#### 13-15-00307-CV

ACCEPTED 13-15-00307-CV THIRTEENTH COURT OF APPEALS CORPUS CHRISTI, TEXAS 8/10/2015 6:32:18 PM CECILE FOY GSANGER CLERK

# NO. 13-15-307 IN THE THIRTEENTH COURT OF APPEALS CORPUS CHRISTI, TEXAS

# ALAN L HAMILTON, Appellant,

V.

# DANIEL DAVILA III, Appellee.

# <u>UNOPPOSED FIRST MOTION FOR EXTENSION OF TIME</u> <u>TO FILE APPELLANT'S BRIEF,</u> WITH MOTION FOR CLERK'S RECORD TO BE FIXED

Alan L Hamilton Appellant, Pro Se 9902 Childress Dr Austin, Texas 78753 512-832-6384 AlanHamilton@ProBaitCourt.com

# **Table of Contents**

1) This Motion, "Unopposed First Motion to Extend Time to File Appellant's Brief, with Motion for Clerk's Record to be Fixed".

2) Proposed Order granting this Motion

# 3) List of Exhibits:

# i) Exhibit A:

Letter from Alan Hamilton's doctor about bradycardia symptoms with his heart graph below 60 bpm, as well as his carpal tunnel diagnosis in his hands, causing the debilitating "numb finger" sensation he has been describing. (6 pages)

# ii) Exhibit B:

American Heart Association (AHA) Bradycardia webpage - diagnosis-symptoms description (2 pages)

# iii) Exhibit C:

screenshots of "Clerk's Record PDF Non-Descriptive TOC Bug" showing (3 pages total):

1) "pdf-clickable-bookmarks-TOC" on left vs "docket page" with "additional info" field containing document titles (2 pages)

2) screenshot showing "pdf-clickable-bookmarks-TOC" on left vs "index page" with "document description" field and category field containing the same info, with no document titles, i.e. "additional info" field missing. The "pdf-clickable-bookmarks-TOC" is displaying the "category" field NOT the "additional info" field which contains the document title. *NOTE:* The "index page" itself echos the "pdf-clickable-bookmarks-TOC" bug with no "descriptive document" title displayed, only duplicate category fields. Document title is stored in the "Additional Info" field, a quick and easy global search and replace bug fix for any programmer. (1 page)

# iv) Exhibit D:

History of Clerk's Record fix attempts before it was sent to the Appellate Court on 7/9/2015. (2 pages)

# v) Exhibit E:

TIFF/PDF WhitePaper for Federal Court documents (5 pages).

# vi) Exhibit F:

Readable pdf "RFAs/RFPs/ROGs spreadsheets", as submitted to Travis County District Clerk's Office. (7 pages)

# vii) Exhibit G:

Unreadable "pdf to TIFF" "RFAs/RFPs/ROGs spreadsheets" from Clerk's Record central to appeal, with missing color data as well. Does not happen with pdf documents which are the Federal Court standard now. (7 pages).

# UNOPPOSED FIRST MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S BRIEF, WITH MOTION FOR CLERK'S RECORD TO BE FIXED

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# TO THE HONORABLE THIRTEENTH COURT OF APPEALS:

Pursuant to TEX. R. APP. P. 10.1 and 38.6(d), the Appellant, Alan L Hamilton, files this "Unopposed First Motion to Extend Time to File Appellant's Brief, with Motion for Clerk's Record to be Fixed". Appellant's opening brief is currently due on August 10, 2015.

Appellant requests a 30-day extension of time to file its brief, making the brief due on Sept 10, 2015. This is the first request for extension of time to file the opening brief.

Appellant is filing this Motion for an extension to file the appellant's brief, in order to accomplish the following:

1) to have the Travis County District Court (TCDC) Clerk's Office to fix the Clerk's Record, which was submitted with an unusable pdf Table of Contents (TOC), without descriptive document titles in the clickable pdf bookmarks, as attachment #1 shows. Without descriptive titles in the clickable pdf bookmarks TOC, looking thru the documents amounts to alot of frustration while chicken-pecking thru alot of filings titled "other filings", while trying to find the document you are looking for.

# If the documents/pdfs are not easy to navigate and read, they are unusable and a fair appeal consideration is not possible. This will aid not just in our appeal now, but with the Appeals Court Judges frustrations in the future as well.

For \$1200, the same cost as 2 new home appliances, we deserve at least a use-able electronic document/pdf. Impossible to navigate documents with non-descriptive TOC bug in Clerks Record (pdf TOC without document titles). Document title is stored in the "Additional Info" field, a quick and easy global search and replace bug fix for any programmer. (see Exhibits C and D)

A visit to the Harris County Court website shows this "Clerk's Record" task would have taken 15 minutes if we were not in TCDC website/jurisdiction, which does not yet have Public Access to non-lawyers for the court documents. Harris County Clerk's office allows you to put documents into a cart and order and pay for them online.

We would like our \$1200 back if the descriptive TOC in the pdf is not fixed. No one's going to read it, we can't even figure out which document is which, and we were there. For instance, find Exhibit CC in the Clerk's Record thru the "bookmark" document titles in the pdf. Not even possible. Without it, the contradicting evidence cannot be found, making our appeal as futile as using the Clerk's Record pdf in it's present "non-descriptive TOC clickable-bookmarks" form.

2) the reason we are just now filing this request for the Clerk's Record to be fixed (received on Tuesday, 7/21/2015, via snail mail from 13th COA), is that we have been dealing with some emergency medical problems with Alan. See Exhibit A - letter from Alan's doctor on 7/24/2015. The reason Alan has been sleeping so much is his heart rate is too low the doctor said. It's called Bradycardia, and as we have been worried about, it's a walking heart attack (see Exhibit B - about bradycardia). So Alan needs to take the time to make the doctor visits about this serious and worrisome condition now. Dr Pekar also confirmed Alan's hand-finger numbness problem, and the necessary assistance with computer/typing of court communications by his wife, Marjorie

UNOPPOSED FIRST MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S BRIEF, WITH MOTION FOR CLERK'S RECORD TO BE FIXED Page **3** of **6** 



Miller. (see Exhibit A documents from Dr Pekar).

3) As well, after receiving the TCDC Clerk's Record from the Appeal Court Clerk's Office, we have also discovered while attempting to read the \$1200 Clerk's Record pdf as well, that the filed pdfs appear to have been made into Black and White tiffs and then reconverted to pdfs, making the words unreadable and looking like faxes from the 1980s. The color that used to accentuate points, now are a blurred-light-grey. The RFA/RFP/ROG spreadsheet tables which are central to showing the facts in our appeal, are unreadable. (see Exhibits E thru G)

Federal Courts have settled on using secure pdfs from Adobe Acrobat, not the outdated an unreadable "secure TIFF" solution of the past. See the "Liquid Litigation PDF vs TIFF" white-paper at <u>http://llm.liquidlitigation.com/rs/liquidlitigationmanagement/images/LLM\_PDF-vs-</u><u>TIFF\_white paper.pdf</u>. It is attached as well (see Exhibit E).

Though this "pdf to TIFF" issue may not be possible to fix in our time-frame, the TOC fix is imperative to navigability of the Clerk's Record and is a simple quick fix.

*This Clerk's Record pdf TOC issue and Alan's Health issues can be worked out in parallel during the 30 day extension we are asking for.* In the end, the "Clerks Record pdf TOCs" will be fixed for all, and Alan will have received the proper medications for his heart. The doctor took blood tests on 7/24/2015 and will be getting back to us with the results and his medical recommendations. Indeed, the doctor has contacted us and wants to see Alan again now, which is what we plan to do next.

Appellant seeks this extension of time to be able to prepare a cogent and succinct brief to aid this Court in its analysis of the issues presented. This request is not sought for delay but so that justice may be done.

The undersigned has conferred with opposing counsel, and she has indicated that her client does not oppose this motion.

All facts recited in this motion are within the personal knowledge of the counsel signing this motion, therefore no verification is necessary under Rule of Appellate Procedure 10.2.

# PRAYER FOR RELIEF

For the reasons set forth above, Appellant requests that this Court grant this "Unopposed First Motion to Extend Time to File Appellant's Brief, with Motion for Clerk's Record to be Fixed", and extend the Deadline for Filing the Appellant's Brief up to and including September 10, 2015.

As well, during this extension time period, Appellant requests this Court to order the Travis County District Court's (TCDC) Clerk's Office to fix the Clerk's Record for this case with a useable "pdf with descriptive clickable TOC bookmarks", as described in the Motion, and re-submit to this Court. This is an easy global replace fix of "Additional Info" for "Document description" and should not take a competent programmer long to fix.

Also, Appellant requests this Court to order the TCDC Clerk's Office to address the unreadability UNOPPOSED FIRST MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S BRIEF, WITH MOTION FOR CLERK'S RECORD TO BE FIXED Page 4 of 6 of "pdf to TIFF" documents and spreadsheets, central to this appeal, with the loss of color data as well. This "readability fix" might take longer to do, removing the "pdf to tiff" conversion from the "Appeal Creator" program used by the TCDC, but needs to be raised in priority by the Clerk's Office. The use of TIFFs is based on an outdated security need, which has evolved in Adobe Acrobat Pro pdfs (without public expense), while remaining stagnant in the TCDC's "Appeal Creator" program.

As the embedded picture of this motion's pdf TOC shows, this is not difficult to attain using Adobe Acrobat Pro to combine documents, and is the standard in Federal Court as described in Exhibit

Appellant's wife assists Appellant with computer/document work and has been a computer programmer for 33 years now, will assist the TCDC Clerk's Office with attaining these goals for a use-able/navigable/readable Clerk's Record for the Appeals Court.

Appellant requests all other relief to which it may be entitled.

Respectfully submitted,

Alan L Hamilton, Appellant, Pro Se 9902 Childress Dr Austin, Texas 78753 512-832-6384 AlanHamilton@ProBaitCourt.com

UNOPPOSED FIRST MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S BRIEF, WITH MOTION FOR CLERK'S RECORD TO BE FIXED Page 5 of 6

# **CERTIFICATE OF CONFERENCE**

I certify that I conferred with counsel for Appellee regarding this motion and that Appellee is not opposed to this motion.

