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By Email and First Class Mail

August 1, 2008

John Hardin Young, Esquire  
Sandler, Reiff & Young, P.C.  
300 M Street, SE  
Suite 1102  
Washington, DC 20003

Re: Donald Hitchcock v. DNC, et al., Civil Action No. 07-003040 B

Dear Mr. Young:

I write to request a formal apology for the inappropriate and physically threatening behavior you exhibited toward me following yesterday's mediation session in the matter of Donald Hitchcock v. DNC, et al., held in the Superior Court for the District of Columbia.

Following the mediation, the parties were instructed by the mediator to set a pretrial conference date with the court clerk. The parties agreed in the presence of the mediator to set a pretrial conference date within 60 days of yesterday. While the lead attorney, Lynne Bernabei, was not present, you attempted to misrepresent to the clerk that we were to set the pretrial conference date within 60 days of the second mediation session scheduled for September 11, 2008, rather than 60 days from yesterday's date.

In response to your misrepresentation to the court employee, I stated that the parties specifically agreed with the mediator to set the pretrial conference date within 60 days of yesterday. At that point, you became physically intimidating, and moved quickly toward me, within six inches of my face. In fact, you were so close that you spit on my face. You then proceeded to point your finger at me, and in an angry, raised voice yelled, "Don't you ever contradict me," and "Don't you ever interrupt me." You also told me to "know my place." Your angry tirade lasted almost one minute before my client, Mr. Hitchcock, physically stepped between us to stop your assault and asked that you not speak to me that way and to step away from me.

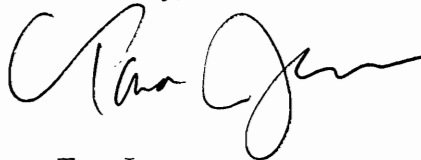
As you are aware, as members of the D.C. bar, we are ethically required to act with professionalism and civility towards each other. As opposing counsel in this case, your bullying conduct, which you engaged in while Ms. Bernabei was not present, was intended to mislead the court employee who was scheduling a date for the pretrial conference. Your abusive behavior toward me was surely intended to gain a strategic advantage in this litigation, since you knew that counsel had specifically agreed on an earlier date, and was wholly unprofessional.

John Young, Esquire  
August 1, 2008  
Page 2 of 2

By letter dated February 26, 2008, I have previously advised your partner, Joseph Sandler, that your abusive conduct was unacceptable and stated that I would discuss future issues solely with Mr. Sandler if you were unable to conduct yourself in a professional and civil manner. See Letter from T. Jensen to J. Sandler (Feb. 26, 2008) (attached hereto). Unfortunately, this letter failed to have any corrective effect, as evidenced by your public actions in the court house yesterday.

I demand that you apologize to me, in writing, for your unjustified and unprofessional conduct on February 22, 2008 and on July 31, 2008, or I will be forced to make a more formal complaint against you.

Sincerely,

A handwritten signature in black ink, appearing to read "Tara Jensen", written in a cursive style.

Tara Jensen

Enc.

cc: Donald Hitchcock  
Amanda LaForge, Esquire

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By Email and First Class Mail  
February 26, 2008

Joseph E. Sandler, Esquire  
Sandler, Reiff & Young, P.C.  
300 M Street, SE  
Washington, DC 20003

Re: Donald Hitchcock v. Democratic National Committee, et al.  
Civil Action No. 07-003040 B

Dear Joe:

I write to confirm the revised deposition schedule that was discussed today.

As an initial matter, the complete lack of civility displayed by your co-counsel, Mr. Young, during the deposition of Paul Yandura on February 22, 2008, which continued into our conversation today, is inappropriate and unnecessarily hinders the effective resolution of discovery disputes. Neither I nor other attorneys in this office will submit ourselves to Mr. Young's continuing abusive conduct. If he cannot conduct himself in a professional and civil manner, we will not talk to him over the telephone. In fact, it is preferable and more productive if we discussed discovery disputes with you.

I am also writing to confirm that Julie Tagen's deposition will begin at 9:30 a.m. on February 28, 2008. You have offered to make Howard Dean available for six hours of deposition. We will depose Mr. Dean on March 6, 2008 from 9:00 a.m. until 1:00 p.m. and resume on March 7, 2008 at 12:00 until 2:00 p.m. If you continue to refuse to make Mr. Dean available for further examination as necessary, we will move the Court to compel his appearance for the full seven hours of deposition pursuant to Rule 30(d)(2), Super. Ct. R. Civ. P. Because we are nearing the close of discovery, we will file the motion immediately unless we hear back from you by the end of today. It is regrettable to involve the Court in a needless discovery dispute, but unfortunately, the defendants are not able to conform to the discovery rules. Rule 30(d)(2), Super. Ct. R. Civ. P.

Joseph E. Sandler, Esquire  
Sandler, Reiff & Young, P.C.  
February 26, 2008  
Page 2 of 2

Please advise us immediately if you disagree with the times and dates for the depositions of Julie Tagen and Howard Dean set forth above.

Thank you for your attention to this matter.

Sincerely,



Tara Jensen

cc: Mr. Donald Hitchcock