

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF KENUCKY  
NORTHERN DIVISION AT COVINGTON**

<b>SARAH JONES,</b>	:	Case No. 2:09-cv-00219-WOB
<b>Plaintiff,</b>	:	Judge William O. Bertelsman
<b>v.</b>	:	<b>Motion for Sanctions Against David S. Gingras and Defendants</b>
<b>DIRTY WORLD ENTERTAINMENT RECORDINGS LLC dba THEDIARY.COM, HOOMAN KARAMIAN aka NIK RICHIE aka CORBIN GRIMES, DIRTY WORLD, LLC dba THEDIARY.COM, and DIRTY WORLD ENTERTAINMENT, LLC dba THEDIARY.COM,</b>	:	
<b>Defendants.</b>	:	

On Friday, November 2, 2012 at 7:03 PM, David S. Gingras, Esq, the out of state legal counsel for Defendants sent the attached email to Sarah Jones. It speaks for itself. It is a severe violation of ethics and quite frankly, shocking. Counsel has never experienced such an attempt by opposing counsel like this.

I have never given counsel permission to contact Sarah Jones directly like this and both Sarah Jones and I will attest to this fact. The attached email dated August 31, 2012 I sent to them was in response to an email by Alex Ward. Sarah Jones works in my office. They knew this permission was relative to office communications since she would send emails on the case as one of my staff. Mr. Gingras communicated to Sarah Jones on her personal email. Furthermore, no permission was given to hold a secret settlement negotiation without me. It's clear from his email he wanted to do so.

We move for sanctions against David S. Gingras including:

1. Revocation of his Motion Pro Hac Vice and not allow him to participate further in this

case.

2. Whatever sanctions the Court believes is appropriate.

/s/ Eric C. Deters

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**CERTIFICATE OF SERVICE**

I certify that on November 5, 2012 the foregoing was filed via the Court's electronic filing system which will send notice to all persons of record.

/s/ Eric C. Deters

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Eric C. Deters (81812)

Cc:

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