

Jo Mildred

LAW OFFICE REPORT #27

April 20, 1978

page 1

from June

E

1. Ranch - Regional program, patient rates - Bonnie doesn't think we'll get the special rates on the program, after going through the third degree with the Board of Health people last week. We've always had volunteer labor because of the ownership by the church, etc. The questions asked were "why do you want more money?" There isn't the expense of paid labor, there is already a profit, why do we want more money?

She has to draw up expenditure sheets to show how the income is distributed, into food, sundries, rent etc. As it is now, the figure for food is 37 cents per person, hardly recognizable in the eyes of the Board of Health. Claire has a personal draw of \$12 - \$30 per month, hardly realistic in the eyes of business people who don't relate to apostolic life. There are ways of enhancing this expenditure list, which Bonnie intends to do, in hopes of proving that we do need the increased special rates in order to provide the special services and operate at a profit.

She has talked privately with the psychologist who has been pushing the special rates; she has asked him not to tell Claire or the others yet that it looks like the ranch will not get the higher rates. He wants to appeal if we don't get the rates; he wants to go to our Congressman (Clausen); she plays this down and tries to get him to not pursue it. She is stalling the Board of Health until she can draw up the expenditure sheets, which are due no more than 2 more weeks. Martha and I both agree with her that the figures need more work. Also, she suggests adding a depreciation fund; i.e., a fund for anticipating depreciation of equipment, such as setting aside funds for repairs or new van, cars, etc.

2. We've received a bill from the Bonding Service to renew the annual estate bond on Anthony Lopez's guardianship case. Ask Chaikin if we should pay it. \$20.

IT IS A BILL FOR THE BONDING SERVICE TO RENEW THE BOND.

NOT OUR PROBLEM E.

3. Pets Unlimited - We were sued, as you know. Garry called the Deputy City Attorney who had sent us the summons. She said it was policy to send summons to all parties to the action regardless of involvement. Garry left a note with her to call him if she thought we needed to be represented at the hearing. Otherwise he didn't plan on doing anything else. He suggested we call Pets and see what they were going to do, but thought we should sit on it basically. He wasn't too optimistic about our getting our money back.

4. Canoe case - They never responded to our letter demanding delivery of the canoes. Garry said we should send the whole file to the Post Office Fraud Division and see if they have anything on these people. And let him know what they say. Should we do this? *yes. E.*

B46(88)

5) Clara Johnson's niece, Syola Williams, had a court case going, and we have received notice from the attorney that he is dropping the case because he never received any response to his letters from Clara. He is filing a motion in the court to withdraw from the case. See attached. I am not familiar with this case. What are we to do with this.

*It is so nice
can sell her
house. We
don't want
to have her
to deal with
someone else to
fight the dispute
E*

6) Rob Gieg had a bus accident last year, in which he was hit in an intersection by a car that ran a red light, swerved to avoid hitting him and hit another car as well. Now the driver of the car that ran the red light is suing Rob, and P.T. Bonnie called Brown Brothers Adjusters here in SF, who is our representative in the case it turns out that Mayfield never reported the accident when it happened to Brown Bros. Brown Bros. has been told that Rob is in S.A. Harold's file on the accident has the dmV form filled out by Rob, notes of calling Mayfield, and an unsigned statement by Rob. Brown Bros. would be the ones that would defend us in this, but if you want us to talk to Eric about it, we will.

*let to
most of our
let our car
to defend
E*

7) Don Jackson had a bus accident last year; Brown Bros. (?) is on the other side in this one, say they served him with a lawsuit 1/15/78. They have been told that he left for S.A. 10/25/77 and has been there ever since and we have no one here who accepted for him. They were threatening default judgment because he had not responded. The insurance man has said they may need official proof from the Embassy in Georgetown of Rob's presence there. Don't know know this for certain yet.