Alan L. Hame How Alan L. Hamilton, Appellant, Pro Se

# **CERTIFICATE OF SERVICE**

I certify that on August 10, 2015, I e-served a copy of this motion to the following counsel by <u>www.eFileTexas.gov</u> via www.greenfiling.com.

Counsel for Appellee:

Attorney for: Attorneys name: Attorneys address: Daniel Davila, III Karen Landinger, Robert M Smith COKINOS, BOSIEN & YOUNG 10999 West IH-10, Suite 800 San Antonio, Texas (210) 293-8700 office (210) 293-8733 fax klandinger@cbylaw.com RMSmith@cbylaw.com

Alan L Hamilton, Appellant, Pro Se

UNOPPOSED FIRST MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S BRIEF, WITH MOTION FOR CLERK'S RECORD TO BE FIXED Page 6 of 6

# NO. 13-15-307 IN THE THIRTEENTH COURT OF APPEALS CORPUS CHRISTI, TEXAS

# ALAN L HAMILTON, Appellant,

V.

# DANIEL DAVILA III, Appellee.

# ORDER GRANTING PLAINTIFF'S UNOPPOSED FIRST MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S BRIEF AND FOR CLERK'S RECORD TO BE FIXED

On \_\_\_\_\_\_, the court considered the Plaintiff's "Unopposed First Motion to Extend Time to File Appellant's Brief, with Motion for Clerk's Record to be Fixed", in this case.

After considering the motion, the court decided that the request should be granted.

It is ORDERED that the "Unopposed First Motion to Extend Time to File Appellant's Brief, with Motion for Clerk's Record to be Fixed"." is granted and extends the Deadline for Filing the Appellant's Brief up to and including September 10, 2015.

This Court also returns and rejects the prepared Clerk's Record and requests and orders the Travis County District Court's (TCDC) Clerk's Office to fix the Clerk's Record for this case with a use-able navigation of the documents with "pdf with descriptive clickable TOC bookmarks", as described in the Motion, and re-submit to this Court. This is an easy global replace fix of "Additional Info" for "Document description" and should not take a competent programmer long to fix.

This Court requests and orders the TCDC Clerk's Office to address the unreadability of "pdf to TIFF" documents and spreadsheets, central to this appeal, with the loss of color data as well. This "readability fix" might take longer to do, removing the "pdf to tiff" conversion from the "Appeal Creator" program used by the TCDC, but needs to be raised in priority by the Clerk's Office. The use of TIFFs is based on an outdated security need, which has evolved in Adobe Acrobat Pro pdfs (without public expense), while remaining stagnant in the TCDC's "Appeal Creator" program.

# ORDER GRANTING PLANTIFF'S UNOPPOSED FIRST MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S BRIEF AND FOR CLERK'S RECORD TO BE FIXED

As the embedded picture of this motion's pdf TOC shows, this is not difficult to attain using Adobe Acrobat Pro to combine documents, and is the standard in Federal Court as described in Exhibit

Appellant's wife (Marjorie Miller) assists Appellant with computer/document work and has been a computer programmer for 33 years now, will assist the TCDC Clerk's Office with attaining these goals for a use-able/navigable/readable Clerk's Record for the Appeals Court.

Signed on \_\_\_\_\_.

JUDGE PRESIDING

APPROVED AS TO FORM AND SUBSTANCE:

Alan L. Handberg

Alan L Hamilton Appellant, Pro Se 9902 Childress Dr Austin, Texas 78753 512-832-6384 <u>AlanHamilton@ProBaitCourt.com</u>

> ORDER GRANTING PLANTIFF'S UNOPPOSED FIRST MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S BRIEF AND FOR CLERK'S RECORD TO BE FIXED Page 2 of 2

# Exhibit A



7/24/2015

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# RE: HAMILTON, ALAN DOB: 7/7/1946

To Whom It May Concern:

Alan Hamilton is under my care and has medical issues I am currently trying to stabilize. These conditions including undiagnosed chest pain, bradycardia, carpal tunnel syndrome, and worsening fatigue for unknown reasons.

Do to his age and these medical conditions it would be difficult to keep to tight deadlines and he may need extra time to perform tasks due to his medical conditions which limit his energy levels and ability to perform activities (ie: hard to type/write with carpal tunnel syndrome).

As a medical professional, I request the court take these medical conditions when assigning dead-lines and tasks for my patient.

Any consideration shown to this patient is appreciated. Please feel free to contact me if you have any questions.

Man, M/

Respectfully,

Nathan Pekar, MD

Victory Medical 430% Victory Drive Austin, Texas 78704 512-462-3627  $(\mathbf{P}$ 512-462-2898

4303 Victory Drive Austin, TX 78704

Phone: (512) 462-3627 FAX: (512) 462-2898 www.victorymed.com

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O. Trus Louis

http://www.austinhandgroup.com/

# Carpal Tunnel Syndrome

# What is carpal tunnel syndrome?

Carpal tunnel syndrome is a common, painful disorder of the wrist and hand.

# How does it occur?

Carpal tunnel syndrome is caused by pressure on the median nerve in your wrist. People who use their hands and wrists repeatedly in the same way (for example, illustrators, carpenters, and assembly-line workers) tend to develop carpal tunnel syndrome.

Pressure on the nerve may also be caused by a fracture or other injury, which may cause inflammation and swelling. In addition, pressure may be caused by inflammation and swelling associated with arthritis, diabetes, and hypothyroidism. Carpal tunnel syndrome can also occur during pregnancy.

# What are the symptoms?

The symptoms include:

- pain, numbness, or tingling in your hand and wrist, especially in the thumb and index and middle fingers; pain may radiate up into the forearm
- increased pain with increased use of your hand such as when you are driving or reading the newspaper

- increased pain at night
- weak grip and tendency to drop objects held in the hand
- sensitivity to cold
- muscle deterioration especially in the thumb (in later stages).

# How is it diagnosed?

Your doctor will review your symptoms, examine you, and discuss the ways you use your hands. He or she may also do the following tests:

- The doctor may tap the inside middle of your wrist over the median nerve. You may feel pain or a sensation like an electric shock.
- You may be asked to bend your wrist down for one minute to see if this causes symptoms.
- The doctor may arrange to test the response of your



Carpal Tunnel Syndrome - Page 1 of 3

# Carpal Tunnel Syndrome

# **Carpal Tunnel Syndrome**

nerves and muscles to electrical stimulation.

# How is it treated?

If you have a disease that is causing carpal tunnel syndrome (such as rheumatoid arthritis), treatment of the disease may relieve your symptoms. Other treatment focuses on relieving irritation and pressure on the nerve in your wrist. To relieve pressure your doctor may suggest:

- restricting use of your hand or changing the way you use it
- wearing a wrist splint during sleep and physical activity involving the wrist
- exercises.

Your doctor may prescribe a cortisonelike medicine or a nonsteroidal anti-inflammatory medicine, such as ibuprofen. Your doctor may recommend an injection of a cortisonelike medicine into the carpal tunnel area. In some cases surgery may be necessary.

# How long will the effects last?

How long the symptoms of carpal tunnel syndrome last depends on the cause and your response to treatment. Sometimes the symptoms disappear without any treatment, or they may be relieved by nonsurgical treatment. Surgery may be necessary to relieve the symptoms if they do not respond to treatment or they get worse. Surgery usually relieves the symptoms, especially if there is no permanent damage to the nerve.

Symptoms of carpal tunnel syndrome that occur during pregnancy usually disappear following delivery.

# How can I take care of myself?

Follow your doctor's recommendations. Also try the following:

- Elevate your arm with pillows when you lie down.
- Avoid activities that overuse your hand.
- Find a different way to use your hand by using another tool or try to use the other hand.
- Avoid bending your wrists down for long periods.

# When can I return to my sport or activity?

The goal of rehabilitation is to return you to your sport or activity as soon as is safely possible. If you return too soon you may worsen your injury, which could lead to permanent damage. Everyone recovers from injury at a different rate. Return to your sport will be determined by how soon your wrist recovers, not by how many days or weeks it has been since your injury occurred. In general, the longer you have symptoms before you start treatment, the longer it will take to get better.

You may return to your sport or activity when you are able to painlessly grip objects like a tennis racquet, bat, golf club, or bicycle handlebars. In sports such as gymnastics, it is important that you can bear weight on your wrist without pain. You must have full range of motion and strength of your wrist.

# What can I do to help prevent carpal tunnel syndrome?

If you do very repetitive work with your hands, make sure that your hands and wrists are comfortable when you are using them. Take regular breaks from the repetitive motion. Avoid resting your wrists on hard or ridged surfaces for prolonged periods.

If you have a disease that is associated with carpal tunnel syndrome, effective treatment of the disease might help prevent this condition.

In some cases the cause is not known and carpal tunnel syndrome cannot be prevented.

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Carpal Tunnel Syndrome - Page 2 of 3

# **Carpal Tunnel Rehabilitation Exercises**

You may do all of these exercises right away.

- 1. Active range of motion
  - A. Flexion: Gently bend your wrist forward. Hold for 5 seconds. Repeat 10 times. Do 3 sets.
  - B. Extension: Gently bend your wrist backward. Hold this position 5 seconds. Repeat 10 times. Do 3 sets.
  - C. Side to side: Gently move your wrist from side to side (a handshake motion). Hold for 5 seconds at each end. Repeat 10 times. Do 3 sets.
- 2. Stretching
  - A. Place both palms on a desk or table. Gently lean your body forward over your wrists and hold for 15-30 seconds. Repeat 3 times.
  - B. With your uninjured hand, help to bend the injured wrist down by pressing the back of your hand and holding it down for 15 to 30 seconds. Next, stretch the hand back by pressing the fingers in a backward direction and holding it for 15 to 30 seconds. Do this twice.





