

**IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA
GENERAL CIVIL DIVISION**

NEIL J. GILLESPIE,

Plaintiff,

CASE NO.: 05-CA-7205

vs.

BARKER, RODEMS & COOK, P.A.,
a Florida corporation; WILLIAM
J. COOK,

DIVISION: G

Defendants.

/

**PLAINTIFF'S MOTION TO CANCEL DEPOSITION DUCES TECUM
JUNE 18, 2010 AND FOR AN ORDER OF PROTECTION**

Plaintiff pro se, Neil J. Gillespie, moves the Court to cancel Defendants' Deposition Duces Tecum on June 18, 2010 and for an Order of Protection and states:

1. Defendants counsel Ryan C. Rodems failed to coordinate the time and date of the hearing with the Plaintiff. This is an ongoing problem with Rodems.
2. Plaintiff cannot appear June 18, 2010 and has other commitments.
3. Plaintiff's Motion to Stay Pending ADA Determination, filed June 14, 2010 requests an Order to Stay all proceedings pending a determination of his ADA accommodation request.
4. Mr. Rodems and associates have a history of violence and defamation against other participants in contentious litigation. This lawsuit is especially contentious, a former client suing his lawyer for fraud, breach of duty, etc., etc.
 - a. Mr. Rodems and his former law partners were named in a \$5 million dollar defamation lawsuit brought by attorney Arnold Levine, Buccaneers Limited Partnership

v. Alpert, Barker & Rodems, PA, US District Court, Middle District of Florida, Tampa Division, case 99-2354-CIV-T-23C. In retaliation, a Tampa Police Department report dated June 5, 2000, case number 00-42020, alleges Mr. Alpert committed battery, Florida Statutes §784.03, upon attorney Arnold Levine by throwing hot coffee on him. At the time Mr. Levine was a 68 year-old senior citizen. The report states: "The victim and defendant are both attorneys and were representing their clients in a mediation hearing. The victim alleges that the defendant began yelling, and intentionally threw the contents of a 20 oz. cup of hot coffee which struck him in the chest staining his shirt. A request for prosecution was issued for battery." Mr. Rodems is listed as a witness on the police report. A copy of the police report is attached as Exhibit A.

b. Another example of Mr. Rodems' bizarre behavior against participants in litigation are his defamatory comments about Eric Bischoff, a witness in *WrestleReunion, LLC v. Live Nation, Television Holdings, Inc.*, United States District Court, Middle District of Florida, Case No. 8:07-cv-2093-T-27, trial August 31-September 10, 2009. Mr. Rodems and his client failed to prevail at trial. The comments may be found online at: <http://www.declarationofindependents.net/doi/pages/corrente910.html>, and include, "The expert report Bischoff submitted in this case bordered on illiteracy, and Bischoff was not even called to testify by Clear Channel/Live Nation because Bischoff perjured himself in a deposition in late-July 2009 before running out and refusing to answer any more questions regarding his serious problems with alcohol and sexual deviancy at the Gold Club while the head of WCW." and "The sad state of professional wrestling today is directly attributable to this snake oil salesman, whose previous career highlights include selling meat out of the back of a truck, before he filed bankruptcy and

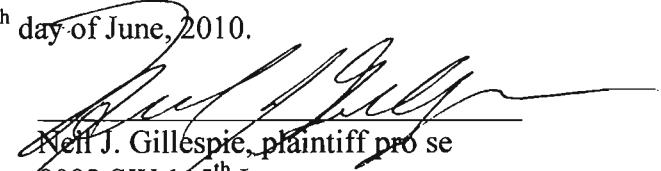
had his car repossessed. Today, after running WCW into the ground, Bischoff peddles schlock like "Girls Gone Wild" and reality shows featuring B-listers." A copy of Rodems' comments are attached as Exhibit B.

5. Another stunt used by Mr. Rodems against participants in contentious litigation is a sworn affidavit used to falsely accuse his opponent of wrongdoing for the purpose of advantage. On March 6, 2006 Mr. Rodems made a verified pleading that falsely named Judge Nielsen in an "exact quote" attributed to Plaintiff, putting the trial judge into the controversy. The Tampa Police Department recently determined that the sworn affidavit submitted by Mr. Rodems to the court about an "exact quote" attributed to Plaintiff was not right and not accurate.