*Our insurance
carrier should
be defending
us in
default
judgment
and Don is
our driver.*

B46(89)

TELEPHONE:
(415) 832-8776

BONDING SERVICE, INC.
SURETY BONDS

125 - 12th STREET • SUITE 103 • OAKLAND, CALIFORNIA 94607

TO **Walter J. Jones**

DATE **4/1/78**

ATTORNEY **Eugene B. Chaikin**
Attorney at Law
Post Office Box 15156
San Francisco, Calif. 94115

IF THIS MATTER IS CLOSED
PLEASE SEND CANCELLATION
EVIDENCE AS SOON AS POSSIBLE

BOND NO	BOND AMOUNT	DUE DATE	PREMIUM DUE
94 61 37	4,000.00	4/14/78	\$20.00
FOR THE GUARDIANSHIP OF VINCENT LOPEZ, JR.			
PREMIUM RENEWAL			
TOTAL DUE →			\$20.00

TO INSURE PROPER CREDIT PLEASE RETURN COPY OF THIS INVOICE WITH YOUR REMITTANCE

INVOICE

FORM 7015

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LAW OFFICES
DICKER & DICKER
A PROFESSIONAL CORPORATION
1180 SOUTH BEVERLY DRIVE
LOS ANGELES, CALIFORNIA 90035
(213) 853-8700
(213) 879-4777

Attorneys for Plaintiff

MUNICIPAL COURT, LOS ANGELES JUDICIAL DISTRICT
COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

SYOLA WILLIAMS,)	CASE NO. LA 167,485
Plaintiff,)	NOTICE OF MOTION TO WITHDRAW AS
vs.)	ATTORNEY OF RECORD, DECLARATION
CHARLES TURNER, et. al.,)	OF ROBERT L. DICKER, AND POINTS
Defendants.)	AND AUTHORITIES IN SUPPORT THEREOF.

TO: SYOLA WILLIAMS, and to CHARLES TURNER, and to his attorney of record:

Notice is hereby given that on Friday, APRIL 28, 1978, at 9:45 A.M., in DIVISION 7, or as soon thereafter as the matter may be heard in this court, located at 110 North Grand Avenue, Los Angeles, California, ROBERT L. DICKER will move the court for an Order permitting him to withdraw as counsel of record for SYOLA WILLIAMS.

This Motion will be made on the ground that said party has failed and refused to cooperate with her attorney and have continually failed to respond to this attorney's request for answers and other pertinent requests for further information as

B4b(91)

06. P. 141

156-10000

1 to the basis of this lawsuit in unlawful detainer.

2 The Motion will be based on this Notice of Motion, the
3 Declaration of ROBERT L. DICKER, and the Memorandum of Points and
4 Authorities filed herewith, and on such oral and documentary evi-
5 dence as may be presented at the hearing of the Motion.

6 DATED: April 12, 1978

7 DICKER & DICKER

8
9 By ROBERT L. DICKER
10 Robert L. Dicker,
Attorneys for Plaintiff

11 * * * *

12 DECLARATION OF ROBERT L. DICKER

13 I, ROBERT L. DICKER, hereby state and declare as follows:

14 I am the attorney of record for SYOLA WILLIAMS, Plaintiff
15 herein. On approximately JUNE 23, 1977, I was retained by the
16 Plaintiff to represent her in this action, which I have faithfully
17 done to date. That I was originally approached by the Plaintiff's
18 aunt, MRS. CLARA JOHNSON, and at all times from the inception of
19 this matter communicated with MISS WILLIAMS through her aunt at
20 1345 Alvarado Terrace, Apt. 207, Los Angeles, California. That
21 pursuant to her instructions, I served upon the Defendant in this
22 matter a 30-Day Notice To Quit the premises and subsequently on
23 JULY 25, 1977 filed this unlawful detainer action.

24 I was subsequently put into communication with attorney
25 ROBERT D. BASH who informed me and submitted to me various docu-
26 ments and information which seemed to indicate that there were
27 some very serious problems and questions regarding the propriety
28 of this unlawful detainer action. I subsequently granted to MR.

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CORPORATION
LOS ANGELES, CALIF.

B46(92)

1 BASH an open extension in which to file his responsive pleading to
2 the unlawful detainer action until such time as I could more prop-
3 erly inform myself as to the additional facts which I felt were
4 necessary in order to prosecute successfully in this action.

5 On AUGUST 15, 1977 I wrote to the Plaintiff's aunt request-
6 ing additional information, a copy of which is attached hereto as
7 Exhibit "A" and incorporated by reference herein. I subsequently
8 followed this letter with a letter of AUGUST 29, 1977 indicating
9 that it was most imperative that Plaintiff contact me, a copy of
10 which is attached hereto as Exhibit "B" and incorporated by refer-
11 ence herein.

