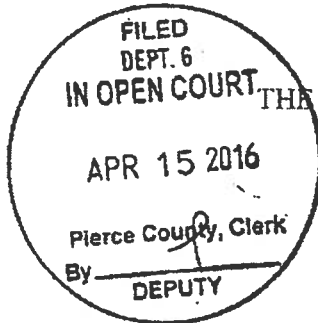


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07-2-11635-0 46732286 ORG 04-18-16



THE HONORABLE JACK F. NEVIN

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4/18/2016

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF PIERCE

TED SPICE, PLEXUS DEVELOPMENT,  
LLC, and DORIS E. MATHEWS,

No. 07-2-11635-0

Petitioners/Plaintiffs,

**FINDINGS OF FACT,  
CONCLUSIONS OF LAW AND  
ORDER GRANTING CITY OF  
PUYALLUP CR 11 SANCTIONS  
AGAINST ATTORNEY CAROLYN  
A. LAKE**

vs.

PIERCE COUNTY, a political subdivision,  
and CITY OF PUYALLUP, a municipal  
corporation,

Respondents/Defendants.

THIS MATTER came before the Court on Respondent/Defendant *City of Puyallup's Renewed Motion for Award of CR 11 Attorneys' Fees and Costs*, dated August 28, 2015. Having reviewed the motion and all materials filed in support and in opposition, along with other pleadings previously filed in this case, having considered the law regarding Rule 11, having heard argument by attorneys for the parties, having rendered an oral decision on December 11, 2015 and further explained that decision at a hearing on January 15, 2016, the Court now: **GRANTS** the motion in part, finding a CR 11 violation against attorney Carolyn Lake and awarding CR 11 fees and costs in the amount of \$45,000 against attorney Carolyn A. Lake; **DENIES** the motion in part, finding no CR 11 violation against Plaintiff Ted Spice or attorney Stephen M. Hansen or his law firm; and **ORDERS** that final judgment be entered on the fee award.

**FINDINGS, CONCLUSIONS, AND ORDER  
GRANTING CITY OF PUYALLUP CR 11  
SANCTIONS AGAINST CAROLYN LAKE AND  
GOODSTEIN LAW GROUP - 1**

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Mathews had died, and to correct the improperly entered orders and judgment.

40. Instead the Court awards the City CR 11 sanctions in the amount of \$45,000,  
which the Court finds to be a fair and reasonable amount given the nature and extent of this  
litigation and how far it was allowed to proceed before the fact of Ms. Mathews' death was  
disclosed, for Ms. Lake's failure to make a reasonable inquiry into the death of her client,  
Ms. Mathews, and as a sanction for deterrence. This amount is a sanction award, and not  
intended as attorneys' fees and costs incurred by the City for the work of its attorneys  
(Walter, Yamamoto and Waldbaum). However, this sanction award may have the effect of  
offsetting some of the fees and costs attributable to Ms. Lake's failure prior to filing the  
first notice of appeal on October 10, 2013 to advise this Court or the Defendants of the  
death of Ms. Mathews, which violated CR 11, as well as her misrepresentation on pleadings  
filed with this Court intimating that Ms. Mathews was still alive, and her continued signing  
of pleadings on her behalf following her death in December 2009, and for the other reasons  
announced in the Court's oral decision on December 11, 2015. At least this amount of  
attorneys' fees and costs would not have been incurred but-for the actions and omissions by  
Plaintiffs' attorney Carolyn Lake following the death of her client, Plaintiff Doris Mathews.

41. Attorney Lake's actions following the death of Doris Mathews, without  
advising the Court or the Defendants of her client's death, were advanced without  
reasonable cause or inquiry within the meaning of CR 11, thus entitling the City to \$45,000  
in sanctions, which may also offset some of the City's attorneys' fees and costs, and for the  
reasons announced in the Court's oral decision on December 11, 2015. In making this  
determination, the Court specifically finds:

- a. That all substantive actions taken in this case relating to Doris Mathews, following her death on December 8, 2009, were null, void and without legal effect;
- b. That Ms. Mathews, and following her death her Estate, is a necessary and indispensable party to this lawsuit and to recovery under either the LUPA claim or the Ch. 64.40 damages claim (the Court reaffirms its prior rulings in this regard);

