

PAUL S. GROSSWALD, ESQ., LLC

140 Prospect Avenue, Ste. 8S
Hackensack, New Jersey 07601

Paul S. Grosswald, Owner / Attorney
Admitted in NJ & NY

18 Dalewood Lane
Kings Park, New York 11754

(917) 753-7007
pgrosswald@hotmail.com

September 17, 2012

Via Facsimile

The Honorable Rachelle Lea Harz
Judge Superior Court
Superior Court of New Jersey
Bergen County Courthouse
10 Main Street, 3rd Floor
Hackensack, NJ 07601
Fax: (201) 371-1156

Re: World Mission Society, Church of God v. Colón
Docket No: BER-L-5274-12

Dear Judge Harz:

This office represents the Defendant, Michele Colón, in the above-captioned matter. I respectfully request that Your Honor strike the Plaintiff's most recent letter regarding its request for an adjournment of Ms. Colón's pending motions. The letter was signed by Corey Pollard of Dozier Internet Law, P.C. Mr. Pollard is not a lawyer admitted in the State of New Jersey and is not authorized to practice law in this State. Nor has he applied for *pro hac vice* admission. Therefore, Mr. Corey is not permitted to speak on behalf of the Plaintiff, pursuant to R. 1-21(a).

Nevertheless, it is worth responding to some of the points raised in Mr. Pollard's letter. First, it is not necessary for this Court to engage in an analysis of when the Plaintiff first realized that it needed a new lawyer after Mr. Dozier's death. The Plaintiff had already decided that Ms. Wernick was to be the attorney of record for this litigation. Ms. Wernick signed the Complaint, and she is the only attorney to have appeared on behalf of the Plaintiff in this matter who is licensed to practice law in this State.

Moreover, had Mr. Dozier applied to this Court for *pro hac vice* admission, Ms. Colón would have opposed that motion. In other words, it was never a sure thing that Mr. Dozier would have been permitted to represent the Plaintiff in this litigation. Had Mr. Dozier lived, and his motion for *pro hac vice* admission been denied, this Court would in all likelihood have required Ms. Wernick to proceed with the litigation, and would not have required Ms. Colón to suffer a delay resulting from

the denial of Mr. Dozier's admission. Mr. Dozier's death should be given the same effect as if his motion for admission were denied - that is to say that this Court should require the New Jersey attorney who signed the Complaint to proceed with the litigation.

The arguments made by Mr. Pollard in which he tries to show that the Plaintiff's litigation tactics are not frivolous will be addressed at the appropriate time. Nevertheless, Ms. Colón and I stand by our position that the Virginia and New Jersey lawsuits filed by the Plaintiff against Ms. Colón and Mr. Newton are frivolous SLAPP-suits which were filed for harassment purposes, and not with the intention of prevailing on the merits.

Thank you for your consideration of this matter.

Sincerely,



Paul S. Grosswald

cc by email: Batya Wernick, Esq. (bgwlaw@verizon.net)
Corey Pollard, Esq. (corey@cybertriallawyer.com)