

From: [McGuire, Candy L.](mailto:McGuire_Candy_L)
To: [REDACTED]
["zeusdesfor@aol.com"](mailto:zeusdesfor@aol.com)
Subject: Dress Code for Founder's Briefing that Anita sent for the last event still holds...
Date: Sunday, September 13, 2009 6:36:12 PM

Gentlemen:

For those who will be giving presentations: (1) Suit or (2) dress pants, long-sleeved dress shirt and jacket during your presentation - no tie necessary.

Other times: (1) Suit or (2) dress pants with long-sleeved dress shirt, with or without jacket.

Ladies:

For those who will be giving presentations: (1) Suit, (2) modest dress or (3) slacks with dressy top and jacket during your presentation.

Other times: Your choice of suit, modest dress, nice slacks with dressy top. (Nothing too tight or revealing, of course.)

If in doubt, err on the side of professional.

The rooms may be chilly to some, so dress accordingly. Most of our guests will probably be dressed more casually, but you will see a variety of styles.

Candy McGuire

Assistant to the Founder & President

Liberty Counsel

PO Box 540774

Orlando, FL 32854

(800) 671-1776 – Phone

(407) 875-0770 – Fax

www.LC.org

Offices in Florida, Virginia and the District of Columbia

Subscribe to our informative *Liberty Alert* email update at <http://www.lc.org/index.cfm?PID=14103>

Support the ministry of Liberty Counsel at <https://donateling.net/donate/donate.asp?mid=LibertyC4u>

This message (and any attached files) is intended for the person to whom it is addressed and may contain confidential information. If you are not the intended recipient, please notify us immediately by replying to this message and deleting it from your computer, because any distribution of this message by you is strictly prohibited. Email cannot be guaranteed secure or error-free. We do not accept responsibility for errors or omissions herein that result from email transmission. Any views or opinions expressed in this email are solely those of the author and do not necessarily represent those of Liberty Counsel.

EXHIBIT

1

LC28968

From: zeusdesfor@aol.com
Sent: Thursday, February 05, 2009 3:58 PM
To: Crampton, Steve
Subject: Re: Proposed Order

[REDACTED]

REDACTED: ATTORNEY-CLIENT PRIVILEGE

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

-----Original Message-----

From: Crampton, Steve <scrampton@liberty.edu>
To: 'Sarah Star' <srs@sarahstarlaw.com>
Cc: 'Michelle Kenny' <mkenny@kenlanlaw.com>
Sent: Thu, 5 Feb 2009 3:15 pm
Subject: RE: Proposed Order

Sarah,

First, let me thank you for your efforts to try to work things out. I appreciate it very much. Second, as to the make-up day and efforts to reach a compromise, if we cannot come to an agreement we will file a motion and formal objection to the proposed order: It is simply unacceptable, in my opinion, for Isabella to be forced to miss a school day in order to comply with the visitation order, and I do not believe Judge Cohen intended such a consequence. Further, the offer from Janet was to get anot her

three days in exchange for one day missed, which Lisa was not willing to give. So I guess it goes both ways here, too.

For what it is worth, I think our motion would seek a modification of the March visitation terms from the 9:00 a.m. drop off time to 1:00 p.m., and from the 5:00 p.m. drop off time to 1:00 p.m.; and a modification of the May visitation terms from a 5:00 p.m. pick up time to 3:00.

As for the bridal shower, thank you for the invitation, but as I understand it, Isabella did not ask to be allowed to attend, but only whether Janet intended to take her there; she does not want to go under these circumstances.

Moreover, regarding the communications between the parties, let me state for the record that while it is understandable that you would believe your client over Lisa, I resent and unequivocally deny that Lisa is "misrepresenting things that Janet has said to her." I think it is absurd to suggest that Lisa simply made up the idea that they had reached an agreement, and that it is far more likely that Janet actually did agree when speaking with Lisa, and only after reflecting on the matter reconsidered and withdrew her agreement. Whatever was actually said, I agree with you that until trust is built *on both sides*, the telephonic communications will remain a problem. Nevertheless, they should (and must, under the court order) continue.

Regarding video conferencing: Lisa is agreeable, and would like to insure that before she purchases expensive equipment, Janet is on the record as agreeing to acquire the technology on her end necessary to make it happen.

