

San Bernardino County

316 North Mountain view

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

Civil and Political Rights Section

Special Procedures Division

Office of the High Commissioner for Human Rights

tel: + 41 22 917 91 51

email: ototh@ohchr.org

/s/ Orly Taitz 

09.06.10.

Proposed order

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

LISA LIBERI, et al.,) **Case # 09-1898 Hon Eduardo Robreno presiding**
)
)
)
Plaintiffs)
)
v.)
)
ORLY TAITZ, et al.,))
Defendants.)

Reply to Opposition to motion

SEP 26 2010
MICHAEL E. HUNG, Clerk
By _____ Dep. Clerk

Defendants, Dr. Orly Taitz and Defend Our Freedoms Foundation hereinafter "Defendants" are providing a following reply to the 09.14.10 opposition to their motion to provide documents, missing from 08.07.09. transcript and for 60B motion for reconsideration.

Plaintiff's opposition provided zero evidence to deny the Defendant's motion for production of Liberi's PA driver's license, allegedly submitted to this court during 08.07.09 emergency hearing. Yet again Plaintiffs commit fraud on the court, as they bring

decision to deny the Defendant's motion to dismiss this case due to lack of jurisdiction and to include in the 06.04.10 order a finding that "Liberi is a resident of PA"

2. If no PA drivers license for Liberi is available, Defendants are moving this court to dismiss current action 09-1898 Liberi et al v Taitz et al due to lack of jurisdiction, due to the fact that Liberi never provided proof of her PA residence, and without proof of state residence no federal district court can assert diversity jurisdiction.

3. Defendants request sanctions and damages awarded to them due to egregious fraud on the court by the Plaintiffs and their attorney Philip J. Berg

Respectfully submitted,

/s/ Dr. Orly Taitz, ESQ

07.28.10.

I certify under penalty of perjury, that I served above pleadings on following parties and authorities:

Philip Berg
555 Andorra Glen Court, ste 12
Lafayette Hill PA 19444-2531

Neil Sankey
2470 Stearns str #162
Simi Valley, CA 93063
Linda Belcher
201 Paris
Castroville TX 78009

Ed and Caren Hale
1401 Bowie Str

Wellington TX 79095

Philadelphia District Attorneys' office
3 South Penn square
Philadelphia, PA

US Attorneys' office
Eastern District of PA
615 Chestnut str, ste 1250
Philadelphia PA 19106-4100

Social Security Administration
6401 Security Blvd
Baltimore, MD 21235

James Secord
Assistant District attorney
San Bernardino County
316 North Mountain view
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

Public Integrity Section
Department of Justice
950 Pennsylvania Ave, NW
Washington DC 20530-0001

Office of the United Nations High Commissioner for Human Rights (OHCHR)
Special Rapporteur on the Situation of Human Rights Defenders
The Honorable Mrs. Margaret Sekaggya
Palais des Nations
CH-1211 Geneva 10, Switzerland
International Criminal bar Hague

United Nations Commission for
Civil Rights Defenders
Orsolya Toth (Ms)
Human Rights Officer
Civil and Political Rights Section
Special Procedures Division
Office of the High Commissioner for Human Rights
tel: + 41 22 917 91 51
email: ototh@ohchr.org
/s/ Orly Taitz
07.28.10.

Proposed order

Law offices of
Dr. Orly Taitz, ESQ
29839 Santa Margarita CA 92688
Pro se and for Defend Our Freedoms Foundation

UNITED STATES DISTRICT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Lisa Liberi, et al) Case # 09-cv-01898-ECR
Plaintiffs) Assigned to Honorable Eduardo C. Robreno
)
V)
Orly Taitz et al)
Defendants

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) 766-7683
E-Mail: dr_taitz@yahoo.com

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

LISA LIBERI, et al,)	Case # 09-1898 Hon Eduardo Robreno presiding
)	Reply to 10.07.10 motion by the Plaintiffs
)	Defendant's request for the court to use its' inherent power
)	to sanction the plaintiffs,
Plaintiffs)	Attorney Philip J. Berg and witness Shirley Waddell for
)	repeated acts of fraud on the court and perjury
)	
v.)	Request to expedite production of Lisa Liberi's
)	Pennsylvania drivers License, allegedly provided to court
ORLY TAITZ, et al.,)	during the emergency hearing on 08.07.09.
)	
Defendants.)	

