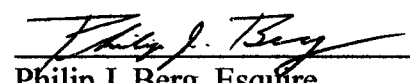




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Dated: February 18, 2011



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Philip J. Berg, Esquire  
Law Offices of Philip J. Berg  
555 Andorra Glen Court, Suite 12  
Lafayette Hill, PA 19444-2531  
(610) 825-3134  
Email: [philjberg@gmail.com](mailto:philjberg@gmail.com)  
PA ID 09867  
Attorney for Charles Edward Lincoln,  
III pending admission *pro hac vice*

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**EXHIBIT "A"**

1 Charles Edward Lincoln, III  
2 603 Elmwood Place, Suite #6  
3 Austin, Texas 78705  
4 Telephone: (512) 968-2500  
5 E-mail: charles.lincoln@rocketmail.com  
6 Plaintiff *in propia persona*

7 **UNITED STATES DISTRICT COURT**  
8 **FOR THE CENTRAL DISTRICT OF CALIFORNIA,**  
9 **SOUTHERN DIVISION**

10  
11 CHARLES EDWARD LINCOLN, III  
12 Plaintiff,

CIVIL ACTION NUMBER:  
8:10-CV-01573 AG (PLAx)

13  
14 vs.

15 DAYLIGHT CHEMICAL INFOR-  
16 MATION SYSTEMS, INC., et al,

Declaration of Philip J. Berg, Esq.

17 Defendants.  
18  
19

20  
21 **Declaration of Philip J. Berg, Esquire**

22  
23 I, Philip J. Berg, Esquire am over the age of 18 and not a party to the within  
24 action. I have personal knowledge of the facts herein, and if called to do, I could  
25 and would competently testify. I am making this Declaration under the penalty of  
26 perjury of the Laws of the United States pursuant to 28 U.S.C. §1746.  
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1. I am an Attorney in good standing, licensed to practice law in the Commonwealth of Pennsylvania.

2. I am the attorney of record for the Plaintiffs in the matter of Liberi, et al v. Taitz, et al, U.S.D.C., Eastern District of Pennsylvania, Case No. 09-cv-01898 ECR. Lisa Liberi is a Plaintiff in said case.

3. On June 22, 2010, Judge Robreno issued a corrected Order severing and transferring the case of Liberi, et al v. Taitz, et al to this Court, U.S.D.C., Central District of California, Southern Division.

4. Since that time, Orly Taitz, Esquire has continued sending hearsay statements and documents to Judge David O. Carter and the Chief Judge in this Court, in attempts to conflict-out the Judges of this Court prior to the Court receiving the Liberi case.

5. On January 9, 2011, Orly Taitz as Attorney for Appealing Dentistry, Orly Taitz, Inc. and Defend our Freedoms Foundations, Inc. filed hearsay statements and documents pertaining to Lisa Liberi in this case. *See* Docket Entry No. 24. Lisa Liberi has absolutely nothing to do with the within Case and I believe Orly Taitz, Esquire filed the hearsay statements and documents to further Obstruct Justice, as she has previously attempted. *See* **EXHIBIT "A"** attached hereto. **EXHIBIT "A"** is a letter I was forced to send out due to Orly Taitz, Esquire improperly sending hearsay statements and documents

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supposedly pertaining to Lisa Liberi to this Court and other locations for no other purpose than to Obstruct Justice. Once again, Orly Taitz, Esquire is trying to prejudice and bias the Judges of this Court against Lisa Liberi in attempts to conflict them out in the matter of Liberi, et al v. Taitz, et al prior to this Court receiving the case.

6. In addition, on January 15, 2011, Orly Taitz, Esquire filed hearsay statements and hearsay documents regarding me in this matter, which has absolutely no bearing on the within Case. See Docket Entry No. 26. I believe Orly Taitz, Esquire did this in attempts to prejudice the Plaintiff, Charles Edward Lincoln, III as I have agreed to represent him in this matter for limited purposes.

7. Contrary to Orly Taitz, Esquire's statements, I am in good standing with the Commonwealth of Pennsylvania, as demonstrated by the attached Certificate of Good Standing dated January 14, 2011, which I received from the Pennsylvania Supreme Court. See **EXHIBIT "B"**.