6. These lawyers have a history of physical violence and defamation against participants in contentious litigation, and Plaintiff fears for his safety and well-being.

WHEREFORE, Plaintiff moves the Court to cancel Defendants' Deposition Duces Tecum on June 18, 2010 and for an Order of Protection.

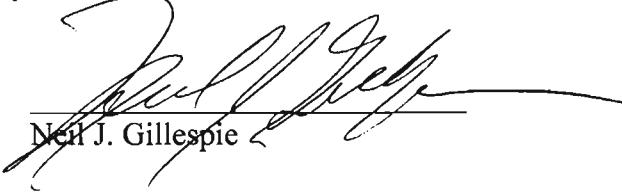
RESPECTFULLY SUBMITTED this 14th day of June, 2010.



Neil J. Gillespie, plaintiff pro se
8092 SW 115th Loop
Ocala, Florida 34481
No phone for Mr. Rodems

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by US mail to Ryan Christopher Rodems, Attorney, Barker, Rodems & Cook, P.A., 400 North Ashley Drive, Suite 2100, Tampa, Florida 33602, this 14th day of June, 2010.



Neil J. Gillespie

INCIDENT REPORT - TAMPA POLICE DEPARTMENT

Page 3

D 305 (8/96)

Restricted Persons	Codes SP=Suspects			W=Witnesses			JA=Juvenile Arrest			JR=Runaway			M=Misconduct			Page <u>2</u>			
	Code	3	Name: Last	First	Middle	Race	Sex	DOB/Mos	Height	Weight	Hair	Skin	Eyes	Build	Award	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
	SP	01	ALPERT, JOHNA THOMAS L.	IN	M	9-4-45	5'6"	150	Brown	Light	Brown	Brown	Build	ALPER	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
	Home Address 902 ANCHORAGE RD							City		TAMPA	County	HILLS	State	Zip	Phone	223-1757			
	Business/School Address 100 S. ASHLEY ST. #2000							City		TAMPA	County	HILLS	State	Zip	Phone	223-4131			
	Occupation ATTORNEY			Work Hours		08a-1700	Can ID PNU	TF	With/Time	Foul Play		Miss Pres							
	Additional Description/Juvenile Charges NINE															12			
	Code	3	Name: Last	First	Middle	Race	Sex	DOB/Mos	Height	Weight	Hair	Skin	Eyes	Build	Award	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
	W	01	BRENNAN, EDWARD M.	IN	M	9-5-62													
	Home Address 14907 DEVONSHIRE Woods Rd							City		TAMPA	County	HILLS	State	Zip	Phone	761-2656			
	Business/School Address 100 S ASHLEY ST #1600							City		TAMPA	County	HILLS	State	Zip	Phone	229-6585			
	Occupation ATTORNEY			Work Hours		0800-1700	Can ID PNU	TF	With/Time	Foul Play		Miss Pres							
	Additional Description/Juvenile Charges															12			
Evidence	#	Description																	
	Dusted	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Prints Attached	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Photos	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Evidence No			How Marked	Prop Clerk	Date	Time						

If an officer is assaulted or killed, consult the CIS Code Sheet and enter the appropriate codes in the blocks. The incident must be fully explained in the Narrative Section.

Officer's Name:

13	14	15	16	17	18	19	20	21	22	23	24	25
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Narrative

INTERVIEW: THE COMPLAINANT IS AN ATTORNEY. ON SATURDAY 3 JUNO AM 12:30 HRS HE WAS WITH HIS CLIENTS IN A MEDIATION HEARING. ON THE 13TH FLOOR. THE DEFENDANT IS ALSO AN ATTORNEY AND HAD HIS CLIENTS IN THE MEETING. DURING THE HEARING, NEGOTIATIONS WENT BAD AND THE DEFENDANT BEGAN PUNCHING AND RAVING. ALL THE CLIENTS LEFT THE ROOM LEAVING HIMSELF, THE DEFENDANT, EDWARD BRENNAN, PETER GRILLI, RICK McLELLAN, RYAN COEWS IN THE ROOM. THE DEFENDANT WALKED AROUND THE TABLE AND WAS ABOUT 6 FEET AWAY FROM HIM. THE DEFENDANT THROWN THE COFFEE OFF A 30 OZ CUP OF HOT COFFEE WHICH STRUCK HIM IN THE CHEST STOPPING HIS SHIRT AND CAUSING HIM MUCH EMBARRASSMENT.