Response to Plaintiff's 10.07.10 motion and simultaneous request for this court to use its inherent powers sanction Plaintiff's Attorney Philip Berg for repeated acts of fraud on the court and perjury and request to expedite production of Liberi's PA driver's license

This case was filed by plaintiffs on May 04, 2009. The case is for defamation of character . The essence of the case is the sworn statement by the Plaintiff Lisa Liberi and her co-plaintiff and attorney Philip J Berg, claiming that Liberi is an

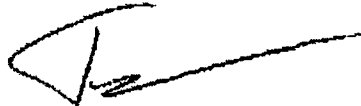
Liberi et al v Taitz et al. Defendants response to motion. Defendants demand for sanctions against Plaintiffs, witness Shirley Waddell and Attorney Philip J. Berg 1

/s/ Dr. Orly Taitz, ESQ



07.28.10.

I certify under penalty of perjury, that I served above pleadings on following parties and authorities:



Philip Berg
555 Andorra Glen Court, ste 12
Lafayette Hill PA 19444-2531

Neil Sankey
2470 Stearns str #162
Simi Valley, CA 93063
Linda Belcher
201 Paris
Castroville TX 78009

Ed and Caren Hale
1401 Bowie Str
Wellington TX 79095

Philadelphia District Attorneys' office
3 South Penn square
Philadelphia, PA

US Attorneys' office
Eastern District of PA
615 Chestnut str, ste 1250
Philadelphia PA 19106-4100

Social Security Administration
6401 Security Blvd

Liberi et al v Taitz et al. Defendants response to motion. Defendants demand for sanctions against Plaintiffs, witness Shirley Waddell and Attorney Philip J. Berg 11

Baltimore, MD 21235

James Secord
Assistant District attorney
San Bernardino County
316 North Mountain view
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

Public Integrity Section
Department of Justice
950 Pennsylvania Ave, NW
Washington DC 20530-0001

Office of the United Nations High Commissioner for Human Rights (OHCHR)
Special Rapporteur on the Situation of Human Rights Defenders
The Honorable Mrs. Margaret Sekaggya
Palais des Nations
CH-1211 Geneva 10, Switzerland
International Criminal bar Hague

Liberi et al v Taitz et al. Defendants response to motion. Defendants demand for sanctions
against Plaintiffs, witness Shirley Waddell and Attorney Philip J. Berg 12

United Nations Commission for
Civil Rights Defenders
Orsolya Toth (Ms)
Human Rights Officer
Civil and Political Rights Section
Special Procedures Division
Office of the High Commissioner for Human Rights
tel: + 41 22 917 91 51
email: ototh@ohchr.org
/s/ Orly Taitz
07.28.10.

Proposed order

Law offices of
Dr. Orly Taitz, ESQ
29839 Santa Margarita CA 92688
Pro se and for Defend Our Freedoms Foundation

UNITED STATES DISTRICT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Lisa Liberi, et al) Case # 09-cv-01898-ECR
Plaintiffs) Assigned to Honorable Eduardo C.
Robreno)
V)
Orly Taitz et al)

Liberi et al v Taitz et al. Defendants response to motion. Defendants demand for sanctions against Plaintiffs, witness Shirley Waddell and Attorney Philip J. Berg 13

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT “B”



Supreme Court of Pennsylvania

Eastern District

John W. Persue, Jr., Esq.
Deputy Prothonotary
Patricia A. Johnson
Chief Clerk

468 City Hall
Philadelphia, PA 19107
(215) 560-6370
www.judiciary.us

January 14, 2011

Philip J. Berg, Esq.
555 Andorra Glen Ct Ste 12
Lafayette Hill, PA 19444-2531

RE: **Certificate of Good Standing**

Dear Attorney Berg:

Enclosed is your Certificate of Good Standing confirming that you are an active member in good standing of the Bar of the Supreme Court of Pennsylvania.

In addition, enclosed is your Receipt Number(s) 2011-SUP-E-000117 showing payment in the amount of \$25.00.