Wrist extension

- 3. Tendon glides: Start with the fingers of your injured hand held out straight. Gently bend the middle joint of your fingers down toward your upper palm. Hold for 5 seconds. Repeat 10 times. Do 3 sets.
- 4. Wrist flexion: Hold a can or hammer handle with your palm up. Bend your wrist upward. Hold this position for 5 seconds. Repeat 10 times. Do 3 sets. Gradually increase the weight of the object you are holding.
- 5. Wrist extension: Holding a can or similar object with the palm down, bend the wrist up. Hold this position for 5 seconds. Repeat 10 times. Do 3 sets.
- 6. Grip strengthening: Squeeze a rubber ball and hold for 5 seconds. Repeat 10 times.

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C.







Grip strengthening

# Exhibit B

Search

Congenital Arrhythmia Cholesterol Defects Children Diabetes Heart Attack Heart Failure & Adults	High Blood Stroke More Pressure
Bradycardia   Slow Heart Rate	Arrhythmia
Share         1         Like {97         8+1         9         280         Updated:Apr 29,2015	• Home
<ul> <li>Bradycardia = too slow</li> <li>A heart rate of less than 60 beats per minute (BPM) in adults is scalled bradycardia. What's too slow for you may depend on your age and physical condition.</li> <li>Physically active adults often have a resting heart rate slower than 60 BPM but it doesn't cause problems.</li> <li>Your heart rate may fall below 60 BPM during deep sleep.</li> <li>Elderly people are more prone to problems with a slow heart rate.</li> <li>View an animation of bradycardia.</li> </ul>	About Arrhythmia     Introduction     Atrial Fibrillation     Bradycardia     Conduction Disorders     Premature Contractions     Tachycardia     Ventricular Fibrillation     Other Rhythm Disorders     Types of Arrhythmia in Children
Causes of bradycardia © American Heart Association	Why Arrhythmia Matters
Problems with the sinoatrial (SA) node, sometimes     called the heart's natural pacemaker	Understand Your Risk for Arrhythmia
<ul> <li>Problems in the conduction pathways of the heart (electrical impulses are not conducted from the atria to the ventricles)</li> </ul>	Symptoms, Diagnosis & Monitoring of Arrhythmia
<ul> <li>Metabolic problems such as hypothyroidism</li> <li>Damage to the heart from heart attack or heart disease</li> </ul>	Prevention & Treatment of Arrhythmia
	Arrhythmia Tools & Resources
<b>Symptoms of bradycardia</b> A heart rhythm that's too slow can cause insufficient blood flow to the brain with symptoms such as:	
<ul> <li>Dizziness</li> <li>Lightheadedness</li> <li>Fainting or near-fainting spells</li> <li>In extreme cases, cardiac arrest may occur.</li> </ul> Complications of bradycardia Severe, prolonged untreated bradycardia can cause: <ul> <li>Heart failure</li> <li>Syncope (loss of consciousness; fainting)</li> <li>Angina pectoris (chest pain)</li> </ul>	Subscribe to Heart Insight magazine and monthly e-newsletter HeartInsight Our digital magazine delivers helpful articles and the latest news on keeping your heart healthy. Sign up today!
High blood pressure	Email.*
Treatment of the underlying medical cause	State: Please Select V
<ul> <li>Not usually needed except with prolonged or repeated symptoms</li> <li>Can usually be corrected with an artificial pacemaker to speed up the heart rhythm as needed</li> <li>Medication may be adjusted.</li> </ul>	Zip Code: By clicking submit below you agree to the Terms and Conditions Submit
Why join any other "support group" when you can be part of our new professionally	
moderated American Heart Association/American Stroke Association's Support Network!	Popular Articles
Created for individuals just like you.	1 Understanding Blood Pressure Readings
Be part of this online community and share your thoughts and support.	2 Target Heart Rates
IT'S FREE. IT'S TOTALLY PROTECTED.	3 All About Heart Rate (Pulse)
Join the conversation now.	4 What are the Symptoms of High Blood
	Pressure?
	5 Low Blood Pressure
This content was last reviewed on 10/23/2014.	6 Heart Attack Symptoms in Women 7 What Your Cholesterol Levels Mean
	8 Warning Signs of a Heart Attack
	• Warning Oigns of a riealt Allack

9 Tachycardia | Fast Heart Rate

**10** Good vs. Bad Cholesterol

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# Exhibit C



AlanHamilton-COA-pg#-012

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<ul> <li>MTN:OTHER MOTION</li> <li>NTC:OTHER NOTICE</li> <li>OTHER ANSWER/RESPONSE</li> <li>OTHER FILING</li> <li>OTHER FILING</li> <li>OTHER FILING</li> <li>IORD:OTHER ORDER</li> </ul>	OTHER FILING PLAINTIFF'S MEMORANDUM OF OPPOSITION TO: DEFENDANT DANIEL DAVILA IIIS MOTION FOR TRADITIONAL AND NO EVIDENCE SUMMARY JUDGMENT(EXHIBITS CC - II)
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ORD:OTHER ORDER	ER OBTAINED WITH A FRAUDULENT AND PERJURING MOTION"
5/28/2015 OTHER OTH	R FILING LETTER-ALAN L HAMILTON
NTC:NOTICE OF APPEAL	(WITH ORDER FORWARDED TO CLERK OF THE 353RD

DINDER PAGE WITH 2 IDENTICAL CATEGORY FIELDS BUT NO DOCUMENT TITLES (ADDITIONAL INFO FIELD) P3



AlanHamilton-COA-pg#-014

# Exhibit D

History of Clerk's Record problem/attempts to fix:

For \$1200, we could have purchased two home appliances, which would have been guaranteed to be functional. The 7/9/2015 Clerk's Record pdf submitted by the TCDC is non-functional. It would result in a failing grade for a student exam paper, much less a document delivered by a court for a \$1200 admission card to the appeals court with an unreadable document. A visit to the Harris County Court website shows this "Clerk's Record" task would have taken 15 minutes if we were not in TCDC website which does not yet have Public Access to non-lawyers for the court documents. Harris County Clerk's office allows you to put documents into a cart and order and pay for them online.

We would like our \$1200 back if the descriptive TOC in the pdf is not fixed. No one's going to read it, we can't even figure out which document is which, and we were there. For instance, find Exhibit CC in the Clerk's Record thru the "bookmark" document titles in the pdf. Not even possible. Without it, the contradicting evidence cannot be found, making our appeal as futile as using the Clerk's Record pdf in it's present "non-descriptive TOC clickable-bookmarks" form.

After working in great detail for 2 weeks (between 6/8/2015 and 7/9/2015) with the TCDC Clerk's Office, including 2 levels of supervisors:

1) Shaun Glasson, Clerk assigned to our appeal record, <u>512-854-5956</u>, <u>Shaun.Glasson@co.travis.tx.us</u>

2) Danikae Doetsch, Manager, <u>512-854-5851</u>, <u>Danikae.Doetsch@traviscountytx.gov</u>

3) Connie Jefferson - Director ("as high as we could go unless we wrote Velma Price a letter"), <u>512-854-5834</u>

In order to "do it right the first time" with the Clerk's Record submission, we were assured all of the above that the errors listed below had been fixed:

1) 3/25/2015 Motion submitted in multiple parts, per efiletexas/greenfiling directions, were not compatible with the "Appeal Creator" software used by TCDC Clerk's Office, and were being displayed in the wrong order,

2) the Judge's Notes were missing,

3) no Table of Contents (TOC) descriptions in index page but appear on docket page, and no page numbers on TOC but appear on index page. Danikae and Connie assured us that the TOC was displayed/working in the resulting pdf, so that the bug in the index page *didn't matter*. (the "double category field-doc title in additional comments field NOT in document description field" bug)

The top manager we spoke to, Connie Jefferson, REFUSED to let us see the "fixed" version and said only the Appeals Court could give out copies of the "clerk's/appellate record". We told them that if it wasn't correct, for a cost \$1200, we would be filing a motion to have it fixed. We described to Connie the analogy of the Clerk's Office being the publisher and us the

novelist, and that publishing a book without Chapter titles and in the wrong order, ie. Chapter 1 then Chapter 5 then Chapter 2, would not be acceptable, and it is not acceptable for the Clerk's Office to do. Again we were assured everything was correct but we couldn't see it until after it was sent to Appeals Court. This despite the fact that they had not known about the other errors until we told them the docket list was in the wrong order for the 3/25/2015 multi-part "chapter" submissions, due to "max envelope" size of 30MB constraint for efiletexas.gov.

As seen in the attachment, it has NOT been fixed, though Danikae said she spent a day with "Jeff the programmer in IT" to fix it. The "Clerk's/appellate record pdf" is unusable without a descriptive Table of Contents, pecking thru the "category names" attempting to figure out which document is which, when it is a simple global replace in the "Appeal Creator" code, to use the "additionalInfo" field for the document title, NOT the "document description" field, which has been MISUSED by the Clerks as a duplicate category field. This is a one day fixed for a programmer who knows the code, and a one week fixed for a programmer who does not know the code. And yet everyone who uses that pdf with no titles in the TOC (Table of Contents) will waste their time, energy and frustration, and no one can get a fair appeal hearing with an unusable document that would get anyone fired at anything except a government job. If we have to sue Travos County to get this bug fixed we will. Or we want our \$1200 back. It is pure incompetence and irresponsibility that has allowed this bug to continue, propagating with it everyone's frustration due to the TCDC Clerk's Office not doing their job correctly and charging everyone an arm and a leg for an unusable inferior product that would get you flunked out of high school these days.

The TCDC Clerk's Office obviously needs extra motivation to fixed this bug and perhaps an Order to fix it. It is unbelievable that we are the first to point this out. Shaun at the TCDC, said we were the first to ever ask to look at it, and yet the TRAP rules say the appellant is responsible to check for the correct content, not the Clerk's Office ironically. So we asked to check it, and they, up 2 levels of management Shaun to Danikae to Connie Jefferson, said we had to wait until AFTER we had paid for it and it was submitted wrong to the Appeals Court before it could be fixed. So that is where we are now.

