BEFORE THE INQUIRY BOARD
OF THE
ILLINOIS ATTORNEY REGISTRATION
AND
DISCIPLINARY COMMISSION

John Patrick Messina	)	
	)	
in relation to	)	No. 96 CI 2889
	)	
John Labatt Limited, et al.	)	
	)	

RESPONDENT'S FIRST MOTION TO DISMISS

I present this first of two motions regarding the Board's inquiry into the contempt and Rule 11 findings issued by the Honorable James B. Zagel on June 9, 1995 ("the Contempt Order"), in *Grove Fresh Distributors, Inc. v. John Labatt, Ltd., et al.*, no. 90 C 5009 ("the *Labatt* case"), and reported at 888 F. Supp. 1127 (N.D. Ill. 1995). Each motion presents separate and independent grounds for dismissing all charges arising out of the Contempt Order.

This First Motion prays for an order as follows:

a. pursuant to ARDC Rule 102, directing the Administrator to investigate

i. what evidence, if any, was in the record of *Grove Fresh Distributors, Inc. v. Everfresh Juice Co. et. al.*, no. 89 C 1113 (N.D. Ill.) ["the *Everfresh* case"] as of August 31, 1990, to support the finding in the Contempt Order that I was attempting to litigate Grove Fresh's claims "on the courthouse steps;"

ii. what evidence, if any, was in the record of the *Everfresh* case or the *Labatt* case to support the finding in the Contempt Order that, between August 31, 1990 and April 16,1993, I was attempting to litigate Grove Fresh's claims "on the courthouse steps."

iii. the truth or falsity of the statement in the October 1993 rule to show cause drafted by defense counsel and signed by Judge Zagel asserting that "the parties appeared before the court on ... September 1, 1993" and on that date, "the Court ordered that John P. Messina be present in court at the next hearing;"

b. after the Administrator has completed the investigations described in the previous subparagraph, for a finding that the August 1990 order sealing *Labatt* ("August 1990 Seal Order) and the October 1993 rule to show cause were so lacking in due process that the findings of fact and conclusions of law regarding them should be accorded no weight in this inquiry;

c. dismissing all charges arising out of the August 1990 Seal Order and the October 1993 rule to show cause on the ground that, both procedurally and substantively, they depart so far from Illinois' standards and policies regarding public proceedings and the discipline of attorneys that Illinois should not collaterally enforce them; and

d. pursuant to Supreme Court Rule 766 (b)(2), disclosing in the interests of justice the entire file in this inquiry.

In support of this motion I state as follows:

A. Introduction.

1. This Board's inquiry into the Contempt Order should include an evaluation of the quality, extensiveness, and fairness of the proceedings underlying the findings therein. While those proceedings are entitled to a presumption of regularity, that presumption is rebuttable. *See Montana v. United States*, 440 U.S. 147, 164n.11 (1979) (holding that "redetermination of issues is warranted if there is reason to doubt the quality, extensiveness, or fairness of procedures followed in prior litigation"; RESTATEMENT (SECOND) OF JUDGMENTS § 28(c) (relitigation permitted when there are "differences in the quality or extensiveness of the procedures followed in the two courts."). *See also In re Owens*, 125 Ill.2d 390, 532 N.E. 2d 248, 252 (1988) (cautioning against any "abridgement of the disciplinary process.")

2. The Administrator can confirm the statements that are the basis for the relief sought herein from the following sources:

a. She can subpoena the lawyers for Everfresh Juice Co. ("Everfresh") and John Labatt Ltd. ("Labatt"), and the lawyers for American Citrus Products Corp. and its president, Henry Lang, and ask them to produce stamped copies of any filings they made between August 1989 and April 1993 in any of the Grove Fresh cases wherein they offered any evidence (as distinguished from unverified, non-specific claims by defense counsel) that I was making extrajudicial statements that jeopardized their clients' rights to a fair trial.

b. She can subpoena defense counsel's time records for September 1, 1993, the date of the fictitious hearing date recited in the rule to show cause why I shouldn't be held in contempt for failing to appear in Court on October 21, 1993.