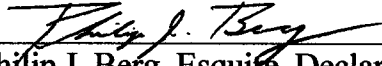
8. These improper actions of Attorney Orly Taitz should not be permitted. For these reasons, Docket Entry No.'s 24, 26, 30, 38, 38-1, 42, 43, and 46 must be stricken.

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I declare under the penalty of perjury of the Laws of the United States and California that the foregoing is true and correct.

Executed this 23<sup>rd</sup> day of January, 2011 in the Commonwealth of Pennsylvania, County of Montgomery.

  
Philip J. Berg, Esquire, Declarant

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**EXHIBIT "A"**



LAW OFFICES OF  
**PHILIP J. BERG**

---

PHILIP J. BERG  
CATHERINE R. BARONE  
BARBARA MAY

---

NORMAN B. BERG, Paralegal [Deceased]

---

555 Andorra Glen Court, Suite 12  
Lafayette Hill, PA 19444-2531

---

(610) 825-3134

FAX (610) 834-7659

E-Mail: [philjberg@gmail.com](mailto:philjberg@gmail.com)

October 26, 2010

Honorable Eduardo C. Robreno  
**United States District Court  
for the Eastern District of Pennsylvania**  
11614 U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106-1797  
**Sent via Fax to (267) 299-5113**

**Philadelphia District Attorneys Office**  
Three South Penn Square  
Corner of Juniper and South Penn Square  
Philadelphia, PA 19107-3499  
**Sent via Regular Mail**

**U.S. Attorney's Office**  
615 Chestnut Street  
Suite 1250  
Philadelphia, PA 19106  
**Sent via Fax to (215) 861-8618**

**Social Security Administration**  
6401 Security Blvd.  
Baltimore, MD 21235  
**Sent via Regular Mail**

**Public Integrity Section  
Department of Justice**  
950 Pennsylvania Ave., NW  
Washington, D.C. 20530-0001  
**Sent via Regular Mail**

Hon. James Secord  
Deputy District Attorney  
**San Bernardino County**  
316 North Mountain View  
San Bernardino, CA 92415-0004  
**Sent via Regular Mail**

**San Bernardino County Probation Dept.**  
175 W. Fifth Street, 4<sup>th</sup> Floor  
San Bernardino, CA 92415-0460  
**Sent via Fax to (909) 387-5600**

**Chief Judge Audrey B. Collins**  
**U.S.D.C., Central District of CA**  
Courtroom 680  
255 East Temple Street  
Los Angeles, CA 90012  
**Sent via Regular Mail**

**Judge David O. Carter**  
Courtroom 9D  
U.S.D.C. Central District of CA,  
Southern Division  
411 west Fourth Street  
Santa Ana, CA 92701-4516  
**Sent via Regular Mail**

U.S. Attorney's Office  
312 North Spring Street  
Los Angeles, California 90012  
**Sent via Regular Mail**

**Re: Orly Taitz's Obstruction of Justice and other Criminal Acts**

**Re: Orly Taitz Obstruction of Justice and other Criminal Acts**  
Page Two

October 26, 2010

I represent Plaintiffs, Evelyn Adams, Philip J. Berg, Esq., Lisa Liberi, Lisa Ostella, Law Offices of Philip J. Berg, and Go Excel Global in a case against Orly Taitz and other Defendants. The Case was filed in the U.S. District Court, Eastern District of PA, Case No. 09-cv-01898 before the Honorable Eduardo C. Robreno. This Case was brought due to illegal behaviors of Defendant Taitz and the other Defendants.

