

July 23, 2019

**Via Electronic Mail**

Denver G. Edwards, Esq.  
Pierce Bainbridge Beck Price & Hecht LLP  
277 Park Avenue, 45th Floor  
New York, NY 10172

Re: Pierce Bainbridge v. Donald Lewis  
Docket No. 19STCV16890  
Frivolous Pleading Notice Follow-Up

Denver,

I have not heard any response concerning my attached July 3, 2019 request to meet and confer, and the potential withdrawal of your sham Los Angeles lawsuit -- the 21-day clock expires tomorrow, July 24, 2019. Please be advised that if you continue to pursue the defamatory filing, in which you blatantly lied throughout, my team will take any and all available actions to hold you accountable, above and beyond the separate defamation and Judiciary Law 487 action we have already filed. By way of brief and egregious example:

- \$65 Million Lie. Written communications indicate that you and Mr. Brickman agreed to a range of seven figures during your initial conversations, yet you alleged I “sought to extort a sum of \$65 million multiple times.” This lie was then used as a catalyst to defame me on a massive public scale.
- Withdrawal as Extortion Lie. You were well aware that S. Jeanine Conley, your counsel from the Littler Firm, requested we withdraw the New York Complaint and “thanked” us for doing so, and then hours later you filed a Complaint alleging that I withdrew the Complaint as part of a “scheme to extort.” This lie was then used as a catalyst to defame me on a massive public scale.
- LaVigne Conversation Lie. Either Christopher N. LaVigne has been corroded by the Pierce Bainbridge culture of dishonesty or Pierce added Chris to the list of people he has used and jeopardized; whatever the case may be, your characterization of the night Chris and I spoke after our hockey game is remarkably false and I have witnesses that will attest to the same. This mischaracterization was then used as a catalyst to defame me on a massive public scale.

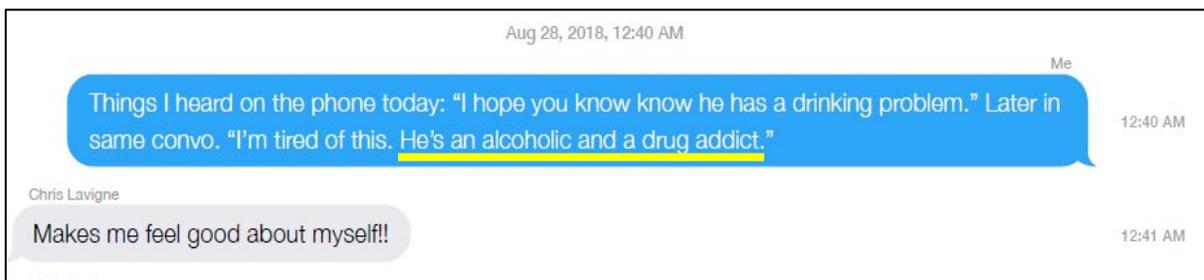
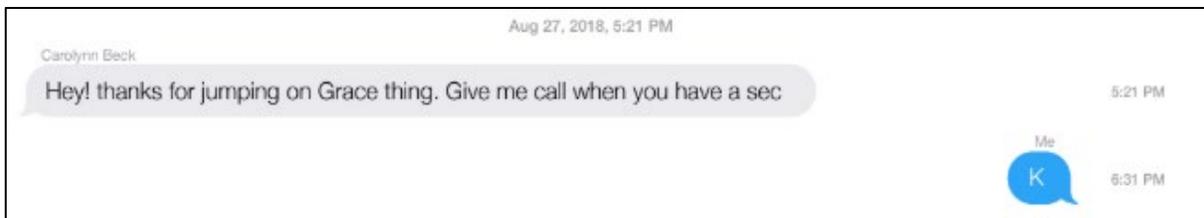
Because it appears that your outside counsel has – at best – misapplied and misunderstood the law on critical issues related to my Complaint, as one African-American professional to another, I kindly advise you of the following authority: “Petitioner has additionally misled a court by filing dishonest and inaccurate pleadings in the action . . . [the California Supreme Court] has denounced such conduct by the offending attorney even in instances where there was **no direct evidence of malice**, intent to deceive, or hope of personal gain.” *Giovanazzi v. State Bar*, 28 Cal.3d 465, 473 (1980) citing *Pickering v. State Bar*, 24 Cal.2d 141, 145 (1944) (one-year actual suspension); *Paine v. State Bar*, 14 Cal.2d 150, 153-154 (1939) (six months' actual suspension) (emphasis mine.)

You should be aware that after I admonished John Pierce for his greedy self-dealing, which is surely documented in Wells Fargo bank statements, he hadCarolynn say I was banned due to the “nature of the allegations.” Less than two weeks before I was banished, I shut down the candidacy of a potential white lateral

partner who one of the female partners said in writing was a “sexual harasser” who “made her skin crawl.” Doug Curran, Chris LaVigne and Carolynn Beck are aware. I shut it down after resistance from your misogynistic “leader” who, as documented, refers to women as “psycho females,” “crazies,” “extortionists,” “stick-up artists” “whack jobs” and derisively opined about your female General Counsel, Carolynn Beck, “her mind moves at the speed of pond water.”

Just days after I was banished, your “leader” called the white “sexual harasser” in for interviews. Chris LaVigne was consulted on these issues in real-time and has first-hand knowledge of this, as well as first-hand knowledge of the financial malfeasance. Chris has accurately referred to your “leader” as a “liar,” “snake,” “sexist pig” and LaVigne agreed with the characterization of Pierce, as did Jonathan Sorkowitz and the bookkeeper, as a “narcissistic-sociopath.” I’ll add “racist” to the list, which he hides when convenient.

In addition, on August 27<sup>th</sup>, Carolynn Beck requested I talk to Grace Chang who was on the verge of quitting because of Pierce. This was shortly after the Boston Trial, where Schaefer-Green texted “FU\*K GRACE”. Pierce explained “Grace is crushing on me and [Lauren] is just jealous.” Your “leader” then referred to Chang as “plump and cuddly” and opined: “normal chicks like Grace are scared of me. the psychos are drawn to me.” During our August 27<sup>th</sup> conversation, Chang, Pierce’s longest tenured employee, referred to him as “alcoholic and a drug addict.” This was discussed with Beck and James D. Bainbridge, who said they already knew, as well as LaVigne. Given the PB penchant for lying, even in court filings, about documented information, below are supporting screen shots.



As for the false allegations against me and the resulting sham investigation, you should also be aware that we have consulted with ex-NYPD detectives who opined that essentially no investigation was done, and exculpatory evidence was ignored.

I am compelled to note that during negotiations you personally expressed concerns about my detailed Complaint going public, yet, rather than negotiate in good faith, you chose to join Pierce’s and his lackeys in their concerted scheme to attempt to silence me, including through extortionate threats of bogus criminal charges, as well as a massive public smear campaign, figuring I’d surrender. As you can see, the plan backfired.

Pierce is a deeply flawed and deeply troubled individual; the fact that you and your partners countenance his misconduct, which included calling me a **REDACTED** on LinkedIn, is disgraceful.

In any event, I figured you would appreciate this knowledge prior to making your decision. The way I see it, you and your partners can keep doing the bidding of a “sociopath” (in the words of one of his partners, and

agreed to by several) recently reported to the California State Bar by a former client, who has lied to his partners, lied to investors and lied to the press and put your law licenses at risk, or you can act like an independently minded, professional, adult attorneys and do the right thing.

Very truly yours,

*Don Lewis*

Don Lewis

Cc: PB Partners

Lauren Schaefer-Green

Michael Yim, Esq.

Daniel Murphy, Esq.