IN THE SUPREME COURT OF FLORIDA

THE FLORIDA BAR,

Complainant,

v.

HALLARD J. GREER,

Respondent.

_____/

CASE NO. 71,280
TFB NO. 84-05,988(06A)
84-06,029(06A)
84-06,085(06A)
85-10,868(06A)
85-10,900(06A)

RESPONDENT'S REPLY BRIEF

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SYMBOLS AND REFERENCES

In this Reply Brief, Complainant, The Florida Bar, will be referred to as "The Florida Bar". The Respondent, Hallard J. Greer, will be referred to as "Respondent". "RR" will refer to the Report of Referee filed on August 16, 1988.

The transcript of the Testimony and Proceedings before the Referee will be shown as Volume I, taken August 1, 1988; Volume II, taken August 2, 1988; and Volume II, taken August 3, 1988, and will be shown as:[T-Vol.I or II or III, and the number of the page/pages]

REPLY TO FLORIDA BAR'S INITIAL BRIEF

The Respondent has been a member of the Florida Bar for almost 36 years and in that period of time, the only discipline that he ever received was a public reprimand in 1977 which is almost twelve years ago. It is interesting to note that the 06A Grievance Committee which heard the testimony in the case recommended that Respondent be found guilty of only minor misconduct. The Referee upon hearing the case recommended a public reprimand and two years probation. The Board of Governors of the Florida Bar, who did not hear the testimony or read the transcript of the record, then recommended a 91 days suspension and the making of a passing score on the Professional Responsibility portion of the Florida Bar examination which, as I am sure this Honorable Court is aware, would mean that that the Respondent would have to prove rehabilitation and that the suspension would be for much longer than 91 days suspension.

The Florida Bar points out that the Respondent committed cumulative misconduct, but I think it is clear that The Florida Bar deliberately withheld these cases so that they could be brought to a hearing all at one time to make it look like the respondent had committed cumulative misconduct instead of isolated misconduct, just as they did in the Rubin case. The Florida Bar v. Ellis Rubin, 362 So.2d, page 12.

Furthermore, Respondent maintains that he did not commit the violations of which the Referee found him guilty as set forth in Points on Review in Respondent's Reply Brief.

Based on the above, Respondent respectfully requests this Honorable Court to reject the findings of the Referee and his recommended discipline and also the recommendation of discipline by the Board of Governors of The Florida Bar.

STATEMENT OF THE CASE

The complaint in Count I, #84-05,988 was filed with the Florida Bar on September 25, 1983.

The complaint in Count II, #84-06,029, was filed with the Florida Bar on December 1, 1983.

The complaint in Count IV, #85-10,868 was filed with the Florida Bar in July of 1984.

The complaint in Count V, #85-10,900 was filed with the Florida Bar in 1979.

Each of the said complaints was investigated by the investigator for the Grievance Committee, and the recommendations from the invesigator were that no action be taken as there was no apparent violation of the rules.

Nothing more was heard about the complaints until November 5, 1986, when a Motion to Temporarily Suspend Respondent was filed by Mr. Steve Rushing, Branch Staff Counsel of the Florida Bar, Case No. TFBHTS87,0031, whereby it was stated in the Petition that these complaints were presently pending. No copy of the said Petition was served upon the Respondent, but Respondent received a call from the Clerk of the Supreme Court wanting to know if Respondent was going to file an Answer to the same. Upon learning of the Petition, the Respondent filed his Answer to the Petition with this Court. This Court, after consideration of the Petition and the Answer, rejected the Florida Bar's Petition. On November 20, 1986, the Florida Bar then decided to set down these complaints again before the Grievance Committee.

On February 19, 1987, the Sixth Judicial Circuit Grievance Committee "A" found probable cause in File Number 84-06,085(06A) (Count III), and File Number 85-10,900(06A) (Count V). On March 19, 1987, the Sixth Judicial Circuit Grievance Committee "A" found probable cause in File Number 85-10,868(06A) (Count IV), not withstanding the objections of the Respondent to the witness who was out-of-state, and his testimony was given over the telephone and was

not properly sworn as required by Florida law. On July 28, 1987, the Sixth Judicial Circuit Grievance Committee "A" found Probable Cause in File Number 84-05,988(06A) (Count I) and File Number 84-06,029(06A) (Count II). The Grievance Committee **recommended** that the Respondent be found guilty of only minor misconduct.