As well, after receiving the TCDC Clerk's Record from the Appeal Court Clerk's Office, we have also discovered while attempting to read the \$1200 Clerk's Record pdf as well, that the filed pdfs appear to have been made into Black and White tiffs and then reconverted to pdfs, making the words unreadable and looking like faxes from the 1980s. The color that used to accentuate points, now are a blurred-light-grey. The RFA/RFP/ROG spreadsheet tables which are central to showing the facts in our appeal, are unreadable. (see attachment)

Federal Courts have settled on using secure pdfs from Adobe Acrobat, not the outdated an unreadable "secure TIFF" solution of the past. See the "Liquid Litigation PDF vs TIFF" white-paper at <u>http://llm.liquidlitigation.com/rs/liquidlitigationmanagement/images/LLM\_PDF-vs-TIFF\_white paper.pdf</u>. It is attached as well.

# Exhibit E

# April 2010

# The Advantages of PDF over TIFF

by Jennifer Lazor

AlanHamilton-COA-pg#-019

### Summary

In order to conduct a successful document review, lawyers need to be able to quickly and effectively view documents in electronic format. Document database aside, review efficiency relies heavily on whether reviewers choose to use PDF files or TIFF files. PDF documents are more secure, smaller, more accessible, and more cost efficient than TIFF files. For good reason, the standard is trending towards use of PDF over TIFF.

### TIFF, The Back Story

TIFF, essentially a picture of a document, was created to standardize the file type for scanned paper documents. Prior to its creation, each scanning vendor had its own proprietary file format and compatibility issues were common. In an effort to solve this problem, TIFF was released in 1987 by Aldus and Microsoft, Inc. Since merging with Aldus, Adobe Systems, Inc. owns the trademark to TIFF. However, Adobe has not updated the specifications for TIFF since 1992 and instead, has chosen to invest in the PDF file type. According to Diana Helander, Group Manager for Worldwide Standards for Acrobat, PDF use is becoming the de facto standard with many agencies including the FDA and the U.S. Federal Courts.<sup>1</sup>

### PDF, The Future

Released in 1992, the PDF file type was originally used as the standard for the U.S. federal government's legacy files. Beginning under the Clinton administration and continuing through to present-day, there is a push in the U.S. government to limit paper documents in favor of more efficient electronic forms.<sup>2</sup> Their form of choice? The PDF. PDF, or Portable Document Format, lives up to its name due to its accessibility and portability. Today, more and more paper documents are being archived as PDF files. Additionally, files such as Excel, PowerPoint and Word are being converted to PDF to preserve the format for easier collaboration and review.

Use of PDFs is becoming increasingly widespread in the legal industry due in large part to the number of advantages it provides over TIFF files during review.

# Size and Speed

A key component of a successful review is the speed in which review is conducted. Review speed relies heavily upon how quickly reviewers are able to load and view files.

- PDFs are compressed, making them much smaller than TIFF files. Smaller files take less time to load, cutting wait times significantly and allowing the reviewer to read their documents more quickly. Additionally, smaller files take up less space on a hard drive, meaning that storage costs for hosting will be less when using a hosted solution.
- TIFF documents are stored as multiple files, with each page of a document as a separate file. This takes up a lot of computer space and adds time to review as reviewers will have to open a

<sup>&</sup>lt;sup>1</sup> Foss, Kurt. "Adobe Interview: Diana Helander." *Adobe Acrobat User Community*. Adobe Systems Incorporated, 01 Jul 2006. Web. 31 Mar 2010. <a href="http://www.acrobatusers.com/articles/2006/07/diana\_helander\_qa">http://www.acrobatusers.com/articles/2006/07/diana\_helander\_qa</a>.

<sup>&</sup>lt;sup>2</sup> Johnson, Duff. "PDF in Government." Adobe Acrobat User Community. Adobe Systems Incorporated, 02 Feb 2007. Web. 31 Mar 2010. <a href="http://www.acrobatusers.com/articles/2007/02/pdf\_in\_government">http://www.acrobatusers.com/articles/2007/02/pdf\_in\_government</a>>.

separate file for each page of a document. PDFs take up much less space and are more convenient because all of the pages of a multipage document are saved in one file. When reviewing multipage PDF documents, reviewers move from one page to the next by a simple scrolling motion, rather than opening up multiple files as with TIFFs. This cuts down review time significantly.

- Smaller file size not only has a speed advantage, but a cost advantage. As software companies
  often charge a per gigabyte fee for storage, it is cost efficient to reduce gigabyte size wherever
  possible. PDFs are generally smaller than TIFF files, resulting in fewer costs for the firm. When
  PDFs are created directly from native files, the size difference between PDFs and TIFFs is further
  increased.
- PDF files stream as they load. This allows the reviewer to begin to read the document while it finishes loading in the background. File streaming is similar to viewing videos online. For example, the video starts to play before it is entirely loaded. Load times vary with document size. However, file streaming allows the reviewer to be able to begin to review a document as quickly as they can read, without even noticing the load time. TIFF files do not have this ability.

### Clarity

Once the documents are opened and loaded, quality and clarity are crucial to their readability. TIFF images are bitmap images, making them appear pixilated. Bitmap images have low visual clarity because they are created from pixels in a grid. Bitmap images and thus, TIFF files, are resolution dependent, meaning that as they are zoomed or printed, their quality deteriorates because pixels are lost. If a file is not clear on screen or in print, it is more tedious to review.

PDFs display text and images with the utmost clarity due to Adobe's PostScript technology. PostScript is a language between document and printer or document and monitor that essentially describes the exact appearance of images and text to a printer or monitor. Therefore, when printed or zoomed, PDFs maintain the exact visual standards they have on screen. With increased document clarity, review time is decreased because less time is spent deciphering words. Professionalism is also maintained when printing PDFs for experts or trial because the images will be exceptionally clear.





O The Advantages of PDF over TIFF

<sup>&</sup>lt;sup>3</sup> "PDF Conversion." *PDF Solutions* (2006): n. pag. Web. 31 Mar 2010. <a href="http://www.investintech.com/resources/articles/whattiff/>">http://www.investintech.com/resources/articles/whattiff/></a>.

### Color

In addition to clarity, color is another important visual standard in both review and production. The vast majority of compressed TIFF formats use black and white only, whereas PDFs transparently and efficiently include color. Color not only plays an important role in review, but in production as well. TIFF files cannot typically be produced in color. JPEGs are often produced with TIFFs to supply the color, meaning extra work is needed to create productions. PDFs can be produced in color, saving time and, if the review is conducted in color, there is a seamless transition to a colored production.

### **Search Capabilities**

In addition to convenient file size and visual clarity, reviewers also need to effectively search through large volumes of documents. TIFF images are only pictures of documents and, therefore, do not have embedded text and are not text-searchable on their own. A separate text file must be provided for each page of a TIFF document to make it text-searchable. PDFs, on the other hand, retain all of their text information, making them fully text-searchable without any extra steps. This allows PDFs to be available for review more quickly than TIFFs. It is beneficial for reviewers to have the ability to both search and look at the image of a document simultaneously so that they can read a document in context. Additionally, it is easier to share documents that have both the image and the text together. A reviewer would need to share many more files with another reviewer because TIFFs need their matching text files, whereas PDFs combine text and image in one file.

### Flexibility

As review progresses and documents are moved from computer to computer, flexibility becomes increasingly important. At the root of flexibility is platform independence. Both TIFF and PDF are platform independent, meaning that they can be opened on any operating system. However, only PDFs are able to be stored and printed on any hardware without loss of quality.

### **Other Features/Software Updates**

In the changing legal industry, perhaps one of the most important advantages of PDFs over TIFF is their ability to be updated. TIFF specifications are stagnant and will not be upgraded or changed. However, Adobe invests in updating PDF specifications often. One of Adobe's newer features<sup>4</sup> is The TouchUp Text Tool, which allows the text in PDFs to be edited if the files are not locked. As a reviewer, this is advantageous as notes can be made directly on a document. Adobe also constantly releases updates to its Acrobat Reader software, ensuring PDFs are secure from malware and viruses.

# **Electronic Court Filing**

PDFs have several advantages over TIFFs and provide the speed, functionality and technological advances that lawyers need as they review documents. PDF files also record each document's electronic history and metadata. Each time a document is opened or changed, digital data, or metadata, is stored with the PDF, allowing reviewers and the U.S. courts to verify their accuracy. The legal industry has noticed these benefits and has widely adopted PDF as the file type of choice. The Administrative Office

<sup>&</sup>lt;sup>4</sup> "News." *Adobe Acrobat User Community*. Adobe, 27 Mar. 2010. Web. 31 Mar 2010. <a href="http://www.acrobatusers.com/news">http://www.acrobatusers.com/news</a>>.

of the U.S. Courts adopted use of PDF in the ECF system in 1996, furthering its use in the legal industry. The ECF system permits the retention of electronic case files over the Internet. The U.S. Court lists the several benefits of the ECF system<sup>5</sup>:

- Courts can allow registered attorneys to file documents 24 hours a day, 7 days a week.
- Reduction of paper, photocopy, postage and courier costs.
- Full case information is available immediately to attorneys, parties, and the general public through the Internet. This includes the ability to view the full text of most filed documents.
- Attorneys on the system will receive email notices electronically in CM/ECF cases. This greatly
  speeds delivery and eliminates the costs to both the court and attorneys of handling and mailing
  paper notices.
- Multiple parties can view the same case files simultaneously.
- Since CM/ECF uses Internet standard software, the out-of-pocket cost of participation for attorneys is typically very low.

Due to its several benefits most, if not all, U.S. Courts have adopted the ECF system. <sup>6</sup> More information about the ECF system can be found here: <u>http://pacer.psc.uscourts.gov/faq.html</u>.

As PDFs become the accepted standard in the U.S. Courts, it makes sense for firms to work with systems that utilize PDFs to create pleading exhibits. This would streamline the entire review and ECF process, tying the two together seamlessly.

# PDF over TIFF

Choosing PDF over TIFF is the only option for an efficient document review. PDFs are cost efficient, small, secure, quick to load, visually clear and easily accessible. Reviewers need a technology that can keep up with the legal industry and, with its constant updates; PDF is up to the challenge. With all of these benefits, it is no wonder the U.S. Courts have adopted the PDF as the file type of choice.

