

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, JOHN HARKNESS,
AND FRANK ANGONES,

Defendants.

PLAINTIFF'S MOTION FOR JUDICIAL NOTICE

COMES NOW petitioner, John B. Thompson, (Thompson) an attorney on his own behalf, and asks the court to take judicial notice of the below news article regarding defendant, The Florida Bar's record counsel herein, stating:

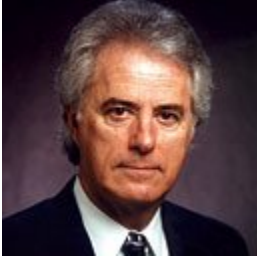
The below news article appearing this day in the *National Law Journal* proves that God has a sense of humor.

Barry Richard is set to hold forth tomorrow evening about the "Bush administration's [alleged] assault on American liberties" while he, Mr. Richard, lies to this court about the holdings in certain abstention cases in order, knowingly, to facilitate his client's criminal assault upon plaintiff's "American liberties." This is the most unintentionally funny news story plaintiff has read in quite sometime. Here it is:

Bush's Recount Lawyer Blasts Administration

Julie Kay
[The National Law Journal](#)
November 9, 2007

 [Printer-friendly](#)  [Email this Article](#)  [Reprints & Permissions](#)



Greenberg Traurig's Barry Richard

Barry Richard, the Greenberg Traurig lawyer who achieved fame for his successful representation of George Bush in the *Bush v. Gore* recount suits, is set to give a speech blasting the Bush administration Saturday night.

Richard will be the keynote speaker at the National Association of Former U.S. Attorneys' annual conference starting Thursday and running through Saturday at the Ritz Carlton Hotel in Miami Beach, Fla.

More than 100 former U.S. Attorneys are expected to attend the conference, which will also feature a panel discussion on the controversial U.S. Attorney firings by former Attorney General Alberto Gonzalez. That panel -- scheduled for Saturday afternoon -- will feature two of the eight former U.S. Attorneys who were allegedly fired over politics last year: David Iglesias, former U.S. Attorney in New Mexico and John McCay, former U.S. Attorney of the Western District of Washington. Additionally, James Eisenstein, a law professor at Pennsylvania State University Dickinson School of Law, will serve on the panel.

The conference requires preregistration.

But the session that is expected to ignite the most fireworks is the dinner speech by Richard. Richard said in an interview he has never spoken out against the Bush administration before and that he did not reveal the topic of his speech when asked to speak by NAFUSA.

"I'm sure people will see my name on the program and expect I will be defending the administration," said Richard, a Tallahassee, Fla., lawyer.

"But I'm a constitutional lawyer. I am concerned with the Bush administration's assault on American liberties ... how the administration deals with habeas corpus and the administration's posture on electronic surveillance. This administration has gone farther than any other."

Richard, a longtime Democrat, said he doubts his public stance Saturday will cost him any jobs but hopes it will gain him some. "The Republicans didn't hire me cause they liked my views, they hired me for my legal abilities, and I assume they would again," he said.

However, Richard acknowledged that he has had few jobs representing Democrats since the highly publicized 2000 case and he chafes at being viewed as "a Republican mouthpiece."

"What I was proud of was that before 2000 I represented both parties," he said. "I would like to get back to neutral."

<http://www.law.com/jsp/article.jsp?id=1194516250476>

Mr. Richard, of course, does not stop with going after the President. He informs us, above, what a fine lawyer he is:

Mr. Richard is "neutral"? Plaintiff and other targets (Miles Gopman, etc.) of The Bar's selective prosecution and its shredding of their constitutional rights look forward to hearing when the neutral Mr. Richard represents his first Bar ethics respondent. New York Mayor Koch once famously said that "A conservative is a liberal who has been mugged by reality." Plaintiff is fond of saying that "A civil libertarian is a Republican who has been indicted."

Mr. Richard should be indicted for his willing involvement in a criminal conspiracy to violate others' civil rights. Maybe then Mr. Richard would become someone who *really* believes in civil liberties rather than merely a mouthpiece who utters constitutional platitudes for \$500 an hour.

This court has before it a motion for a show cause order regarding misconduct by Mr. Richard in this case. It should set the matter for a hearing.

I hereby certify that the foregoing has been provided to opposing counsel through the court's electronic filing system, this November 9, 2007.

/s/ JOHN B. THOMPSON, Plaintiff
Attorney, Florida Bar #231665
1172 South Dixie Hwy., Suite 111
Coral Gables, Florida 33146
Phone: 305-666-4366
amendmentone@comcast.net