

No doubt Bell was aware of the preexisting orders and unsuccessful attempts by her to disqualify the Trustee and undersigned counsel. Her counsel, though new to the case, should have known of these orders and would have known had she looked at the record.

Bell and her counsel should also be sanctioned for attempting to mislead the court by omitting pertinent facts. Paragraphs 16-19 of the Rule 60 pleading are clearly intended to persuade your Honor that undersigned counsel is dishonest, unqualified and holds a conflict of interest adverse to the estate and a grudge against Bell. To do this Bell uses snippets of attack by a worthy opponent in an unrelated case. Bell omits several pertinent facts however. First, the underlying case from which the allegations were lifted was decided in favor of the position advanced by counsel, via trial on the merits and appeal with the Louisiana Third Circuit Court of Appeal. See *Regions Bank vs. Norris Rader of Lafayette, Inc.* 2004-1505 (La. App. 3rd Cir. 5/25/05), 904 So. 2d.76.

Also left out by Bell is the fact that the lawyer who made the assertions set forth in paragraph 19 of Bell's pleading, after losing the underlying case, was sued for malpractice and breach of professional responsibilities. After a lengthy trial, a decision was rendered finding the lawyer whom Bell quotes, to have committed malpractice and violated multiple rules of professional conduct. A certified copy of this decision will be submitted into evidence. A copy of said decision is attached hereto as Exhibit 2. Undersigned counsel regrets having to publicize another lawyer's misfortune but undersigned counsel takes very seriously this continued attack by a woman who has been cast in judgment for close to a million dollars in value, for having defrauded her brother, sisters and nephews while Trustee of a family trust but still insists on using isolated statements by a zealous advocate, out of context, to impugn counsel. This is what happens