<sup>&</sup>lt;sup>5</sup> "CM/ECF." *CM/ECF Frequently Asked Questions*. The PACER Service Center, 12 Jan. 2010. Web. 31 Mar 2010. <a href="http://pacer.psc.uscourts.gov/cmecf/ecffaq.html#GE">http://pacer.psc.uscourts.gov/cmecf/ecffaq.html#GE</a>>.

<sup>&</sup>lt;sup>6</sup> "Local CM/ECF Court Information." *CM/ECF*. The PACER Service Center, 12 Dec. 2009. Web. 31 Mar 2010. <a href="http://pacer.psc.uscourts.gov/announcements/general/ecfnews">http://pacer.psc.uscourts.gov/announcements/general/ecfnews</a>

# Exhibit F

# RFAs from Davila

	Answers in pink and green, are still being pondered.							
	Admit or Deny:	answer (individually)	notes	page#	translation Davila was engaged and hired to do	demand readable sentences	answer (as Executor)	answer (as Successor- Trustee)
FA-1	Davila was NOT engaged or hired to do Estate tax return	deny	double negative		Estate taxes	vague		
FA-2	Davila did NOT do Estate tax returns	admit	double negative		Davila did NOT do the Estate tax returns and was supposed to	vague		
FA-3	Davila did NOT do Trust taxes AFTER Maurine died.	admit	double negative		Nor did he do them in 2004 when they were due BEFORE Maurine died			
FA-4	Alan did NOT engage or hire Davila to provide:		double negative					
	a) accounting services	deny			Did engage for accounting services			
	b) Personal financial services	admit	careful - taxes?					
	c) Retirement Counseling services	admit	careful					
FA-5	same as RFA-4 as Successor-Trustee	same						
FA-6	same as RFA-4 as Executor	same						
	oral murder1 start: "act of murder"							
FA-7	Alan stated orally that Davila committed "an act of murder"	deny	committed					
	Alan stated orally that Davila conspired to committed murder with							
RFA-8	others		conspired					
FA-9	Alan stated orally that Davila concealed murder	deny	concealed					
	Alan stated orally that Davila failed to report murder	deny	report					
	oral murder2 start: word change = "murdered"							
	Alan stated orally that Davila committed "murder"	deny	committed					
	Alan stated orally that Davila conspired to "murder"	deny	conspired					
	Alan stated orally that Davila concealed "murder"	deny	concealed					
FA-14	Alan stated orally that Davila report "murder"	deny	report					
			Alan's murder					
	Alan believes Maurine was "murdered"	vague. Suspicious death.	opinion					
RFA-16	Alan stated that Maurine was "murdered"	vague. Suspicious death.	Alan stated murder					
	stolen1: begin oral "Davila stole it" from "Maurine Hamilton"		end murder1 oral					
	word change "Mutual of Omaha annuities (or their proceeds)"							
RFA-17	Alan stated orally that Davila "stole Mutual of Omaha annuities"	deny	oral Davila stole it					
RFA-18	Alan stated orally that Davila conspired to "steal annuities"	deny	conspired to steal it		5			
		admit. Davila informed us						
		with Ticker tape on	Davila knowledge					
	Alan stated orally that Davila "had knowledge of stolen annuities" Alan stated orally that Davila "had knowledge of and failed to report stolen annuities"	9/10/2008 admit. Davila said "Police never look into these kinds of things" and them filed fraudulent taxes to IRS to	of theft		5			
RFA-20		cover up embezzlement.	failed to report					
RFA-21	Alan believes "annuities were stolen"	admit admit. Written confession	Alan believes stoler Alan stated		5			
RFA-22	Alan stated orally that "annuities stolen"	and bank records.	oral stolen		5			
	stolen2: word change = "multiple annuities (or their proceeds)"				6			
FA-23	Alan orally stated that Davila "stole annuities"	deny	committed		6			1
	Alan orally stated that Davila "conspired to steal annuities"	deny	conspired		6			
	Alan orally stated that Davila "concealed theft of annuities"	admit	concealed		6			
	Alan orally stated that Davila "failed to report stolen annuities"	admit	report		6			
	Alan believes "annuities were stolen"	admit	Alan believes stoler		7			
	Alan stated orally that "annuities stolen"	admit	stated orally stolen		7			
1 A-20	Stolen3: begin - word change = "sum of \$800,000" from "Maurine or Estate" added	aumit	Stated Orany Stolen		7			
FA-20	Alan orally stated that Davila "stole sum of \$800,000"	deny	committed		/			
	Alan orally stated that Davila "stole sum of \$600,000"	deny	conspired					
	Alan orally stated that Davila "concealed theft of annuities"		conceal					
		admit						
IFA-32	Alan orally stated that Davila "failed to report stolen annuities" begin stolen4 - oral as "theft"	admit	report					
FA-33	Alan orally stated that Davila "committed theft"	deny	committed					
	Alan orally stated that Davila "conspired to steal"	deny	conspired					
	Alan orally stated that Davila "concealed theft"	admit	conceal					
	Alan orally stated that Davila "failed to report theft"	admit	report					
	היאמוז סומווץ סומנכם נוומו במיוום המווכם נט ובףטון נווכון	Garrie	iopon					1

# RFAs from Davila

	1	L					
RFA-37	Alan believes \$800,000 stolen	admit		9			
RFA-38	Alan believes money stolen	admit		9			
RFA-39	orally stated \$800,000 stolen	admit		9			
<b>RFA-40</b>	stated orally money stolen	admit		9			
	stolen5: begin - word change = "embezzlement" from "Maurine"						
RFA-41	Alan orally stated that Davila "committed embezzlement"	deny	committed	10			
RFA-42	Alan orally stated that Davila "conspired to commit embezzlement"	deny	conspired	10			
	Alan orally stated that Davila "concealed embezzlement"	admit	concealed	10			
	Alan orally stated that Davila "failed to report embezzlement"	admit	report	10			
	stolen6: begin - word change = "embezzlement" from "Estate of		Topolt				
	Maurine"						
RFA-45	Alan orally stated that Davila "committed embezzlement"	deny	committed	10			
	Alan orally stated that Davila "conspired to commit embezzlement"	deny	conspired	11			
	Alan orally stated that Davila "concealed embezzlement"	admit	conceal	11			
	Alan orally stated that Davila "failed to report embezzlement"	admit	report	11			
	Alan believes and stated						
RFA-49	Alan believes there was an "embezzlement" from "Maurine"	admit	Alan believes	11			
	Alan believes there was an "embezzlement" from "Estate of Maurine"	admit	Alan believes	11			
	Alan stated orally there was an "embezzlement" from "Maurine"	admit	stated	12			
N A OI	Alan stated orally there was an "embezzlement" from "Estate of	admit	Stated	12			
RFA-52	Maurine"	admit	stated	12			
	income tax fraud1: start						
RFA-53	Alan stated that Davila committed of Fed income tax fraud	admit	commit	12			
	Alan stated that Davila conspired to commit Fed income tax fraud	admit	conspire	12			
	Alan stated that Davila had knowledge and concealed Fed income tax		conopii c				
RFA-55		admit	conceal	12			
	Alan stated that Davila had knowledge of Fed income tax fraud and		knowledge-failed to				
RFA-56	failed to report	admit	report	13			
	income tax fraud2: start - word additions = "regarding the tax returns of						
	Maurine"	admit					
RFA-57	Alan stated that Davila committed of Fed income tax fraud	admit	committed				
RFA-58	Alan stated that Davila conspired to commit Fed income tax fraud	admit	conspire				
	Alan stated that Davila had knowledge and concealed Fed income tax						
RFA-59		admit	conceal				
554.00	Alan stated that Davila had knowledge of Fed income tax fraud and						
RFA-60	failed to report	admit	report	14			
	IRS fraud-believes and stated						
	Alan believes that Fed income tax fraud regarding tax returns of	admit	holiovo				
	Maurine occurred	admit	believe				
	Alan stated orally that Fed income tax fraud re - Maurine occurred	admit	stated	14			
RFA-03	oral crook	vague.		14			
	written or printed (W/P) start						
554.04	W/P murder1: start						
RFA-64	Alan stated in writing/print that Davila committed "an act of murder"	deny	committed	14			
RFA-65	Alan stated in writing/print that Davila conspired to commit "an act of murder"	dopy	cononirod	14			
	Alan stated in writing/print that Davila concealed "an act of murder"	deny	conspired	14			
		deny	conceal				
KFA-0/	Alan stated in writing/print that Davila failed to report "an act of murder"	ueny	report	14 14			
DEA 60	W/P murder2: written or printed start	dopy	committed				
	Alan stated Davila committed murder	deny	committed	14			
	Alan stated that Davila conspired to commit "murder"	deny	conspired	15			
KFA-70	Alan stated that Davila concealed "murder"	deny	concealed	16			
	Alan stated that Davila failed to report a "murder" and "an act of murder" (forgot to do "act of" edit out in one spot)	deny	report	16			
NI A-1 1		vague. Suspicious death	report	10			
RFA-72	Alan stated that Maurine was murdered	warranting investigation.					
1117112	W/P stolen1: begin "Davila stole it" from "Maurine Hamilton"	including invooligation.					
	word change "Mutual of Omaha annuities (or their proceeds)"						
RE4-72	Alan stated that Davila "stole Mutual of Omaha annuities"	deny	committed				
	Alan stated that Davila "stole Mutual of Offana annulties"		conspired				
	Alan stated that Davila "conspired to steal Mutual of Omaha annuities"	deny					
RFA-13	Alan stated that Davila "had knowledge of Mutual of Omaha annuities" Alan stated that Davila "failed to report theft of Mutual of Omaha	admit	knowledge of				
RF4-76	annuities"	admit	report				
	Alan believes Mutual of Omaha annuities stolen	admit	believes	FXAC	CTLY the same as RFA-21		
	Alan stated Mutual of Omaha annuities stolen	admit	stated				
11/1-10		uunit	010100				

