should stop, or the plaintiff will have to continue to alert him to what his client is doing.

8. Mr. Kent’s misrepresentation to this court that he does not have what in fact his lawyer has is an unethical act by a lawyer in this federal case, which should in fact be sent to the *Ad Hoc* Committee, and Thompson strongly urges the court to do just that.

9. Needless to say, this court need not allow intervention to give Mr. Kent anything, and further, this court need not give him what he and his lawyer already have.

10. This is typical of the mendacity and the unethical conduct that Thompson has put up with from this fellow for twenty years now. The Florida Bar couldn't care less.

11. The *Ad Hoc* Committee should care. This fellow filed a false pleading in this case. The court should refer the matter to the Committee. It would be about time.

I HEREBY CERTIFY that this has been served upon record counsel this 10th day of October, 2007, electronically.

/s/ JOHN B. THOMPSON, Plaintiff
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