12 Not having received any response whatsoever from my
13 clients, I again wrote to them on NOVEMBER 15, 1977 and stressed
14 the importance of being informed as to all the complex facts in-
15 volved in this matter. A copy of that letter is attached hereto
16 as Exhibit "C" and incorporated herein by reference. Again re-
17 ceiving no response, I sent a memorandum to the Plaintiff's aunt
18 on JANUARY 12, 1978, in which I once again indicated it was ab-
19 solutely necessary that she communicate with me as to this matter.
20 A copy of this memorandum is attached hereto as Exhibit "D" and
21 incorporated by reference herein. All attempts to communicate
22 with the Plaintiff having failed, I sent a final letter on MARCH
23 29, 1978, a copy of which is attached hereto as Exhibit "E" and
24 incorporated by reference herein. As of this date I have had no
25 response whatsoever from the Plaintiff or her aunt, and believe
26 that at this time the Plaintiff is no longer interested in pro-
27 ceeding in this matter or responding in any way to my pleas for
28 cooperation.

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B45(93)

1 That at this time the Plaintiff has suffered no prejudice
2 in this matter and as a result there is still sufficient time prior
3 to trial for the Plaintiff to obtain other counsel and no injus-
4 tice or prejudice will be caused by my withdrawal.

5 I declare under penalty of perjury that the foregoing is
6 true and correct.

7 This Declaration was executed on the 12th day of APRIL,
8 1978, in Los Angeles, California.

10 ROBERT L. DICKER
11 Robert L. Dicker

12 * * * *

13 POINTS AND AUTHORITIES

14 I

15 It is well established that an attorney may withdraw as
16 counsel of record upon application to the court showing good cause
17 for said withdrawal.

18 C.C.P. §284.2

19 II

20 That an attorney must continue his services until he is
21 released by the client or by the court; he may apply to the court
22 for a release for further services and for good cause shown may
23 be released.

24 People v. Prince, 268 C. A. 2d 398, (1968). The court in
25 this case stated: "The question of granting or denying applica-
26 tion of an attorney to withdraw as counsel is one which lies
27 within the sound discretion of the trial court."

28 In this case the court allowed the attorney to withdraw

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B4b (94)

1 from defendant's failure to pay attorney's fees. It is deemed
2 that this type of activity is to be a failure to cooperate and
3 deemed the attorney is justified in seeking a withdrawal. In this
4 case, Plaintiff has continually refused to cooperate with this
5 attorney in substantiating Plaintiff's claim and supply Plaintiff's
6 attorney with necessary information in order to prosecute this
7 unlawful detainer action. Plaintiff has put this attorney in a
8 situation where Plaintiff's failure to cooperate is inhibiting
9 this attorney's ability to prosecute this action, and therefore,
10 it is most respectfully requested that this court grant this
11 Motion, that an Order be made relieving ROBERT L. DICKER in the
12 law firm of DICKER & DICKER, a professional corporation, as
13 attorneys of record.

14 DATED: APRIL 12, 1978

Respectfully submitted,
DICKER & DICKER

17 By ROBERT L. DICKER
18 Robert L. Dicker,
19 Attorney for Plaintiff
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LOS ANGELES, CALIF.

-5-
B46(95)

August 15, 1977

Ms. Clara Johnson
1435 Alvarado Terrace
Los Angeles, CA. 90006

Re: Williams vs. Turner

Dear Ms. Johnson:

Charles Turner is being represented by an attorney who has contacted me.

Mr. Turner claims that Mrs. Williams is his wife and that he has an ownership interest in the property, having paid taxes and other items for a number of years.

It is going to be necessary to get a lot more information than I have now.

Additionally, as you might imagine, what started off as a single unlawful detainer proceeding, is now going to end up to be a case of a substantially different complexion, and for that reason, I feel it is very important that we get together, that I be furnished all of the facts and information, and that we arrive at a mutually agreeable fee schedule.

Awaiting word from you, I remain,

Very truly yours,

ROBERT L. DICKER

RLD:lj

EXHIBIT "A"

B46(96)

August 29, 1977.

Ms. Clara Johnson
1435 Alvarado Terrace
Los Angeles, CA. 90006

Re: Williams vs. Turner

Dear Ms. Johnson:

Please find enclosed herein, copy of letter dated August 19, 1977 from Attorney Bash along with copy of Marriage Certificate.

