

From: David Gingras <[REDACTED]>
Date: Thu, May 9, 2024 at 9:50 AM
Subject: RE: Owens v Echard
To: Michael Marraccini <[REDACTED]>

Mike (please call me David),

Just FYI – there’s an ethical rule for lawyers that says I’m not allowed to communicate about a case directly with a “represented party” (meaning a person who is currently represented by a lawyer), *unless* I have consent from that person’s lawyer. That limit only applies to discussions *about* the matter in which the person is represented. So for example, if you were represented by a lawyer in a lawsuit involving a car accident, if I was the opposing lawyer, I could not speak directly with you about the car accident without your lawyer’s permission....but I could still talk to you about something else – sports, the weather, politics, etc.

I know that’s a weird rule, but it’s something I take seriously.

[REDACTED]

In this situation, it's not clear to me whether anyone represents you with respect to Laura's case. I know Randy Sue Pollock previously represented you with respect to the CA order of protection stuff (which is all resolved now). To my knowledge, she does not represent you with respect to the AZ case involving Laura and Clayton. I also don't think Gregg Woodnick is representing you with respect to Laura's case (he has never claimed to be acting as your lawyer). So at this point, I ***think*** you are technically not represented with respect to Laura's case, but I am not 100% clear on this. It's entirely possible for a lawyer to represent you with respect to ONE thing, but not with respect to something else.

So, to err on the side of caution, I need to make sure that IF you are represented by anyone with respect to the AZ case, I have permission from your lawyer to talk to you about the AZ trial (bearing in mind I understand you don't want to talk at this point). If you are NOT represented, that's fine...I just need to know.

I am only mentioning this so you didn't think I was ignoring your comments below. I DO want to respond, and I DO want to encourage you to change your mind about talking to me (I promise – it's not a big deal). But I just need to make sure you aren't represented by anyone first, since that hasn't been made clear by either Gregg or Randy Sue.

P.S. I removed that tweet from yesterday, and I'm happy to remove anything else if you ask.

David Gingras, Esq.

Gingras Law Office, PLLC

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]