B. Factual background regarding the August 1990 Seal Order.

3. These are the relevant events leading to the entry of the August 1990 seal order:

a. In February 1989 an out-of-state lawyer filed five lawsuits for Grove Fresh, including one against Everfresh. In August 1989 I was hired as local counsel. In October 1989 defense counsel offered $35,000 to settle Grove Fresh's claims against Everfresh and one of its co-packers, Flavor Fresh Foods Corp. In November 1989 Grove Fresh fired the out-of-state lawyer for a conflict

of interest that barred him from suing Everfresh for acts occurring prior to August 1988.

b. I took over the litigation. In December 1989 Everfresh's lawyers asked for a counterproposal to their $35,000 settlement offer. Grove Fresh declined to make one until after I completed investigating claims that the first lawyer had not pursued because of his conflict of interest. I completed that investigation in August 1990 and began drafting the complaint for what would become the *Labatt* case.

c. On August 15, 1990, I sent Everfresh a negotiable settlement demand for $2,000,000 in lost profits and for an unspecified amount of attorneys' fees. (The case was settled three years later for $2,000,000.) On August 23, 1990, having received no response to my August 15th letter, I notified Everfresh that Grove Fresh was preparing to file a new lawsuit alleging a RICO conspiracy to adulterate orange juice from 1975 onward, and that Everfresh would be one of at least ten defendants in the case.

d. On August 24, 1990, Everfresh served me with an emergency motion to require that Grove Fresh file the *Labatt* complaint under seal. Everfresh contended that the proposed new lawsuit was an improper attempt to amend the February 1989 suit against it. The motion did *not* allege that I was attempting to litigate Grove Fresh's claims "on the courthouse steps," which is the explanation for the seal order that Judge Zagel gave five years later. I appeared in court on less than two hours' notice and offered to file under seal "so long as we can have a status on Tuesday [August 28, 1990] and then discuss how we would dispose of the seal." The court agreed, stating that it would determine at the status "whether it should be under seal in the first place." (8/24/90 Tr. of Proceedings)

e. I filed the *Labatt* complaint on August 28, 1990. The court did not hold any hearing on the seal after I filed the *Labatt* complaint. On August 31, 1990, I presented a motion to vacate the seal. The court denied that motion without stating any legal or factual reasons for the seal.

4. *Labatt* was settled in April 1993 without the court ever having held a hearing on its reasons for the seal. The first intimation that alleged attorney misconduct was the reason for the seal came on October 27, 1994, in the proceedings on remand of an appeal by the Ad Hoc Coalition of In Depth Journalists, which had intervened to challenged the validity of the seal. The court explained for the first time that the "principal factor" for the seal

> was the fact that I had litigation before me in which I had a lawyer for the plaintiff, Mr. Messina, who . . . was willing to use not the force of the law, but the force of public relations to beat the defendants into some form of submission.... I gained an impression of Mr. Messina very early on that he was not likely to follow the well-trod paths of custom. Indeed, I thought Mr. Messina might in fact be reluctant to obey court orders. One of the reasons that the sealing order was so broad was my concern that Mr. Messina would ignore any order that was not broad.

(10/27/94 Tr.)

5. Neither my attorney nor I was present when the court made these remarks. After I learned about the remarks, I promptly moved for leave to file a memorandum responding to them. Among other things, the memorandum showed that the court's recollection of events leading up to the seal was mistaken, and that the court had no basis for opining that I was "reluctant to obey court orders." On December 2, 1994 the court denied me leave to file the memorandum with the following one-sentence explanation: "Leaving aside immaterial matters (a reply to judicial remarks) nothing is said in the supplemental response that could not have been said earlier ..." This conclusion was wrong. Because the remarks of October 27, 1994, were the first statement of the purported reasons for issuing the seal order, there was no "earlier" opportunity to respond to the informal findings expressed by those remarks.

6. The Contempt Order provides the first written (and, therefore, the first appealable[1]) explanation for the seal order—five years after the Seal Order was issued. The Contempt Order states that *Labatt* was sealed because

> Mr. Messina's past behavior [showed] he would go to any lengths to try his case on the courthouse steps rather than in the courtroom itself. That Mr. Messina sincerely, even fervently, believed in the unremitting badness of the defendants in this case is beyond doubt, as was his willingness to hurt them by disseminating information for purposes of damaging them outside the walls of the courtroom.

888 F. Supp. at 1430. The Order makes these sweeping assertions without a single reference to any facts to back up or explain the assertions.

