

# ROBINSON

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November 19, 2015

Erin K. Russell  
The Russell Firm, LLC  
233 South Wacker Drive, 84th Floor  
Chicago, IL 60606-6338

Re: John L. Steele

Dear Ms. Russell,

As you may know, we represent John L. Steele with respect to matters pending before the ARDC. In the course of that representation, we have become aware of recent proceedings in *Prenda v. Godfread, et al.*, no. 13-CV-04341 (N.D. Ill.). The recent events in that case are reflected in the docket sheet as follows:

06/11/2015	<u>96</u>	CLAIM by Prenda Law, Inc. regarding <i>Opposition to Motion for Damages, etc.</i> (Duffy, Paul) (Entered: 06/11/2015)
08/20/2015	<u>97</u>	MINUTE entry before the Honorable John W. Darrah: Status hearing held and continued to 9/30/15 at 9:30 a.m. Mailed notice(maf) (Entered: 08/20/2015)
09/30/2015	<u>98</u>	MINUTE entry before the Honorable John W. Darrah: Status hearing held and continued to 10/14/15 at 9:30 a.m. A representative from plaintiff's law firm is ordered to be present. Mailed notice (maf) (Entered: 09/30/2015)
10/14/2015	<u>99</u>	ORDER: Status hearing held and continued to 11/4/15 at 9:30 a.m. A Rule to Show Cause shall issue against the representative from plaintiff's law firm. Defendants are granted leave to file a

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		motion for sanctions. Signed by the Honorable John W. Darrah on 10/14/2015. (jh, ) (Entered: 10/15/2015)
11/04/2015	<u>100</u>	MINUTE entry before the Honorable John W. Darrah: Status hearing held and continued to 12/1/15 at 9:30 a.m. Return on the rule to show cause against the representative from plaintiff's law firm is set for 12/1/15 at 9:30 a.m. Counsel for the defendants advised the Court that they spoke to Mr. John Steel(e) and he was aware of the 11/4/15 status. Mailed notice(maf) (Entered: 11/04/2015)

You recently sent Mr. Steele a copy of the October 14, 2015 order. Mr. Steele did not appear for the November 4 hearing because he is not, and has never been, a representative of Duffy Law Group. It is not accurate to describe him as "a representative of plaintiff's law firm." He has no authority to act on behalf of any party or law firm associated with the case.

We presume that Judge Darrah has been informed that Mr. Duffy is deceased. Mr. Duffy appears to have been the last person to file a pleading in case number 13-CV-4341. Whatever his death may mean for that pleading or for the case, Mr. Steele has nothing to do with it. He has had, and presently has, no involvement with the case in any way. He does not own or operate Prenda, and he has not done so at any time, including during the pendency of case number 13-CV-4341. Mr. Steele was not and is not a party to case number 13-CV-4341. The counterclaims you filed on behalf of your clients referred to Mr. Steele and made various factual averments about him, but according to the docket sheet in case number 13-CV-4341, the counterclaim was stricken on March 6, 2014, and it does not appear to have been refiled or re-pled. Also, Mr. Steele was not served with the counterclaim or any other pleading in the case. No reference to Mr. Steele appears anywhere in the docket of the case except in the minute entry for November 4 referred to above. We also note that on January 22, 2015, Judge Darrah entered an order in case number 13-CV-4341 finding, correctly, that Prenda's Illinois incorporation documents listed Duffy as Prenda's Corporate Agent and President.

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Earlier this year, in the related case *Duffy v. Godfread, et al.*, no. 13-CV-1569, you attempted to secure an order making Mr. Steele (and Paul Hansmeier) personally liable for any liabilities imposed on Prenda for monetary sanctions and/or potential conspiracy and anti-SLAPP counterclaims. In an April 9, 2015 order denying your request for that relief, Judge Darrah observed that "John Steele and Paul Hansmeier have not been designated parties to the present litigation, nor have they been made parties by service of process," and that "Claims cannot be 'asserted against nondiverse parties [like Steele and Hansmeier] when jurisdiction was based on diversity.' [citations omitted]." Similarly, Mr. Steele has not been made a party to case number 13-CV-4341, and he is not a representative of any law firm involved in the case.

Later, in case number 13-CV-4341, you sought punitive damages in the amount of \$12,000,000. On August 20, 2015, Judge Darrah entered an order denying your request, finding that you were basing your request on conduct that occurred outside of case number 13-CV-4341.

We are unaware of any basis upon which to suggest to Judge Darrah, or to anyone else, that Mr. Steele has done anything in connection with case numbers 13-CV-4341 or 13-CV-1569, let alone anything that can or should subject him to any sanction of any kind, let alone an eight-figure sanction. He has no relationship to either case or to the parties thereto. He should not be called upon to appear in either case for any reason, and he has no intention of appearing.

If you have evidence that you believe supports any attempt to cause Mr. Steele to be made a party to case numbers 13-CV-4341 or 13-CV-1569, or to suggest that he is a representative of Duffy Law Group or the estate of Paul Duffy such that he should be required to appear in that case, please send us that information immediately so that we may review it. We do not believe that any such evidence exists, and in its absence, we demand that you refrain from in any way communicating or suggesting to Judge Darrah that Mr. Steele is a representative of any party or law firm associated with the case, or that he is or should be required to appear either in case number 13-CV-4341 or in case number 13-CV-1569.

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Should you have any questions regarding the matters contained in this letter, please feel free to contact the undersigned.

Very truly yours,

A handwritten signature in black ink, appearing to read "Mary Robinson", with a long horizontal flourish extending to the right.

Mary Robinson

A handwritten signature in black ink, appearing to read "James A. Doppke, Jr.", with a horizontal line at the end.

James A. Doppke, Jr.  
Attorneys for John L. Steele