

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

LEONARD ROWE ET AL,

Plaintiffs,

v.

GARY, WILLIAMS, PARENTI &
WATSON, P.L.L.C. ET AL,

Defendants.

Civil Action No.
1:15-CV-0770-AT

MOTION OF DEFENDANT, MARIA P. SPERANDO,
FOR ADDITIONAL PAGES

Defendant, Maria P. Sperando, pro se, hereby moves pursuant to Local Rule 7.1D of the Local Rules of the Northern District of Georgia for permission to file a Motion to Dismiss of 105 pages in length.

The Plaintiffs are making the most horrific allegation against the undersigned that one can make against an attorney—betrayal of one’s own client for money. They have alleged that in a discrimination action Defendant Willie Gary and his firm prosecuted from 2001 to 2005 on their behalf, Mr. Gary negotiated a bribe with two of the defendants, talent agencies William Morris and CAA, in exchange for agreeing to sabotage the Plaintiffs’ case. They have further alleged that the other Defendants

in this case, including the undersigned, who worked for the Gary Firm at that time then took actions pursuant to Mr. Gary's instructions to insure that the motions for summary judgment of William Morris and CAA would be granted. The Plaintiffs claim that in addition to professional negligence and common-law fraud the Defendants' conduct constituted a violation of RICO and that the Defendants are criminal racketeers.

Not content to allow the judicial system to resolve their allegations of misconduct against the Defendants, the Plaintiffs have engaged in the most vile, libelous, slanderous and destructive publicity campaign against the Defendants on the internet and in the media. An individual by the name of Ray Rogers, who calls himself the Director of an organization called Corporate Campaign, Inc. and claims to represent the Plaintiffs, emailed a letter dated February 17, 2015 to the Defendants, including the undersigned, a copy of which is attached as Ex. A.

In said letter Mr. Rogers, on behalf of the Plaintiffs, wrote, "your outlandish behavior against many of your clients merits your disbarment and imprisonment... You can choose to recognize and correct the errors of the past...or be disgraced, probably face disbarment, heavy fines and restitution, and many years in prison. Simply put, you can opt for justice or public and professional humiliation. In the event we do not hear from you by February 24, 2015 to schedule a meeting in New York City no later

than March 3, 2015 to resolve the injustices done to the plaintiffs in the ‘Rowe/King’ lawsuit, we will have no other choice than to launch The ClientKiller.org website and a relentless campaign to bring you all to justice.” Mr. Rogers has been good to his word.

In that same letter Mr. Rogers also wrote that “[b]ehind the scenes, unfortunately, the judicial process is too often corrupted by payoffs, dishonest attorneys, clerks and judges to the detriment of aggrieved plaintiffs seeking justice from powerful and politically connected corporations and individuals.”¹

It would have been easy enough to say, “Father, forgive them, for they know not what they do” and dismiss this letter as the ravings of a lunatic were it not for the fact that Mr. Rogers published this letter on the internet by means of a “news release” on April 21, 2015. Indeed, he has published numerous “news releases” on the internet and has sent them via email to an untold number of people—including most particularly some in the legal community—viciously disparaging the Defendants, including the undersigned, and accusing them of “defrauding clients out of millions of dollars” and “embezzling clients’ funds.” The Plaintiffs, to the undersigned’s

¹ Six minutes after Mr. Rogers emailed his letter, Plaintiffs’ counsel, Edward Griffith, emailed a letter at 6:20 p.m. on February 17, 2015, to Willie Gary on which he copied the other Defendants, including the undersigned, inquiring whether Mr. Gary had “any interest in discussing a pre-litigation resolution” of the Complaint attached to the letter. Said letter is attached as Exhibit B.

knowledge, have never disavowed Mr. Rogers' claim that he represents them or any of what he has published on their behalf. In fact, Plaintiff Leonard Rowe appeared on WSB-TV on March 18, 2015 making the same allegations of fraud against the Defendants.

Attempting to respond to these absurd accusations via the media or the internet other than by means of a simple denial would be a fool's errand. It is only this Court that stands between the undersigned and this outrageous and reckless publicity blitz.

Thus, in an effort to explain to the Court why this Complaint should be dismissed, the undersigned prepared an extensive motion to dismiss that was over 100 pages in length. After the undersigned shortened the motion as much as possible without removing arguments and citations necessary to the Court's informed decision, the motion was then 75 pages in length using Times New Roman font with a print size of 12 and one-inch margins. After the motion was converted to the required print size of 14 with a 1.5 inch upper margin, the motion is now 105 pages in length.