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c. Plaintiffs' counsel Carolyn Lake had a duty to engage in a reasonable inquiry about the status (or death) of her client, Ms. Doris E. Mathews, and failed to do so. Ms. Lake has offered no explanation as to why she did not make this inquiry; nor has she advised the Court when Ms. Lake knew of the death of her client Ms. Mathews;

d. Ms. Lake knew or should have known after a reasonable inquiry by at least 2012 when attorney Stephen Hansen associated in this case following his lawsuit against the Estate, that her client, Ms. Mathews, was deceased. This fact was significant; it was significant to the Court, to the City and to the other litigants;

e. Plaintiffs' counsel Carolyn Lake also had a duty to advise this Court and the other parties promptly of the death of her client, Doris E. Mathews, who at the time of her death, was the fee title owner of the subject property, and that she failed to advise this Court or the parties of her death until, at the very earliest, October 10, 2013. To date, Ms. Lake has not explained why she never advised the Court of Ms. Mathews' death;

f. Ms. Lake never sought to amend the caption to delete Ms. Mathews name, or to otherwise indicate that she had died, thus creating pleadings that were misleading and arguably false, and therefore a violation of CR 11;

g. Ms. Lake continued to sign each and every pleading following Ms. Mathews' death as if she was still alive, without any indication in her signature or on the documents that Ms. Mathews was deceased, or that she was no longer representing her, again, in violation of CR 11;

h. Ms. Lake continued to vigorously litigate this case following the death of Plaintiff Mathews, without legal authority to do so; and thus filed pleadings that were not well-grounded in fact and without legal effect;

i. Ms. Lake's actions in litigating the case after Ms. Mathews' death were in violation of CR 11;

j. The pleadings filed by Ms. Lake after the death of Doris Mathews were not objectively reasonable and were prepared without a reasonable inquiry or investigation, and were without basis in fact or law, in violation of CR 11;

All of the pleadings filed by Ms. Lake were on her law firm's pleading paper, and identified her law firm – Goodstein Law Group PLLC; and

k. The fact of Mathews' death was important, it mattered, it is serious, and it was a violation of CR 11.

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3 42. By signing the pleadings following the death of Doris Mathews and failing  
4 to disclose her death to the Court, Ms. Lake breached her certification obligations under CR  
5 11, thus entitling the City to sanctions as a deterrent and to partially offset some of the  
6 expenses incurred by the City that would not have been incurred had Ms. Mathews' death  
7 been promptly disclosed. The pleadings and documents by Attorney Carolyn Lake  
8 following the death of Doris Mathews were not well grounded in fact and were not  
9 warranted by existing law because she never disclosed to the Court that her client, a  
10 principal owner of the subject property, was deceased. Ms. Lake signed and presented  
11 pleadings she either knew, or should have known were false. In doing so she filed  
12 pleadings that were at least without merit and at most were false. These pleadings were  
13 misleading to the Court and to counsel. Ms. Lake failed to conduct the necessary reasonable  
14 inquiry before signing them.

15 43. In arriving at its decision, the Court had no information concerning the  
16 following:

- 17 a. The terms by which Ms. Lake's firm was retained to represent Ms.  
18 Mathews' interests, along with the interests of Mr. Spice and Plexus;  
19 b. The date Ms. Lake learned that Ms. Mathews was deceased;  
20 c. That Mr. Spice was a 25 percent owner of the property, that the Estate was a  
21 75 percent owner of the property, or even that there was a split in ownership  
22 of the property following the verdict in the Estate litigation;  
23 d. Why Ms. Lake did not move to substitute the Estate for Ms. Mathews, or  
24 bifurcate claims in the case, or file an amended complaint, or take any other  
25 Court action to remove the deceased Doris Mathews from the lawsuit.

26 44. While the City is entitled to an award of sanctions under CR 11, the Court  
27 finds that neither the Rule nor interpretative case law or other authorities provide  
benchmarks or guidance as to how to compute sanctions under CR 11. CR 11 does not  
require a specific formula or method to calculate monetary sanctions.

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## II. CONCLUSIONS OF LAW

1. The conduct, actions and representations by Plaintiff Ted Spice did not amount to a violation of CR 11, thus he is not liable for CR 11 sanctions.

2. The conduct, actions and representations by attorney Stephen M. Hansen did not amount to a violation of CR 11, thus neither he nor his law firm is liable for CR 11 sanctions.

3. The conduct, actions and representations by Attorney Carolyn Lake, as outlined in the Findings of Fact section of this Order, did violate CR 11, and she is liable for sanctions under CR 11 in the amount of \$45,000.