THE COMPLAINANT SAID THE ATTORNEY STAINED SHIRT FOR EVIDENCE. THE SHIRT IS THE SUIT THAT WAS UNZIPPED AND ZIPPED UP AGAIN.

EDWARD BRENNAN IS A 5'10" MEC FROM FLA. HE IS 42 YEARS OLD. THE INCIDENT OCCURRED AT THE END OF MAY.

TAMPA POLICE DEPARTMENT CONTINUATION/LETTER

Page 3 of 3

Offense/Incident BATTERY	Location 100 S. ASHLEY ST.	Date 5 JUN 00
Victim/Firm LEVINE, ARNON	Address 100 S. ASHLEY ST.	

INVESTIGATION:

I RESPONDED TO THE VICTIM'S OFFICE AND INTERVIEWED HIM AND THE WITNESS. I THEN WENT TO DATE #2000 AND MET WITH THE SUSPECT. HE IDENTIFIED HIMSELF BUT ELECTED TO NOT MAKE ANY STATEMENTS ABOUT THE INCIDENT WITHOUT HIS ATTORNEY PRESENT.

I COMPLETED A REQUEST FOR PROSECUTION FOR BATTERY ON THE DEFENDANT AND GAVE THE ORIGINAL COPY TO THE VICTIM.

Report No.
LIC-14-2000

Reporting Officer
Dw/Sqd [] Second Officer
Records Section Only Copies To

Dw/Sqd [] Edited By []
Routed By [] Data Entry []
[] Pick Up []

REQUEST FOR PROSECUTION BY COMPLAINANT

IF YOU WISH THIS CASE TO BE CONSIDERED FOR PROSECUTION MAIL THIS FORM TO THE STATE ATTORNEY'S OFFICE: 800 E. TWIGGS ST., TAMPA, FL 33602, ATTENTION: INTAKE AFTER 3 DAYS BUT NO LATER THAN 14 DAYS.

TO BE FILLED IN BY OFFICER:
(FOR USE IN MISDEMEANOR CASES ONLY)

DEFENDANT'S LAST NAME ALPERT		FIRST JOHNATHON	MIDDLE L.	AKA	
ADDRESS OR PLACE DEFENDANT CAN BE LOCATED (NOT A P.O. BOX) 100 S. ASHLEY SUITE # 2000		CITY TAMPA	ZIP 33602		
DOB 8-4-45	SEX M	RACE W	HT. 5-6	WT. 150	PHONE 227-4131
CO-DEFENDANT (S) COMPLETE SEPARATE COMPLAINT FOR EACH NONE			CROSS COMPLAINT ISSUED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
CIRCLE ONE <u>WITHIN CITY OF TAMPA</u> <u>PLANT CITY-TEMPLE TERRACE</u>			IF UNINCORPORATED AREA		CHECK ONE () W. OF 301 () E. OF 301
LOCATION OF OFFENSE: 100 S. ASHLEY 12TH FLR					
OFFENSE BATTERY			DATE OF OFFENSE 3 JUN 00		STATUTE 784.03
COMPLAINANT'S LAST NAME LEVINE		FIRST NAME ARNOLD	MIDDLE NAME D.	RACE/SEX W/M	D.O.B. 12-12-31
ADDRESS 100 S. ASHLEY ST. #1600		CITY TAMPA	ZIP 33602	HOME PHONE [REDACTED]	BUSINESS PHONE 227-6585
WORK HOURS 0800-1700					
RELATIONSHIP TO DEFENDANT CIRCLE ONE					
SPOUSE/RELATIVE () NEIGHBOR CO-WORKER ACQUAINTANCE (NONE)					
WITNESS LAST ① BRENNAN, EDWARD M.	FIRST	MIDDLE	D.O.B. 9-5-62	ADDRESS 100 S. ASHLEY #1600	PHONE 229-6585
WITNESS LAST ② RYAN C. RODEMS	FIRST	MIDDLE	D.O.B.	ADDRESS 100 S. ASHLEY #2000	PHONE 227-4131

