

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND FOR
PALM BEACH COUNTY, FLORIDA

CASE NO: 502005 CA 004986 XXXX MB AG

BOYD LENKERSDORF and
MARY LENKERSDORF, his wife,

Plaintiffs,

-vs-

MICHAEL SORRENTINO,
WILLIE CLARKE and LEILA CLARKE,

Defendants.

PLAINTIFFS' MOTION TO COMPEL DEFENSE COUNSEL TO WEAR
APPROPRIATE SHOES AT TRIAL

Plaintiff moves the Court for relief as follows:

1. This is an action alleging personal injuries to Plaintiff, BOYD LENKERSDORF as a result of a car collision which occurred on December 18, 2002.
2. Trial is set to begin on June 15, 2009.
3. It is well known in the legal community that Michael Robb, Esquire wears shoes with holes in the soles when he is in trial.
4. Upon reasonable belief, Plaintiff believes that Mr. Robb wears these shoes as a ruse to impress the jury and make them believe that Mr. Robb is humble and simple without sophistication.
5. Throughout the discovery of this case, Mr. Robb's clear strategy has been to attack the credibility of the Plaintiff and his counsel by suggesting that Plaintiff is faking his injuries and exaggerating his claims and demanding more compensation than he deserves because Plaintiff is greedy.

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6. Part of this strategy is to present Mr. Robb and his client as modest individuals who are so frugal that Mr. Robb has to wear shoes with holes in the soles. Mr. Robb is known to stand at sidebar with one foot crossed casually beside the other so that the holes in his shoes are readily apparent to the jury who are intently watching all counsel and the Court at that moment.

7. Then, during argument and throughout the case Mr. Robb throws out statements like "I'm just a simple lawyer" with the obvious suggestion that Plaintiff's counsel and the Plaintiff are not as sincere and down to earth as Mr. Robb.

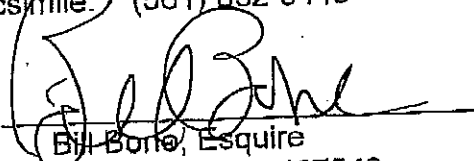
8. Mr. Robb should be required to wear shoes without holes in the soles at trial to avoid the unfair prejudice suggested by this conduct.

WHEREFORE, Plaintiff prays this honorable court granted the relief herein requested.

I HEREBY CERTIFY that a true copy of the foregoing has been furnished via U.S. Mail to Vivian M. Knapp, Esquire, Law Offices of Vivian Knapp, 1450 Centrepark Blvd., Suite 250, West Palm Beach, Florida 33401, and Michael A. Robb, Esq., Clark, Robb, Mason, Coulombe & Buschman, Building 3 – Suite 207, 7501 Wiles Road, Coral Springs, FL 33067 on this 12th day of June, 2009.

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By:


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