4. The original judgment, entered on December 13, 2013, for RCW Ch. 64.40 attorneys' fees and costs as against Plaintiff Ted Spice and Plexus is not necessarily voided, and that that specific question has not been presented to the Court.

5. CR 11 and interpretive authorities establish some general rules regarding CR 11 violations and sanctions, including (but not limited to) the following:

- a. A violation of CR 11 is not the same as a violation of the Rules of Professional Conduct. Sometimes they overlap, sometimes not, but they are not synonymous;
- b. Case law authority interpreting Federal Rule of Civil Procedure 11 is useful in interpreting and applying the State's counterpart – CR 11;
- c. CR 11 was adopted to deal with baseless filings and to curb abuses in the legal system.
- d. CR 11 does not just apply to filings; it applies to every pleading, every written motion, every legal memorandum filed or served during any litigation, and it applies throughout the entirety of the litigation;
- e. If an attorney signs a pleading, motion or other document in violation of the rule, the Court can impose an appropriate sanction against the attorney, the person represented, or both;

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- f. At a minimum, CR 11 requires attorneys to undertake a reasonable inquiry into the facts and the law before filing any pleading or document;
- g. An attorney's inquiry into the law and the facts must be objectively reasonable under the circumstances;
- h. The Court has broad discretion to impose an appropriate sanction under CR 11, and to decide against whom the sanctions should be imposed;
- i. Sanctions under CR 11 are intended to deter and punish sanctionable conduct, but are not a fee-shifting mechanism; and
- j. CR 11 sanctions are available against both an attorney and the attorney's law firm. However, the court is satisfied by the representations of Ms. Lake explaining the nature of her ownership interest in the Goodstein Law Group PLLC, that it is appropriate to exclude that entity from the imposition of CR 11 sanctions. The court therefore imposes these sanctions against only Ms. Lake.

6. Neither CR 11 nor interpretative case law or other authorities provide benchmarks or guidance as to how to compute damages or sanctions under CR 11. In other fee request contexts, one method is to use a Lodestar analysis to determine the reasonableness of a fee request. However, CR 11 does not require this formula, nor does the Rule mandate any other or specific method to calculate damages sanctions.

7. The Court concludes the City of Puyallup is entitled to a total award of \$45,000 in sanctions due to Attorney Carolyn Lake's failure to advise either this Court or the attorneys for Defendants of the death of Ms. Doris Mathews, a plaintiff in this case, an owner of the subject property, and a client of Carolyn Lake and her law office. This award is made under CR 11 based on the Court record to date, the Findings and Conclusions set forth above, and the reasons announced in the Court's December 11, 2015 and January 15, 2016 hearings.

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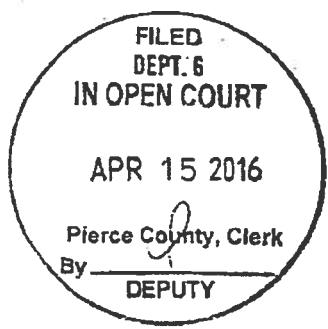
III. ORDER RE: CR 11 ATTORNEYS' FEES AND COSTS

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the Defendant City of Puyallup is hereby awarded \$45,000 in as a sanction pursuant to CR 11 against Plaintiffs' counsel Carolyn A. Lake at [REDACTED]

[REDACTED] 9/1

DATED this 15 day of April, 2016.

*Jack F. Nevin*  
HONORABLE JACK F. NEVIN  
Judge of the Pierce County Superior Court



September 24 2015 4:13 PM

The Honorable Jack Nevin STOCK  
Hearing: Friday, September 25, 2015; 9:00 a.m.  
With Oral Argument  
COUNTY CLERK  
NO: 07-2-11635-0

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF PIERCE

TED SPICE, PLEXUS DEVELOPMENT,  
LLC, and DORIS E. MATHEWS,

Plaintiffs/Petitioners,

v.

PIERCE COUNTY, a political  
subdivision, and the CITY OF  
PUYALLUP, a municipal corporation,

Defendants/Respondents.

