

MARK W. LORD
Attorney at Law

P.O. Box 1643, 34230
46 N. Washington Blvd., Suite 16
Sarasota, FL 34236
941-365-4995

June 14th, 2013

Mr. Steven Esdale
1112 Weston Road
Suite 234
Weston, Florida 33326

RE: PROCEDURAL SUMMARY; ANNULMENT PETITION

Dear Steve:

The petition for annulment of the marriage, filed on 9/17/07, was scheduled by order of Court, with other matters, for a four (4) day period, commencing 10/26/07. Being cognizant of your financial inability to afford an expert in Bolivian marital law, I faced a dilemma as counsel because I knew that we could not, on 10/26/07, produce expert testimony to support the annulment petition. I recall that I had asked the Court to schedule the necessary hearings sometime after 12/1/07, but the Court had scheduled all pending matters for the referenced dates in October.

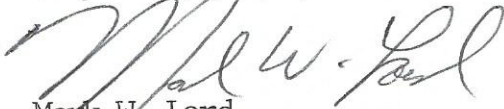
Faced with this dilemma, I considered a voluntary dismissal of the petition to avoid an adverse ruling. However, I feared that the Statute of Limitations could prevent a refiling, since the defective marriage had occurred almost five (5) years previously. Rather than risk the ultimate loss of the cause of action, and being unable to communicate with you as the hearing approached, I questioned the slayer during the hearing to establish an evidentiary record for later review. As I recall, she introduced her "documentary" evidence of a "valid" marriage during the hearing of 10/29/07.

On 10/30/07, the Court formally dismissed the annulment petition, with prejudice, citing insufficient evidence and incorrectly stating in the order that the "testimony of the Petitioner" had been considered at the hearing. You, in fact, did not attend the hearing. The only testimony considered was that of the slayer. On 10/27/08, I moved to vacate the order of 10/30/07, based upon fraud that you had discovered in October, 2008. On 11/13/08, in connection with the Motion To Vacate, I requested the slayer's production of the documents that she had presented to Judge Gallen to purportedly prove the validity of the marriage, which documents were not in the Clerk's custody because Judge Gallen had instructed the Clerk to return them to the slayer after the evidentiary hearing of 10/29/07.

On 3/9/09, Judge Gallen dismissed the Motion To Vacate and upheld counsel's objections to the document request, though neither of these matters had been scheduled for a hearing. On 3/19/09, I moved for reconsideration, citing multiple cases indicating a violation of due process. The Court later entered a formal order on 10/6/09, denying the Motion To Vacate. The related Motion For Reconsideration was denied on 10/20/09.

I hope the foregoing procedural review proves helpful.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Mark W. Lord". The signature is written in dark ink and is positioned above the printed name.

Mark W. Lord