Very truly yours,

Office of the Prothonotary

/rdh
Enclosure



**Supreme Court of Pennsylvania
PAYMENT RECEIPT**

Receipt Date: 01/14/2011
Receipt No: 2011-SUP-E-000117

Remitter:

Philip J. Berg, Esq.
555 Andorra Glen Ct Ste 12
Lafayette Hill, PA 19444-2531

PAYMENT

Method	Check / Money Order No.	Bank Transit No.	Amount
Money Order	18411341354		\$ 25.00

FEE

Date	Type	Pages	Fee Amount	Paid
166 CGS 2011	Certificate of Good Standing for Berg, Phillip J.			
01/13/2011	Request for Certificate of Good Standing	1	\$ 25.00	\$ 25.00
			\$ 25.00	\$ 25.00

Total Payment: \$ 25.00
Change: \$ 0.00
Payments Less Change: \$ 25.00

Comments:

RETAIN THIS RECEIPT FOR YOUR RECORDS



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Philip J. Berg, Esq.

DATE OF ADMISSION

November 18, 1971

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal
Dated: January 14, 2011

A handwritten signature in cursive script, reading "Patricia A. Johnson".

Patricia A. Johnson
Chief Clerk

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT "B"



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Phillp J. Berg, Esq.

DATE OF ADMISSION

November 18, 1971

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal
Dated: January 14, 2011

Patricia A. Johnson

Patricia A. Johnson
Chief Clerk

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT “C”

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 CHARLES EDWARD LINCOLN, III

11 Plaintiff,

12 vs.

13 DAYLIGHT CHEMICAL INFOR-
14 MATION SYSTEMS, INC., et al,

15 Defendants.
16
17

CIVIL ACTION NUMBER:

8:10-CV-01573 AG (PLAx)

**Declaration of Dr. Charles Edward
Lincoln, III**

18 **Declaration of Dr. Charles Edward Lincoln, III**

19
20 I, Charles Edward Lincoln, III, am over the age of 18 and am the Plaintiff in
21 the above-entitled-and-numbered cause. I have personal knowledge of the facts
22 herein, and if called to do, I can and will competently testify. I make this
23 Declaration under the penalty of perjury of the Laws of the United States pursuant
24 to 28 U.S.C. §1746.
25
26
27
28

1 1. I drafted and filed the original and First Amended Complaints in this action
2 on my own behalf, *pro se, in propria persona*.

3
4 2. From about May 30, 2009 through November 4, 2009, Orly Taitz brought
5 me to California from Florida, Massachusetts, and Texas to work with her as a law
6 clerk and consultant and to assist her with her pending litigation. The first of the
7 cases I assisted her with was Liberi, et al v. Taitz, et al filed in U.S. District Court
8 in Philadelphia and pending in the Eastern District of Pennsylvania. Although our
9 relationship grew and became multifaceted and complex, Orly Taitz suddenly and
10 unilaterally terminated our collaboration on the evening of November 4, 2011.

11
12
13 3. In or about the end of December 2009, in the resulting aftermath of this
14 termination, I hired Philip J. Berg, Esquire to represent and defend me in a Court
15 matter in Florida, specifically an Order to Show Cause (a satellite litigation spun
16 off from a mortgage-redemption case I had filed) which was originated and
17 orchestrated by Orly Taitz, essentially to cover up and distract attention from a
18 romantic relationship which had been exposed and made public by another of her
19 former colleagues/associates in relation to the presidential eligibility litigation.
20
21
22

23 4. Mr. Berg was successful in his litigation and I was neither sanctioned by the
24 Court nor found guilty of any criminal or civil infraction or offense as a result of
25 Orly Taitz's malicious prosecution and false allegations.
26
27
28

1 5. None of the Plaintiffs in the Liberi, et al v. Taitz, et al case have anything to
2 do with my present complaint or litigation and therefore, the documents and
3 statement filed by Orly Taitz in this Court's Docket Entry No.'s 24, 26, 30, 38, 38-
4 1, 42, 43 and 46 are inappropriate, irrelevant and very prejudicial to the Liberi, et
5 al Case as the U.S. District Court for the Eastern District of Pennsylvania has
6 ordered that case transferred as a matter of venue and convenient forum to this
7 United States District Court for the Central District of California, Southern
8 Division.