It is necessary for the undersigned to file a motion to dismiss of 105 pages in length for several reasons. First, as evidenced by the Complaint which is 63 pages in length this is a very factually complex matter requiring a lengthy and comprehensive Statement of Facts.

Second, the Complaints' seven counts raise numerous issues, i.e., personal jurisdiction pursuant to federal statute, personal jurisdiction pursuant to Georgia law, venue, the plausibility of the Plaintiffs' RICO claims (see Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 127 S. Ct. 1955, 1274, 167 L. Ed. 2d 929 (2007)), the statute of limitations as to each of the Plaintiffs' claims including the Plaintiffs' defense of fraudulent concealment, and failure to state a cause of action pursuant to RICO, each of which must be thoroughly addressed.

Third, several of the issues, i.e., plausibility, fraudulent concealment and failure to state a claim under RICO, required amassing the numerous facts and applying them to the law. This necessitated a greater number of pages than otherwise would have been required if there were fewer issues and/or if each issue were not as factually intense.

Fourth, the law on RICO is extremely complex. To determine whether a RICO claim has been properly pled, the Court must consider numerous factors and even within each issue, e.g., continuity, there are several factors that must be addressed. The undersigned has attempted to address all of them.

Fifth, certain arguments regarding the statute of limitations must be made as to each Plaintiff individually.

Finally, a motion to dismiss of 105 pages in length is not unreasonable given

that most of the arguments the undersigned is making apply to the other Defendants as well as herself.

The Plaintiffs have demanded more than \$1.2 billion in damages, not including their demand for treble damages and attorney's fees. At stake is not only the significant amount of money the Plaintiffs are demanding but the undersigned's personal and professional reputation as well as her ability to practice law and earn a living. Therefore, the undersigned has attempted to leave no stone unturned in defending herself and begs the Court's indulgence in allowing the undersigned to file a motion to dismiss of 105 pages in length.

WHEREFORE, Defendant, Maria P. Sperando, respectfully requests that she be allowed to file a Motion to Dismiss of 105 pages in length.

Respectfully submitted,



Maria P. Sperando
Defendant, Pro-Se

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 4th day of May, 2015, the original Motion For Additional Pages was furnished via U.S. Mail for filing with Office of the Clerk,

United States District Court, 2211 United States Courthouse, 75 Spring Street, SW, Atlanta, Georgia 30303 and that a true and correct copy of the foregoing was furnished via U. S. Mail to Edward Griffith, Esquire, The Griffith Law Firm, Attorneys for the Plaintiffs, 45 Broadway, Suite 2200, New York, New York 1000; Tricia Hoffler, Esquire, Edmond, Lindsay & Hoffler, 344 Woodward Avenue, S.E., Atlanta, Georgia 30312; William Campbell, Esquire, 120 Milano Drive, Atlanta, Georgia 30331; and Chan Bryant Abney, Esquire, The Law Firm of Gary, Williams, Parenti, Watson, & Gary P.L.L.C., Attorney for Willie Gary, Esquire, Lorenzo Williams, Esquire, Sekou Gary, Esquire and The Law Firm of Gary, Williams, Parenti, Watson & Gary, P.L.L.C., 221 E. Osceola Street, Stuart, Florida, 34994.



Maria P. Sperando
Defendant Pro-Se
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Maryann@Sperandolaw.com



Tools to Confront Power with Power

February 17, 2015

Letter via email to:

The Law Offices of Gary, Williams, Parenti & Watson, P.L.L.C.
Willie E. Gary, Esq.
William C. Campbell
Sekou M. Gary, Esq.
Tricia P. Hoffler, Esq.
Robert V. Parenti, Esq.
Maria P. Sperando, Esq.
Donald N. Watson, Esq.
Lorenzo Williams, Esq.

Dear Mr. W. Gary, Mr. Campbell, Mr. S. Gary, Ms. Hoffler, Mr. Parenti, Ms. Sperando, Mr. Watson and Mr. Williams:

I am writing to you about very serious issues relating to charges of unlawful behavior engaged in by The Gary Law Firm and Willie Gary, William Campbell, Sekou Gary, Tricia Hoffler, Maria Sperando and Lorenzo Williams while serving as attorneys in the employment of The Gary Law Firm.

We represent a number of The Gary Law Firm's former clients who claim—and apparently for good reason—that Mr. Gary and his colleagues have performed legal malpractice and criminal activity in order to defraud them.