AlanHamilton-COA-pg#-026

# RFAs from Davila

	W/P stolen2: word change: X = "multiple annuities (or their proceeds)"					
	Alan stated that Davila "stole X"	deny	committed	17		
	Alan stated that Davila "conspired to steal X"	deny	conspired			
RFA-81	Alan stated that Davila "concealed stolen X"	admit	concealed			
RFA-82	Alan stated that Davila "failed to report stolen X"	admit	report			
RFA-83	Alan stated that "X were stolen from Maurine"	admit	stated			
	W/P stolen3: begin - word change: X = "sum of \$800,000" from "Maurine or Estate" added					
RFA-84	Alan stated that Davila "stole X"	deny	committed			
<b>RFA-85</b>	Alan stated that Davila "conspired to steal X"	deny	conspired			
	Alan stated that Davila "concealed stolen X"	admit	concealed			
RFA-87	Alan stated that Davila "failed to report stolen X"	admit	report			
	W/P begin stolen4: word change: X = "theft"					
RFA-88	Alan stated that Davila "committed theft"	deny	committed			
	Alan stated that Davila "conspired to commit theft"	deny	conspired			
	Alan stated that Davila "concealed theft"	admit	concealed			
	Alan stated that Davila "failed to report theft"	admit	report			
1174-51		admit	Topon			
RFA-92	Alan has stated that \$800,000 was stolen from Maurine or Estate of Maurine	admit	stated	20		
	Alan has stated that money was stolen from Maurine or Estate of					
RFA-93	Maurine	admit	stated	21		
	stolen5: begin - word change = "embezzlement" from "Maurine"					
RFA-94	Alan stated that Davila "committed embezzlement"	deny	committed			
RFA-95	Alan stated that Davila "conspired to commit embezzlement"	deny	conspired			
	Alan stated that Davila "concealed embezzlement"	admit	concealed			
	Alan stated that Davila "failed to report embezzlement"	admit	report	21		
	stolen6: begin - word change = "embezzlement" from "Estate of Maurine"	Garne	lopent			
RFA-98	Alan stated that Davila "committed embezzlement"	deny	committed			
	Alan stated that Davila "conspired to commit embezzlement"	deny	conspired			
	Alan stated that Davila "concealed embezzlement"	admit	concealed			
	Alan stated that Davila "failed to report embezzlement"	admit	report			
	stated (can't believe in writing so only 2 instead of oral 4)	admit	Topon			
DEA 102	Alan stated embezzlement occurred from Maurine	admit	stated			
	Alan stated embezzlement occurred from Maurine's Estate	admit	stated	22		
RFA-103		aumit	Sidieu	22		
	IRS fraud1 begin	o duoit	a a mana litta d			
	Alan stated that Davila committed of Fed income tax fraud	admit	committed			
	Alan stated that Davila conspired to commit Fed income tax fraud Alan stated that Davila had knowledge and concealed Fed income tax	admit	conspired			
RFA-106		admit	concealed			
REA_107	Alan stated that Davila had knowledge of Fed income tax fraud and failed to report	admit	report	22		
RFA-107	income tax fraud2: start - word additions = "regarding the tax returns of	aumit	Tepon	22		
	Maurine"					
RF4-108	Alan stated that Davila committed of Fed income tax fraud	admit	committed	23		
	Alan stated that Davila conspired to commit Fed income tax fraud	admit	conspired	20		
1477-105	Alan stated that Davila had knowledge and concealed Fed income tax	admit	conspired			
RFA-110		admit	concealed			
	Alan stated that Davila had knowledge of Fed income tax fraud and					
RFA-111	failed to report	admit	report			
	IRS fraud - stated (only 1 since can't believe in writing)					
	Alan stated that Fed income tax fraud regarding tax returns of Maurine					
RFA-112	occurred	admit	stated			
<b>RFA-113</b>	Alan stated Davila was a crook - written	vague	stated	25		
RFA-114	Sylvia admitted to Alan that she stole the proceeds of the annuities	admit		25		
	checks written to Maurine P. Hamilton at 9008 East Dr section	-				
RFA-115	check written to Maurine P. Hamilton - \$50,285,57			25		
	check written to Maurine P. Hamilton - \$98,562.47			25		
	check written to Maurine P. Hamilton - \$101,476.88			26		
	check written to Maurine P. Hamilton - \$33,668.54			20		
	check written to Maurine P. Hamilton - \$33,008.34			26		
	check written to Maurine P. Hamilton - \$75,721.05			20		
11/17-120	check written to Maurine F. Hamilton - \$30,444.00			20		
## RFAs from Davila

RFA-121	total cash surrender value \$414,159.17 on 10/22/2004		27		
	UA7728306				
	UA7728307				
	UA7728312				
	UA7762551				
	UA8441079				
	UO1126221				

RFP #	Documents requested	Response:	page#	Location (of things we can produce at this time):
		Maurine records to 2008 - Sylvia Hamilton		
RFP-1	Bank	(previous Trustee) discovery ongoing	1	
RFP-2	IRS	Contact agency-ongoing investigation	1	
RFP-3	APD	Contact agency-ongoing investigation	1	
RFP-4	DA	Contact agency-ongoing investigation	1	
RFP-5	TDI	Contact agency-ongoing investigation	2	
RFP-6	FINRA	Contact agency-ongoing investigation	2	
RFP-7	SEC	Contact agency-ongoing investigation	2	
		bank records-Sylvia accounting/confession-DA		
RFP-8	embezzlement proof	Binder	3	DA Binder webpage
RFP-9	written contract (DPOA)	Propronent has document(s)	3	DA Binder webpage
RFP-10	attorney's fees docs		3	Jason Coomer
RFP-11	recordings-photos anything basis of lawsuit		3	discovery ongoing - criminal investigations pending
RFP-12	insurance	none	4	
RFP-13	claims submissions	none - letter to Peggy Rodewald notifying Mutual of Omaha of embezzlement and requesting investigation and claim.	4	
	docs used to prepare answers			included in Answers except where Proponent has document(s)
RFP-15	recordings of Davila	3-10-2010 - already sent	4	• • • • • • • • •
RFP-16	recordings of Sylvia	ongoing investigation	5	
RFP-17	exhibit list for trial		5	see RFP-8, RFP-18, RFP-25 and other submitted documents. Discovery ongoing. Awaiting Defendants responses. See ROGs for attached documents and tables. TBD.
<b>RFP-18</b>	document for damages		5	Annuity docs and spreadsheet
RFP-19	criminal convictions to be used at trial	ongoing investigations - TBD	5	
RFP-20	court docs of other lawsuits	Sylvia Hamilton - available from District Court	6	Be nice and just give this to them? Definitely should get RFA/RFP/ROGs to Sylvia on same day.
RFP-21	police reports	Contact agency-ongoing investigation	6	
	docs proving causes of action		6	
RFP-23	IRS communications and liens	Contact agency-ongoing investigation	6	
RFP-24	all docs prepared by Davila	Propronent has document(s)	7	
RFP-25	docs which defined duties of Davila which he breached-DPOA-emails			DPOA-Emails-Letters Testamantary-IRS Sortable Tables and Summary Judgment Table(s) (short and long versions on Coomer webpage)

AlanHamilton-COA-pg#-029

Alan Hamilton-Bates pg#-116

RFP-26	Wayne Gronquists duties	Not tax preparation or accounting services	7	
		Sylvia Hamilton and Davila already submitted with		
RFP-27	witness statements obtained-Davila's ticker tape	RFDs	7	add 9/10/2008 ticker tape?
		Davila was supposed to produce non-fraudulent		
		Trust taxes - instead produced 1040s hiding the		
	tau anti-mar 0000 0010	embezzlement of the Trust from the IRS and the	0	
RFP-28	tax returns 2000-2012	beneficiaries. Proponent has copies of these.	8	
	all bank account info of Maurine Hamilton (bank	Sylvia Hamilton discovery ongoing - see embezzlement proof bank records above	0	
RFP-29	acct list given a thru i)	proprietary, attorney-client privilege, work product,	8	
RFP-30	Probaitcourt.com	private	8	
111-50		proprietary, attorney-client privilege, work product,	0	
RFP-31	PBC	private	8	
		proprietary, attorney-client privilege, work product,	•	
RFP-32	PBC	private	9	
	APD - copy of police report - 2 of them	Contact agency-ongoing investigation	9	
RFP-34		Contact agency-ongoing investigation	9	
RFP-35	APD	Contact agency-ongoing investigation	9	
RFP-36	APD	Contact agency-ongoing investigation	9	
RFP-37	APD	Contact agency-ongoing investigation	10	
RFP-38	APD	Contact agency-ongoing investigation	10	
RFP-39	from Gronguist to Davila documentation	Propronent has document(s)	10	
RFP-40	from Davila to Gronguist documentation	Propronent has document(s)	11	
RFP-41	from Alan to Davila	Propronent has document(s)	11	
RFP-42	from Davila to Alan	Propronent has document(s)	11	
RFP-43	from Maurine to Davila	Propronent has document(s)	12	
RFP-44	from Davila to Maurine	Propronent has document(s)	12	
RFP-45	from Sylvia to Maurine	Sylvia Hamilton discovery ongoing	13	
	from Maurine to Sylvia	Sylvia Hamilton discovery ongoing	13	
	from Estate of Maurine to Davila	Propronent has document(s)	13	
RFP-48	from Davila to Estate of Maurine	Propronent has document(s)	14	
	from Estate of Alfred to Davila	Propronent has document(s)	14	
RFP-50	from Davila to Estate of Alfred	Propronent has document(s)	15	
RFP-51		none	15	
RFP-52	2	available at Probate Court online	15	
RFP-53		already submitted	15	
RFP-54	copy of Davila's 4/14/2009 "Hamilton Tax Folder"	Propronent has document(s)	15	
	anything not requested which has to do with liability			
RFP-55	or damages which will be submitted to jury		16	email from Brad Seals?