I guess I am not clear as to what specifically you would like from Lisa regarding the two visiting days. Are you just wanting dates?

--Steve

P.S. We also resent your suggestion that the only way Lisa will comply is if the order is registered for enforcement in Virginia.

Stephen M. Crampton, Esq.

Vice President for Legal Affairs and General Counsel

Liberty Counsel

1-800-671-1776

Offices in Florida, Virginia and the District of Columbia

Licensed in Mississippi, Tennessee and Texas

www.LC.org • scrampton@LC.org

Subscribe to our informative [Liberty Alert email update](#)

[Support the ministry of Liberty Counsel](#)

This message (and any attached files) is intended for the person to whom it is addressed and may contain confidential information. If you are not the intended recipient, please notify us immediately by replying to this message and deleting it from your computer, because any distribution of this message by you is strictly prohibited. Email cannot be guaranteed secure or error-free. We do not accept responsibility for errors or omissions herein that result from email transmission. Any views or opinions expressed in this email are solely those of the author and do not necessarily represent those of Liberty Counsel.

From: Sarah Star [<mailto:srs@sarahstarlaw.com>]

Sent: Thursday, February 05, 2009 11:41 AM

To: Crampton, Steve

Cc: 'Michelle Kenny'

Subject: Proposed Order

Dear Steve and Michelle,

LG28971

I am afraid that we are moving backwards with respect to our negotiations. Janet will not (and should not) give up more parent child contact in exchange for one make-up day. Moreover, she does not feel that transportation convenience can be exchanged for quality time with her daughter. She was willing to rearrange things for one day so that Isabella did not need to miss school, but given how much contact has already been missed, she feels that the quality time is more important than one missed school day. Hence, I think it is best to just stay with the order as stated.

Isabella is still welcome to attend the bridal shower if Lisa will allow it. She did express a desire to attend, and I am sure that the Jenkins' could arrange transportation.

Janet vehemently denies that she reached any sort of alternative agreement with Lisa regarding visitation for March. She did say that she would consider it, and she did. If you all recall, this is the same claim that Lisa made regarding Thanksgiving – that after court, Janet agreed to less time than she was entitled to. If communication is to be encouraged, it does not help things for Lisa to (now twice) misrepresent things that Janet has said to her. Communication will continue to be an ongoing problem if the trust problem continues. This is why I suggest starting communication again through email, and eventually trust can be rebuilt and communication can flow more easily. That being said, I did instruct Janet to return Lisa's call, and she informed that she did and left a message. I am not sure if the two have actually spoken yet.

As for the visiting days in the summer, I have not received a response or counter-proposal. I have also not heard anything back about the video-conference capabilities that Lisa has. Janet is not going to invest in a camera adapter until she knows that Lisa is willing to as well, because it won't work if both people don't have the right equipment.

If I don't hear anything back regarding the above matters by the end of the week, I am going to go ahead and submit the proposed order without any summer visit days or make up days included. I need to get the order going so we can get it registered in Virginia in a timely manner, especially because Lisa is pretty clear that she will not abide by an order unless it is capable of being immediately enforced in Virginia. Hence, while it would be great to work out the best possible schedule, the overriding importance of registering the order takes precedence for me.

After five years of litigation, I wonder how much can actually be agreed upon between the parties with regard to make up time etc. I have been willing to try, but please be aware that I am a busy solo practitioner, and do not have unlimited time to negotiate make up time and alternative visitations. Hence, at this time, I am very inclined to simply advise Janet, that until there is a level of trust built up between she and Lisa again such that they can negotiate/communicate between themselves in the best interests of Isabella, that the order simply needs to be followed verbatim. I strongly believe that the only way this trust is going to be rebuilt is for Lisa to show, at the very least, that she can and will comply with the court order.

If you would like to discuss further, perhaps the three of us can arrange a phone conference.

Thanks,

Sarah

Sarah R. Star, Esq.
Attorney and Counselor at Law
P.O. Box 106
Middlebury, Vermont 05753
Ph: (802)385-1023
Fax: (802) 419-3600

This email message and any attachments are intended only for the use of the addressee named above and may contain information that is privileged and confidential. If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited. If you received this message in error, please immediately notify the sender by replying to this email message or by telephone. Thank you.

