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"Zamani & Associates, PLLC" & Sogand Zamani, Esq.,

This is a response to a "Correspondence" that I received by e-mail from Marisa Slifka on March 06, 2018, after I asked you to stop sending me things that I have not requested from you.

You are abusing the judicial process and are severely harassing me. Your actions are egregious in the extreme.

Structure of the remainder of this document:

Quotes by you, from the "Correspondence" I received, are noted below with a preceding "greater than sign" (>). My responses to what you wrote will immediately follow the quotes.

>As you know, we represent your wife

I don't really know that you represent Kim. I know you have filed false statements in court; that you have made a number of false statements to me personally; and that you are defrauding myself and my wife.

Have you ever sent me an agreement between yourself and Kim that shows you represent Kim? I don't think you have. I don't think you've presented anything like that to a court either.

>in her action for legal separation

According to the document I received, the action is yours and was submitted by you.

>pending before the Superior Court of the District of Columbia.

Do you know if your complaint is still pending? I have asked for it to be dismissed and for you to be investigated. Have you read my response to the complaint you submitted? You were personally served with my response.

>On multiple occasions, I suggested that you retain counsel

I don't believe you have ever suggested that I "retain counsel", but you have indicated to me that you think I should employ one of your peers. Due to your continued insistence on making such comments to me, I asked you if you were part of a cartel. You did not answer, "no".

I believe that on multiple occasions now, I have asked you to stop talking to me about seeking an attorney.

I retain whatever counsel I please.

>so that you will have independent advice

The advice will not be independent if the person I have counsel with is a part of your industry, particularly if they are a part of an industry group to which you belong (e.g. the "Bar").

>on what is and is not appropriate in the context of separation and divorce litigation

You do not seem to know what is and is not appropriate. You do not seem to have a grasp of the basic facts. I have not voluntarily separated with Kim; a fact, that you have not disputed since I've made the claim. In fact, Kim and I do not even have a separation; as you have already essentially noted, many of Kim's things are still in the house that we rent, where I am living with one of our cats. If Kim and I had a voluntary separation, Kim would have her things and you would not be filing false court documents asking for those things. I have not stopped Kim from moving any of her things.

>and to enable a productive discussion regarding settlement.

You do not seem capable of having "productive discussion[s]". Since you have first contacted me, I've tried to talk to you on a number of occasions. You have, hung up the phone in the middle of a conversation and have yelled at me in the lobby of your building, where you were hysterical and were barely able to receive service. You walked away from that "discussion" apparently irate, while making false claims publicly (e.g. that I was "disturbing the building").

>It appears that you refuse to retain counsel

As I said, I retain whatever counsel I please. There is no requirement for me to do so; I don't know why you continue to bring this up even after I've asked you several times to stop.

>you continue to make improper request of

No. I haven't made an improper request. Which request[s] has/have been "improper"?

>and hurl accusations against me and my firm

You are welcome to defend against any "accusations", but so far, I don't believe you have.

>In addition to the above, you have called our law office 70 times, making similar demands and we have spoken to you on several occasions.

Sogand, that is because your "law office" is unresponsive and unreliable. I still have outstanding items from Marisa Slifka that she took down and was supposed to respond to me with. In my last conversation with Marisa she was telling me that she

wasn't going to answer any questions. Did you direct Marisa to refuse to answer my questions? Why did you send me your phone number if not for me to call it? Why is your law office so utterly unresponsive? Why did you hang up on our phone conversation? Aren't you supposed to be representing Kim? Aren't you supposed to be "negotiating a settlement"? How are you doing that by unilaterally ending conversations while I am speaking?

Also, haha, 70 times. I just received an email from Amanda which has 52 enumerated requests, in addition to numerous other lettered and numbered paragraphs. 70 phone calls (most of which you have been totally unresponsive toward) is practically nothing compared to what you have been subjecting me to.

>These conversations are never productive because it appears you have a misapprehension of the separation and divorce process.

No, the conversations aren't productive because you unilaterally end the conversations. It is also you that appears to have a complete misapprehension of the separation and divorce process. You do not appear to have even the most basic grasp of the facts in this matter. There are no circumstances under which a separation or divorce can be granted at this time, yet you are sending me numerous documents (including some being thrown in my face by a vulgar individual) demanding all kinds of information and answers to questions.

>As we have already communicated to you, your requests are inappropriate for a variety of reasons.

No, I don't believe you have communicated that to me. When, where, and how did you communicate the reasons you claim?

>I am not permitted to share with you any communications between me and any client of the firm.

It is not even established that Kim is your client; based on your actions, you should not have any clients. Why do you believe you are not permitted to share any communications? Your "privilege" only extends to "applicable law" and you have claimed no law to be applicable to our situation. It is you who appears to make baseless claims. Show me the law that is applicable or produce the materials I have requested.

>We do not have any obligation to grant you access to our office or systems and will not do so.

I reserve the right to challenge that you have no obligation; however, that point is now moot as you have engaged in False Statements and fraud. Your obligations or objections are no longer relevant as you are engaged in (self-noted, by the way) criminal behavior. The way things are going, I may need to obtain a conservatorship, receivership, or other, over your firm, in order to wind it down and to satisfy any obligations that exist.

>Also, as we do not represent you,

Yes, we have already established that.

>we will not take instruction from you in any regard,

Watch and learn, Sogand.

>including relating to legal action you wish to be taken.

I'm not exactly sure what you are referring to here, but maybe you are referring to the actions to be taken against Denise, Jim, and the US Government? Kim is a beneficiary of my 401k account and the amount that is due to her from that account is probably the single largest asset that Kim and I have. Your failure to act, or to even converse, or to seek additional information about, and actual refusal to accept pertaining documents, to secure these assets is only further evidence of your incompetence.

>We have notified you that your insistence to communicate regarding issues which we cannot and will not discuss with you is harassment;

No, I don't believe you have. When, where, and how did you communicate what you claim you have?

>yet we continued to receive such communications from you.

Which communications are you claiming are harassment?

>If there is information you wish to request from Ms. La Pierre

It seems that you have already received my requests.

>please make those requests formally.

How would you like them? Served by a Marshal?

>Should you wish to engage in settlement discussions as we have attempted to initiate,

Your discussions are based on false premises and you are the one that unilaterally decided that I was not engaging in "settlement discussions" with you. The record until now reflects otherwise and shows that you appear to be incapable of having, essentially, any discussion.

>we can arrange an informal exchange of documents

No, it doesn't appear that you can.

>but only for those documents relevant to your and Ms. La Pierre's marriage and separation.

Again, there is no separation. You are continuing to make False Statements.

>If you wish to consult with counsel, but cannot afford one, you may wish to consult with the D.C. Superior Court Self Help Desk, Legal Aid, or The Affordable Law Firm.

Please heed my prior instructions to you.

>Again, it cannot be overstated that we do not in any way represent you in this or any other matter

Yes, this appears to be pretty much all you are able to talk about. Would you like us to notarize a document stating that you do not represent me? You don't appear qualified to represent anyone.

>and that your incessant and irrelevant demands to our firm

It is a false statement to say that I have "incessant" demands. It's just not true, Sogand. Please demonstrate that my "demands" have been without interruption. Neither are any of my requests ("demands" as you seem to refer to them) irrelevant.

Please show each demand that you think I have made and how it is 1) incessant and/or 2) irrelevant.

>and behavior towards our receptionist and other staff are unacceptable

I have not engaged in unacceptable behavior to your receptionist or other staff. If you are making a charge against me, please be specific.

Do you intend to respond to my response/"Answer" to your "Complaint"?

Blake LaPierre

Blake La Pierre

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