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December 22, 2013

Mr. Eliot Bernstein
2753 NW 34th Street
Boca Raton, FL 33434

Re: *Simon Bernstein Irrevocable Insurance Trust Dtd 6/21/96, et. al v.
Heritage Union Insurance Company, et. al., Case No. 13 cv 3643*
Motion to Strike Pleadings and Disqualify Counsel

Dear Mr. Bernstein:

I am writing with regard to the Motion to Strike Pleadings and Disqualify Adam Simon as Counsel which you filed in the matter referenced above. This letter is being written pursuant to FRCP Rule 11, entitled Signing Pleadings, Motions, and Other Papers; Representations to the Court; Sanctions.

By signing and filing your counterclaims, cross-claims, third-party claims, and motion to strike and disqualify you have subjected yourself to the provisions and requirements of Rule 11. At a previous hearing in this matter on September 25, 2013, before the Honorable Amy St. Eve, the judge admonished you about filing frivolous pleadings including a frivolous motion to disqualify me as counsel.

Specifically, I address your attention to Rule 11(b) entitled Representations to the Court. You are currently in violation of Rule 11(b) in that your motion and your counterclaims, cross-claims and third-party claims:

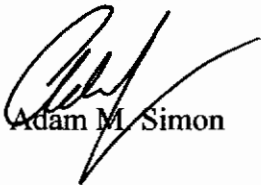
- i) are being presented for improper purposes including harassment, delay and needless increase in costs to all parties;
- ii) have no reasonable basis in law or in fact, nor do they provide any non-frivolous arguments for the extension or modification of existing law;
- iii) have no evidentiary support and are wholly irrelevant to the issue of conflict and disqualification which you have so blatantly attempted to manufacture.

As Judge St. Eve explained to you in open court, Rule 11 does apply to pro se litigants such as yourself. After your receipt of this letter, you will now have been warned at least twice that the filing of frivolous and vexatious pleadings may result in sanctions being imposed against you.

Should you continue to proceed with your frivolous motion in the United States District Court for the Northern District of Illinois, I will not only oppose the motion but seek to impose appropriate sanctions against you including injunctive relief to prevent such filings in the future.

To avoid such sanctions and the time and costs associated with needless motion practice, I urge you to withdraw your motion to strike and disqualify prior to the court date set for presentment of the motion. .

Sincerely,



Adam M. Simon