**I am sending this letter to each of you as Orly Taitz has now been obstructing justice and attempting to prejudice and conflict out the very Court this case has been ordered transferred to by sending copies of letters and filings to you. My request is that these documents should “not” be read by anyone other than the Honorable Eduardo C. Robreno. Further, I believe a Restraining Order should be issued against Orly Taitz to stop her current tactics and Sanctions should be imposed against her as she is an attorney who should know better.**

On June 3, 2010, Judge Robreno Ordered the Case Transferred to the U.S. District Court, Central District of California, Southern Division against the California Defendants and to the U.S. District Court, Western District of Texas against the Texas Defendants. Due to some inconsistencies, I filed a Motion for Reconsideration of this Order, which was Granted in part by Judge Robreno. Judge Robreno amended (corrected) his Order on June 22, 2010, which maintained the Transfer of the Case to the U.S. District Court, Central District of CA and the U.S. District Court, Western District of Texas.

Since this time, Orly Taitz's behaviors have intensified against the Plaintiffs, especially Plaintiffs Lisa Liberi and Lisa Ostella. Orly Taitz's behaviors include but are not limited to Cyber-stalking; Cyber-bullying; harassment; stalking; inchoate offenses; forgery; false law enforcement reports; attempting to have Lisa Liberi and Lisa Ostella falsely arrested based on falsified allegations; which Plaintiffs Lisa Liberi and Lisa Ostella are the victims.

Moreover, Orly Taitz has been attempting to intimidate/retaliate against a Witness for Plaintiffs, Shirley Waddell to deter her from testifying in the Civil Case.

Since Judge Robreno's Order of June 22, 2010 Transferring this Case, Orly Taitz Appealed the Ruling, said Appeal is in the U.S. Court of Appeals for the Third Circuit. However, Orly Taitz has continued filing frivolous documents with Judge Robreno's Court, which include many falsified statements; falsified information pertaining to the Civil Case pending against her; forged and altered documents in the name of Plaintiff Lisa Liberi and Lisa Ostella, and falsified recitations of pleadings filed by Plaintiffs, just to name a few.

In so doing, Orly Taitz has been sending her filings containing many falsified statements forged and altered documents to all parties listed above for absolutely **no** permissible purpose other than to continue her harassment of the Plaintiffs and to attempt to conflict out or prejudice the Judge's in the U.S. District Court, Central District of California, Southern Division, the very Court this Case is being Transferred to. And, attempting to have Plaintiffs Lisa Liberi and Lisa Ostella falsely arrested on falsified allegations.

**Re: Orly Taitz Obstruction of Justice and other Criminal Acts**  
Page Three

October 26, 2010

Again, Orly Taitz began sending all her falsified statements, falsified recitations of pleadings filed by the Plaintiffs; forged and altered documents, etc., which she filed in Judge Robreno's Court to all the parties listed in this letter, including the Chief Judge of the U.S. District Court, Central District of California as well as Judge Carter, U.S. District Court, Central District of California, Southern Division after Judge Robreno's June 22, 2010 Order Transferring this Case to the U.S. District Court, Central District of California, Southern Division. *See* Judge Robreno's June 22, 2010 Opinion and Order attached hereto as **EXHIBIT "A"**. *See* Orly Taitz's "Certificate of Services" for 7/29/2010; 9/8/2010; 9/28/2010; and 10/21/2010 attached hereto as **EXHIBIT "B"**.

This is extremely concerning as Orly Taitz continues breaking State and Federal Laws. Not only am I concerned regarding the prejudices this creates for my clients, I am extremely concerned about the safety of my clients.

Orly Taitz's filing of false statements (perjury) as well as forged and altered documents in the name of Plaintiffs Lisa Liberi and Lisa Ostella also constitutes Obstruction of Justice, Perjury, Forgery and other criminal acts.

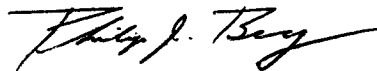
Orly Taitz is an attorney licensed in the State of California and is well aware her actions, behaviors and activities are illegal and constitute crimes, for which she must be prosecuted.

I would appreciate any assistance for my clients in order to stop the illegal behaviors of Orly Taitz.

Please do not hesitate contacting me should you require anything additional.

Thank you.