C. The August 1990 Seal Order should not be given any weight in this inquiry because it is factually groundless, and because it was issued without due process.

7. According to the Contempt Order, the Seal Order was a form of lawyer discipline—it was issued because I allegedly was attempting to litigate Grove Fresh's claims "on the courthouse steps." Both the Northern District of Illinois[2] and the Illinois

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[1] As noted in paragraph 5 of this Motion, the first explanation of the seal order was given orally in October 1994. Because the explanation was not reduced to writing or entered on the docket, Fed. R. App. P. 4(a)(2) barred me from appealing it. Rule 4(a)(2) provides that a party cannot appeal from a district court ruling that has been announced but not docketed; a notice of appeal filed before the ruling has been docketed is ineffective until the date the ruling is actually docketed.

[2] General Rule 40 of the Northern District of Illinois provides as follows:

A lawyer or law firm associated with a civil action shall not during its investigation or litigation make or participate in making an extrajudicial statement, other than a quotation from or reference to public records, which a reasonable person would expect to be disseminated by means of public communication where such dissemination will pose a serious and imminent threat of interference with the fair administration of justice and the statement relates to the following:

(a) Evidence regarding the occurrence of transaction involved;

(b) The character, credibility, or criminal record of a party;

(c) The performance or results of any examination or tests or the refusal or failure of a party to submit to such, and

Supreme Court[3] prohibit lawyers from making extrajudicial statements that (a) are likely to be disseminated by the public media and (b) would threaten the fair administration of justice.

8. The August 1990 Seal Order is factually groundless. To this day, neither the defendants nor Judge Zagel has ever identified a single extrajudicial statement made by Grove Fresh or me that was actually or likely to be disseminated by the public media. Judge Zagel's statement that I was attempting to litigate Grove Fresh's claims on the courthouse steps is pure fiction.

9. The August 1990 Seal Order, in addition to being based on pure fiction, violated due process in three respects. *First*, because the Order was imposed as a form of discipline for alleged misconduct in the trial court, I was entitled to notice of the alleged misconduct and to an independent factual inquiry before the discipline was imposed. *Matter of Cook*, 49 F.3d 263, 266 (7th Cir. 1995). No such notice or hearing was afforded me.

10. *Second*, after I finally received notice of the Order's disciplinary purpose, I was still denied a hearing, and I was even barred from submitting a written response to the charges. *See* ¶¶4-5, above. *Third*, because I was never afforded a hearing on the alleged misconduct, I was never afforded the opportunity to cross-examine the witnesses against me.

11. Timely notice and timely opportunity for a hearing are indispensable ingredients of due process. *Mullane v. Central Hanover Bank and Trust Co.*, 339 U.S. 306, 314 (1950). So is the right to cross-examine one's accusers. Because the proceedings underlying the August 1990 Seal Order lacked all three ingredients, that Order should be accorded no weight in this inquiry.

D. The August 1990 Seal Order was retaliation for a protected attempt to petition a government agency on behalf of my client.

12. Judge Zagel justified the August 1990 Seal Order with sweeping comments about my character and fitness to practice law. He declared that I have a "tragic 'flaw'" in my personality because I am an attorney "who could not keep a confidence," and that I attempted "to beat the defendants into submission by ... generat[ing] unfavorable publicity for them." 888 F. Supp. at 1438. In effect, Judge Zagel found that the defendants needed the Seal Order in order to be protected from my alleged character flaws.

13. In the Contempt Order Judge Zagel cites but a single event to justify the beliefs he formed about my character before he issued the Seal Order. This single event is referred to in a footnote as the "Minute Order of 7/18/90 Granting Motion to Enforce Protective Order in 89 C 1113." The footnote omits to describe any of the underlying

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(d) His/Her opinion as to the merits of the claims or defenses of a party, except as required by law or administrative rule.

[3] Illinois Rule of Professional Conduct 3.6(a) provides that "[a] lawyer shall not make an extrajudicial statement the lawyer knows or reasonably should know is likely to be disseminated by public media and, if so disseminated, would pose a serious and imminent threat to the fairness of an adjudicative proceeding."

facts. Those facts demonstrate that the Seal Order was not issued because of any concern about extrajudicial statements within the meaning of General Rule 40 or Illinois R.P.C. 3.6(a). Rather, the Seal Order was imposed in retaliation for a perfectly proper attempt to petition the Food and Drug Administration ("FDA") on my client's behalf.