On October 14, 1987, the Florida Bar filed a Formal Complaint. On October 26, 1987, Judge Thomas A. Miller, Sr. was appointed to act as Referee in the matter.

Respondent filed a Motion to Dismiss which was granted by Judge Miller, and on February 29, 1988, an Amended Complaint was filed by the Florida Bar.

On the 4th day of May, 1988, Respondent filed a Motion for the Production of Documents and a Motion to Dismiss the Complaint and all counts thereto on the grounds that the Florida Bar did not expeditiously prosecute the Complaint, and that the complaints were deliberately withheld by the Florida Bar to make it look like the Respondent was guilty of cumulative misconduct. A further Motion was filed on the 5th day of May, 1988, to dismiss the Complaint and all counts thereto on the grounds of the misconduct of the Florida Bar. A further Motion to Dismiss Counts II and IV was filed on the grounds that the witnesses at the Grievance Committee hearing were not properly sworn as provided by Florida law.

The Florida Bar filed a Motion to Produce which was voluntarily complied with by the Respondent. But on August 1, 1988, the Referee denied all the motions filed by the Respondent. After the hearing on August 1, 2, and 3, 1988, the Referee filed his Report recommending that the Respondent be found guilty in Court I of violating DR 6-101(A)(3); in Count II of violating DR 1-102(A)(4), DR 1-102(A)(5), DR 1-102(A)(6), and DR 6-101(A)(3); in Count IV of violating DR 6-101(A)(2) and DR 6-101(A)(3); and in Count V of violating DR 1-102(A)(6). The referee then recommended that the Respondent receive a

public reprimand and be placed on two years probation.

On September 30, 1988, the Board of Governors of the Florida Bar voted to seek a 91-Day Suspension with a requirement that the Respondent obtain a passing score on the Professional Responsibility portion of the Florida Bar examination. On October 6, 1988, a Petition for Review of the Referee's Report was filed by the Florida Bar and a Cross-Petition for Review of the Referee's Report was filed by the Respondent on October 14, 1988.

STATEMENT OF THE FACTS

Count I

On April 1, 1981, Mr. and Mrs. Alexander Stefan and Mr. and Mrs. McGrath appeared at my office with a real estate broker to have a contract for the sale of the Stefan's real estate to the McGraths. It appeared to the Respondent that the real estate people were taking advantage of the McGraths, so the Respondent asked the McGraths if they had an attorney. The McGraths told the Respondent that they had been represented by Richard Carr, and the Respondent told them to contact their attorney, which they did. The realtor turned over the $4,000.00 down payment to Mr. Carr who put it in his escrow account. The Stefans then had trouble in perfecting the title to the property, whereupon Mr. Carr and the Respondent entered into an agreement with the McGraths to rent the house until title could be perfected.

A closing was set for July 1, 1981. The Stefans appeared at the closing, but the McGraths did not. The Respondent then wrote a letter to Richard Carr demanding return of the $4,000.00. Mr. Carr and the Respondent, over a period of time, attempted to settle the matter. On September 8, 1981, Mr. Carr's partner, Ronald Schnell, sent the Respondent a check for $1,000.00. The Stefans refused to accept the check as settlement of their claim against the McGraths, and later an agreement was worked out between the Respondent and Mr. Carr and the Stefans that they would accept the $1,000.00 for the rental of the property and for a water bill. Respondent delivered the check for $1,000.00 to the Stefans in December of 1981. After that, Mr. Carr and the Respondent attempted to work out a settlement in the matter, but at that point, the McGraths had disappeared and could not be located by Mr. Carr or by the Respondent.

At that point, Mr. Carr was served with a garnishment against the McGraths, and the Respondent filed an answer to the garnishment and caused the garnishment

action to be dismissed on the grounds that the Stefans had a prior claim on the money. A suit could not be filed against the McGraths as their whereabouts were unknown. Mr. Carr finally heard from the McGraths and informed the Respondent that the had returned the balance of the money to the McGraths.