		page#  our response	notes
I-1	name address DOB	1 Alan Hamilton, 9902 Childress, Austin, Texas 78753, 7/7/1946	
I-2	who helped you do this RFAs, RFPs and ROGs	Jason Coomer, Marjorie Miller	
I-3	describe incident of lawsuit:how,events,persons,dates, times,locations of alleged occurances	In a nutshell, Davila is hired by Sylvia Hamilton to rob Maurine Hamilton life savings, and Davila complied, and then lied, to the Executor-Successor Trustee about what happened and prepared fraudelent taxes to cover it up. No Trust taxes prepared. see IRS Sortable Tables and Davila Summary Judgment Table, and Davila Summary Judgment Text.	embedded doc links don't work in google spreadsheets yet-see docs links on Jason Coomer page on www ProBaitCourt.com
1-4	how and why Davila or anyone else was responsible for damage to Alan	Had Davila not "helped out" in 2004, Maurine might have made it to the nursing home she had paid \$500/month insurance for, lived out her years with \$67,000/year and passed on the retirement Trust to her children as she and her husband had planned for many years. Davila was well aware as he computed the \$315,000, that Maurine Hamilton was already sitting on too much cash and not enough investments. Maurine also had \$200,000 in bank according to Davila's \$2032 taxable interest 1099 from the 2003 taxes he did.	
I-5	experts	None at this time	
I-6	tell us about any investigations	Ask the agencies yourself-pending investigations	
17	statements-admissions by Davila or anyone on his behalf		
I-7 I-8	which will be used at trial monetary losses - liquidated	<ul> <li>Already provided - discovery ongoing - criminal investigations pending</li> <li>Annuity docs and spreadsheet - RFDs damages section + "\$315,000 Allan" doc Davila knew was there from Alfred before early withdrawal of \$414,000, as Brad Seals requested that Defendant compute.</li> </ul>	
I-9	damages -liquidated - how different from #8?	?	
I-10	high schools attended	irrelevant	
I-11	max damages	?	
I-12	employment history	irrelavant	
I-13	party to lawsuit in last 10 years?	Sylvia's lawsuit	
I-14	describe each act of breach or fraud by Davila	see IRS Sortable Tables and Davila Summary Judgment table (long version)	
I-15	material false respresentations made by Davila	<ol> <li>In Maurine Hamilton's DPOA, which he wrote and included in communication to Mutual of Omaha for the annuity withdrawal Defendant said he would take over Sylvia Hamilton's Duties if she failed to perform them and instead filed tax extensions for 2 years.</li> <li>Defendant presented fraudulent taxes to Plaintiff in order to coverup wrongful actions by Defendant. After being informed that taxes were fraudulent and requesting non-fraudulent Trust taxes again on 4/14/2009, Defendant created a high drama "murder accusation" in order to justify continuing his no-cooperation with the investigation. Any misunderstanding</li> </ol>	
		was cleared up in the 4/15/2009 email. Instead Defendant chose to "continue with the confusion" created by his latest distraction.	
		3) From 9/10/2008 to present, Defendant has continued to stymy any investigation, never presenting the Mystery Davila DPOA which allowed it all to happen to Regulators, just as he never showed it to Plaintiff. Mutual of Omaha sent Plantiff a copy of Mystery Davila DPOA after status request on annuities. There was also a copy in the "Hamilton Tax Folder" which was shown to Davila on 4/14/2009 and asked about.	
1.40	for a data at a super state of the form	IRS Sortable Tables, 4/15/2013 "murder accusation" by Davila in order to continue	
I-16	fraudulent concealment details	5 coverup	
I-17	Probaitcourt.com PBC	proprietary/privileged-work product/private	
I-18		ditto	
I-19 I-20	are all damages same for all 3 "Alans" was there a settlement with Sylvia?	5 yes 6 no	
		playing with how to do links in google spreadsheets below: search the web	

## Exhibit G

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Bookmarks	$\times$		Note: 12	21 RFAs, 55 RFPs and 20 ROGs for each "Alan": 1) Individually 2) Such Answers in pink and green, are still being produced.	essor-Trustee 3) Executor. W	e assume all Qs are I	he same, b	out will double-check. If they have mixed	them up, it is even o	learer abusive dis	scovery.
				Admit or Deny:	answer (individually)	notes	page#	translation	demand readable sentences	answer (as Executor)	answer ( Success Trustee)
	•		RFA-1	Davila was NOT engaged or hired to do Estate tax return	deny	double negative		Davila was engaged and hired to do Estate taxes	vague		
MAILED			RFA-2	Davila did NOT do Estale lax returns	admit	double negative		Davila did NOT do the Estate tax returns and was supposed to	vague		
OTHER			RFA-3	Davila did NOT do Trust laxes AFTER Maurine died.	admit	double negative		Nor did he do them in 2004 when they were due BEFORE Maurine died	fore marine a server ma		
ANSWER/RESPONSE			RFA-4	Alan did NOT engage or hire Davila to provide:	ې د د مېرو د د د د د د مېرو د در در در در در در د مېرو د د د د مېرو د د د د د د د د د د د د د د د د د د مېرو د در د د د د د د د د د د د د د د د د	double negative	م بر د مرد د بر د مرد م	n ann an ann an ann an an an ann an ann an a		 مېرو د درېمېز د لور کړد که وره هو کې کور کرو د د 	North Contraction Contraction
IOTH:OTHER FILING			) June is menes	a) accounting services	deny	l naja sanan sama sa kana sa kana	- Indender to a	Did engage for accounting services	) Same conservation conservations	napasan na mananan karawana	
			(	b) Personal financial services	admit	carelui - laxes7	uniesia muisso		 		ana di seria da ma
IOTH:OTHER FILING			DEAC	c) Retirement Counseling services	admit	careful	an ini ana ana an	territe al 1715 another checker and the constitue at 1715 the above. Avoid a source of the		-	ann farmenne
			RFA-5	The comparison of a subsection of the comparison of a section of the contract of the section of	same						
IOTH:OTHER FILING			RFA-6	and a second of the second second second second of the second second second second second second second second	same		ad second			in Sacalario fa Postalan Ostal	anarys. Jaconerae
		4		oral murder1 start, "act of munder"	ee gee anno conno essenticiona	1		nda	terreter service as commences		
IOTH:OTHER FILING			RFA-7	Alan stated orally that Davila committed "an act of murder" Alan stated orally that Davila conspired to committed murder with	deny	committed				e i sur energia e anti e a sur	una promos
MTN:OTHER MOTION			RFA-8	others		conspired					
			RFA-9	Alan stated orally that Davila concealed murder	deny	concealed	والمحادة المراجع ال	i internet of the second states and the second sec		l 1940 - Maria Maria, 1940 - Maria Maria	
NTC:OTHER NOTICE			RFA-10	Alan stated orally that Davila failed to report murder	deny	report		a di na mandrata di kuku ku pina, ma di na pina di ku di ku di ku ka su ka ji maji ku pina di ku ku ku ku ku k	ji 1. juli - Hendeland av Altered 1. – det setting, den deterner v		
			2 Sectores matrice	oral musder2 start: word change = "murdered"	and a second	and the second		interest a construction of the second state of		وورده محربه ومراجع فورادر والاستراط وا	r us 1/7 - ec - is. (A. at Noviti 1 - hope
OTHER			to date a discussion of	Alan stated orally that Davila committed "murder"	deny	committed		a d'a chen barro una berbariar tiral barro der anatomico familia decem derimation			
ANSWER/RESPONSE			RFA-12	pagest services and a relation of a standard manages in a relation of the service of services and the service of a local services and the services of the serv	deny	conspired	un interession		and the second s	n barden in region disego muran	ante a la caler de
OTHER FILING	Ξ			Alan stated orally that Davila concealed "murder"	deny	concealed		the second secon	2 	l den como como en	. (Sale conditions, provides)
A			RFA-14	Alan stated orally that Davila report "murder"	deny	report		n of a particle state in a fragment in place on the state and the state of the stat		ar - 1 an an an an an an an an an	rashdalar (Re-150-1804)
OTHER FILING			- Junior and a second	Alan believes Maurine was "murdered"	vague. Suspicious death	Alan's murder opinion				-	
OTHER FILING			RFA-16	Alan stated that Maurine was "murdered"	vague. Suspicious death.	Alan stated murde			Januari, marine		
Moniterine			-	stolun1, begin oral "Davila stole it" from "Maurine Hamilton"		end morder toral					
IORD:OTHER ORDER			i harate course	word change "Mutual of Omaha annuities (or their proceeds)"						1. 1. 2. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	
A			RFA-17	Alan stated orally that Davila "stole Mutual of Omaha annuities"	deny	oral Davila stole it			1		
NTC:NOTICE OF APPEA	L		RFA-18	Alan stated orally that Davila conspired to "steal annuities"	deny admit. Davila informed us	conspired to steal	t	5			

