Lu v. Hulme et al Doc. 14 Att. 1

-----Exhibit 1

Lu v. Hulme, BPL Trustees

Wednesday, December 19, 2012 3:31 PM

From: "Driscoll, Caroline" < Caroline. Driscoll@cityofboston.gov>

To: "Friedrich Lu" <x2flu@yahoo.com>

Dear Mr. Lu,

I was informed recently that you are required to file a copy of Judge Wolf's March 29, 2002 Order in case # 00-11492-MLW and to affirm compliance with Judge Wolf's order for any cases in the federal district courts in Massachusetts.

The docket in your matter currently pending against Mr. Hulme and the Trustees of the BPL indicates that you failed to do so. Therefore, in light of Judge Wolf's order, I intend to file a motion for sanctions and fees tomorrow evening. I am sending you this email per Local Rule 7.1 to notify you of our intentions and to attempt to resolve this matter.

At this time, the Trustees of the BPL would like to reiterate that you are free to use the library as any other patron. Likewise, the Trustees and Mr. Hulme believe that there was no violation of your civil rights on June 13, 2012, as you set forth in your Complaint.

If you would be willing to dismiss this matter, it would be in all parties' interests to avoid further litigation. If dismissal is not an option for you, I will forward to you a copy of the motion as filed tomorrow evening, December 20, 2012.

Thank you,

Caroline

Caroline O. Driscoll
Assistant Corporation Counsel
City of Boston -- Law Department
City Hall, Room 615
Boston, MA 02201
(617) 635-4925
Caroline.Driscoll@cityofboston.gov
------Exhibit 2

Re: Lu v. Hulme, BPL Trustees

Thursday, December 20, 2012 2:20 PM From: "Friedrich Lu" <<u>x2flu@yahoo.com</u>>

To: "CarolineDriscoll" < Caroline.Driscoll@citvofboston.gov>

- (1) Naturally I have thought any claim like you made yesterday was outlandish (as a nonparty to benefit from an order that even does not include the nonparty).
- (2) Today I have searched jurisprudence and treatises for any trace of such claim and found none. I ask you to base the vowed motion on authorities you can muster. Otherwise I will attach these three emails (one from you and two from me, including the instant one) and request Fed Rule Civ Proc 11 sanction.

OFFICE OFFICE

-----Exhibit 3

RE: Lu v. Hulme, BPL Trustees

Thursday, December 20, 2012 3:25 PM

From: "Driscoll, Caroline" < Caroline. Driscoll@cityofboston.gov>

To: "Friedrich Lu" <<u>x2flu@yahoo.com</u>>

Message contains attachments 2 Files (3965KB): Exhibits for; D's Motion f

Dear Mr. Lu,

The legal basis for this motion is set forth in the attached memorandum of law and exhibits, which I have filed. Specifically, please refer to Exhibit B (Judge Wolf's 2002 Order).

Judge Wolf's order applied to your case against Harvard Dental, et al., and to any future case you filed in the federal district court of Massachusetts; the order was not limited to one or more specific parties.

Thank you,

Caroline

Caroline O. Driscoll
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