Respectfully,



Philip J. Berg

PJB:jb

Enclosures

cc: Orly Taitz  
26302 La Paz Ste 211  
Mission Viejo, CA 92691  
Ph: (949) 683-5411  
Fax: (949) 586-2082  
**Sent via Regular Mail**

## **EXHIBIT "A"**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LISA LIBERI, et al., : CIVIL ACTION  
 : NO. 09-1898  
Plaintiffs, :  
 :  
v. :  
 :  
ORLY TAITZ, et al., :  
 :  
Defendants. :

M E M O R A N D U M

EDUARDO C. ROBRENO, J.

June 22, 2010

**I. BACKGROUND**

On May 4, 2009, Plaintiffs Lisa Liberi ("Liberi"), Philip J. Berg, Esq. ("Berg"), the Law Offices of Philip J. Berg, Evelyn Adams a/k/a Momma E ("Adams"), Lisa Ostella ("Ostella"), and Go Excel Global (collectively, "Plaintiffs") initiated this defamation, libel and slander action against Defendants Orly Taitz ("Taitz"), Defend our Freedoms Foundations, Inc. ("DOFF"), Neil Sankey, The Sankey Firm and Sankey Investigations, Inc. (collectively, "Sankey"), Edgar Hale, Caren Hale, Plains Radio, KPRN AM 1610, Bar H. Farms, Plains Radio Network (collectively, "the Hales"), and Linda Sue Belcher (collectively, "Defendants").

On June 3, 2010, the Court severed the action and transferred the claims to each Defendant's home jurisdiction. Before the Court is Plaintiff Berg's motion for leave to file a motion for reconsideration (doc. no. 120), Defendant Taitz's response (doc. no. 121) and Defendant Sankey's response (fax

dated 6/11/10). On June 18, 2010, Plaintiff Berg filed a motion for leave to file a motion to strike Defendant Taitz's response (doc. no. 122).

## II. MOTION FOR RECONSIDERATION

### A. Legal Standard

A motion for reconsideration is treated as the "functional equivalent" of a motion pursuant to Rule 59(e) which seeks to alter or amend a judgment. Fed. Kemper Ins. Co. v. Rauscher, 807 F.2d 345, 348 (3d Cir. 1986) (internal citation omitted). The purpose of a motion for reconsideration is to "correct manifest errors of law or fact or to present newly discovered evidence." Harsco Co. V. Zlotnicki, 779 F.2d 906, 909 (3d Cir. 1985). Reconsideration is appropriate where the party seeking reconsideration establishes "(1) an intervening change in the controlling law; (2) the availability of new evidence that was not available when the court . . . [issued its previous decision]; or (3) the need to correct a clear error of law or fact or prevent manifest injustice." Max's Seafood Cafe ex rel. Lou Ann v. Quinteros, 176 F.3d 669, 677 (3d Cir. 1999); North River Ins. Co. v. CIGNA Reinsurance Co., 52 F.3d 1194, 1218 (3d Cir. 1995); U.S. v. Cabiness, 278 F. Supp. 2d 478, 483-84 (E.D. Pa. 2003) (Robreno, J.).

### B. Proposed Grounds for Reconsideration

On June 7, 2010, Plaintiff Berg faxed a motion for leave to file a motion for reconsideration. See doc. no. 120 (docketed 6/13/10). Defendant Taitz responded by fax on June 10, 2010 and Defendant Sankey responded by fax on June 11, 2010. See Taitz 6/10/10 Ltr., doc. no. 121 (docketed 6/14/10); see also Sankey 6/11/10 Ltr. Mr. Sankey's response was not filed of record.<sup>1</sup>

In his letter, Plaintiff Berg lists eight purported errors in the Court's 6/3/10 Order that severed the action and transferred the claims to each of Defendants' home jurisdictions. Upon review, Plaintiff Berg actually raises only three discrete issues. Importantly, Plaintiff Berg's motion does not argue that the legal conclusions set forth in the Memorandum were incorrect.

The three outstanding administrative errors raised by Plaintiff Berg are grouped as follows.

1. Points 6, 8 and 9

Points 6, 8 and 9 are as follows:

---

<sup>1</sup> Defendant Taitz's response does not substantively address Plaintiff Berg's motion for leave to file a motion for reconsideration, thus it is inapposite to the issues at bar.

