

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.

**SUPPLEMENT TO PLAINTIFF'S VERIFIED MOTION FOR ORDER TO SHOW
CAUSE AND MEMORANDUM OF LAW IN SUPPORT THEREOF**

COMES NOW plaintiff, John B. Thompson, hereinafter Thompson, as an attorney on his own behalf, and supplements his verified motion for an order to show cause, directed to Barry Richard of Greenberg, Traurig, why he and his subordinate, supervised attorneys herein should not be referred to this District Court's Ad Hoc Committee for Lawyer Discipline, stating:

Plaintiff in his show cause motion asserted that there is a "culture of corruption" at the Greenberg, Traurig firm which makes it a perfect fit as outside general counsel for a dissembling Bar.

In furtherance of that view, the court is apprised hereby of a long list of scandals involving the Greenberg, Traurig law firm at http://en.wikipedia.org/wiki/Greenberg_Traurig#Other_controversies.

Of particular interest are the following two items, as they mirror the fraud by Barry Richard perpetrated upon this court:

In December 2008, the firm and several current and former firm attorneys (Harley Lewin, Steven Wadyka and Janet Shih-Hajek) were sued in the U.S.

District Court for the Eastern District of Virginia by Catherine and Richard Snyder of Herndon, Virginia. Also named in the suit, Greenberg Traurig's client, [Diane Von Furstenberg Studios](#), [Conde Nast Publications](#), [The New Yorker](#) and *New Yorker* staff reporter, Larissa MacFarquhar. The Snyders' suit stems from a suit filed in the same court by Diane Von Furstenberg Studios against Catherine Snyder in December 2006 for trademark infringement, which resulted in an award of damages to [DVF Studios](#). The Snyders' complaint alleges, among other things, that the **Greenberg attorneys made false statements to the court** when applying for a search warrant and that one (Wadyka) impersonated a federal officer by flashing a badge and stating that he was with the office of the [U.S. Attorney](#). The suit also alleges that the attorneys failed to post a required bond and that the search of the Snyders' home exceeded the scope of the warrant and resulted in the seizure of many personal items. The suit also alleges that the firm's attorneys improperly brought *New Yorker* staff reporter MacFarquhar, who was profiling Lewin for a forthcoming article, into the Snyders' home while conducting their raid in December 2006 pursuant to the search warrant.^[27]

AND

In November 2008, a New York State court refused to dismiss a suit alleging that Robert J. Ivanhoe, chairman of Greenberg Traurig's [New York](#) office and head of its real estate group, disregarded his "legal and fiduciary duties" by taking a personal financial stake in a competitor to a client that had invested in a multibillion-dollar real estate venture.^[18] **The former client had sued Ivanhoe**

and Greenberg Traurig in April 2008 for breach of fiduciary duty, aiding and abetting breach of fiduciary duty, tortious interference with prospective economic damages, and malpractice. Greenberg Traurig said that the allegations were "without merit" and that it would appeal the ruling.^[19]

Plaintiff and this court are simply the latest victims of this firm's culture of corruption.

Here, finally, is a damning slip. The Florida Supreme Court in its Disbarment Order, attached hereto as an exhibit, places Barry S. Richard on its service list to receive the order. Mr. Richard and Greenberg Traurig were not parties in the disbarment proceedings. He and his firm had no disclosed role in any of it.

And yet by this inadvertent disclosure the Florida Supreme Court reveals that this outside law firm was up to its eyeballs in shepherding the disciplinary process through its various levels, making sure that Thompson had no hearing of his constitutional defenses at ANY of them!

This really has morphed from a drama into a farce. Greenberg, Traurig tells this court that Thompson will be able to make his constitutional arguments every step of the way within the disciplinary Leviathan, and yet, apparently from the innermost reaches of that process, Greenberg Traurig was making sure that the last thing The Bar would give him was a consideration of the Constitution.

Every other person the Florida Supreme Court put on its service list for the Disbarment Order had a direct involvement in it, and that includes Greenberg Traurig, that, like the Wizard of Oz, was pulling the levers behind the curtain in order to protect its multi-million-dollar rip-off of Bar members' dues.

I HEREBY CERTIFY that this has been served upon record counsel this 18TH day of August, 2009, by the court's electronic system.

/s/ JOHN B. THOMPSON, Plaintiff
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