Count II

In September 1982, Philip Trimmer retained Respondent to seek a reduction of Mr. Trimmer's child support. A hearing was set on the modification for November 17, 1982; no hearing was held on that date because Mrs. Trimmer's attorney, Joan Lo Bianco Walker, asked for a continuation of the hearing. After several contempt citations and two divorce hearings for Mr. Trimmer and his girlfriend, the hearing was rescheduled for October of 1983, and then rescheduled again for January of 1984.

In September of 1983, a hearing was held on Mr. Trimmer's ex-wife's Motion for an Order of Contempt. The presiding judge could not find the Petition to Reduce Child Support in the file. Respondent assured the Court that one had been filed and should be in the court file. The Respondent did not file a copy of the motion after that date because he had been fired by Mr. Trimmer.

In September of 1983, Mr. Trimmer asked Respondent to file a Petition for Bankruptcy. Respondent **never** told Mr. Trimmer that the Petition for Bankruptcy had been filed. Respondent did tell Mr. Trimmer that the Petition had been returned for defects. Respondent then refunded to Mr. Trimmer his fee, and Mr. Trimmer thereafter did not seek another attorney to file a Petition for Bankruptcy.

Respondent represented Mr. Trimmer's wife in a divorce action. On July 12, 1983, Peter Meros sent a letter to Respondent outlining three options for

Mrs. Trimmer to take regarding the Property Settlement Agreement. In October of 1983, Mrs. Trimmer told Respondent she would like to exercise option #3. Respondent then contacted Mr. Meros and told Mr. Meros of Mrs. Trimmer's wish. Respondent did not fail to follow through on the matter for Mrs. Trimmer. Mr. Meros filed a Motion to Terminate Exclusive Use and for Contempt and scheduled a hearing for November of 1983. Mrs. Trimmer did not attend the hearing because she was not required to do so as the matter was settled.

Count IV

In May of 1983, James Fish entered into an oral agreement whereby Respondent would represent Mr. Fish in **one** malpractice case. On December 5, 1983, a Claims Supervisor for the doctor's insurance carrier wrote a letter to Respondent requesting medical records from Mr. Fish. Respondent did not answer the request until January 31, 1984, because Mr. Fish did not supply Respondent with any medical records. In February of 1984, Respondent was advised by the Claims Supervisor that they throught there was no merit to Mr. Fish's claim. The reason Respondent failed to submit any additional correspondence to the insurance company within the thirty-day period was because Mr. Fish did not supply Respondent with any further medical reports. Respondent did inform Mr. Fish that the insurance company intended to close its file which would have nothing to do with whether Mr. Fish could file a suit against the doctor.

Respondent continued to keep Mr. Fish up to date on his case via telephone, and Respondent did not fail to answer Mr. Fish's inquiries.

Count V

In January of 1979, Respondent was representing Audrey Bright Tongel in her Dissolution of Marriage case. Mrs. Tongel's husband wanted $1,000.00 to settle the case or he was going to ask the Court for an equitable share in

Mrs. Tongel's house. Mrs. Tongel did not have $1,000.00. Respondent had represented Mrs. Tongel and her family for many years. Respondent, not wanting to see Mrs. Tongel lose her house and also knowing the dire financial conditions of Mrs. Tongel, Respondent put up the $1,000.00 out of his own funds to settle the matter. Mrs. Tongel never at any time filed a complaint with the Florida Bar against the Respondent.

SUMMARY OF ARGUMENT

POINT I

THE FLORIDA BAR DELIBERATELY WITHHELD THE FOUR (4) COUNTS ON WHICH RESPONDENT WAS FOUND GUILTY INSTEAD OF LETTING THEM TAKE THEIR NORMAL COURSE THROUGH THE GRIEVANCE COMMITTEE IN AN EFFORT TO MAKE IT APPEAR THAT THE RESPONDENT WAS GUILTY OF CUMULATIVE MISCONDUCT AND THIS WAS ONLY DONE AFTER THE BAR'S PETITION FOR TEMPORARY SUSPENSION WAS DENIED BY THIS HONORABLE COURT.

POINT II

COUNT IV SHOULD HAVE BEEN DISMISSED BY THE REFEREE ON THE GROUNDS THAT IT WAS FOUNDED ON UNSWORN TESTIMONY CONTRA TO FLORIDA LAW.

