

Diana Lin

Subject: Request for Initial Extension- Matter # 1412MU14 Re Tracey Gordon

From: Michael Coard [<mailto:michaelCoard@msn.com>]
Sent: Friday, January 02, 2015 6:08 PM
To: Michael Cooke
Cc: Richard Glazer; Maya Nayak; Maya Nayak; Elizabeth Downey
Subject: Re: Request for Initial Extension- Matter # 1412MU14 Re Tracey Gordon

Dear Mr. Michael J. Cooke, Esquire:

I thank you for your professional courtesy and general reasonableness.

Sincerely,
Michael Coard, Esquire
Counsel for Tracey Gordon

Sent from my iPhone

On Dec 31, 2014, at 10:48 AM, Michael Cooke <Michael.Cooke@phila.gov> wrote:

Mr. Glazer,

While I am skeptical that Mr. Coard has demonstrated good cause for this extension, I will not object to his request.

However, if Mr. Coard withdraws as counsel before the expiration of the new deadline and Ms. Gordon seeks another extension as a result, I will object to that request.

Regards,

Michael J. Cooke, Esq.
Director of Enforcement
Board of Ethics
of the City of Philadelphia
1515 Arch St., 18th Floor
Philadelphia, PA 19102
(215) 686-9459
(f) (215) 686-9453

From: Richard Glazer [<mailto:rglazer@comcast.net>]
Sent: Wednesday, December 31, 2014 10:30 AM
To: Michael Cooke
Cc: Maya Nayak; Maya Nayak; Elizabeth Downey; michaelcoard@msn.com
Subject: Fwd: Request for Initial Extension- Matter # 1412MU14 Re Tracey Gordon

Mr Cooke,

Do you have an objection to Mr Coard's request for a 30 day extension?

Richard Glazer
Hearing Officer
Rglazer@comcast.net

----- Original message -----

From: MICHAEL COARD
Date: 12/30/2014 5:49 PM (GMT-05:00)
To: Elizabeth Downey, Michael Cooke
Cc: Maya Nayak
Subject: Request for Initial Extension- Matter # 1412MU14 Re Tracey Gordon

Dear Ms. Elizabeth Downey and Mr. Michael Cooke,

At present, I continue to serve as pro bono counsel for Tracey Gordon. However, if or when that changes, I will notify you immediately.

In connection with the correspondence recently submitted by Ms. Gordon (to the Executive Director), I now submit this letter as an official request for an initial thirty (30) day extension in which to submit a formal written Response to the Notice of Administrative Enforcement Proceeding.

The "good cause" basis for requesting this extension is that I have been totally immersed in several previously scheduled time-sensitive objections including, inter alia, a recent capital murder trial involving the death of a police officer, post-sentence motion/appellate filings, legal matters in Delaware County and Montgomery County, final exams in four courses as a professor at Temple University, twice weekly radio programs, a lawyers' activist event, et cetera.

Thank you.

Sincerely,
Michael Coard

From: Elizabeth.Downey@Phila.gov
To: michaelcoard@msn.com
CC: Maya.Nayak@phila.gov; Michael.Cooke@phila.gov
Subject: Matter # 1412MU14 FW: Letter from Tracey Gordon
Date: Tue, 30 Dec 2014 21:31:50 +0000

Dear Mr. Coard:

Could you please let me know if you continue to represent Ms. Gordon in the Board's administrative enforcement proceeding captioned in the subject line of this email? If so, please let me know if you consent to members of the Board's General Counsel staff and the Board's Hearing Officer communicating with Ms. Gordon about this matter. I know the Board's Director of Enforcement, Michael

Cooke, has separately reached out to you about your representation of Ms. Gordon.

Thank you,

Liz Downey

From: Michael Cooke
Sent: Tuesday, December 30, 2014 2:33 PM
To: Elizabeth Downey
Cc: Jordan Segall; reachingback@aol.com; MICHAEL COARD
Subject: Letter from Tracey Gordon

Liz,

Attached, please find a letter we received from Tracey Gordon yesterday. Although the letter was addressed to the Executive Director, I believe a request for an extension of time should be submitted to the General Counsel.

Yesterday, I asked Michael Coard whether or not he still represents Ms. Gordon. To date, I have not heard back from him. Out of an abundance of caution, I am cc'ing both him and Ms. Gordon.

Please do not hesitate to contact me if you have any questions.

Best regards,

Michael J. Cooke, Esq.

Director of Enforcement

Board of Ethics
of the City of Philadelphia
1515 Arch St., 18th Floor
Philadelphia, PA 19102
(215) 686-9459
(f) (215) 686-9453

December 24, 2014

J. Shane Creamer, Jr

Executive Director

Board of Ethics of City of Phila.

1515 Arch Street, 18th Floor


Philadelphia Pa 19102

Case #1412MU14

Dear Mr. Creamer:

I would like to request a hearing to contest the allegations, and I would also like more time to respond to the Notice.

Sincerely,


Tracey L. Gordon

6543 Windsor Street

Philadelphia Pa 19142

reachingback@aol.com

267-235-0091