Some of these former clients and the charges they are making are described on a website we plan to launch as part of a broad public campaign to hold Mr. Gary, his law firm accomplices, and The Gary Law Firm accountable. To preview TheClientKiller.org website, visit <http://corporatecampaign.org/testsite/theclientkiller/>

We are very careful in our research and investigations as well as the accuracy of information and opinions that we present to the public. We want to give each of you the opportunity to respond to information on the website before its planned launching in seven days from the date of this letter. Unless you can make a valid case that the information we present as fact on the website is erroneous, nothing on the website will be changed or removed.

You are all being implicated in a series of allegations of very serious crimes against plaintiff clients in order to enrich yourselves. The ongoing corruption spans more than a decade and is not just isolated to one case. Allegations of corrupt activity, some of which overlap, include:

- Fraud upon the court;
- Violating RICO statutes;
- Defrauding clients out of millions of dollars;
- Embezzling clients' funds;

Exhibit A – February 17, 2015 letter to Defendants – Page 1 of 2

- Stealing clients' portion of settlements;
- Inflating expenses to defraud clients;
- Entering into illegal conflict of interest deals with defendants and/or their attorneys; and,
- Failing to properly represent clients and reckless disregard of their rights.

Behind the scenes, unfortunately, the judicial process is too often corrupted by payoffs, dishonest attorneys, clerks and judges to the detriment of aggrieved plaintiffs seeking justice from powerful and politically connected corporations and individuals. Rest assured that the transgressions of Mr. Gary et al will not be contained and hidden from public scrutiny, but aired locally, nationally and internationally as part of a far-reaching Campaign seeking Justice for Willie Gary Victims. We have the resources and ability to effectively reach out to, and communicate with, tens of thousands of civil and human rights leaders and activists as well as labor, political, religious and academic leaders and the legal community.

The case of Leonard Rowe is our focus at this time and demands your immediate attention. As you should be aware, Leonard Rowe; Rowe Entertainment, Inc.; Lee King and Lee King Productions are prepared to file a complaint against all of you for civil liability under the federal Racketeer Influenced and Corrupt Organization Act, the Georgia Racketeer Influenced and Corrupt Organization Act, common law fraud and legal malpractice.

It is our belief that your outlandish behavior against many of your clients merits your disbarment and imprisonment. At the same time, you have shown the ability to win multi-million dollar judgments for clients honestly and to gain a comfortable lifestyle. I will be the first to applaud "The Giant Killer" tag when you earn your money by successfully prosecuting tobacco and other companies over their negligent and destructive policies and practices.

You all have a choice to make. You can choose to recognize and correct the errors of the past vis-à-vis those we represent and continue to make lots of money honestly as "Giant Killers" or be disgraced, probably face disbarment, heavy fines and restitution, and many years in prison. Simply put, you can opt for justice or public and professional humiliation.

In the event we do not hear from you by February 24, 2015 to schedule a meeting in New York City no later than March 3, 2015 to resolve the injustices done to the plaintiffs in the "Rowe/King" lawsuit, we will have no other choice than to launch TheClientKiller.org website and a relentless campaign to bring you all to justice.

Please do not hesitate to contact me directly.

Yours Truly,



Ray Rogers
Director

**Exhibit A – February 17, 2015 letter to
Defendants – Page 2 of 2**

**Cooper Station, P.O. Box 1002 • New York, NY 10276-1002
(718) 852-2808 • www.CorporateCampaign.org**



Maria Sperando

From: Edward Griffith <eg@thegriffithfirm.com>
Sent: Tuesday, February 17, 2015 6:20 PM
To: Willie E. Gary (weg@williegary.com)
Cc: William C. Campbell (williamcc1996@aol.com); Sekou M. Gary (sekou@williegary.com); Tricia P. Hoffler (ckhoffler@edmondfirm.com); Maria Sperando; Lorenzo Williams (lw@williegary.com); Chan Abney (cba@williegary.com); Joseph Sayad
Subject: Rowe, et al. v. Gary, et al.
Attachments: Draft Complaint.pdf

Dear Mr. Gary,

Attached please find a complaint that our clients, Leonard Rowe and Lee King, have instructed us to file. Please let us know within the next week, *i.e.*, by February 25, 2015, if you have any interest in discussing a pre-litigation resolution.

Regards,

Ed Griffith

THE GRIFFITH FIRM
45 Broadway, Suite 2200
New York, New York 10006
(212) 363-3784
(212) 363-3790 (fax)
(646) 645-3784 (cell)

**Exhibit B – February 17, 2015 Email to
Mr. Gary from Mr. Griffith – Page 1 of 1**