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Book	rmarks	×	RFA-19	Alan stated orally that Davila "had knowledge of stolen annuities"	with Ticker tape on 9/10/2008	Davila knowledge of theft 5		
<u>*</u>				Alan stated orally that Davila "had knowledge of and failed to report	admit. Davila said "Police never look into these kinds of things" and them filed fraudulent taxes to IRS to			
		^	RFA-20	stolen annuities"	cover up embezzlement.	failed to report 5		
М	JUDGMENT NOTICE		RFA-21	Alan believes "annuities were stolen"	admit	Alan believes stolen 5		
	MAILED		DE4 00	Alex stated and to that the suite of states	admit. Written confession	Alan stated		
	OTHER		KFA-22	Alan stated orally that "annuities stolen"	and bank records.	oral stolen 5	n se nomen e se un stran e la service de la se	
	ANSWER/RESPONSE		DEA 22	stolen2: word change = "multiple annuities (or their proceeds)" Alan orally stated that Davila "stole annuities"	deny	committed 6		
	OTH:OTHER FILING		DECOMPANY THE OWNERS	Alan orally stated that Davila "conspired to steal annuities"	denv	conspired 6		
A			<ul> <li>Strating Terribles/struktion</li> </ul>	Alan orally stated that Davila "concealed theft of annuities"	admit	concealed 6		
	<b>!OTH:OTHER FILING</b>			Alan orally stated that Davila "failed to report stolen annuities"	admit	report 6	анан ( ) алан ( ) андар ( ) алан ( ) а Алан ( ) алан	
-				Alan believes "annuities were stolen"	admit	Alan believes stolen 7	างการสารสารการการสารสารการสารสารการสารสารการการสารสารการสารสารการการสารการสารสารการการสารการสารการสารการสารการส สารการสารสารการการสารสารการสารการสารการการการสารการการสารการการสารการการสารการการสารการสารการสารการสารการสารการ	
	<b>!OTH:OTHER FILING</b>		241 House and a second	Alan stated orally that "annuities stolen"	admit	stated orally stolen 7		
	OTH:OTHER FILING	4	1	stolen3; begin - word change = "sum of \$800,000" from "Maistine or Estate" added				
			<ul> <li>In the Apple of th</li></ul>	Alan orally stated that Davila "stole sum of \$800,000"	deny	committed		
	MTN:OTHER MOTION			Alan orally stated that Davila "conspired to steal annuities"	deny	conspired		
	NTC:OTHER NOTICE		0 1 Prov 10 625 (99 - 11) -	Alan orally stated that Davila "concealed theft of annuities"	admit	conceal		
м	nic.omennonce		RFA-32	Alan orally stated that Davila "failed to report stolen annuities"	admit	report		
	OTHER		March March 1	hegin stolen4 - oral as "theft"	andfer second to reason a second or reasons			
	ANSWER/RESPONSE			Alan orally stated that Davila "committed theft"	deny	committed		
		-	<ul> <li>Consistent Are Antennietter</li> </ul>	Alan orally stated that Davila "conspired to steal"	deny	conspired		
	OTHER FILING	1	C 5/0 (5/00/07) (5/00/07)	Alan orally stated that Davila "concealed theft" Alan orally stated that Davila "failed to report theft"	admit admit	conceal	e versoer, ensemmer som an annende av somere and ander somere and an andere and an order of a somere and a some	
	OTHER FILING		KFA-J0	Alan orally stated that David Tailed to report their begin Alan "believes" or "stated orally" stolen as "money" or "\$800,000	And a second of the second second second second second	report end stolen4		
	OTHER FILING			nanna anns an seam scalar i ruga leannar craininairte an seanna an seanna an seanna	n a - Cara a a se no se con a come o como s	1	Alan Hamilton-Bates pg#-112	
	!ORD:OTHER ORDER						864	
	NTC:NOTICE OF APPEA	L						
_	AlanHamilton-COA-p	e#-034			R	PEAs from Davila		

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					an constant and constant and a second second	anales de carditile cardeni co acced		ana tanag merupakan menuru anakar merupakan	an a	·	1
~				RFA-37 Alan believes \$800,000 stolen	adi	Alahinin Malahasan ( Alahasi) (Alahasi ( Malahasi Alahasi Alahasi	สารสุริการสารสารสารสารสารสารสารสารสารสารส		where we want a state of the second s	ngalaw Norwood Challen - with a solution of the solution of	
0	MAILED			RFA-38 Alan believes money stolen	adi	an constant material data and a second	e de 14 - 16 - 16 - 16 - 16 - 16 - 16 - 16 -	9	e ne postante stan destante estatuar de la caracteria de la caracteria de la caracteria de la caracteria de la	A charles were neared to characterize the restricted and when the set	4
	JUDGMENT NOTICE			RFA-39 orally stated \$800,000 stolen	adi	Charles of the Society part of the property of the Society of the	and forme or the second of the second of the	9	الم 1990 ( ( 1990 ( 1990 ( 1990 ( 1990 ( 1990 ( 1990 ( 1990 ( 1990 ( 1990 ( 1990 ( 1990 ( 1990 ( 1990 ( 1990 ( 1 1990 (	n provinsi na mananan a sa 200 milan na manan n Ta panan na manana na	4
	MAILED			RFA-40 stated orally money stolen	adi	Imit		transformer and the second s	ner and a second s		ł.
				stolen5. hegin - word change = "embezzi		in producer na internet an anna an an anna an a	u fan e sen e sen du		a approximate a second consideration of the second constraints of the		2
	OTHER			RFA-41 Alan orally stated that Davila "committed		vis 2 Stocki proteina i Pretovansko tako vitanstipan, no	committed	10	tina no constante destante en recente de la constante de se	nen mandarten (anter al parater respondentanter).	1
	ANSWER/RESPONSE			RFA-42 Alan orally stated that Davila "conspired I		CONTRACTOR AND AND ADDRESS AND ADDRESS ADDRESS ADDRESS ADDRESS	conspired	10	a na serie a serie a serie a serie a serie da s	n - ang ang sa ang sa kanang sa kang sa kanang sa	
				RFA-43 Alan orally stated that Davila "concealed	consistent develop internet de conversion de la tradicité de la constant	control managery and considered managements	concealed	10		 	
	<ul> <li>!OTH:OTHER FILING</li> <li>!OTH:OTHER FILING</li> </ul>			RFA-44 Alan orally stated that Davila "failed to re stolen6: begin - word change = "embezzi Mawrine"		imit	report	10		1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	
				RFA-45 Alan orally stated that Davila "committed	embezzlement" der	άλλ	committed	10			ŧ
	IOTH:OTHER FILING			RFA-46 Alan orally stated that Davila "conspired I	they have been also also also there are a started at the days in the design of the	weather all and the first second s	conspired	11	and the matrix of the section of the	en en el como el contreto, com els com el comencia mune esteretar el comencia en el comencia el comencia el com	
	Miennentente			RFA-47 Alan orally stated that Davila "concealed		lmit	conceal	11			
	IOTH:OTHER FILING		•	RFA-48 Alan orally stated that Davila "failed to re	a provide a book the real and a subject to the subject of the set of the set of the set	lmit	report	11	entered and the second s	alanda ya tanga sa kadaga sa kada da sa kaga kaga kada ya tang kada ya tang kada ya tang kada ya tang kada ya	•
	2			Alan believes and stated					ang a na ana ana ang ang ang ang ang ang	ngka ka shina shina nga mana nga nga nga nga nga nga nga nga nga	
	MTN:OTHER MOTION			RFA-49 Alan believes there was an "embezzleme	ent" from "Maurine" adr	lmit	Alan believes	11	1. (A. 67 m), - (* 1600 - 160 - 160 - 160 - 170 - 170 - 170 - 170 - 180 - 180 - 170	na na manana ina ana ana ana ana ana ana ana an	2
				RFA-50 Alan believes there was an "embezzleme	and a comparison of the state o	internet internets in the state of an electric state.	Alan believes	11	(raine ar called a construction of the second s	n and a second	
	NTC:OTHER NOTICE			RFA-51 Alan stated orally there was an "embezzl	enduaries that water two emissions of an examination reason of Blasses a	to every any, any photos, taken to any, the ever	stated	12	n, waana ah taa saya 🗛 ah sayaa ah ahaan dharang ah	na haranan ara na anana ing mananan na pantara na tantaran hara d	d.
	OTHER			Alan stated orally there was an "embezzl RFA-52 Maurine"	ement" from "Estate of	lmit	stated	12		1. 19 Alin 2 Ali an Alin 2 A	
	ANSWER/RESPONSE			income tax fraud1, start	n an air air an Annaichte ann an Annaichte Annaichte ann an Annaichte ann an Annaichte Annaichte ann an Annaichte	nang taka di dala siya kalan se kata kada di	en en andre en en anterne en e	non an ann an ann an an ann an an tha ann an thar an		na na serie e nan terre an ar e nan an e na san an a	
	OTHER FILING	Ξ		RFA-53 Alan stated that Davila committed of Fed	income tax fraud ad	lmit	commit	12	an a		
	M			RFA-54 Alan stated that Davila conspired to comr	parcol Kine Housekiller all All southouter Neurophysikesis, "All yeak with your defin your de	Imit	conspire	12	n on an ann ann ann ann ann ann ann ann	aan oo biya tarahii a barkabusa in karaka kataga ka basan adamadiya tarahada ka biya damadi karakada karak 	A Contraction of the Contraction
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	<b>^</b>		Alan believes that Fed income tax fraud regarding tax returns of Maurine occurred	admit	believe			
JUDGMENT NOTICE			Alan stated orally that Fed income tax fraud re - Maurine occurred	admit	stated	**************************************		
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			Alan stated that Davia failed to report a "murder" and "an act of	deau		10		
NTC:OTHER NOTICE		KFA-/1	murder" (forgot to do "ect of" anti out in one spot)	deny vague. Suscectors dealer	report	16		
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	JUDGMENT NOTICE		RFA-102 Alan stated embezzlement occurred from Maurine	admit	stated		1922 (1929) 1927 (1920)	n n
	MAILED		RFA-102 Alan stated embezzlement occurred from Maurine's Estate	admit	stated	22	ananan ananan ang anan anan ana ang ang	
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			RFA-107 failed to report	admit	report	22		1
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			RFA-109 Alan stated that Davila conspired to commit Fed income tax fraud	admit	conspired	in a few of the contract of th		
	MTN:OTHER MOTION		Alan stated that Davila had knowledge and concealed Fed income tax	[ ]				
	A		RFA-110 fraud	admit	concealed			an au
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	OTHER FILING	=	RFA-113 Alan stated Davia was a crook - written	Veque	stated	25	ntang na tangkagan tangkagan kanalagan na pangkagan kanala panan kanala pangkan kanala panan kanala pangkan kan I	- and
	OTHER FILING		IN 71117 AND STREET FRAME ROLE OF A CORE - MUSICS	100000	j DNERU93	20		
			RFA-114 Sylvia admitted to Alan that she stole the proceeds of the annuities	admit	d na inclusion i na bhadhar an an abhadhar i na cinn abhadhar i na cinntair an an annaiche.	25	na positivities - Provide general and a statistic - Providence - Andrean - Providence - Provid	
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			RFA-116 check written to Maurine P. Hamilton - \$50,302.47 RFA-117 check written to Maurine P. Hamilton - \$101,476.88	en de la composition de la composition La composition de la c	(1) We had a discrete discrete and the product of the product o		en de la serie de	
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		-	REA-110 check written to Maurine P. Hamilton - \$33,000.34 REA-119 check written to Maurine P. Hamilton - \$73,721.65	e a presenta de la competencia de la competencia A competencia de la co A competencia de la	a la charannaí i na Arannaí an annaí ar i nacharach na c	20		un∮ 🔻
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