From: Lindevaldsen, Rena M.
Sent: Thursday, March 12, 2009 10:23 AM
To: Gentry, Bonnie M.
Subject: FW: Isabella

Rena Lindevaldsen

From: Crampton, Steve
Sent: Thursday, March 05, 2009 6:51 PM
To: 'zeusdesfor@aol.com'
Cc: Lindevaldsen, Rena M.
Subject: FW: Isabella

REDACTED: ATTORNEY-CLIENT PRIVILEGE

Stephen M. Crampton, Esq.
Vice President for Legal Affairs and General Counsel
Liberty Counsel
1-800-671-1776
Offices in Florida, Virginia and the District of Columbia
Licensed in Mississippi, Tennessee and Texas
www.LC.org • scrampton@LC.org
Subscribe to our informative [Liberty Alert](#) email update
[Support the ministry of Liberty Counsel](#)

This message (and any attached files) is intended for the person to whom it is addressed and may contain confidential information. If you are not the intended recipient, please notify us immediately by replying to this message and deleting it from your computer, because any distribution of this message by you is strictly prohibited. Email cannot be guaranteed secure or error-free. We do not accept responsibility for errors or omissions herein that result from email transmission. Any views or opinions expressed in this email are solely those of the author and do not necessarily represent those of Liberty Counsel.

From: srs@sarahstarlaw.com [mailto:srs@sarahstarlaw.com]
Sent: Thursday, March 05, 2009 6:42 PM
To: Crampton, Steve
Subject: Re: Isabella

If she does end up going to the dr tomorrow, can you arrange for any test results and documentation of ongoing fever to be faxed to my office? (802)419-3600. I am sure lisa could sign a limited release for this purpose. If I have no kind of documentation by 3pm tomorrow and they are not en route to vt, I will plan to file something with the court.

Sent via BlackBerry by AT&T

From: "Crampton, Steve"
Date: Thu, 5 Mar 2009 15:18:04 -0500
To: 'srs@sarahstarlaw.com'<srs@sarahstarlaw.com>
Subject: RE: Isabella
I understand.

Stephen M. Crampton, Esq.
Vice President for Legal Affairs and General Counsel

LG28978

Liberty Counsel

1-800-671-1776

Offices in Florida, Virginia and the District of Columbia

Licensed in Mississippi, Tennessee and Texas

www.LC.org • scrampton@LC.org

Subscribe to our informative [Liberty Alert](#) email update

[Support the ministry of Liberty Counsel](#)

This message (and any attached files) is intended for the person to whom it is addressed and may contain confidential information. If you are not the intended recipient, please notify us immediately by replying to this message and deleting it from your computer, because any distribution of this message by you is strictly prohibited. Email cannot be guaranteed secure or error-free. We do not accept responsibility for errors or omissions herein that result from email transmission. Any views or opinions expressed in this email are solely those of the author and do not necessarily represent those of Liberty Counsel.

From: srs@sarahstarlaw.com [mailto:srs@sarahstarlaw.com]

Sent: Thursday, March 05, 2009 3:24 PM

To: Crampton, Steve

Cc: Mann, Dustin (Liberty Counsel)

Subject: Re: Isabella

Thanks for the head's up.

Call me cynical, but if she is going to miss any portion of the visit, I am going to need to see medical records.

Sent via BlackBerry by AT&T

From: "Crampton, Steve"

Date: Thu, 5 Mar 2009 15:03:02 -0500

To: 'Sarah Star' <srs@sarahstarlaw.com>

Subject: Isabella

Sarah,

I wanted to let you all know that Isabella was sent home from school this morning with a fever of almost 102 degrees. Lisa will take her to the doctor tomorrow morning if she is not better by then. Apparently there is both a strep virus and a 4-day virus going around, according to the school nurse. Lisa is still planning to come to VT at this point, but we wanted you to know that this development could present complications.

--Steve

Stephen M. Crampton, Esq.

