

AFFIDAVIT

STATE OF FLORIDA}

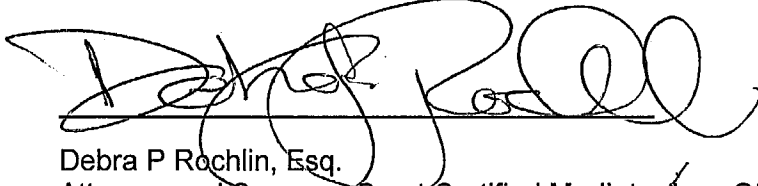
COUNTY OF BROWARD}

BEFORE ME, the undersigned authority, appeared DEBRA P. ROCHLIN, Esq, after being first duly sworn, deposes and says as follows:

1. Helen Stone's rabbi contacted me to explained to me that Helen used to be a member of his synagogue and was in a guardianship where she was very unhappy and fearful and she had asked him to obtain legal representation for her.
2. He requested that I represent her due to her present circumstances.
3. I was also in contact by Barbara Stone who informed me that there was a hearing before Judge Michael Kaplan on April 8, 2015. She explained she filed a Petition on behalf of her mother to seek an injunction against Blaire Lapides (one of the guardians in her mother's matter.)
4. On April 8, 2015, outside of Judge Michael Kaplan chambers I spoke with attorney Roy Lustig who stated that I should not represent Helen Stone.
5. At the hearing, Judge Kaplan stated that as a representative of Helen Stone I should file a separate action and would not accept my presence in the case.
6. Judge Kaplan entertained Roy Lustig's Motion to Dismiss and ruled that Barbara Stone did not have standing to act on behalf of her mother even though she had raised repeated allegations of repeat violence and abuse against her mother.
7. Two hours after the hearing, I received a phone call from someone who identified himself as Miami Dade County Judge Michael Genden. When I checked the number that the call came from, I was informed by a clerk that it was the central number for the Miami-Dade courthouses – 305.520.4000.
8. The person who identified himself as Judge Gedden, stated that he heard, I was in a hearing in front of Judge Kaplan earlier and that I had no right to file anything and should have known better. I explained that I did not file anything. He then proceeded to state that he was going to file a bar complaint against me. He informed me that Barbara Stone was wearing an arrest ankle bracelet. He alleged wrongdoing by Barbara Stone. I told him I was aware of the ankle bracelet and I felt it was pretty outrageous that she was not permitted to see her own mother because of the guardianship. I emphasized that at Mrs. Stone's age, it was wrong for her to be removed from her mother when her mother was so sick and possibly dying.
9. I stated I was amazed that in the two hour time frame from the time the hearing ended and this conversation began, Roy Lustig called him about the Broward hearing. The person at the end of the line who stated he was Judge Gedden said yes because it was important he be informed of all matters related to Helen Stone. I said this was ex-parte communication between himself and Mr. Lustig, Esq. He said that it was acceptable because he needed to know everything that was happening in one of his cases. He said he knew I was in front of Judge Shapiro the day before (that's how I knew he spoke to Roy Lustig, because I shared that information with Roy)

10. I felt threatened by the Judges actions and felt that both Roy Lustigs and the Judges ex-parte communication to be inappropriate if that was really the judge on the other end of the phone line.
11. In the alternative, I thought that perhaps Roy Lustig, Esq had someone impersonate the Judge to scare me off the case which is also outrageous and a violation of the bar rules of professional conduct.

This statement is true and correct to the best of my knowledge and belief.
FURTHER AFFIANT SAYETH NAUGHT.

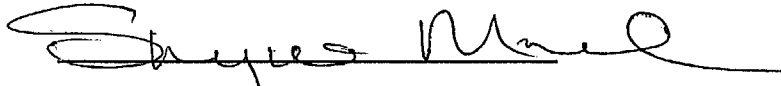


Debra P Rochlin, Esq.
Attorney and Supreme Court Certified Mediator / Law Offices of Debra P Rochlin
900 South Andrews Ave
Fort Lauderdale, Florida 33316
Tel: 954.832.9009

I HEREBY CERTIFY that on this day, before me, an officer duly authorized in the State aforesaid and in the County aforesaid to take acknowledgements, that the foregoing instrument was acknowledged before me on this 15 day of April 2015 by Debra P Rochlin, Esq.

who is personally known to me, and who did take an oath.

WITNESS my hand and official seal in the County and State last aforesaid.



NOTARY PUBLIC

SHAYNE MALEKOVIC
NOTARY PUBLIC - STATE OF FLORIDA
COMMISSION # FF179546
EXPIRES 11/30/2018
BONDED THRU 1-888-NOTARY1

{ S E A L }