9
10
11
12 6. In addition, Orly Taitz continues to file what appear to be documents from
13 other Court cases in which I was involved or in which I might have been named
14 though not directly involved. Just as with the Liberi, et al file, the documents
15 pertaining to me and filed by Orly Taitz are completely irrelevant to any issue
16 presently before the Court relating to my complaint and/or its probable
17 amendments.
18

19
20
21 7. Notably among these, Orly Taitz also has filed documents and statements
22 pertaining to my August, 2000 conviction for misstatement of my social security
23 number in violation of 42 U.S.C. §408(a)(7)(B). I had told Orly Taitz of my
24 conviction before we ever began working together, plus I have a blog on-line
25 which describes everything about my history in some detail. I had even warned
26 Orly Taitz that she ran a risk by not officially disclosing my background to all her
27
28

1 clients, but that as Patriotic Americans they should understand that I was charged
2 and convicted essentially for offending the U.S. District Courts in Texas with my
3 civil rights litigation rather than anything else. My criminal conviction is now over
4 ten years old and certainly does not have any relevancy to the within suit, even
5 though my very low-supervision “probation” (during which I was even allowed to
6 travel to Europe, Africa, and the Middle East, pursuing my former career in
7 archaeology) did not formally end until 2003.

10
11 8. Orly Taitz continues to make statements in her filings implying to this Court
12 that I spent a large amount of time in jail. This simply is not true, in fact, my time
13 spent involved in a romantic liason with Orly Taitz exceeds by a factor of more
14 than two (more than 100%) all the time I ever spent in jail (even combining two
15 arrests for contempt [or something like contempt] in August 2006 and December
16 2007-January 2008).

19 9. In several of Orly Taitz’s filings (which mirror if they do not duplicate her
20 prior published and public statements for which I am already suing her in this case)
21 she misrepresents or at best presents in ludicrously false light the facts into issues
22 concerning my previous conviction, what the Liberi, et al Case is about.
23 Astoundingly, just as one example, she falsely claims Lisa Ostella and I are
24 associates and calls us co-conspirators, when we have never worked together, nor
25 even met.
26
27
28

1 10. Further, Orly Taitz has claimed in her filings and insinuated that Gary
2 Kreep, Philip J. Berg, Esquire and Lisa Liberi interjected themselves into litigation
3 she had pending against President Barack Obama. This is untrue. I can state from
4 personal knowledge working as Orly's assistant and in reviewing all the relevant
5 paperwork and "evidence" which Orly gave me to review that Lisa Liberi has
6 never interfered or had anything to do with any of Orly Taitz's cases, other than
7 the case Mrs. Liberi has pending against her, which suit complains of matters of
8 personal injury, defamation, and fraud (and, ironically, improper publication of
9 private information, including social security numbers) quite unrelated to Barack
10 Obama or his eligibility to serve as President of the United States.

11 11. Philip J. Berg, Esquire did send a letter to Judge Carter in the case of Barnett
12 v. Obama and requested a document filed by Orly Taitz to be sealed as it contained
13 the birth date, social security number and other private data of Lisa Liberi. Other
14 than protecting his client, Mr. Berg has not had anything to do with any of Orly
15 Taitz's "Obama" cases.

16 12. Gary Kreep is an attorney two (2) Plaintiffs in a case against President
17 Obama hired, when they fired Orly Taitz. Because Orly Taitz represented other
18 Plaintiffs in the same case, Gary Kreep and Orly Taitz had to work together. They
19 had previously cooperated on related litigation in California Superior Court.
20
21
22
23
24
25
26
27
28

1 13. I submit to the Court that Orly Taitz has filed this barrage of irrelevant and
2 immaterial documents in a misguided attempt to prejudice this Court against my
3 attorney, Philip J. Berg, his paralegal, and a case completely unrelated to this one,
4 Liberi, et al v. Taitz, et al, as well as two of the Plaintiffs in Liberi, et al v. Taitz, et
5 al, Lisa Liberi and Lisa Ostella.
6
7