No. 07-2-11635-0

**COMBINED REPLY IN SUPPORT  
OF CITY OF PUYALLUP'S MOTION  
FOR CR 11 FEES AND COSTS**

**Friday, September 25, 2015; 9:00 a.m.  
With Oral Argument**

**I. INTRODUCTION**

In approximately 230 pages of Response submittals, Plaintiffs fail to offer any meaningful – or relevant -- opposition to the City's CR 11 Motion. This Motion is about whether Plaintiff Spice and his legal counsel violated CR 11 each and every time they filed a pleading representing Doris Mathews after her death, to which the only answer is "Yes." The Motion is not about whether counsel had the ability to continue represent Spice and Plexus, about CR 25 substitution, about violations of independent ethics rules, about "assumptions" of what the other of Plaintiffs' attorneys may have said or done, or about different cases involving different parties long-ago resolved in separate pleadings (the *Michael Stanzel* case, for example).

The conduct in this case is so egregious neither attorney even attempts to address the facts or issues presented or the actual basis for CR 11 sanctions. Ms. Lake completely ignores the fact that she continually filed pleadings representing that Doris Mathews was still alive

COMBINED REPLY IN SUPPORT OF CITY OF  
PUYALLUP'S MOTION FOR CR 11 FEES AND  
COSTS - 1

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KEATING, BUCKLIN & MCCORMACK, INC., P.S.  
ATTORNEYS AT LAW  
800 FIFTH AVENUE, SUITE 4141  
SEATTLE, WASHINGTON 98104-3175  
PHONE (206) 623-8861  
FAX: (206) 223-9473



1 and well for years after her death, without ever giving even a hint of her client's death, and all  
2 the while showing Ms. Mathews name as a Plaintiff on the caption of her pleadings. Reading  
3 Ms. Lake's materials, you would not even know that Doris Mathews was her client.<sup>1</sup>

4 Mr. Hansen now, belatedly, admits that he knew Ms. Mathews was dead long before  
5 he came into the case (which was on October 19, 2012 – the date he served his Notice of  
6 Association) – but claims that he “assumed” everyone knew Ms. Mathews had died and before  
7 the bulk of the litigation work occurred (2013). Astoundingly, he now says he should be  
8 absolved of any liability or responsibility for Rule 11 fees because he purposely removed Ms.  
9 Mathews' name from the caption of his Notice of Association and Notice of Withdrawal and,  
10 thus, based on this unauthorized alteration of the pleadings, everyone should have known he  
11 was not representing a dead person. This despite the fact that he did sign off on other pleadings  
12 with Ms. Mathews' name on the caption<sup>2</sup>, was in receipt of virtually every other pleading with  
13 her name on it, and that he represented to the Court and the parties that he was associating  
14 with Ms. Lake in this “matter” -- the case involving Ms. Mathews as a Plaintiff.<sup>3</sup> And, even a  
15 basic, reasonable inquiry of the Court docket in this case from 2013 to date shows that Doris  
16 Mathews was his client as well. His only “defense” is claiming ignorance of the law, and that  
17 is no defense at all. And, he does not see any conflict of interest in both representing Doris  
18 Mathews as if she was alive and well in this case, and representing his co-plaintiff, Mr. Spice,  
19 on the opposite side of a lawsuit against her Estate at the exact same time.

20 The after-the-fact purported “expert” declarations by John Strait and Brian Krikorian  
21 are purely legal opinions, are based on false or incomplete facts, are not in any way relevant  
22 to the CR-11 standards, are not based on a “more probable-than-not” basis, and are rife with

23  
24 <sup>1</sup> Notably, neither Ms. Lake nor Mr. Hansen has produced – or even offered to produce – an engagement letter,  
25 client contract, fee agreement, or even any written communication between them and Ms. Mathews from any  
point in time. This fact is significant. The Court can conclude that no such agreement between either attorney  
and Ms. Mathews was ever executed or exists.

26 <sup>2</sup> See, e.g., *Walter Reply Decl*, Exh's. D – F.

27 <sup>3</sup> He intentionally omitted Mathews from the caption of this case – without obtaining leave of Court, as required  
– and claims that his clients in this matter were only Spice and Plexus, though his Notice of Appearance never  
limited the scope of his representation. See, *Walter Reply Decl.*, ¶¶ 5-9.

1 false assumptions. Neither provide a defense or justification for counsel's conduct, and both  
2 should be stricken.

3 The City's Motion is based on undisputed facts and clear documentary history. The  
4 Plaintiffs have failed to challenge the amount or computation of the fees and costs requested.  
5 Accordingly, the City's Motion should be granted and fees and costs in the full amount  
6 requested by the City (\$312,181.86) should be assessed against attorneys Lake and Hansen,  
7 their law offices, and Mr. Spice and Plexus, jointly and severally.

