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

ALAN R. FEUERSTEIN	)	Civil Action Number: 2004-134
Plaintiff	)	
-v-	)	
GEORGE R. SIMPSON	)	
Defendant	)	

PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION FOR SANCTIONS AGAINST ROBERT L. KING, ESQ.

COMES NOW, Plaintiff, by and through Alan R. Feuerstein of the law firm of Feuerstein and Smith, LLP, in opposition to the Motion of the Defendant, *pro se,* which moves for sanctions against attorney Robert. L. King "due to Plaintiff's opposition to Defendant's Motion to dismiss Plaintiff's Complaint," and sets forth the following:

Defendant made a Motion to Dismiss Plaintiff's Complaint against him, and Plaintiff personally has filed his opposition to the Motion to Dismiss. Plaintiff, Alan R. Feuerstein, has hired attorney, Robert L. King, and his law firm as trial counsel. All activity, filings and pleadings with respect the instant case have been made by Alan R. Feuerstein and the law firm of Feuerstein & Smith, LLP as the attorneys of record for Plaintiff.

The Defendant apparently sent out by mail a Motion for Rule 11 Sanctions against Robert L. King. The Defendant George R. Simpson never sent the "Rule 11 letter" to Alan R. Feuerstein, attorney for Plaintiff, and the attorney in all of the consolidated cases.

This procedural defect in the Defendant's present Motion is apparent, and Plaintiff respectfully submits that the failure to serve the instant motion upon Feuerstein & Smith, LLP was Defendant's attempt to "ambush" Plaintiff's trial counsel, Robert L. King.

Notwithstanding this procedural defect in the Defendant's Motion for Sanctions, Plaintiff respectfully submits that there is nothing in the opposition to the Defendant's Motion to Dismiss filed with this Court that was or is, in any way, sanctionable.

Plaintiff's opposition, signed by Alan R. Feuerstein, was not late and was not "out of time" and was filed with the Court in accordance with the Local Rules of Civil Procedure in the United States Virgin Islands and the provisions of the Federal Rules of Civil Procedure. Because Plaintiff's opposition to Defendant's Motion to Dismiss advises the Court that a statement of trial readiness was filed in this case years ago, and Attorney Feuerstein advised, during proceedings before this Court, that the case was trial ready, (both of which statements are absolutely true,) there is nothing that is before this Court that is, in any way, remotely related to sanctionable conduct and/or in violation of Federal Rule of Civil Procedure 11.

Robert L. King has not filed any submissions to this Court and the Defendant's Motion for Sanctions against him has no basis in law or in fact. As such, Defendant's Motion should be disregarded as the continued rantings of a *pro se* Plaintiff who does not understand the law, and who will file frivolous motions to strike, dismiss, and/or for sanctions anytime that anybody disagrees with Mr. Simpson's bizarre points of view.

WHEREFORE, Defendants' Motion for Sanctions should be denied.

DATED: June 9, 2009

Respectfully submitted,

BY: /s/_____

Alan R. Feuerstein, Esq.
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CERTIFICATE OF SERVICE

I, Alan R. Feuerstein, hereby certify that on the 9th day of June, 2009 served the within Plaintiff's Opposition to Defendant's Motion for Sanctions against Robert L. King by first class mail directed to the following:

Mr. George R. Simpson
P.O Box 775
Hampton Bays NY, 11946

BY: /s/_____

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