POINT III

THE REFEREE'S FINDING OF RESPONDENT GUILTY IN COUNT I OF NEGLECTING A LEGAL MATTER WAS TOTALLY ERRONEOUS, UNLAWFUL AND IMPROPER.

POINT IV

THE REFEREE'S FINDING OF RESPONDENT GUILTY IN COUNT II OF ENGAGING IN CONDUCT INVOLVING DISHONESTY, FRAUD, DECEIT OR MISREPRESENTATION, AND ENGAGING IN CONDUCT PREJUDICIAL TO THE ADMINISTRATION OF JUSTICE, AND ENGAGING IN ANY OTHER CONDUCT THAT REFLECTS ON HIS FITNESS TO PRACTICE LAW, AND NEGLECT OF A LEGAL MATTER ENTRUSTED TO HIM, IS TOTALLY ERRONEOUS, UNLAWFUL AND UNJUSTIFIED.

POINT V

THE FINDING OF THE RESPONDENT GUILTY IN COUNT IV OF HANDLING A LEGAL MATTER WITHOUT PREPARATION ADEQUATE IN THE CIRCUMSTANCES AND NEGLECTING A LEGAL MATTER IS ERRONEOUS, UNLAWFUL AND UNJUSTIFIED.

POINT VI

THE FINDING OF RESPONDENT GUILTY IN COUNT V OF ENGAGING IN ANY OTHER CONDUCT THAT REFLECTS ON HIS FITNESS TO PRACTICE LAW IS, AGAIN, TOTALLY ERRONEOUS, UNLAWFUL AND UNJUSTIED.

ARGUMENT

POINT I

THE FLORIDA BAR DELIBERATELY WITHHELD THE FOUR COMPLAINTS INSTEAD OF PROCESSING THEM THROUGH THEIR NORMAL COURSE OF A GRIEVANCE COMMITTEE SO THAT IT WOULD LOOK LIKE CUMULATIVE MISCONDUCT ON THE PART OF THE RESPONDENT.

The complaint in Count I #84-05,988 was filed on September 25, 1983. The complaint was investigated by a Grievance Committee 06A, and the Respondent was told tha the Committee could find nothing that the Respondent had done wrong and that the complaint was going to be dismissed.

The complaint in Count II #84-06,029 was filed on December 1, 1983, and investigated by a Grievance Committee 06A, and the Respondent was told that the Commitee was not going to take any action on the same.

The complaint in Count IV #85-10,868 was filed in July of 1984. The said complaint was fully investigated by a Grievance Committee 06A, and the Respondent was told that the Committee was not going to go forward, as there was no indication that Respondent had done anything wrong.

The complaint in Count V #85-10,900 occurred in 1979. No complaint was ever filed by Mrs. Bright Tongel but, instead, the complaint was filed by The Florida Bar sometime in 1983.

The Respondent heard nothing concerning these complaints until the 5th day of November, 1986, when Respondent learned by accident that a Petition for Temporary Suspension had been filed by Mr. Steve Rushing, Branch Staff Counsel of The Florida Bar. A copy of said Petition was not even served on the Respondent, but Respondent received a call from the Clerk of the Supreme Court wanting to know if Respondent was going to file an answer to it. These 4 complaints were listed in the said Petition. Respondent filed an answer to

the Petition and this Court dismissed the Bar's Petition for Temporary Suspension. Immediately thereafter, the Bar set down all 7 complaints they had been holding back for a hearing before the Grievance Committee 06A.

POINT II

THE FLORIDA BAR USED UNSWORN TESTIMONY BEFORE THE GRIEVANCE COMMITTEE AT THE FINDING OF PROBABLE CAUSE ON COUNTS III AND IV.

At the Grievance Committee hearing on Counts III and IV, one of the witnesses on Count Iv was in another state, to wit: Massachussets. On Count II, the witness was from St. Petersburg. Both witnesses were interviewed by telephone and no person authorized by law to administer an oath was present to administer an oath to the individuals prior to their testimony. In fact, there was no identification by any person authorized to administer an oath that the person was one and the same who they said they were. This is totally contrary to Florida law which requires a witness who is testifying by telephone to be sworn in by a person who is authorized to administer oaths at the place where they are testifying. This was not done in these two complaints, and the Grievance Commitee should not have found probable cause based on the improperly sworn testimony. §117.03, §454.17, §92.525, and §92.50 Fla. Stat.