It is imperative that you contact me so we can discuss this case in more detail.

Awaiting word from you, I remain,

Very truly yours,

DICKER & DICKER

By ROBERT L. DICKER

RLD:lj

ENCLOSURE

B46(97)

November 15, 1977

*1/22
Witnessing Aunt?*

Mrs. Ciara Johnson
1345 Alvarado Terrace, Apt. 207
Los Angeles, California 90006

Dear Mrs. Johnson:

I am receiving some pressure from the attorney for Mr. Turner and we are going to have to resolve this case one way or the other.

Needless to say, I was employed by you to represent your aunt and it is with the furtherance of her interests that I am most concerned. However, in order to protect her to the extent the law permits, I must have full and complete explanations to the questions which have been raised so that I can offer intelligent and meaningful advice.

In addition to the above, I believe we should have a better understanding as to the fees which we are going to charge so that you may know in advance what is involved.

With the above thoughts in mind, I would suggest that you contact me at your earliest convenience so that we can arrange an appointment and move ahead with this matter.

Awaiting word from you, I remain

Very truly yours,

Robert L. Dicker

RLD:csc

ENCLOSURE "C"

B4b (98)

From the Office of

DICKER & DICKER
ATTORNEYS AT LAW

1180 SOUTH BEVERLY DRIVE, SUITE 801,
LOS ANGELES, CALIFORNIA 90035

(213) 553-9700
(213) 879-4777

MEMORANDUM

TO: CLARA JOHNSON
1345 Alvarado Terrace, Apt. 207
Los Angeles, California

DATE: January 12, 1978
FILE: 5968

SUBJECT: Williams V. Turner

Dear Mrs. Johnson:

I have repeatedly tried to phone you regarding the above matter, but all of my attempts have failed. Please phone this office at your convenience so that we may arrange an appointment to discuss this matter.

Very truly yours,

/siw

Robert L. Bicker

ENCLOSURE

B4b (99)

NATHAN M. DICKER
ROBERT L. DICKER
ROBERT M. SCHOLNICK

LAW OFFICES
Dicker & Dicker
A PROFESSIONAL CORPORATION
SUITE 501
1180 SOUTH BEVERLY DRIVE
Los Angeles, California 90035

AREA CODE 213
823-8700
878-4777

March 29, 1978

Mrs. Clara Johnson
1345 Alvarado Terrace, Apt. 207
Los Angeles, California 90006

RE: Williams vs. Turner

Dear Mrs. Johnson:

Since I have not heard from you with respect to my letter of February 27, 1978, I no longer consider this office as representing either you or your aunt, Syola Williams, any further.

Please arrange to have another attorney take care of this matter.

As I explained to you on so many occasions, we need your cooperation and we have not received it.

So that any rights which you or your aunt may have in this matter are not prejudiced, I sincerely recommend that you immediately retain another attorney and advise me who he is, and I shall gladly send to him my entire file along with an executed Substitution of Attorneys.

Remember, any further delay in this matter will only add to whatever loss you have suffered by the delay that has taken place thus far.

Very truly yours,

Robert L. Dicker

RLD/sc

ENCLOSURE

B46(100)

(VERIFICATION — 446, 2015.5 C. C. P.)

STATE OF CALIFORNIA, COUNTY OF

I am the _____

in the above entitled action or proceeding; I have read the foregoing _____

and know the contents thereof; and I certify that the same is true of my own knowledge, except as to those matters which are therein stated upon my information or belief, and as to those matters I believe it to be true.

Executed on _____ at _____, California
(date) (place)

I declare, under penalty of perjury, that the foregoing is true and correct.

Signature

PROOF OF SERVICE BY MAIL (1013a, 2015.5 C. C. P.)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am a resident of the county aforesaid; I am over the age of eighteen years and not a party to the within entitled action; my business address is:

1180 S. Beverly Dr., Suite 501, Los Angeles, California 90035.

On APRIL 12, 19 78, I served the within NOTICE OF MOTION TO WITH-

DRAW AS ATTORNEY OF RECORD, DECLARATION OF ROBERT L. DICKER, AND POINTS AND AUTHORITIES IN SUPPORT THEREOF,

on the Defendant, CHARLES TURNER, and Plaintiff, SYOLA WILLIAMS,

in said action, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California,

addressed as follows:

Robert D. Bash, Esq.
201 S. Lake Ave., Suite 406
Pasadena, California 91101

Syola Williams
c/o Mrs. Clara Johnson
1345 Alvarado Terrace, Apt. 207
Los Angeles, California 90006

Executed on April 12, 1978 at Los Angeles, California
(date) (place)

I declare, under penalty of perjury, that the foregoing is true and correct.

