



THE STATE BAR
OF CALIFORNIA

1149 SOUTH HILL STREET, LOS ANGELES, CALIFORNIA 90015-2299

OFFICE OF THE CHIEF TRIAL COUNSEL
ENFORCEMENT

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<http://www.calbar.ca.gov>

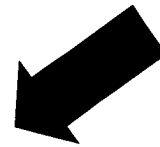
DIRECT DIAL: (213) 765-1060

January 3, 2012

PERSONAL AND CONFIDENTIAL

Linda Paquette, Esq.
Law Ofc Linda Paquette
847 S Grand Ave
Pasadena, CA 91105

Re: Case Number: 11-O-18493
Complainant: Joel Simon obo Francine Teitelbaum

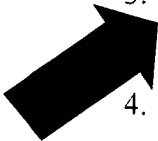


Dear Ms. Paquette:

This letter is sent to you based upon information that you are not currently represented by counsel in this matter. If this is incorrect, please advise me within **five** days so that future communications may be directed to your counsel.

The State Bar received a complaint from Joel Simon obo Francine Teitelbaum alleging the following:

1. On or about November 29, 2010, Judge Roby Paul issued Order Denying Motion to Seal Protected Health Care Information and Granting Protective Order in Los Angeles County Superior Court Probate Case No. BP1191489, Conservatorship of the Person and Estate of Eunice D. Bellah. The court's order limited disclose of medical records related to the physical or mental records of the conservatee to counsel and counsel's retained experts related to the pending litigation;
2. You are in violation of the court order regarding protecting the confidential medical information of Mrs. Eunice Bellah. You have posted to various websites video segments from depositions of Mrs. Eunice Bellah's doctor's discussing her medical conditions. You have also posted to various websites personal information about Mrs. Eunice Bellah that violates her privacy;
3. In further violation of the court's order, you caused a story to be written in The Hollywood Reporter concerning Mrs. Eunice Bellah. The story contained materials that violated both the court's order and Mrs. Eunice Bellah's right to privacy;
4. Joel Simon, attorney for the conservatee, has written you with cease and desist letters on August 17, 2011, and September 21, 2011, detailing your violation of the court's order and requesting that you remedy the situation immediately. You have failed to do so and the offending materials remain posted for public viewing;
5. While Mr. Simon has brought this matter to the State Bar's attention, his primary reason for doing so is not seeking disciplinary action against you but to get you to obey the court's protective order and for you to maintain your oaths and duties as an attorney. His sole motivation is to protect the interests and privacy of his client.



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Your written response to these allegations along with any supporting documentation is requested. **All** documents that you send to the State Bar, whether **copies or originals**, become State Bar property and are subject to destruction. In addition, please provide the information requested below and legible copies of referenced documents:

1. Evidence that you have taken down the websites, or the materials in question from other websites, and have removed all privileged/confidential information concerning Mrs. Eunice Bellah from public dissemination.

FAILURE TO PROVIDE THE DOCUMENTS REQUESTED IN THIS LETTER MAY RESULT IN THE ISSUANCE OF A SUBPOENA DUCES TECUM.

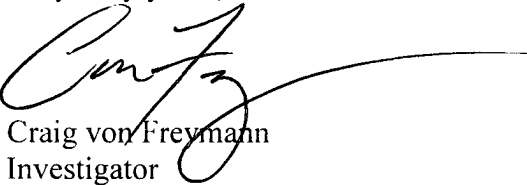
In addition, pursuant to Business and Professions Code section 6086.10, you may be subject to a cost assessment for the expenses incurred by the State Bar if this matter results in public discipline.

We must receive your written response and the documents requested, if any, by **January 18, 2012**. Section 6068(i) of the Business and Professions Code states that it is the duty of an attorney to cooperate with and participate in any State Bar Investigation.

Upon request, the Office of the Chief Trial Counsel will consider granting you additional time within which to submit a written response to the allegations and the requested information and documents. A request for an extension of time must be in writing and state good cause as to the specific constraints on your practice which are claimed to necessitate the additional time. Any request for extension of time must be received by the undersigned on or before **January 18, 2012**.

Please feel free to call me at (213) 765-1060 if you have any questions.

Very truly yours,


Craig von Freymann
Investigator

CvF