Diana Lin

Subject:

Supplement/Revision To Filed Response- Creamer v. Gordon #1412MU14

From: MICHAEL COARD [mailto:michaelcoard@msn.com]

Sent: Thursday, February 05, 2015 5:28 PM

To: Maya Nayak

Cc: Hortencia Vasquez; Shane Creamer; Michael Cooke; Elizabeth Downey; reachingback@aol.com

Subject: Supplement/Revision To Filed Response- Creamer v. Gordon #1412MU14

Dear Ms. Nayak, Esquire,

Although I no longer represent Tracey Gordon, I nonetheless, at her request today, am now forwarding this verbatim supplement/revision to the timely filed Response.

- 15. "Norys Gonzales was present at the time that Ms. Gordon opened the card."
- 16. "There is a credibility issue regarding why a temporary worker would open city department commission mail without permission."
- 18. "Ms. Gordon did not create the flyer."
- 20? "Resumes are in the confiscated computer, which can be used as evidence regarding non-gratuity activities."
- 29. "Seth Bluestein is needed to testify at the hearing."
- 30? "Ms. McCall is a volunteer."

"Phone messages for 6/12/14 are needed."

"Why would Ms. McCall contact Ms. Gordon if she is part of an ethics violation investigation? And Ms. Gordon did not know that Ms. McCall was part of an investigation."

Please submit all inquiries regarding clarification and all other matters directly to Ms. Gordon and none to me because I am no longer involved in this case in any capacity.

Thank you.

Sincerely, Michael Coard, Esquire

From: michaelcoard@msn.com
To: maya.nayak@phila.gov

CC: hortencia.vasquez@phila.gov; shane.creamer@phila.gov; michael.cooke@phila.gov;

elizabeth.downey@phila.gov

Subject: Response- Creamer v. Gordon #1412MU14

Date: Mon, 2 Feb 2015 23:35:00 -0500

Dear Ms. Maya Nayak, Esquire:

The Response and Certificate of Service are now being submitted today, February 2, 2015, via email and postal mail. The original of these documents, which have been signed, are also being postal mailed today.

Now that the Response has been completed and submitted, my pro bono representation is officially and immediately terminated. All correspondence from the Ethics Board and elsewhere must be submitted directly to Tracey Gordon and no correspondence is to be submitted to me directly or indirectly. I am no longer involved in this matter in any capacity whatsoever.

I genuinely thank you and your entire staff for your time, consideration, accommodation, and professionalism.

Respectfully, Michael Coard, Esquire Pro Bono Counsel

Enc: Response