SUZAN F. CRUZE

Signature

Suzan F. Cruze

B46(101)

NATHAN M. DICKER
ROBERT L. DICKER
ROBERT M. SCHOLNICK

LAW OFFICES
Dicker & Dicker
A PROFESSIONAL CORPORATION
SUITE 501
1180 SOUTH BEVERLY DRIVE
Los Angeles, California 90035

AREA CODE 213
853-8700
879-4777

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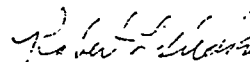
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Very truly yours,


Robert L. Dicker

RLD/sc

B4 b (102)

To Mildred - dup. Copy

LAW OFFICE REPORT #27

April 20, 1978

page 1

from June

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B 4 b (103)

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B 4 b (104)

TELEPHONE:
(415) 832-8776

BONDING SERVICE, INC.
SURETY BONDS

125 - 12th STREET • SUITE 103 • OAKLAND, CALIFORNIA 94607

TO **Walter J. Jones**

DATE **4/1/78**

ATTORNEY **Eugene B. Chaikin**
Attorney at Law
Post Office Box 15156
San Francisco, Calif. 94115

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TO INSURE PROPER CREDIT PLEASE RETURN COPY OF THIS INVOICE WITH YOUR REMITTANCE

INVOICE

FORM 701B

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1180 SOUTH BEVERLY DRIVE
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(213) 878-4777

Attorneys for Plaintiff

MUNICIPAL COURT, LOS ANGELES JUDICIAL DISTRICT
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SYOLA WILLIAMS,)	CASE NO. LA 167,485
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(B4b(106))

1 to the basis of this lawsuit in unlawful detainer.

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7 DICKER & DICKER

9 By ROBERT L. DICKER
10 Robert L. Dicker,
Attorneys for Plaintiff

11 * * * *

12 DECLARATION OF ROBERT L. DICKER

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-2-
B 46 (107)

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15 volved in this matter. A copy of that letter is attached hereto
16 as Exhibit "C" and incorporated herein by reference. Again re-
17 ceiving no response, I sent a memorandum to the Plaintiff's aunt
18 on JANUARY 12, 1978, in which I once again indicated it was ab-
19 solutely necessary that she communicate with me as to this matter.
20 A copy of this memorandum is attached hereto as Exhibit "D" and
21 incorporated by reference herein. All attempts to communicate
22 with the Plaintiff having failed, I sent a final letter on MARCH
23 29, 1978, a copy of which is attached hereto as Exhibit "E" and
24 incorporated by reference herein. As of this date I have had no
25 response whatsoever from the Plaintiff or her aunt, and believe
26 that at this time the Plaintiff is no longer interested in pro-
27 ceeding in this matter or responding in any way to my pleas for
28 cooperation.

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LOS ANGELES, CALIF.

B 473-2 (108)

1 That at this time the Plaintiff has suffered no prejudice
2 in this matter and as a result there is still sufficient time prior
3 to trial for the Plaintiff to obtain other counsel and no injus-
4 tice or prejudice will be caused by my withdrawal.

5 I declare under penalty of perjury that the foregoing is
6 true and correct.

7 This Declaration was executed on the 12th day of APRIL,
8 1978, in Los Angeles, California.

9
10 ROBERT L. DICKER
11 Robert L. Dicker

12 * * * *

13 POINTS AND AUTHORITIES

14 I

15 It is well established that an attorney may withdraw as
16 counsel of record upon application to the court showing good cause
17 for said withdrawal.

18 C.C.P. §284.2

19 II

20 That an attorney must continue his services until he is
21 released by the client or by the court; he may apply to the court
22 for a release for further services and for good cause shown may
23 be released.

24 People v. Prince, 268 C. A. 2d 398, (1968). The court in
25 this case stated: "The question of granting or denying applica-
26 tion of an attorney to withdraw as counsel is one which lies
27 within the sound discretion of the trial court."