14. The controversy underlying the Minute Order of 7/18/90 concerned so-called batch sheets showing the formulas used to make more than 3,000,000 gallons of adulterated orange juice in 1987. The documents were evidence of repeated, intentional, and criminal violations of the food and drug laws. Grove Fresh, hoping to trigger an investigation of its competitors, wanted me to send the documents to the FDA.

15. Under *Eastern Railroad Presidents Conference v. Noerr Motor Freight, Inc.*, 365 U.S. 127, 138-39 (1961), Grove Fresh had a constitutional right to solicit enforcement of the food and drug laws in the hope that enforcement would bring about an advantage to it and a disadvantage to its competitors. In *Noerr Motor Freight* an association of railroads engaged in a publicity campaign in order to influence the government to take action adverse to the interests of a group of trucking companies. The trial court held that the campaign constituted an antitrust conspiracy that violated the Sherman Act. The Supreme Court reversed, holding that the railroads' actions did not violate the antitrust laws because an attempt to persuade the government to take a particular action is protected by the First Amendment:

> In a representative democracy such as this, [the legislative and executive] branches of government act on behalf of the people and, to a very large extent, the whole concept of representation depends upon the ability of people to make their wishes known to their representatives.

365 U.S. at 137. That the railroads intended to destroy the truckers as competitors for long-distance freight business, the Supreme Court held, did not transform conduct otherwise lawful into a violation of the Sherman Act:

> It is neither unusual nor illegal for people to seek action on laws in the hope that they may bring about an advantage to themselves and a disadvantage to their competitors.... Indeed, it is quite probably people with just such a hope of personal advantage who provide much of the information upon which governments must act. A construction of the Sherman Act that would disqualify people from taking a public position on matters in which they are financially interested would thus deprive the government of a valuable source of information and, at the same time, deprive the people of their right to petition in the very instances in which that right may be of the most importance to them. We reject such a construction of the Act and hold that, at least insofar as the railroads' campaign was directed toward obtaining governmental action, its legality was not at all affected by any anticompetitive purpose it may have had."

365 U.S. at 139-40.

16. Because Everfresh had designated the batch sheets as confidential pursuant to an umbrella protective order, I could not send them to the FDA unless I challenged and defeated Everfresh's claim of confidentiality. I made such a challenge in

accordance with the protective order's procedures. Judge Zagel denied the challenge. I obeyed the order.

17. The Minute Order of 7/18/90 was nothing more than a conclusary ruling denying my challenge to Everfresh's claim of confidentiality; it was not an adjudication of any misconduct because challenging an adversary's claim of confidentiality is a perfectly legitimate action. The fact that my client wanted me to send the allegedly confidential documents to the FDA does not support an inference that I intended to make extrajudicial statements of the kind proscribed by General Rule 40 and R.P.C. 3.6.

18. My attempt to communicate truthful information to the FDA in order to obtain government action for my client's benefit was protected by the First Amendment. It should never have been punished with the order sealing *Labatt*. There was no threat, explicit or implicit, to do anything other than to communicate privately with the FDA.

E. The contempt citation for not appearing in court was factually and legally unjustified. Therefore, it is entitled to no weight in this inquiry.

19. In mid-August 1993 defense counsel served a notice that they would present a motion pursuant to Fed. R. Civ. P. 60(b) on August 24, 1993. I had a conflict in my schedule and did not attend. Judge Zagel set the matter over to September 1, 1993, and orally ordered that either I or my attorney was to appear on September 1. He did not reduce this order to writing, which made it unenforceable. *Bates v. Johnson*, 901 F.2d 1424 (7th Cir. 1990). In any event, the September 1st hearing never took place; it was continued by agreement without a new date.

20. In mid-October 1993, defense counsel re-noticed their Rule 60(b) motion for October 21, 1993. My attorney was unavailable to attend because he was in the middle of a jury trial before another federal judge. I so notified defense counsel.