Defendant Sankey's letter disputes Plaintiff Liberi's assertions of Pennsylvania citizenship and argues that Plaintiff Liberi is a citizen of New Mexico. See Sankey Ltr., dated June 11, 2010. However, diversity jurisdiction would only be destroyed if Plaintiff Liberi was a citizen of either of the states of which Defendants are citizens: California or Texas. Thus, the issue is inapposite to Plaintiff Berg's motion for leave to file a motion for reconsideration and the legal conclusions reached in this case.

Point 6: There is a discrepancy in the Court's Order of June 3, 2010, docketed on June 4, 2010 appearing as Docket Entry No. 118;

Point 8: Amendment of this Court's June 3, 2010 Order, docketed June 4, 2010, appearing, as Docket Entry No. 118 is proper. This Court has the inherent Power to amend its Final Judgment; and

Point 9: A proposed Order is attached to Plaintiffs' Motion.

See Berg Mot. Reconsideration 2, doc. no. 120.

These notations are not relevant to the legal disposition of this case. Therefore, Points 6, 8 and 9 will be denied.

2. Points 1, 2, 3, 4 and 5

Points 1, 2, 3, 4 and 5 are as follows:

Point 1: This Court concedes on page two (2), second (2nd) paragraph of the Court's Memorandum [Doc. No. 117] that the Sankey Defendants, which would be Neil Sankey, Sankey Investigations, Inc. and The Sankey Firm, Inc. a/k/a The Sankey Firm are citizens and residents of the State of California;

Point 2: Defendants Neil Sankey and Sankey Investigations, Inc. are **not** within the jurisdiction of the U.S. District Court, Western District of Texas, but instead are located in the Central District of California;

Point 3: Although in Default, the Court made **no** mention of transfer as to Defendant, The Sankey Firm, Inc. a/k/a The Sankey Firm. Is the Court planning on keeping this one Defendant and allowing Plaintiffs to enter Default against them?; If not then,

Point 4: The Sankey Firm, Inc. a/k/a The Sankey Firm is a California Corporation, in the U.S. District



Court, Central District of California, Southern Division jurisdiction. Therefore, transfer of Plaintiffs' claims against this Defendant is only proper to the U.S. District Court, Central District of California, Southern Division; and

Point 5: Defendants Neil Sankey, Sankey Investigations, Inc. and The Sankey Firm, Inc. a/k/a The Sankey Firm conducted the offenses giving rise to this suit from their office locations in California.

See id. at 1-2.

The final Memorandum correctly identifies Defendants Neil Sankey, The Sankey Firm and Sankey Investigations, Inc. as citizens of California; however, the original Order, dated June 3, 2010, incorrectly transferred their case to Texas instead of California. The enclosed Amended Order corrects this error and transfers Neil Sankey, The Sankey Firm and Sankey Investigations, Inc. to the Southern Division of the Central District of California.

No prejudice has resulted because the cases have not yet been transferred and the error has no impact on the legal conclusions reached in this case. Therefore, Plaintiff Berg's motion for reconsideration is granted as to Points 1-5.

3. Point 7

Point 7 is as follows:

Point 7: None of the Parties to this Action asked for severance of the Case; The Court's Order states Defendants Motion to Transfer is Granted; and on page two (2) states Defendants' Motion to Dismiss or, in the

alternative, Motion to Transfer (doc. No. 10) is Denied as Moot. First, Doc. No. 10 is an Affidavit of Service, not a Motion to Dismiss or in the alternative to Transfer. It is believed the Court meant Plaintiffs' Motion to Transfer is Granted, as Plaintiffs' had a pending Motion to Transfer the Case.

See id. at 2.

In Point 7, Plaintiff Berg requests that Defendants' motion to dismiss or, in the alternative, motion to transfer (doc. nos. 24, 25) be denied as moot. However, in its 6/25/09 Order, the Court already denied Defendants' motion to dismiss or, in the alternative, motion to transfer (doc. nos. 24, 25). See Ct. 6/25/09 Order, doc. no. 77.