28 In this case the court allowed the attorney to withdraw

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B 46 (109)

1 from defendant's failure to pay attorney's fees. It is deemed
2 that this type of activity is to be a failure to cooperate and
3 deemed the attorney is justified in seeking a withdrawal. In this
4 case, Plaintiff has continually refused to cooperate with this
5 attorney in substantiating Plaintiff's claim and supply Plaintiff's
6 attorney with necessary information in order to prosecute this
7 unlawful detainer action. Plaintiff has put this attorney in a
8 situation where Plaintiff's failure to cooperate is inhibiting
9 this attorney's ability to prosecute this action, and therefore,
10 it is most respectfully requested that this court grant this
11 Motion, that an Order be made relieving ROBERT L. DICKER in the
12 law firm of DICKER & DICKER, a professional corporation, as
13 attorneys of record.

14 DATED: APRIL 12, 1978

Respectfully submitted,
DICKER & DICKER

By ROBERT L. DICKER
Robert L. Dicker,
Attorney for Plaintiff

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LOS ANGELES, CALIF.

-5-
B 4 6(110)

August 15, 1977

Ms. Clara Johnson
1435 Alvarado Terrace
Los Angeles, CA. 90006

Re: Williams vs. Turner

Dear Ms. Johnson:

Charles Turner is being represented by an attorney who has contacted me.

Mr. Turner claims that Mrs. Williams is his wife and that he has an ownership interest in the property, having paid taxes and other items for a number of years.

It is going to be necessary to get a lot more information than I have now.

Additionally, as you might imagine, what started off as a simple unlawful detainer proceeding, is now going to end up to be a case of a substantially different complexion, and for that reason, I feel it is very important that we get together, that I be furnished all of the facts and information, and that we arrive at a mutually agreeable fee schedule.

Awaiting word from you, I remain,

Very truly yours,

ROBERT L. DICKER

RLD:lj

EXHIBIT "A"

B 4 b (III)

August 29, 1977.

Ms. Clara Johnson
1435 Alvarado Terrace
Los Angeles, CA. 90006

Re: Williams vs. Turner

Dear Ms. Johnson:

Please find enclosed herein, copy of letter dated August 19, 1977 from Attorney Bash along with copy of Marriage Certificate.

It is imperative that you contact me so we can discuss this case in more detail.

Awaiting word from you, I remain,

Very truly yours,

DICKER & DICKER

By _____
ROBERT L. DICKER

RLD:lj

ENCLOSURE "2"

(B4b(12))

November 15, 1977

*1/22
what is my part?*

Mrs. Clara Johnson
1345 Alvarado Terrace, Apt. 207
Los Angeles, California 90006

Dear Mrs. Johnson:

I am receiving some pressure from the attorney ...
for Mr. Turner and we are going to have to resolve ...
this case one way or the other.

Needless to say, I was employed by you to ...
represent your aunt and it is with the furtherance of ...
her interests that I am most concerned. However, in ...
order to protect her to the extent the law permits, I ...
must have full and complete explanations to the questions ...
which have been raised so that I can offer intelligent ...
and meaningful advice.

In addition to the above, I believe we should ...
have a better understanding as to the fees which we are ...
going to charge so that you may know in advance what is ...
involved.

With the above thoughts in mind, I would suggest ...
that you contact me at your earliest convenience so that ...
we can arrange an appointment and move ahead with this ...
matter.

Awaiting word from you, I remain

Very truly yours,

Robert L. Dicker

RLD:csc

ENCLOSURE "C"

B 4 b (113)

From the Office of

DICKER & DICKER
ATTORNEYS AT LAW

1180 SOUTH BEVERLY DRIVE, SUITE 501
LOS ANGELES, CALIFORNIA 90035

(213) 553-9700
(213) 879-4777

MEMORANDUM

TO: CLARA JOHNSON
1345 Alvarado Terrace, Apt. 207
Los Angeles, California

DATE: January 12, 1978

FILE: 5968

SUBJECT: Williams V. Turner

Dear Mrs. Johnson:

I have repeatedly tried to phone you regarding the above matter, but all of my attempts have failed. Please phone this office at your convenience so that we may arrange an appointment to discuss this matter.

