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17 **IN THE UNITED STATES DISTRICT COURT**
18 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

19 KIARA ROBLES,

20 Plaintiff,

21 v.

22 THE REGENTS OF THE UNIVERSITY OF
23 CALIFORNIA, BERKELEY, et al.

24 Defendants.

Case No.: 4:17-cv-04864-CW

**PLAINTIFF’S REPLY TO DEFENDANT
CITY BERKELEY’S RESPONSE TO
PLAINTIFF’S SUPPLEMENTAL
OPPOSITION TO MOTION TO REVOKE
LARRY KLAYMAN’S PRO HAC VICE
ADMISSION**

Date: September 4, 2018

Time: 2:30 p.m.

Courtroom: TBD

25 As set forth in Plaintiff Kiara Robles’ (“Plaintiff”) Supplement to Opposition to Motion
26 to Revoke Pro Hac Vice Admission of Larry Klayman, ECF No. 71, counsel for Defendant City
27 of Berkeley (“Berkeley”) has again not been candid with and has indeed sought to deceive this
28 Court. In its latest filing – designed for tactical purposes to effectively end this case—it claims
that Plaintiff’s counsel Larry Klayman (“Mr. Klayman”) has been suspended from the practice of
law by the District of Columbia Bar.

1 Anyone who simply just graduated with a law school degree can figure out that this has
2 not happened, and indeed this matter is before the United States Court of Appeals for the District
3 of Columbia Circuit, where the Court could even *sua sponte* dismiss this 10-year old proceeding
4 on the grounds of laches and denial of due process. Thus, Mr. Klayman's representation that he
5 has not been suspended for one day during his 41-year career was correct.

6 Further, one has to ask why Berkeley has so viscously attacked Mr. Klayman in a desire
7 to have his *pro hac vice* revoked. As set forth in affidavits of Plaintiff Kiara Robles and Michael
8 Kolodzi, local counsel, removing Mr. Klayman from this case would effectively extinguish
9 Plaintiff's rights and end this case. One also has to wonder why opposing counsel so vehemently
10 disdains Mr. Klayman. The only explanation is the Berkeley abhors what it perceives to be his
11 conservative activism and credentials. To the contrary, Mr. Klayman has not viscously attacked
12 counsel for Berkeley, whose leftist politics he does not agree with.

13 Mr. Klayman has been practicing law for 41 years, and that he has had some differences
14 with judges over this long career, is not, as the Honorable Ronald M. Gould found in the *Bundy*
15 matter, grounds to deny him *pro hac vice* status, particularly under circumstances that exist in
16 this case. The hard fact is, which counsel for Berkeley refuses to acknowledge, Mr. Klayman has
17 been continuously a member in good standing of both the District of Columbia Bar and The
18 Florida Bar for 36 and 41 years respectively. This speaks for itself.

19 Strong lawyers are willing to take risks and ethically and zealously represent their clients.
20 In this case, only Mr. Klayman would come forward to represent Plaintiff, particularly since
21 some of the Defendants are known for violence. Indeed, this is what this lawsuit is all about.

22 Plaintiff is filing this pleading because it cannot allow further misleading information
23 submitted by Berkeley to go unanswered, which would prejudice the rights of Plaintiff.¹
24

25 ¹ Berkeley also argues that the certificate of good standing submitted by Mr. Klayman, ECF
26 No. 71, Ex. 1, is not satisfactory because it was issued after Mr. Klayman's *pro hac vice*
27 application was submitted. Mr. Klayman has put before this Court a certificate of good standing
28 dated April 24, 2017 from The Florida Bar in the previous case, 4:17-cv-3235, which Berkeley
received notice of. In any event, this certificate is re-attached hereto as Exhibit 1. Nothing
Berkeley says can change the fact that Mr. Klayman has been a continuous member in good
standing of The Florida Bar for 41 years.

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DATED: July 27, 2018

Respectfully submitted,

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/s/ Larry Klayman

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