

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 MOTION FOR LEAVE TO FILE DOCUMENT

COMES NOW plaintiff, John B. Thompson, hereinafter Thompson, as an attorney on his own behalf, and moves this court for leave to file the attached document, a letter to partners in two powerful law firms, stating:

1. The Bar, along with the originating Bar complainants, the law firms of Tew Cardenas and Blank Rome, seek to “discipline” plaintiff/respondent Thompson for First Amendment-protected “petition speech” by him to Florida Governor Jeb Bush and to President George W. Bush. Defendant Dava Tunis’ helpful filing of the two Bar complaints makes that patently clear. Letters to both Bushes are listed by The Bar as missives that constituted “unethical” conduct by Thompson.

2. Further, what particularly animated both Tew Cardenas and Blank Rome, were Thompson’s assertions that both firms enjoy a favorable lobbying and financial relationship with both Bushes. Al Cardenas, through his partner and fellow Bar complainant Larry Kellogg, stated that the Bar complaint was filed against Thompson because he sent a letter to Jeb Bush. Defendant Tunis’ filing of the two Bar complaints prove that Cardenas admission!

3. Further, since The Bar, Tew Cardenas, and Blank Rome variously allege that Thompson has fraudulently and unethically identified the actual relationship between the Bushes and their respective lobbyist/law firms, then Thompson is entitled to discovery as to just what that relationship is and to establish that it is precisely as Thompson alleged.

4. However, defendant referee Tunis has gone so far as to refuse to execute a subpoena for Al Cardenas, even though he is listed as a witness on The Bar's trial witness list. She can be counted upon to refuse to the execute the two Bush subpoenas as well. Plaintiff will alert the court if that changes. This obstruction by the referee is precisely why this federal court must enjoin The Bar from its ongoing denials to Thompson of basic due process, even to the point of discovery by way of depositions guaranteed by The Bar's own procedural Rules.

I HEREBY CERTIFY that this has been served upon record counsel this 5th day of September, 2007, electronically.

/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