Very truly yours,

/siw

Robert L. Bicker

EX-151 "D"

B4 b(1/4)

NATHAN M. DICKER
ROBERT L. DICKER
ROBERT M. SCHOLNICK

LAW OFFICES
Dicker & Dicker
A PROFESSIONAL CORPORATION
SUITE 501
180 SOUTH BEVERLY DRIVE
Los Angeles, California 90035

AREA CODE 213
552-8700
878-4777

March 29, 1978

Mrs. Clara Johnson
1345 Alvarado Terrace, Apt. 207
Los Angeles, California 90006

RE: Williams vs. Turner

Dear Mrs. Johnson:

Since I have not heard from you with respect to my letter of February 27, 1978, I no longer consider this office as representing either you or your aunt, Syola Williams, any further.

Please arrange to have another attorney take care of this matter.

As I explained to you on so many occasions, we need your cooperation and we have not received it.

So that any rights which you or your aunt may have in this matter are not prejudiced, I sincerely recommend that you immediately retain another attorney and advise me who he is, and I shall gladly send to him my entire file along with an executed Substitution of Attorneys.

Remember, any further delay in this matter will only add to whatever loss you have suffered by the delay that has taken place thus far.

Very truly yours,

Robert L. Dicker

RLD/sc

B 46 (115)

(VERIFICATION — 446, 2015.5 C. C. P.)

STATE OF CALIFORNIA, COUNTY OF

I am the _____

in the above entitled action or proceeding; I have read the foregoing _____

and know the contents thereof; and I certify that the same is true of my own knowledge, except as to those matters which are therein stated upon my information or belief, and as to those matters I believe it to be true.

Executed on _____ at _____, California
(date) (place)

I declare, under penalty of perjury, that the foregoing is true and correct.

Signature

PROOF OF SERVICE BY MAIL (1013a, 2015.5 C. C. P.)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am a resident of the county aforesaid; I am over the age of eighteen years and not a party to the within entitled action; my business address is:

1180 S. Beverly Dr., Suite 501, Los Angeles, California 90035.

On APRIL 12, 1978, I served the within NOTICE OF MOTION TO WITH-

DRAW AS ATTORNEY OF RECORD, DECLARATION OF ROBERT L. DICKER, AND POINTS AND AUTHORITIES IN SUPPORT THEREOF,

on the Defendant, CHARLES TURNER, and Plaintiff, SYOLA WILLIAMS, in said action, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail

at Los Angeles, California, addressed as follows:

Robert D. Bash, Esq.
201 S. Lake Ave., Suite 406
Pasadena, California 91101

Syola Williams
c/o Mrs. Clara Johnson
1345 Alvarado Terrace, Apt. 207
Los Angeles, California 90006

Executed on April 12, 1978 at Los Angeles, California
(date) (place)

I declare, under penalty of perjury, that the foregoing is true and correct.

SUZAN F. CRUZE

Signature

Suzan F. Cruze

B46 (116)

NATHAN M. DICKER
ROBERT L. DICKER
ROBERT M. SCHOLNICK

LAW OFFICES
Dicker & Dicker
A PROFESSIONAL CORPORATION
SUITE 501
180 SOUTH BEVERLY DRIVE
Los Angeles, California 90035

AREA CODE 213
883-8700
878-4777

March 29, 1978

Mrs. Clara Johnson
1345 Alvarado Terrace, Apt. 207
Los Angeles, California 90006

RE: Williams vs. Turner

Dear Mrs. Johnson:

Since I have not heard from you with respect to my letter of February 27, 1978, I no longer consider this office as representing either you or your aunt, Syola Williams, any further.

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As I explained to you on so many occasions, we need your cooperation and we have not received it.

So that any rights which you or your aunt may have in this matter are not prejudiced, I sincerely recommend that you immediately retain another attorney and advise me who he is, and I shall gladly send to him my entire file along with an executed Substitution of Attorneys.

Remember, any further delay in this matter will only add to whatever loss you have suffered by the delay that has taken place thus far.