8 14. Unfortunately, Orly Taitz has a bad history of retaliating and bullying those
9 who speak against her, such as testifying and those who help or assist one she
10 considers an enemy, like myself. I can only hope this Court will put a stop to Orly
11 Taitz' wildly inappropriate behavior, which effectively wastes massive amounts of
12 time and diverts the attention of the parties and the Court from the real issues in
13 this case, which revolve around Orly Taitz' attempts to destroy me and my future
14 professional recovery to cover up, divert attention from, and disguise the facts that
15 (1) we had an affair because she was an unhappily married, lonely woman
16 controlled by an abusive husband, (2) we made major business plans together
17 around which I redesigned my entire personal and professional life, and (3) her
18 husband Yosef Taitz used (apparently very credible and real) threats of violence,
19 extortion, and intimidation to put an end to both our personal and business
20 relationships---all the while Orly and Yosef and Daylight Chemical Information
21 Systems, Inc., were engaged in a conspiracy to defraud me and the rest of the
22 American people by leading them to believe that they were engaged in one sort of
23
24
25
26
27
28

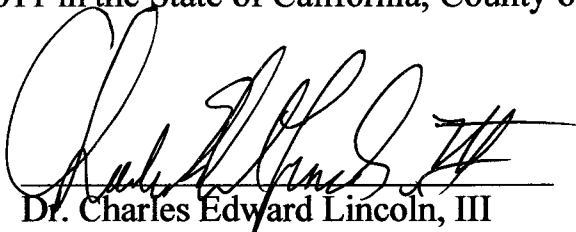
1 politically-oriented constitutional crusade when in fact they were aiming to achieve
2 exactly the opposite purpose.

3
4 15. For the reasons stated in my Motion to Strike, I pray this Court grant my
5 Motion and Strike Orly Taitz's filings appearing on the Docket as Entry numbers
6 24, 26, 30, 38, 38-1, 42, 43, and 46.

7
8 //
9 //
10 //

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

13 Executed this 18th day of February 2011 in the State of California, County of
14 Los Angeles.


15
16 Dr. Charles Edward Lincoln, III
17 Plaintiff

18
19
20
21
22
23
24
25
26
27
28

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 propria persona* pending his Attorney's admission *pro hac vice*

7 Philip J. Berg, Esquire
8 Law Offices of Philip J. Berg
9 555 Andorra Glen Court, Suite 12
10 Lafayette Hill, PA 19444-2531
11 (610) 825-3134
12 Email: philjberg@gmail.com
13 PA ID 09867
14 Attorney for Charles Edward Lincoln, III pending *admission pro hac vice*

15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

CHARLES EDWARD LINCOLN, III	:	
	:	CIVIL ACTION NUMBER:
Plaintiff,	:	8:10-CV-01573 AG (PLAx)
	:	
vs.	:	Certificate of Service
	:	
	:	Date of Hearing: March 21, 2011
DAYLIGHT CHEMICAL	:	Time of Hearing: 10:00 a.m.
INFORMATION SYSTEMS, INC., et al,	:	Location: Courtroom: 10D
	:	
Defendants.	:	

I, Charles Edward Lincoln, III hereby certify a true and correct copy of Plaintiff's Notice of Motion and Motion to Strike were served through the ECF filing system and Email this 18th day of February 2011 upon the following:

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Mark I Melo
Bradley and Gmelich
700 N Brand Blvd 10th Fl
Glendale, CA 91203-1202
Email: mmelo@bglawyers.com

Attorney for Defendants, Yosef Taitz and
Daylight Chemical Information Systems, Inc.

Orly Taitz
Orly Taitz Law Offices
26302 La Paz, Ste 211
Mission Viejo, CA 92691
Email: dr_taitz@yahoo.com

Attorney for Defendants, Appealing Dentistry; Defend our
Freedoms Foundations, Inc.; and Orly Taitz, Inc.

William Edward Pallares
Lewis Brisbois Bisgaard and Smith LLP
221 North Figueroa Street 12th Floor
Los Angeles, CA 90012-2601
Email: pallares@lbbslaw.com

Attorney for Defendants, Orly Taitz and Law Offices of Orly Taitz

Dated: February 18, 2011

Charles Edward Lincoln, III
603 Elmwood Place, Suite #6
Austin, Texas 78705
Telephone: (512) 968-2500
E-mail: charles.lincoln@rocketmail.com
Plaintiff *in propria persona* pending
his attorney's admission *pro hac vice*