Vice President for Legal Affairs and General Counsel

Liberty Counsel

1-800-671-1776

Offices in Florida, Virginia and the District of Columbia

Licensed in Mississippi, Tennessee and Texas

www.LC.org • scrampton@LC.org

Subscribe to our informative [Liberty Alert](#) email update

[Support the ministry of Liberty Counsel](#)

This message (and any attached files) is intended for the person to whom it is addressed and may contain confidential information. If you are not the intended recipient, please notify us immediately by replying to this message and deleting it from your computer, because any distribution of this message by you is strictly prohibited. Email cannot be guaranteed secure or error-free. We do not accept responsibility for errors or omissions herein that result from email transmission. Any views or opinions expressed in this email are solely those of the author and do not necessarily represent those of Liberty Counsel.

LG28979

From: Lindevaldsen, Rena M.
Sent: Thursday, March 12, 2009 10:21 AM
To: Gentry, Bonnie M.
Subject: FW: Web Cam

Rena Lindevaldsen

From: Crampton, Steve
Sent: Friday, March 06, 2009 4:06 PM
To: 'zeusdesfor@aol.com'
Cc: Lindevaldsen, Rena M.
Subject: FW: Web Cam

Stephen M. Crampton, Esq.
Vice President for Legal Affairs and General Counsel
Liberty Counsel
1-800-671-1776
Offices in Florida, Virginia and the District of Columbia
Licensed in Mississippi, Tennessee and Texas
www.LC.org • scrampton@LC.org
Subscribe to our informative [Liberty Alert](#) email update
[Support the ministry of Liberty Counsel](#)

This message (and any attached files) is intended for the person to whom it is addressed and may contain confidential information. If you are not the intended recipient, please notify us immediately by replying to this message and deleting it from your computer, because any distribution of this message by you is strictly prohibited. Email cannot be guaranteed secure or error-free. We do not accept responsibility for errors or omissions herein that result from email transmission. Any views or opinions expressed in this email are solely those of the author and do not necessarily represent those of Liberty Counsel.

From: srs@sarahstarlaw.com [mailto:srs@sarahstarlaw.com]
Sent: Friday, March 06, 2009 3:57 PM
To: Crampton, Steve
Subject: Re: Web Cam

This communication is the last piece of proof of what a liars your client and your whole organization are. Lisa is to have isabella at the park tomorrow at 9am sharp or I will be filing first thing monday morning.

Sent via BlackBerry by AT&T

From: "Crampton, Steve"
Date: Fri, 6 Mar 2009 15:25:07 -0500
To: 'Sarah Star'<srs@sarahstarlaw.com>
Subject: Web Cam

Lisa has searched for Janet on the skype system, which is the only vehicle she has for using the web cam. Please advise what connection Janet has. (Perhaps Janet should simply call her.)

Thanks.

Stephen M. Crampton, Esq.

Vice President for Legal Affairs and General Counsel

Liberty Counsel

1-800-671-1776

Offices in Florida, Virginia and the District of Columbia

Licensed in Mississippi, Tennessee and Texas

www.LC.org • scrampton@LC.org

Subscribe to our informative [*Liberty Alert*](#) email update

[Support the ministry of Liberty Counsel](#)

This message (and any attached files) is intended for the person to whom it is addressed and may contain confidential information. If you are not the intended recipient, please notify us immediately by replying to this message and deleting it from your computer, because any distribution of this message by you is strictly prohibited. Email cannot be guaranteed secure or error-free. We do not accept responsibility for errors or omissions herein that result from email transmission. Any views or opinions expressed in this email are solely those of the author and do not necessarily represent those of Liberty Counsel.

From: Lindevaldsen, Rena M.
Sent: Thursday, March 12, 2009 10:21 AM
To: Gentry, Bonnie M.
Subject: FW: Current status

Rena Lindevaldsen

From: Crampton, Steve
Sent: Friday, March 06, 2009 4:27 PM
To: 'zeusdesfor@aol.com'
Cc: Lindevaldsen, Rena M.
Subject: FW: Current status

FYI.