## 8 II. REPLY

### 9 A. Once a party dies, the attorney client relationship ends

10 *[When a party to a lawsuit dies], the attorney for the*  
11 *deceased party may no longer represent her interests.*

12 *Stella Sales, Inc. v. Johnson*, 97 Wn. App. 11, 18, 985 P.2d 391 (1999)<sup>4</sup> (emphasis added)  
13 (citing to *Bingham v. Zolt*, 683 F. Supp. 965, 976 (S.D.N.Y.1988) (death of client terminates  
14 the attorney-client relationship, and attorney may not act further unless authorized to do so by  
15 deceased client's representative). To this statement of clear law, which this Court has  
16 acknowledged and applied in its July 20, 2015 Order, Plaintiffs have no retort. There is none.  
17 At the time Ms. Mathews died, Plaintiffs' counsel failed to have any legal basis to continue to  
18 represent her and, thus, every pleading filed in the case thereafter representing that Mathews  
19 was still alive, perpetuated a fraud on this Court.

20 Plaintiffs have submitted over 100 pages in declarations and exhibits to this Court  
21 (almost all of which have been previously submitted, are years old, and are not relevant to the  
22 CR 11 Motion) and there is still one glaring omission—the failure of Plaintiffs to produce an  
23 explanation as to why they never disclosed Doris Mathews' death to this Court at the time she  
24 died, and why they continued to represent that she was alive through every pleading filed. So  
25 long as the pleadings submitted (as well as the Court docket) continued to list Mathews as a

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27 <sup>4</sup> Mr. Hansen was well-aware of this established principle of law, since he was counsel of record in the *Stella Sales* case.

1 Plaintiff with either attorney Lake or Hansen or both representing her, they were violating  
2 Rule 11. Omitting Mathews' name from the caption, as Mr. Hansen did and which he believes  
3 absolves him of any responsibility under Rule 11, is not a viable defense.<sup>5</sup>

4 Throughout their Responses, Plaintiffs' counsel continue to distance themselves from  
5 Doris Mathews, diminish her relevancy and instead insist that they were acting "on behalf of  
6 the remaining Plaintiffs Plexus and Ted Spice." *Plaintiffs' Response in Opposition to*  
7 *Puyallup's Motion for CR 11 Terms*, at 23:18-19. This is not the issue, and is not relevant to  
8 the CR 11 violations. The City is not arguing whether or not Ms. Lake and Mr. Hansen could  
9 have continued to advocate separately for Spice and Plexus in this litigation. The basis for  
10 the CR 11 motion is that Plaintiffs' counsel continued to represent that Doris Mathews was  
11 still alive and a party and involved in the litigation each and every time they filed a pleading  
12 in this matter, since they never informed the Court that their client had died. It was counsel's  
13 deleterious conduct in representing a dead person, contrary to black letter law, that directly  
14 caused the (allegedly) "ballooned fees."<sup>6</sup>

15 The City had a judgment for over \$132,000 in hand, yet it came to this Court seeking  
16 to undo that Judgment, since the only legal (and ethical) recourse was to do so to its detriment.  
17 Thus, Spice and his attorneys have been rewarded by the fact that they misrepresented to this  
18 Court that Doris Mathews was alive and allowed a judgement to be entered against her, years  
19 after counsel both knew she was dead. As addressed below, Mr. Spice is conspicuously silent  
20 on his role in this matter and in response to this Motion. The City has brought this Motion  
21 jointly and severally against Spice, Plexus and both attorneys, yet Spice has failed to explain  
22 his actions. That silence can be taken only one way—he has no defense.

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25 <sup>5</sup> Mr. Hansen's actions in unilaterally altering the caption of an already existing case . . . without leave of Court –  
should be viewed as even more deceitful, since he intentionally omitted the name of a plaintiff he knew was  
dead.

26 <sup>6</sup> Notably, all Plaintiffs have done in their Response is try to disparage and distinguish the numerous cases in the  
27 City's favor. Plaintiffs cannot cite a single case to support their claim that they could continue for four years to  
sign pleadings representing a dead person without informing the Court of her death.

