

**IN UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 15-cv-20782-Martinez-Goodman

DENNIS MONTGOMERY,

Plaintiff,

v.

RISEN, ET AL.

Defendants.

**NOTICE OF TELEPHONIC HEARING BEFORE
MAGISTRATE JUDGE JONATHAN GOODMAN**

Plaintiff, Dennis Montgomery, hereby gives notice that a telephonic hearing has been set before the Honorable Jonathan Goodman on November 4, 2015 at 2:30 p.m. E.D.T. This was one of the dates available, and Defendants have said they are available.

The hearing is regarding the issue of the obstruction of Plaintiff being able to subpoena and depose Michael Flynn, the former attorney of Plaintiff who has violated attorney client confidences and work product and made false accusations against Plaintiff, as well as provided Defendants with a thumb drive of over 20 thousand pages of material, much of which is privileged and remains privileged. The hearing also concerns Defendants' harassment of Plaintiff, his wife, his daughter and son in law, by use of the perceived threatening use of their grandchildren and children, while Mr. Montgomery was and remains critically hospitalized and while his wife is in a state of extreme emotional distress.

Pursuant to S.D. Fla. L. R. 7.1 (A)(3), Plaintiff hereby certifies in good faith that the parties met and conferred regarding this discovery dispute and a reasonable effort was made to resolve this issue however the parties were unable to reach an agreement.

Dated: October 27, 2015

Respectfully Submitted,

/s/ Larry Klayman
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of October, 2015, a true and correct copy of the foregoing was served via email and U.S. Mail upon the following:

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/s/ Larry Klayman

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