

**270 Judicial District Court
Judge: Brent Gamble
Prosecutor: Timothy Clyne
Hearing on Motions – 09/13/02**

Today, September 13, 2002 Cliff argued the merits of his Motion for Summary Judgment, and destroyed the “so called” evidence filed by Timothy Clyne (for the Unauthorized Practice of Law Committee) before the court.

Summary Judgment: Black’s Law Dictionary, 7th Edition, page 1449. “A judgment granted on a claim about which there is no genuine issue of material fact and upon which the movant is entitled to prevail as a matter of law.”

At the beginning of the hearing, Cliff requested a court reporter, which the judge denied. **This is a violation of Cliff’s right to due process.** It would appear that the judge was trying to keep Cliff’s arguments out of the record. This did not happen, however, because Cliff had already included the points he brought out in court today in his brief, which was filed and stamped by the court yesterday, September 12th. Also, there were many witnesses to the proceeding today, who could file sworn affidavits as to what actually took place in court.

Evidence Cliff presented to the court against Timothy Clyne.

1. Cliff presented evidence to the court, that on February 1st, Timothy Clyne filed for Temporary Injunction against Cliff, which was styled “Unauthorized Practice of Law Committee **for** the Supreme Court of Texas vs. Clifford F. William, in the 270th Judicial District Court, Houston, Harris County, Texas”.
2. Cliff also presented evidence to the court, that on Timothy Clyne’s Motion for Sanctions, he changed the style of the case to read “Unauthorized Practice of Law Committee **of** the Supreme Court of Texas vs. Clifford F. William, in the 270th Judicial District Court, Houston, Harris County, Texas”. The word “for” would lead one to believe he was doing something in the interest of someone else. The word “of” would lead one to believe he “belongs to, or is a part of the Supreme Court. This is putting fourth a lie before the court.
3. The so called evidence Timothy Clyne used in his attempt to prove that Cliff was holding himself out to the public as having a law office, and therefore holding himself out to be a lawyer, was the phone number of the law office. Cliff destroyed that argument by producing, and getting into the record a letter from Southwestern Bell that the account for that phone number belongs to James D. Farmer. The calls to that phone number were only forwarded to Cliff’s phone. The letter also proved that account was opened several years before James D. Farmer represented William Mills.
4. Cliff also destroyed Timothy Clyne’s so called evidence of the 3 checks, which were made out to Cliff, by calling to the court’s attention, that on the memo line at the bottom of one of the checks, William Mills had written “for: Church fees. On the second check, on the memo line William Mills had written “legal fees”, which could mean anything, such as research, etc,... On the third check, nothing was written on the

memo line. If you will remember, at the hearing on February 15th, James D. Farmer testified, under oath, that the money went to him, and that he was the one who had represented William Mills.

5. Cliff presented evidence to the court, and informed Judge Gamble that the Temporary Injunction, filed by Timothy Clyne, was file stamped February 1st by the Court Clerk. Timothy Clyne then hand walked the Temporary Injunction into Judge Gamble's chambers, where Timothy Clyne and he (Judge Gamble) held an ex parte hearing, **without Cliff's knowledge or presence.**

6. Cliff told Judge Gamble that he (Judge Gamble) and Timothy Clyne adjudicated the case, examined the evidence, found Cliff guilty and signed the Temporary Injunction February 1st. Timothy Clyne then hand walked the order back to the District Clerks office, where he obtained a certified copy on the same day.

7. Cliff also informed Judge Gamble that what he (Judge Gamble) signed on February 1st was not a Temporary Restraining Order that's only good for 10 days, and notice of a hearing **is not** required, but the document he (Judge Gamble) signed was a Temporary Injunction, and notice of a hearing **is** required.

8. Although Judge Gamble and Timothy Clyne claimed Cliff was there with his lawyer, Cliff was not present, nor was he represented by legal counsel. **Cliff was entitled to notice and was never noticed of the hearing and no lawyer ever filed an appearance with the court on Cliff's behalf.**

9. Judge Gamble made the statement to Cliff, "Did we not have a temporary restraining order hearing on February 15th? Cliff then informed the court that what they had was a mock trial, because Cliff's guilt was a foregone conclusion, based on the February 1st adjudication, where Judge Gamble signed the Temporary Injunction. Cliff was found guilty before he ever entered the courtroom.

Judge Gamble denied Cliff's Motion for Summary Judgment, and he also denied Timothy Clyne's Motion for Sanctions. Judge Gamble did not hold Cliff in contempt of court, as Timothy Clyne had tried to get him to do, and he did not have Cliff arrested.

Immediately after the hearing today, Timothy Clyne and Judge Gamble were served citations, that they have been included as defendants in the suit for Rico Action, that was filed in Federal District Court in June of 2002.