Stephen M. Crampton, Esq.
Vice President for Legal Affairs and General Counsel
Liberty Counsel
1-800-671-1776
Offices in Florida, Virginia and the District of Columbia
Licensed in Mississippi, Tennessee and Texas
www.LC.org • scrampton@LC.org
Subscribe to our informative [Liberty Alert](#) email update
[Support the ministry of Liberty Counsel](#)

This message (and any attached files) is intended for the person to whom it is addressed and may contain confidential information. If you are not the intended recipient, please notify us immediately by replying to this message and deleting it from your computer, because any distribution of this message by you is strictly prohibited. Email cannot be guaranteed secure or error-free. We do not accept responsibility for errors or omissions herein that result from email transmission. Any views or opinions expressed in this email are solely those of the author and do not necessarily represent those of Liberty Counsel.

From: srs@sarahstarlaw.com [mailto:srs@sarahstarlaw.com]
Sent: Friday, March 06, 2009 4:26 PM
To: Crampton, Steve
Subject: Re: Current status

Be advised that this is the end of my good faith effort to work with you and your organization. If you have a question for my client, subpoena her. I expect your client to abide precisely by the order from this point forward.

Sent via BlackBerry by AT&T

From: "Crampton, Steve"
Date: Fri, 6 Mar 2009 15:29:35 -0500
To: 'srs@sarahstarlaw.com' <srs@sarahstarlaw.com>
Subject: RE: Current status
Sarah,

I appreciate your prompt response, and your correcting the record. Can you vouch for your client as well?

--Steve

LG28987

Stephen M. Crampton, Esq.

Vice President for Legal Affairs and General Counsel

Liberty Counsel

1-800-671-1776

Offices in Florida, Virginia and the District of Columbia

Licensed in Mississippi, Tennessee and Texas

www.LC.org • scrampton@LC.org

Subscribe to our informative [Liberty Alert](#) email update

[Support the ministry of Liberty Counsel](#)

This message (and any attached files) is intended for the person to whom it is addressed and may contain confidential information. If you are not the intended recipient, please notify us immediately by replying to this message and deleting it from your computer, because any distribution of this message by you is strictly prohibited. Email cannot be guaranteed secure or error-free. We do not accept responsibility for errors or omissions herein that result from email transmission. Any views or opinions expressed in this email are solely those of the author and do not necessarily represent those of Liberty Counsel.

From: srs@sarahstarlaw.com [mailto:srs@sarahstarlaw.com]

Sent: Friday, March 06, 2009 3:41 PM

To: Crampton, Steve

Subject: Re: Current status

This is absolutely untrue. I can provide phone recs if necessary. I suggest you take steps to confirm such things before making wild accusations. I had one extremely courteous phone call to Dottie at Light Medical. That is all.

Sent via BlackBerry by AT&T

From: "Crampton, Steve"

Date: Fri, 6 Mar 2009 15:18:36 -0500

To: 'Sarah Star' <srs@sarahstarlaw.com>

Subject: Current status

Sarah,

The good news is that Lisa has communicated with Light Medical and you may now have Janet call; they assure us they will speak with her.

The bad news is that I have just been informed that you have repeatedly contacted Lisa's employer and harassed them about Lisa and her whereabouts. In case you had not noticed, Lisa is home with a sick child. You have also repeatedly called Light Medical, and we are informed, been rude to them as well.

We hereby demand that you immediately cease and desist this uncalled for and unprofessional behavior at once. You may well have jeopardized Lisa's employment, and certainly have not done either yourselves or Isabella any favors by making nuisances of yourselves at Light Medical.

Thank you,

--Steve Crampton

Stephen M. Crampton, Esq.

Vice President for Legal Affairs and General Counsel

Liberty Counsel

1-800-671-1776

Offices in Florida, Virginia and the District of Columbia

Licensed in Mississippi, Tennessee and Texas

LG28988

www.LC.org • scrampton@LC.org

Subscribe to our informative [Liberty Alert email update](#)

[Support the ministry of Liberty Counsel](#)

This message (and any attached files) is intended for the person to whom it is addressed and may contain confidential information. If you are not the intended recipient, please notify us immediately by replying to this message and deleting it from your computer, because any distribution of this message by you is strictly prohibited. Email cannot be guaranteed secure or error-free. We do not accept responsibility for errors or omissions herein that result from email transmission. Any views or opinions expressed in this email are solely those of the author and do not necessarily represent those of Liberty Counsel.