STATE FACTS TO ESTABLISH THAT A CRIME WAS COMMITTED: **THE VICTIM AND DEFENDANT ARE BOTH ATTORNEYS AND WERE REPRESENTING THEIR CLIENTS IN A MEDIATION HEARING. DURING THE MEETING THE DEFENDANT BECAME ENRAGED AND BEGAN YELLING. THE DEFENDANT THREW THE CONTENTS OF A 20 OZ CUP OF HOT COFFEE AT THE VICTIM STRIKING HIM IN THE CHEST AND STAINING HIS SHIRT. THE VICTIM AND WITNESS #1 STATED IT WAS AN INTENTIONAL ACT.**

STATE FACTS TO ESTABLISH THAT DEFENDANT COMMITTED CRIME: **THE VICTIM AND WITNESSES IDENTIFIED THE DEFENDANT BY NAME AND KNEW HIS OFFICE ADDRESS. THE DEFENDANT IDENTIFIED HIMSELF TO THE VICTIM BUT DID NOT WISH TO MAKE A STATEMENT WITHOUT HIS ATTORNEY PRESENT. WITNESS #2 ALSO DID NOT MAKE A STATEMENT.**

S. S. McLean	66	17	30	John McLean	5 JUN 00
LAW ENFORCEMENT OFFICER	BADGE NO.	DISTRICT	SQUAD	SIGNATURE	DATE

TO BE FILLED OUT BY COMPLAINANT: I desire prosecution in this case and request the State Attorney's Office to review it for prosecution.

Write a brief statement about what happened and list any additional witnesses not listed above, and their address (use additional paper if necessary).

ADDRESS OR PLACE DEFENDANT CAN BE LOCATED (NOT A P.O. BOX) 100 S. ASHLEY SUITE # 2000					CITY Tampa	ZIP 33602
DOB 9-4-45	SEX M	RACE W	HT 5-6	WT 150	PHONE 227-4131	
CO-DEFENDANT (S) COMPLETE SEPARATE COMPLAINT FOR EACH NONE					CROSS COMPLAINT ISSUED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
CIRCLE ONE WITHIN CITY OF TAMPA PLANT CITY-TEMPLE TERRACE			IF UNINCORPORATED AREA		CHECK ONE () W. OF 301 () E. OF 301	
LOCATION OF OFFENSE: 100 S. ASHLEY 13TH FL 2012						
OFFENSE BATTERY			DATE OF OFFENSE 3 JUN 00		STATUTE 784.03	
COMPLAINANT'S LAST NAME LEVINE		FIRST NAME ARNOLD		MIDDLE NAME D.	RACE/SEX W/M	D.O.B. 12-12-31
ADDRESS 100 S. ASHLEY ST. #1600	CITY Tampa	ZIP 33602	HOME PHONE	BUSINESS PHONE 227-6585	WORK HOURS 0800-1700	
RELATIONSHIP TO DEFENDANT CIRCLE ONE <input type="checkbox"/> SPOUSE/RELATIVE () NEIGHBOR CO-WORKER ACQUAINTANCE NONE						
WITNESS LAST ① BRENNAN, EDWARD M.	FIRST MIDDLE	D.O.B. 9-5-62	ADDRESS 100 S. ASHLEY #1600	PHONE 227-6585		
WITNESS LAST ② RYAN C. RODEMAN	FIRST MIDDLE	D.O.B.	ADDRESS 100 S. ASHLEY #2000	PHONE 227-4131		

STATE FACTS TO ESTABLISH THAT A CRIME WAS COMMITTED: **THE VICTIM AND DEFENDANT ARE BOTH ATTORNEYS AND WERE REPRESENTING THEIR CLIENTS IN A MEDIATION MEETING. DURING THE MEETING THE DEFENDANT BECAME ENRAGED AND RECENTLY YELLING. THE DEFENDANT THREW THE CONTENTS OF A 20 OZ CUP OF HOT COFFEE AT THE VICTIM STRIKING HIM IN THE CHEST AND STAINING HIS SHIRT. THE VICTIM AND WITNESS #1 STATED IT WAS AN INTENTIONAL ACT.**