21. At the October 21st hearing Judge Zagel met with defense counsel in chambers, without a court reporter. When he returned to the bench he did not put on the record what had been said off-the-record in chambers. At his direction defense counsel drafted, and he signed, a rule to show cause why I should not be held in contempt for having failed to appear in court that day. The rule *falsely recited* that "the parties appeared before the court on ... September 1, 1993" and on that date, "the Court ordered that John P. Messina be present in court at the next hearing." The record shows that no such written order ever issued. Moreover, not even an (unenforceable) oral order could have issued on or after September 1, 1993, because the parties were not in court on September 1 or on any of the intervening days leading to the hearing of October 21, 1993.

22. Because there was never any written or oral order requiring my appearance on October 21, 1993, the contempt citation for my not appearing in court that day was unjustified as a matter of law and fact.

F. The citations for allegedly breaching the August 1990 Seal Order were factually and legally unjustified. Therefore, those citations are entitled to no weight in this inquiry.

23. Properly viewed, the Contempt Order contains three distinct sets of findings regarding the seal order. Findings regarding my conduct leading up to the entry of the seal order on August 28, 1990; findings regarding my conduct between the date of the seal and the date of settlement in April 1993; and findings regarding my post-settlement actions responding to defendants' charges of professional misconduct. As demonstrated above in paragraphs 7-11, the first set of findings regarding the period from August 1989 to August 28, 1990, are groundless. As demonstrated below, the other two sets of findings are also groundless.

1. The findings regarding my conduct from August 28, 1990 to April 16, 1993, should be rejected.

24. The Contempt order refers to three disputes that occurred prior to the April 1993 settlement and which allegedly involved violations of the seal order and related protective orders. 888 F. Supp. at 1438n.11. However, Judge Zagel never conducted any independent factual inquiry into whether any of the disputes warranted discipline; such an inquiry was required by *Matter of Cook*, 49 F.3d 263, 266 (7th Cir. 1995). Because none of the three disputes resulted in an adjudication of wrongdoing, and because Judge Zagel never conducted an independent factual inquiry into those disputes, the findings based on these disputes should be rejected.

25. The three disputes are as follows:

a. On October 3, 1990, Everfresh presented *ex parte* to Judge Anne Williams—not to Judge Zagel—its Emergency Motion to Require Grove Fresh to File Its Motion and Reply Under Seal. This motion was slid under my office door after 6:30 p.m. on October 2, 1990, after I had left for the evening. I did not learn about the motion until shortly before 10 o'clock the next morning. By the time I got to court, Judge Williams had already granted the motion.

This emergency motion concerned a letter I had sent to defense counsel on October 1, 1990, responding to a motion by them that the *Labatt* complaint violated Rule 11. The emergency motion speculated at page 3 that "Everfresh has no doubt that Mr. Messina intends to include a copy of his October 1, 1990 letter as an attachment to his motion to compel [discovery], which he threatens to file." The fact is, I had no intention of attaching my letter to a motion to compel discovery or to any other motion, and I had no intention of giving the press my October 1st letter responding to Everfresh's Rule 11 charges. Nor did I ever tell anyone that I intended to do either of these things. Everfresh's allegations on this subject were pure fabrication.

Because the order of October 3, 1990, was issued *ex parte* and without any evidentiary support, it should be given no weight in this inquiry.

b. On May 3, 1991, at a hearing at which several other motions were being presented, Everfresh presented its "Motion (A) to Enforce This Court's Previous Orders; (B) To Strike and Seal Grove Fresh's Latest Pleadings; and (c) For Sanctions." The court entered and continued this motion without ever ruling on it. Accordingly, the unsubstantiated allegations in this motion should be given no weight in this inquiry.

c. On January 15, 1993, Grove Fresh filed a memorandum in the Seventh Circuit in support of a challenge to the seal by the Ad Hoc Coalition of In Depth Journalists. I drafted the memorandum, which was authorized by Grove Fresh, and which was reviewed and approved by my co-counsel at Rivkin Radler & Kremer before I filed it. The defendants filed a motion to strike the memorandum and threatened to terminate settlement discussions unless the memorandum was withdrawn. Grove Fresh withdrew the memorandum. The Seventh Circuit never ruled on the motion to strike.

Because this dispute did not result in any adjudication of any kind by the district court or the court of appeals, it should be accorded no weight in this inquiry.

2. The findings regarding my post-settlement conduct should be accorded no weight.

26. The Contempt Order criticizes me for three post-settlement acts that allegedly violated the seal order: alleged disclosures I made in papers I filed in the Seventh Circuit in October 1993; alleged disclosures I made in a letter to the Coalition's attorney; and a proposed press release I prepared in January 1995.