1 Notwithstanding the condescending and disrespectful nature of Mr. Hansen's newly  
2 retained attorney's Opposition ("Hansen's counsel has operated for years in the crucible of  
3 the sharp tactics employed by Seattle law firms"<sup>11</sup>), behind all of this bluster, there is no  
4 substance. The fascinating part of Mr. Hansen's response is that he somehow attempts to turn  
5 things on the City's attorneys, and argues that it was up to the City to do his job for him.<sup>12</sup>  
6 This is not "gotcha" litigation. It is a fact that Mr. Hansen and Ms. Lake continued to represent  
7 a dead person four years after her death. It is Mr. Hansen's and Ms. Lake's behavior which  
8 has sullied the Pierce County Bar, not the actions of the City's attorneys.

9 **D. Carolyn Lake's conduct at every step of this litigation is grounds for CR 11**  
10 **sanctions**

11 "Under CR 11, an attorney's signature constitutes a 'certificate' that 'to the best of the  
12 ... attorney's knowledge, information, and belief, formed after reasonable inquiry [the  
13 attorney's document] is well grounded in fact and is warranted by existing law ...'." *Bryant v.*  
14 *Joseph Tree, Inc.*, 119 Wn.2d 210, 223, 829 P.2d 1099 (1992). In *Bryant*, the court was  
15 inquiring as to whether the original complaint was well-grounded in fact and law. Here, each  
16 and every pleading which continued to purport Doris Mathews as the client of Ms. Lake and  
17 as an "alive" party to the lawsuit were not well-grounded in fact or law.

18 "CR 11 requires attorneys to stop, think and investigate more carefully before serving  
19 and filing papers." *Bryant*, at 219. The court employs an objective standard to determine  
20 whether a reasonable attorney in like circumstances could believe his or her actions to be  
21 factually and legally justified at the time the pleading was submitted. *Id.* at 220. No "stopping  
22 and thinking" was occurring. Ms. Lake believed her only allegiance was to Spice and Plexus,  
23 and Doris Mathews was just an empty name to her. Unlike Mr. Hansen, Ms. Lake won't  
24 identify when or how she became aware of the death of her client. Like Mr. Hansen, however,

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26 <sup>11</sup> The relevance of this statement is lost on the City.

27 <sup>12</sup> Mr. Hansen also somehow believes that the City should have known by osmosis that he was representing the  
Estate because "we had tried the ownership [of the property] for weeks with the Estate right in the same  
Courthouse this LUPA action was pending." *Hansen Dec.*, ¶ 11.

1 she refuses to – or can't – produce an engagement letter, fee agreement, contract, or even a  
2 piece of paper, between her and Ms. Mathews. It is apparent that no such agreement exists.

3       Astoundingly, Ms. Lake attempts to justify her actions and non-disclosure by claiming  
4 that “no offending conduct exists as notice of Mathews’ death was not critical to the  
5 application of law in this litigation.” *Plaintiffs’ Response*, at 10:23-24. Ms. Lake was without  
6 legal authority to represent Ms. Mathews, yet she continued to do so in each pleading filed for  
7 four years after her death. Could there be more “offending conduct?” The pleadings filed by  
8 Ms. Lake were baseless because she lacked the ability to represent Ms. Mathews after her  
9 death, yet she continued to do so without telling the Court of her client’s death.

10       Ms. Lake signed every pleading on behalf of all three Plaintiffs, and never put any  
11 limiting language on her signature, or on any pleading indicating that she was signing for  
12 fewer than all three. Her efforts now in distancing herself from her representation of Doris  
13 Mathews is predictable. At this point, it is fairly obvious that Ms. Lake had no direct contact  
14 with Ms. Mathews. She has not produced a fee agreement, engagement letter, contract or  
15 similar document. She has not produced any correspondence with Ms. Mathews. If she was  
16 truly in contact with her client, the title owner of the property, she would have known that  
17 client was dead long before all of the needless pleadings were filed in this case.

18       Ms. Lake’s only response is to regurgitate the same case law she has used in opposition  
19 to the City’s Motion to Vacate the previous orders, for Summary Judgment, and for Failure to  
20 Join an Indispensable Party. She cannot cite a single case authorizing her actions in  
21 representing a dead person. The clear law enunciated in the *Stella Sales* case is that Ms.  
22 Lake’s representation ended on the day Ms. Mathews died, and she should have notified the  
23 Court and parties of this fact, filed a notice of withdrawal, and not permitted the case to be  
24 litigated for years after her client’s death. Instead, she continued to represent to this Court that  
25 Ms. Mathews was alive and well and that Ms. Lake was her attorney. This behavior, directly  
26