POINT III

THE RECORD AND THE FINDINGS OF THE REFEREE DO NOT ESTABLISH THAT THE RESPONDENT NEGLECTED A LEGAL MATTER IN COUNT I.

In Paragraph #1 of the Report of the Referee, he advises that a closing was to be held on April 1, 1981. This is not correct as the parties had come to my office to sign a contract, and I then told the McGraths that they had better contact their attorney, Richard Carr, so that they could protect themselves [T-Vol. I, 34].

There was no closing set for June 1, 1981, as stated by the Referee [T-Vol. I, 35]. The closing was set for July 1, 1981. The McGraths retained Richard Carr on April 1, 1981, [T-Vol. I, 34] and Richard Carr received the $4,000.00 on April 1, 1981 [T-Vol. I, 35]. The closing was set for July 1st, not June 1, 1981. The Respondent had been representing the Stefans since April 1, 1981.

It is not correct that Respondent did not follow up on his letter to Richard Carr as set out in the Referee's Report Paragraph #3. Mr. Carr states [T-Vol. I, 39] that he and Respondent were in constant contact trying to get the matter settled [T-Vol. I, 41].

Respondent handled a letter of garnishment against the McGraths, trying to save the money for the Stefans [T-Vol. I, 42,43]. A lawsuit could not have been filed against the McGraths as they had disappeared [T-Vol.I, 43], and did not contact Mr. Carr again until the 7th of April, 1982.

Respondent did not deliver the $1,000.00 check to the Stefans until December of 1981, because they would not accept it [T-VolI, 5]. It was finally accepted by the Stefans in December of 1981 for house rent and a payment on the water bill [T-Vol.I, 52]. On May 18, 1982, I wrote to the Stefans after Mr. Carr told me he had given all of the money back to the McGraths [T-Vol.I,55],

so there was nothing more I could do for the Stefans because Mr. Carr would not give me the address of the McGraths.

POINT IV

THE RECORD OF COUNT II DOES NOT ESTABLISH THE REFEREE'S FINDING OF RESPONDENT GUILTY OF NEGLECT OF A LEGAL MATTER ENTRUSTED TO HIM.

In Paragraph #1 of the Referee's Report a hearing was not held on November 3, 1982, because Mr. Trimmer's ex-wife retained an attorney, Joan LoBianco Walker, to represent her in the modification. Mrs. Walker asked for a continuance [T-Vol.I, 116]. It is not correct that the Respondent failed to reschedule ahearing on the Motion to Modify the Final Judgment. Mrs. Walker clearly states in her testimony [T-Vol.I, 123] that I rescheduled the Motion for September 28, 1983; again for October 25, 1983; and again on January 17, 1984, [T-Vol.I, 124].

The reason Respondent did not file a copy of the Motion to Mofidy Final Judgment was that he knew the original had been filed and that it would turn up eventually.

As to the findings in Paragraphs #3 and 4 of the Referee's Report, there is nothing in the record [T-Vol.I, 79-82] that shows that Respondent ever told Mr. Trimmer that a Petition for Bankruptcy had been filed. When Mr. Trimmer learned that it had not been filed, he went to another attorney and came to the Respondent for his file, and then Respondent promptly refunded him his money. There is nothing in Mr. Trimmer's testimony [T-Vol.I, page 79-82] to show that Respondent ever told him that a Petition for Bankruptcy had been filed.

As to Paragraph 5 of the Referee's Report, there is nothing in the record to show that Respondent did not follow through on the Mrs. Trimmer matter. On the contrary, Mr. Meros states [T-Vol.I, 132] that we talked and tried to settle the matter, and that we reached an agreement. Mrs. Trimmer

did not have to be present at the hearing in November of 1983; that is why she was told not to attend the hearing as the matter was apparently settled [T-Vol.I, 122].

POINT V

THE RECORD AND ALSO THE FINDINGS BY THE REFEREE IN COUNT IV ARE TOTALLY DEVOID OF ANY EVIDENCE THAT THE RESPONDENT HANDLED A LEGAL MATTER WITHOUT PREPARATION ADEQUATE IN THE CIRCUMSTANCES OR THAT RESPONDENT NEGLECTED LEGAL MATTERS ENTRUSTED TO HIM.