27. These alleged violations were discussed at length in my appellate briefs, and at pp. 14-24 of my response dated November 14, 1995, in 95 CI 2945. For all of the reasons stated those filings, the findings regarding my post-settlement conduct should be given no weight.

E. The Seventh Circuit's affirmance of the August 1990 Seal Order should be accorded no weight because the secret procedure it approved departs too far from Illinois' procedural standards for disciplining attorneys.

28. Illinois affords basic due process to attorneys charged with misconduct. *See* Sup. Ct. Rule 753(b) (disciplinary "complaint shall reasonably inform the attorney of the acts of misconduct he is alleged to have committed."); Sup. Ct. Rule 753(c)(4) (disciplinary hearing shall be in accordance with the Code of Civil Procedure"); Sup. Ct. Rule 753(c)(6) ("the standard of proof in all hearings shall be clear and convincing evidence"); *In re Owens*, 125 Ill.2d 390, 532 N.E. 2d 248, 252 (1988) (rejecting as undesirable any "abridgement of the disciplinary process").

29. Illinois does not recognize disciplinary orders from foreign jurisdictions where the procedure resulting in the order "was so lacking in notice or opportunity to be heard as to constitute a deprivation of due process of law." Sup. Ct. Rule 763.

30. Based on what is said in the Contempt Order, Judge Zagel, when he issued the August 1990 Seal Order, arrogated to himself the functions of prosecutor, jury, and judge. He acted as prosecutor by identifying a ground for the Seal Order that was not alleged in the defendants' emergency motion for a seal, namely, that I was attempting to litigate Grove Fresh's claims "on the courthouse steps." He acted as jury by finding me guilty of this undeclared allegation. Finally, he acted as judge by imposing improper restraints in the form of the broad, indefinite, undefined, and unexplained Seal Order that he used to curb my advocacy, and later as a basis for punishing me without a full and fair hearing.

31. Compounding the unfairness was the unprecedented secrecy of this adjudication: For more than four years after he issued the Seal Order, Judge Zagel did not disclose that he had already adjudicated me guilty of violating R.P.C. 3.6(a) and Northern District of Illinois General Rule 40. Because my guilt was adjudicated secretly, I never had any opportunity to cross-examine the witnesses against me. Indeed, to this day I do not know who those witnesses are, other than Judge Zagel.

32. Despite all of these flaws in Judge Zagel's procedures, the Seventh Circuit summarily affirmed him on the ground that "we are certainly in no position to question Judge Zagel's first hand impressions of Mr. Messina's conduct."

33. Fifty years ago the United States Supreme Court condemned as unconstitutional a state procedure that allowed a judge to combine the functions of prosecutor, jury, and judge. *In re Oliver*, 333 U.S. 257 (1948). The secret procedure Judge Zagel employed to find me guilty of litigating "on the courthouse steps" was as defective in due process as the secret procedure condemned in *In re Oliver*. Because Judge Zagel's secret procedure departed too far from Illinois' procedural standards for disciplining attorneys, this Board should accord no weight to the August 1990 Order or to any of the findings regarding alleged violations of that Order.

WHEREFORE, respondent prays for an order as follows:

A. Directing the Administrator to investigate

i. what evidence, if any, was in the record of the *Everfresh* case as of August 31, 1990, to support the finding in the Contempt Order that I was attempting to litigate Grove Fresh's claims "on the courthouse steps;"

ii. what evidence, if any, was in the record of the *Everfresh* case or the *Labatt* case to support the finding in the Contempt Order that, between August 31, 1990 and April 16,1993, I was attempting to litigate Grove Fresh's claims "on the courthouse steps."

iii. the truth or falsity of the statement in the October 1993 rule to show cause drafted by defense counsel and signed by Judge Zagel asserting that "the parties appeared before the court on ... September 1, 1993" and on that date, "the Court ordered that John P. Messina be present in court at the next hearing;"

B. Dismissing all charges arising out of the August 1990 Seal Order and the October 1993 rule to show cause on the ground that, both procedurally and substantively, they depart so far from Illinois' standards and policies regarding public proceedings and the discipline of attorneys that Illinois should not collaterally enforce them.

Dated this 13th day of November, 1998

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