Very truly yours,

Robert L. Dicker
Robert L. Dicker

RLD/sc

B46(117)

Caroline Dayton

Response - Tax memo New York City...
The problem is that in using the out of country address we can file through the Philadelphia office, giving extreme scrutiny of the returns and unduly delayed, and no doubt very slow receipt of money, since they are holding up all appeals to Congress. Handy, though they release some, there is leeway where they could procrastinate on the returns by disallowing more, and causing other problems. Am very much aware of the same. It is deadline for those out of country. It is preferred using the address to get the money for pure and proper and with less chance for audit problems. Those that did not get the return filed will just fall into this category. SHE DOES NOT SEEM TO UNDERSTAND THAT FILING THROUGH PHILADELPHIA ALMOST INSURES CIA AUDITORS HANDLING AND PROCESSING THE RETURNS. IT THIS SHOULD BE ELEMENTARY TO OUR ATTORNEY, BUT AMAZINGLY, EVEN ATTORNEYS ARE NAIVE IN THE USA, EVEN SOCIALIST ATTORNEYS. THEY STILL BELIEVE THERE IS LAW & ORDER...

Paragraph 2 - we do not intend to pay taxes for those that owe unless there is a specific problem. We do intend to file the returns. I TOLD BERRY NO SHELL HER "NOT" TO PAY ANY TAXES UNLESS THE PEOPLE WERE EMPLOYED IN THE STATES AND WERE EMPLOYED... it is against the law to fail to file your taxes, not to fail to pay them. On this, we would prefer not connecting them to the mission. I would rather mail returns from the address then become a language. SHOULD SEND A GENERAL DELAY THE DISTRICT. IF you forwarding address on these we do not intend to have pay their taxes so that it does not connect to us. TRUE, THE GOVT KNOWS WHO IS HERE. BUT THEIR DEPARTMENTS ARE SEPARATE, AND THEY ARE POOR ABOUT CONNECTING INFORMATION FROM DEPT TO ANOTHER. there are ways of finding out, but all departments do not... it is a scale of error to be at

last 3 lines of page 1--WE LOSE THE RENTAL REBATE OF \$35 on any that use the out of country address. It then becomes mandatory to prove that they were in the country through Dec 31...which is not always easy, and is seldom true..most of the folk xx here came down last year.

Page 2 item 2--We can start to have them write their own...it is not necessary, since the signature is what matters...so we can do that. item 3--Danny is writing letter..copy to Tish.. 4--I sent instructions on this ..correct; ok deduct what is gone. they can have been junked or given away, which is likely what happens

5) JANARO AUDIT--I asked for and again ask for the canceled checks to be sent down here. THERE IS NO LAW SAYS THEIR RECORDS HAVE TO BE ON THE PREMISES...Tell Bonnie to get out of that! She seems determined to handle that, and if she does I can tell you right now it will end up with a barrel of taxes owed by P. T. PLEASE GET THOSE CANCELED CHECKS OUT OF THERE!!! We will send back and handle via corres-

B48(118)

Handwritten scribbles at the top of the page.

pendence with the... DO NOT ASK THE AUDITORS WHAT THEY WANT!!! Wait until they "ask" for what they want... I AM ASKING FOR THE... 1978 records... cannot file a 77 return without them... judgment... YES, most of records are... CHECKS WHICH YOU CAN SAY THAT RICHARD... BUSINESS PAPERS... SINCE HE PLANNED TO FILE RETURN FROM... ON THIS ONE... will have him... another address there... fortune by the... to keep it from bleeding over into the UNRELATED BUSINESS INCOME... which can go against P.T. and give the government immediate... action to attach ALL OF OUR PROPERTIES... CAROLYN: PLEASE ADVISE DAD OF... THIS FACTOR... Tim Stoen could be... point we must behave totally defensively!

DO NOT WANT XEROX COPIES SENT... I WANT THE ORIGINALS AND DO NOT WANT XEROX COPIES LEFT FOR THE TAX PEOPLE TO LOCATE AND SEND... Claire is in touch with her husband in So Amer and is trying to locate where they are... extension until she can get it all together... I would transfer title of the business and get her out of that country... YOU MAY GET A LAWYER REQUIRING... CLEARANCE TO GET OUT OF THE COUNTRY TOO BEFORE VERY LONG... IF THEY ARE DOING IT IN GUYANA, WHY WOULD NOT THE USA TRY TO... MITO... WE HAD BETTER CONSIDER THE POSSIBILITY... I want Claire to stay as long as possible... at least until she is out of there, or the place is sold... AND she is out of there.

... I want to send... I want Claire to stay as long as possible... at least until she is out of there, or the place is sold... AND she is out of there.

... I want Claire to stay as long as possible... at least until she is out of there, or the place is sold... AND she is out of there.

Vertical text on the right margin.

Vertical text on the right margin.