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IN THE CIRCUIT COURT OF THE THIRD CIRCUIT FOR THE STATE OF HAWAII

PAUL J. SULLA, JR., an individual)	CIV. NO. 12 1-0417
And PAUL J. SULLA, III, an individual)	(Defamation, Per se)
)	
Plaintiffs,)	
vs.)	
)	AFFIDAVIT OF ALLENE KAPLAN
)	PURSUANT TO HANDWRITING
LEONARD G. HOROWITZ, an Individual;)	SAMPLES AND OVER-BILLING BY
SHERRI KANE, an Individual; and DOES)	ATTORNEY PAUL J. SULLA, JR.
1 through 50, Inclusive)	
Defendants /Counter Claimants Pro Se)	
)	JUDGE: Hon. Elizabeth A. Strance
)	
)	TRIAL DATE: Sept. 16, 2014
)	
)	

**AFFIDAVIT OF ALLENE KAPLAN PURSUANT TO HANDWRITING SAMPLES
AND OVER-BILLING BY ATTORNEY PAUL J. SULLA, JR.**

STATE OF HAWAII)
County of Hawaii) SS:
United States of America)

**AFFIDAVIT OF ALLENE KAPLAN PURSUANT TO HANDWRITING SAMPLES
AND OVER-BILLING BY ATTORNEY PAUL J. SULLA, JR.**

Allene Kaplan (hereafter "Kaplan," "me," "I," or "my"), being first duly sworn, on oath deposes and says:

1. I am competent to testify on this matter, based on my knowledge of the facts stated herein.
2. All the facts stated by me herein are true, correct, and complete to the best of my knowledge and understanding.
3. I am 66 years old and work as a Marriage and Family Therapist in private practice.
4. I retained Paul J. Sulla Jr. as my attorney from February 16, 2012 through February 22, 2013.
5. Attached is a copy of the narrative part of a complaint filed with the Office of Disciplinary Counsel on May 30, 2013, outlining Mr. Sulla's exploitation of my case for the purpose of running up substantial legal fees amounting to \$25,000 in 5 months on a case worth only \$56,000. (Exhibit "A")
6. Mr. Sulla violated the Hawaii Rules of Professional Conduct as outlined in my complaint to the Office of Disciplinary Counsel.

7. My litigation was dismissed because Mr. Sulla failed to inform me of pending deadlines when he withdrew as counsel of record.

8. Attached (in Exhibit "B") are also copies of correspondence with Mr. Sulla evidencing his exploitative tactics within the first weeks that he was retained by me.

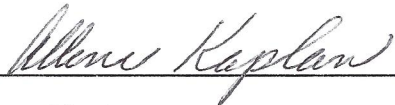
9. After paying Mr. Sulla, Jr. \$15,000 in attorney fees, I informed him that I had no intention of putting any more money into the lawsuit; yet he continued to run up fees in excess of \$10,000.

10. Mr. Sulla then began to harass me with charging interest on the amount in dispute.

11. I provided Dr. Leonard G. Horowitz and Sherri Kane with the attached samples of Mr. Sulla's handwriting from notes he took on some of my documents, marked Exhibit "C."

12. I have agreed to appear as a witness for Dr. Horowitz and Ms. Kane during their pending litigation(s) against Mr. Sulla, to relate my experience with Mr. Sulla's ineffective, exploitative and unethical assistance as counsel.

Further affiant sayeth naught.

A handwritten signature in cursive script, reading "Allene Kaplan", is written over a horizontal line.

Allene Kaplan

(Notary signature page follows.)

On this ^{25th} ~~25rd~~ day of April, 2014, before me, the undersigned notary public, personally appeared ALLENE KAPLAN, who proved to me on the basis of satisfactory evidence of identification to be the person whose name is signed on the preceding or attached document, who swore or affirmed to me that the contents of the document(s) is/are truthful and accurate to the best of his knowledge and belief.

A/K
M.P. [Signature]

Subscribed and sworn to before me this
25th day of April, 2014

Shiyanne C. Kekona (SEAL)
Shiyanne C. Kekona, Notary Public

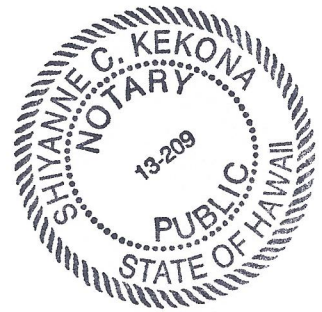


Notary Public in and for Hawaii

My commission expires: June 23, 2017

Shiyanne C. Kekona
Notary Signature

AFFIX SEAL HERE



Doc. Date: April 25, 2014 # Pages: 15

Notary Name: Shiyanne C. Kekona 2nd Circuit

Doc. Description: Affidavit of Allene Kaplan
pursuant to handwriting samples and over-billing
by Attorney Paul J. Gilla Jr.

Shiyanne C. Kekona April 25, 2014
Notary Signature Date

