

09-01-13. Countrywide's Motion for Sanctions and OSC Contempt

Non-Party Countrywide Home Loans, Inc's Notice of Motion and Motion for Monetary Sanctions...

Att Moldawsky (Bryan Cave, LLP) appearing for Countrywide, filed a paper that stands as the banner for abuse of my civil rights at the LA Superior Court:

1. Att Moldawsky purportedly represents a corporate client, but she would not answer direct questions about its identity, neither has she filed any corporate disclosure in the past six months since BOA took over Countrywide, and since Sandor Samuels and Angelo Mozilo presumably ceased to be Countrywide employees. Att. Moldawsky also filed no paper showing she was authorized by BOA, and BOA denied she was authorized.
2. Att Moldawsky purportedly represents a client whom she designates "**Non-Party**". By what authority and on what legal foundation she came by this party designation? Obviously it is handy in failing to report the violations of the law per Sarbanes-Oxley Act of 2002 §307, but why did the Clerk of the Court accept such filing?
3. Att. Moldawsky's paper claims to be part of a case captioned Samaan v Zernik (SC087400), of the LA Superior Court. But the offices of Presiding Judge and Clerk of the Court refuse to certify such facts.
4. Att Moldawsky adequately listed no judge as being assigned the to the case on the face page. And yet, in the first sentence she noticed it to "Department J". What legal theory led Att Moldawsky in determination of venue and jurisdiction? Maybe the fact that Mr Terry Friedman is a friend of Mr Sandor Samuels...
5. Att Moldawsky's arguments are based on a purported July 23, 2007 Order by Judge Connor, but a valid order that was issued, served, noticed, and entered in a timely manner is yet to be produced...
6. Att Moldawsky included in her motion a table of authorities. How did she determine that such case is adjudged by the Law of the State of California ?
7. Att Moldawsky, again, produced evidence with no authentication, and insufficient pleadings – by counsel.