

GINGRAS LAW OFFICE, PLLC

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Via Email Only

October 15, 2025

James D. Lee, Esq.

Re: File No. 25-2599
Complainant: Lauren Neidigh

Dear Mr. Lee,

This letter is in response to yours regarding a complaint from a woman named Lauren Neidigh. Ms. Neidigh claims I filed two pleadings in a court action pending in San Francisco which she alleges contain false statements.

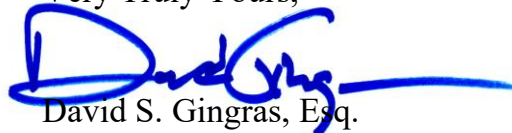
This letter is my response to Ms. Neidigh's complaint.

First, I do not recognize the State Bar of Arizona's authority to investigate alleged misconduct which occurred in the State of California. As you know, I am licensed to practice law in the State of California. If I engaged in misconduct in California, that is a matter for the California Bar to consider in the first instance. I note Ms. Neidigh apparently submitted the same complaint to the California Bar as well.

Second, Ms. Neidigh's complaint is based solely on pleadings I filed in California. Filing pleadings is protected "petitioning" activity within the meaning of both California's anti-SLAPP law (Cal. Code Civ. P. § 425.16) and Arizona's anti-SLAPP law (A.R.S. § 12-751). My decision to petition the court is protected by the California anti-SLAPP law, the Arizona anti-SLAPP law, and the First Amendment. Because my conduct is protected by law, Ms. Neidigh's complaint is unlawful. For that reason, if you choose to pursue charges in this matter, I will respond with a motion to dismiss filed pursuant to A.R.S. § 12-751(A), and I will seek fees and damages, including the cost of writing this response.

Third, Ms. Neidigh lied to you. She claims I made false statements in my pleadings. I did not. Every word I said regarding Ms. Neidigh was true. Of course, I am under no obligation to defend my lawfully protected conduct except to say my conduct was lawful, and Ms. Neidigh's was not.

Very Truly Yours,



David S. Gingras, Esq.