In Paragraph #1 of Referee's Report on Count IV, the Referee finds that the Respondent on September 19, 1983, agreed to represent Mr. Fish on two (2) malpractice cases. This is not correct. The only case that the Respondent agreed to represent Mr. Fish on was the case against Doctor Holley [T-Vol.III, 29-30]. Mr. Fish states that I never agreed to represent him against Doctor Reeves [T-Vol.III, 30]; that I never told him I would accept a case against Doctor Mouradian [T-Vol.III, 30].

Respondent did not answer the letter from the insurance carrier until January 31, 1984, because he was waiting for medical records from Mr. Fish, and the reason Respondent did not send the insurance adjuster any medical records was because Mr. Fish did not send Respondent any medical records, [T-Vol.III, 36-37].

In May of 1984, Mr. Fish demanded a return of his papers, and they were returned to him promptly by the Respondent. It is not correct, as statged in Paragraph 4 of the Referee's Report, that Respondent failed to respond to Mr. Fish's inquiry. Mr. Fish states [T-Vol.III, 19 and 21] that he talked to the Respondent on the phone once a week. Mr. Fish's own testimony is full of nothing but inconsistencies.

POINT VI

THERE WAS NO PROOF IN THE RECORD OR IN THE REFEREE'S REPORT AS TO COUNT V THAT RESPONDENT ENGAGED IN ANY CONDUCT THAT ADVERSELY REFLECTED ON HIS FITNESS TO PRACTICE LAW.

This Count arose in 1979 --- how, I do not know, as Mrs. Tongel states she did not file a complaint with The Florida Bar concerning the payment of the $1,000.00 by the Respondent with his own funds [T-Vol.III, 62]. The Respondent had known Mrs. Tongel's family and represented the same for a long period of time. Respondent knew that she did not have any money and that she might lose her house, so Respondent put up the $1,000.00 out of his own pocket for Mrs. Tongel and kept her from losing her house. The only one who got hurt was the Respondent who is out the $1,000.00 that he put up to settle her divorce case. All that the Respondent did was to help out his client and get the case settled. It has always been my understanding that an attorney should do everything possible for the best interest of his client; most certainly, putting up funds of your own to settle a client's case is not engaging in conduct that adversely reflects on your fitness to practice law.

CONCLUSION

In view of the fact that Respondent did not commit and should not be found guilty of the Referee's finding of the various violations, and due to the fact that The Florida Bar had deliberately withheld these violations to make it appear as cumulative misconduct, the referee's findings and his recommendation of discipline, along with the discipline recommended by the Board of Governors of The Florida Bar should be totally rejected by this Honorable Court.

The Respondent did not violate DR 6-101(A)(3), neglecting of a legal matter entrusted to him, of which he was found guilty in Court I. The record will reflect that he did everything within his power to try to get the matter resolved with Mr. Richard Carr and that there was a total absence of any neglect on the part of the Respondent.

In Count II, the Respondent did not engage in any conduct involving dishonesty, fraud, deceit or misrepresentation; nor did he engage in any conduct prejudicial to the administration of justice; nor did he engage in any conduct that adversely reflects on his ability to practice law; and, he did not neglect a legal matter entrusted to him.

There was absolutely no showing in Count IV that the Respondent was handling a legal matter without preparation adequate in the circumstances or that the Respondent ever neglected a legal matter entrusted to him in this same Count.

In Count V, the Respondent did not engage in any conduct that adversely reflected on his fitness to practice law; the only thing the Respondent did was to help his client.

Whereupon the Respondent respectfully requests this Honorable Court reject the findings and recommendations of the Referee and the Board of Governors of The Florida Bar and dismiss the charges against the Respondent.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing REPLY BRIEF has been furnished to JOHN T. BERRY, Staff Counsel, The Florida Bar, 650 Apalachee Parkway. Tallahassee, Florida 32399-2300; RICHARD A. GREENBERG, Assistant Staff Counsel, The Florida Bar, Suite C-49, Tampa Airport Marriott Hotel, Tampa, Florida 33607; and JAMES De MOULLY, co-counsel for Respondent, 6829 18th Street North, St. Petersburg, Florida 33702, on this 22nd day of Dec., 1988.

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