IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

THE BOARD OF DIRECTORS OF SAPPHIRE BAY CONDOMINIUMS WEST

Plaintiff,

-v-

GEORGE R. SIMPSON, et al.

Defendant.

Civil Number: 2004-62

GEORGE R. SIMPSON

Plaintiff,

-v-

ANDREW CAPDEVILLE and
ALAN R. FEUERSTEIN

Defendant.

Case Number: 2007-51

ALAN R. FEUERSTEIN

Plaintiffs,

-v-

GEORGE R. SIMPSON

Defendant.

CIVIL NUMBER: 2004-134

GEORGE R. SIMPSON

Plaintiff,

-v-

GEORGE WOOD

Defendant.

Civil Number: 2007-102

OPPOSITION TO THE APRIL 18, 2008 "RENEWED MOTION TO DEEM CONCEDED -- MOTION TO HAVE THE COURT HOLD PARTIES AND ATTORNEY IN CONTEMPT OF COURT AND DISMISS ALL CHARGES AGAINST LITIGANT SIMPSON IN Civ. 04-62 AND RULE IN FAVOR OF LITIGANT SIMPSON IN Civ. 07-47 AND Civ. 07-51 FOR WILLFUL VIOLATION OF COURT ORDER"

To Honorable Ronald Buckwalter
Senior United States District Court Judge for the
Eastern District of Pennsylvania

Respectfully submitted,
FEUERSTEIN & SMITH, LLP
Alan R. Feuerstein, Esq.
Attorneys for Defendant
Office and P. O. Address
17 St. Louis Place
Buffalo, New York 14202-1502
(716) 856-9704 Telephone
(716) 856-9707 Facsimile
FSLLP@aol.com
and
Post Office Box 502008
St. Thomas, USVI 00805-2008

TO: George R. Simpson, pro se
Post Office Box 775
Hampton Bay, New York 11946

DATED: April 28, 2008

COMES NOW, Feuerstein & Smith, LLP, on behalf of the Board of Directors of Sapphire Bay Condominiums West, George Wood, Alan R. Feuerstein and Andrew Capdeville, does hereby submit this Opposition to Mr. Simpson's April 18, 2008 "Renewed Motion to Deem Conceded -- Motion to Have the Court Hold Parties and Attorney in Contempt of Court and Dismiss all Charges Against Litigant Simpson in civil number 04-62 and Rule in Favor of Litigant Simpson in civil number 07-47 and 07-51, for a Willful Violation of Court Order", and in opposition sets forth the following:

1. On October 29, 2007 Mr. Simpson brought a Motion before the Court moving that the Court hold the parties and attorney in Contempt of Court and dismiss all charges against Simpson, and rule in his favor on his affirmative clause.
2. Mr. Simpson's allegation is based on the appearance of Alan R. Feuerstein who attended the settlement conference before this Court on October 23, 2007 in Philadelphia, Pennsylvania on behalf of Sapphire Bay, Andrew Capdeville and Alan Feuerstein, Alan Feuerstein, and George Wood.
3. Mr. Simpson has alleged that the individual <u>parties</u> should have been present. Mr. Simpson does not understand that a lawyer who is hired by the parties can appear on behalf of the parties. The parties are not required to be personally present.
4. His first such Motion of October 29, 2007 moves to hold the parties and the attorney in contempt, dismiss all charges against Simpson, and rule in favor of Simpson in the various litigation that is before this Court.
5. Feuerstein & Smith, LLP on behalf of their clients filed their Opposition to Mr. Simpson's Motion on November 20, 2007. (Exhibit 1) The filing of the Opposition is memorialized by the Notice of Electronic Filing attached hereto (Exhibit 2).
6. Even before filing their Opposition, Mr. Simpson's October 29, 2007 Motion was responded to in correspondence dated November 2, 2007 (in the form of an F.R.Civ.P.

Rule 11 letter) which describes the "very basic issue" raised by Mr. Simpson, and demands that he withdraw his Motion. (Exhibit 3)

7. Instead of withdrawing his baseless and absurd Motion, Mr. Simpson compounded his conduct by making a new Motion which ignores the filing and service of the Opposition (Exhibit 1, Exhibit 2) and ignores the Rule 11 warnings sent to him (Exhibit 3). Instead of withdrawing his Motion, instead of acknowledging that he has received a Rule 11 warning letter, Mr. Simpson made a new "Renewed Motion to Deem Conceded his Motion to Have the Court Hold Parties and Attorney in Contempt of Court and Dismiss All Charges Against Him and Rule in Favor of Him for Alleged Willful Violation of Court Order".
8. As required, Feuerstein & Smith, LLP, on behalf of their clients filed their Opposition to Mr. Simpson's renewed Motion on December 28, 2007 (Exhibit 4).
9. Feuerstein & Smith, LLP, having already advised Mr. Simpson of their Oppositions to all of his Motions, having filed the Oppositions properly, now in Opposition to his most recent Motion for the third time again, simply repeats, reiterates, realleges and incorporates by reference all of the averments and allegations as set forth in the Exhibits attached hereto.

WHEREFORE, Feuerstein & Smith, LLP respectfully opposes Mr. Simpson's most recent Motion of April 18, 2008 and, again moves that sanctions be imposed against Mr. Simpson as a result of his most incredible and unusual sanctionable conduct.

DATED: April 28, 2008

Respectfully Submitted,
FEUERSTEIN & SMITH, LLP

BY: s/Alan R. Feuerstein

Alan R. Feuerstein, Esq.
17 St. Louis place
Buffalo, New York 14202-1502

(716) 856-9704 Telephone
(716) 856-9707 Facsimile
and
P.O. Box 502008
St. Thomas, USVI 00805-2008
(340) 777-6325 Telephone and Facsimile

CERTIFICATE OF SERVICE

I, Alan R. Feuerstein, hereby certify that on the 28th day of April, 2008 served the within Opposition to Renewed Motion to Deem Conceded -- Motion to Have the Court Hold Parties and Attorney in Contempt of Court and Dismiss all Charges Against Litigant Simpson in civil number 04-62 and Rule in Favor of Litigant Simpson in civil number 07-47 and 07-51, for a Willful Violation of Court Order via U. S. First Class Mail directed to the following:

George R. Simpson
P.O. Box 775
Hampton Bays, New York 11946

Honorable Ronald Buckwalter, S.J.
United States District Court
Eastern District of Pennsylvania
Room 14614 U.S. Courthouse
601 Market Street
Philadelphia, Pennsylvania 19106-1797

s/Alan R. Feuerstein
Alan R. Feuerstein