Currently, there are no motions pending that have not been previously denied as moot. As such, Point 7 will be denied as moot. See docket.

### **III. CONCLUSION**

\_\_\_\_\_Plaintiff Berg's motion for leave to file a motion for reconsideration will be granted. Points 1, 2, 3, 4 and 5 of the motion for reconsideration will be granted and Points 6, 7, 8 and 9 will be denied as moot.

Plaintiff Berg's motion for leave to file a motion to strike Defendant Taitz's response will be denied as moot.

An amended Order follows.

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

|                      |   |              |
|----------------------|---|--------------|
| LISA LIBERI, et al., | : | CIVIL ACTION |
|                      | : | NO. 09-1898  |
| Plaintiffs,          | : |              |
|                      | : |              |
| v.                   | : |              |
|                      | : |              |
| ORLY TAITZ, et al.,  | : |              |
|                      | : |              |
| Defendants.          | : |              |

**AMENDED ORDER**

**AND NOW**, this **22nd** day of **June, 2010**, it is hereby **ORDERED** that the Court Order, dated June 3, 2010, is **AMENDED** as follows. On June 25, 2009, the Court issued a rule to show cause upon Plaintiff as to why this case should not be (1) dismissed for lack of personal jurisdiction; (2) severed into three or fewer cases against the following groups or Defendants: (i) the Hales; (ii) Belcher; (iii) Taitz, DOFF, and Sankey; and (3) transferred to an appropriate district in either Texas or California, pursuant to 28 U.S.C. § 1404(a).<sup>1</sup> See Court Order, doc. no. 80.

**IT IS FURTHER ORDERED** that, upon consideration of Plaintiffs' responses to the rule to show cause, Defendants'

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<sup>1</sup> On June 25, 2009, the Court issued an order that no further motions shall be filled without prior leave of the Court. See Court Order, doc. no. 78. No motions granted leave to file are currently pending.

replies thereto and Plaintiff Berg's motion for reconsideration, the Court will now **SEVER** the instant case into two separate, independent actions and **TRANSFER** each action to the jurisdiction of the following district courts. All claims pending against Defendants Linda Sue Belcher, Edgar Hale, Caren Hale, Plains Radio Network, Bar H. Farms, and KPRN A.M. 1610 are transferred to the Western District Court of Texas. All claims pending against Defendants Orly Taitz, Defend Our Freedoms Foundations, Neil Sankey, The Sankey Firm and Sankey Investigations, Inc. are transferred to the Southern Division of the Central District of California.<sup>2</sup>

**IT IS FURTHER ORDERED** that this case shall be marked **CLOSED**.

**AND IT IS SO ORDERED.**

s/Eduardo C. Robreno

**EDUARDO C. ROBRENO, J.**

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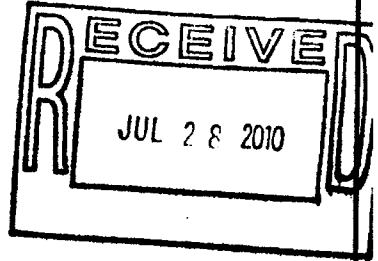
<sup>2</sup> All requests for leave to file pleadings submitted during the time the case was in suspense from December 9, 2009 to June 4, 2010, of which only one letter was made part of the docket (see Berg Letter in Opp'n to Def. Taitz, dated Jan. 10, 2010, doc. no. 116), are denied as moot.

## **EXHIBIT "B"**

ER

Dr. Orly Taitz, Esq  
Attorney Pro Se & Attorney  
For Defend Our Freedoms Foundation  
29839 Santa Margarita Parkway, Suite 100  
Rancho Santa Margarita CA 92688  
Tel: (949) 683-5411; Fax (949) 766-7603  
E-Mail: dr\_taitz@yahoo.com