STATE FACTS TO ESTABLISH THAT DEFENDANT COMMITTED CRIME: **THE VICTIM AND WITNESSES IDENTIFIED THE DEFENDANT BY NAME AND KNEW HIS OFFICE ADDRESS. THE DEFENDANT IDENTIFIED HIMSELF TO THE AFFIANT BUT DID NOT WISH TO MAKE A STATEMENT WITHOUT HIS ATTORNEY PRESENT. WITNESS #2 STATED HE MADE A STATEMENT.**

LAW ENFORCEMENT OFFICER D.W. MILLION	BADGE NO. 610	DISTRICT 07	SQUAD 80	SIGNATURE D.W. Million	DATE 5 Jun 00
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TO BE FILLED OUT BY COMPLAINANT: I desire prosecution in this case and request the State Attorney's Office to review it for prosecution.

Write a brief statement about what happened and list any additional witnesses not listed above, and their address (use additional paper if necessary).

I affirm these facts are true

SIGNED: *[Signature]*

PRINT NAME: *[Signature]*

00-42020



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Sal Corrente of WrestleReunion had a lawsuit against Clear Channel/Live Nation because they reneged on a contract with him. The case went before a jury and Mr. Corrente lost the case, which many feel was unjust. But Eric Bischoff made a statement on wrestlezone.com, which is below, that caused Sal's lawyer to send his statement:

In my last post regarding the WrestleReunion/Live Nation lawsuit, I suggested that Bill Behrens and Eric Bischoff were expert witnesses for WrestleReunion. That was not the case as they were actually witnesses for the Clear Channel/Live Nation side. I just spoke with Eric Bischoff who said he agreed to be an expert witness after reading and taking interest in the case, however he was not called to the stand.

"The case was wrapped up quickly," Bischoff told Wrestlezone.com, "the jury didn't waste any time and came back with what I felt was the correct decision".

Eric was happy with the outcome, to say the least. **"Rob Russen and Sal Corente give the wrestling business a bad name," he stated, "so I'm glad justice prevailed and the bottom feeders didn't win one".**

Bischoff wanted to make sure that everyone knew his comments and opinions were solely his and did not reflect those of Clear Channel/Live Nation.

In regards to the above statement, we have a statement from Mr. Corrente's lawyer:

"It is odd that Eric Bischoff, whose well-documented incompetence caused the demise of WCW, should have any comment on the outcome of the WrestleReunion, LLC lawsuit. The expert report Bischoff submitted in this case bordered on illiteracy, and Bischoff was not even called to testify by Clear Channel/Live Nation because Bischoff perjured himself in a deposition in late-July 2009 before running out and refusing to answer any more questions regarding his serious problems with alcohol and sexual deviancy at the Gold Club while the head of WCW. To even sit in the room and question him was one of the most distasteful things I've ever had to do in 17 years of practicing law. In fact, we understand that Bischoff was afraid to even come to Tampa and testify because he would have to answer questions under oath for a third time about his embarrassing past.

The sad state of professional wrestling today is directly attributable to this snake oil salesman, whose previous career highlights include selling meat out of the back of a truck, before he filed bankruptcy and had his car repossessed. Today, after running WCW into the ground, Bischoff peddles schlock like "Girls Gone Wild" and reality shows featuring B-listers.

Sal Corrente, on the other hand, has always been an honorable man, and he delivered on every promise and paid every wrestler while staging the three WrestleReunion events. Unlike the cowardly Bischoff, Mr. Corrente took the stand in this case. Although his company did not prevail, Sal Corrente proved that he was man enough to fight to the finish -- something Bischoff could never understand."

Sincerely,

Ryan Christopher Rodems
Barker, Rodems & Cook, P.A.
400 North Ashley Drive, Suite 2100
Tampa, Florida 33602
813/489-1001
E-mail: rodembs@barkerrodemandsandcook.com

We just wanted to give Mr. Corrente's lawyer a chance to speak his mind.

Georgie GMakpoulos@aol.com

Since I have always had wrestlers autograph signings as a speciality for any website I worked for, I know for sure, Mr. Corrente is an honest promoter who has NEVER stiffed a wrestler working for his shows or conventions. I would have heard about it.

There are many promoters who do that in this business, which is very sad.

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