09-cv-1898



IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LISA LIBERI, et al, ) Response to the 07.26.10. emergency motion by the  
 ) plaintiffs to keep transcripts under  
 ) seal  
 ) Motion for clarification and motion-request  
 ) for order to show cause, why sanctions should not  
 ) be assessed against parties defrauding the courts  
 ) by claiming that Judge Robreno issued an  
 Plaintiffs ) "order" to seal transcript of Liberi v Taitz  
 ) forwarded to the Third Circuit court of Appeals  
 v. )  
 ) District Court case # 09-cv- 01898-ER  
 ORLY TAITZ, et al, ) Court of Appeals number case #09-3403  
 ) and other repeated acts of fraud  
 Defendants. ) 60 B motion

10 JUL 26 PM 7:35

JUL 26 2010  
By MICHAEL E. NUNZ, Clerk  
Dep. Clerk

Background of the case

Due to the great importance of this matter, and fraud being perpetrated on the US District Court as well as the Court of Appeals, and due to the fact that the plaintiff here Lisa Liberi is currently on probation in the state of CA as a result of 10 felony convictions of forgery, forgery of an official seal and grand theft, this motion is addressed to the presiding judge The Hon Eduardo Robreno; as well as the Chief Judge of US District Court for the Eastern District of Pennsylvania The Hon Harvey Bartle, III; and the Chief

San Bernardino CA 92415-0004

909-387-8309

www.co.san-bernardino.ca.us/da

San Bernardino County, CA

Probation Department

175 w. Fifth str. 4th floor

S. Bernardino, CA

Audrey B. Collins

Chief Judge

US District Court

411 W. Fourth str

Santa Ana CA 92701

Judge David O. Carter

USDC Central District of CA

411 West Fourth Str

Santa Ana CA 92701

US Commission on Civil Rights

624 Ninth Street, NW

10 JUL 28 PM 1:35  
USDC  
CENTRAL DISTRICT OF CA  
SANTA ANA

Office of the High Commissioner for Human Rights

tel: + 41 22 917 91 51

email: [ototh@ohchr.org](mailto:ototh@ohchr.org)

/s/ Orly Taitz



07.27.10.

**Proposed order**

10 JUL 28 PM 7:55  
U.S. DISTRICT COURT  
FEDERAL BLDG  
NEW YORK, NY 10002

Law offices of



**Dr. Orly Taitz, Esq**  
**Attorney Pro Se & Attorney**  
**For Defend Our Freedoms Foundation**  
**29839 Santa Margarita Parkway, Suite 100**  
**Rancho Santa Margarita CA 92688**  
**Tel: (949) 683-5411; Fax (949) 766-7603**  
**E-Mail: dr\_taitz@yahoo.com**

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

|                             |   |  |
|-----------------------------|---|--|
| <b>LISA LIBERI, et al.,</b> | ) | <b>Case # 09-1898 Hon Eduardo Robreno presiding</b>      |
|                             | ) | <b>Motion-Request for documents</b>                      |
|                             | ) | <b>missing from an incomplete transcript of 08.07.09</b> |
|                             | ) | <b>hearing and not provided to Defendants and the</b>    |
|                             |   | <b>Third Circuit court of Appeals</b>                    |
| <b>Plaintiffs</b>           | ) |  |
|                             | ) | <b>60 B motion for Reconsideration</b>                   |
| <b>v.</b>                   | ) | <b>due to new evidence</b>                               |
|                             | ) |  |
| <b>ORLY TAITZ, et al.,</b>  | ) |  |
|                             | ) |  |
| <b>Defendants.</b>          | ) |  |

SEP - 8 2010  
 MICHAEL R. HUNN, Clerk  
 By \_\_\_\_\_ Dep. Clerk

**Motion- request for release of documents, provided by the Plaintiffs to the court on 08.07.09, but never released to the defendants.**

In spite of allegations by the plaintiffs, claiming that transcripts of the 08.07.09 hearing are sealed, this court has recently decided that the transcripts of the 08.07.09 hearing were never sealed and can be obtained by the defendants. Taitz has received those transcripts recently. On 08.31.10 copy of the transcript was certified by the District Court and forwarded to the Third Circuit Court of Appeals, however certain documents were missing. Most notably Taitz did not receive a copy of the drivers license of Lisa Liberi,

Liberi v Taitz 09.01.10 Motion -Request for missing documents and 60 B Motion