

IN THE CIRCUIT COURT OF THE  
20<sup>TH</sup> JUDICIAL CIRCUIT IN AND  
FOR LEE COUNTY, FLORIDA.

CASE NO: 2018 CA001244

ERIN BETH NEITZELT,

Plaintiff,

vs.

CATHERINE ELIZABETH CZYZ,  
THE CZYZ LAW FIRM, P.A., and  
THE CZYZ LAW FIRM, PLLC,

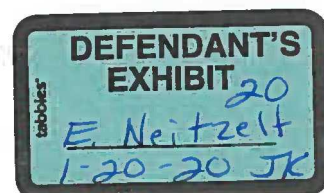
Defendants.

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**REQUEST FOR ADMISSIONS TO ERIN BETH NEITZELT  
(FIRST SET)**

Plaintiff, a Florida corporation, by and through its undersigned Counsel and pursuant to Rule 1.370 of the Florida Rules of Civil Procedure, request the Plaintiff, ERIN BETH NEITZELT, within thirty (30) days after service of this request, make the following admissions, under oath, that each of the following statements is true:

1. Admit that at all times material to the Complaint and/or Amended Complaint, The Czyz Law Firm, P.A. was a Corporation licensed to do business in the State of Florida.
2. Admit that The Czyz Law Firm, P.A. at all times material to the Complaint and/or Amended Complaint maintained an agent(s) in Palm Beach County, Florida.
3. Admit that The Czyz Law Firm, PLLC did not contract with Erin Beth Neitzelt.
4. Admit that the original contract of representation was entered into between The Czyz Law Firm, P.A. and Erin Beth Neitzelt on March 28, 2016.
5. Admit that Catherine Elizabeth Czyz entered into the original contract of representation of Erin Beth Neitzelt as a representative and/or agent of The Czyz Law Firm, P.A..



6. Admit that Erin Beth Neitzelt agreed to pay The Czyz Law Firm, P.A. at a rate of \$500.00 per hour for the initial consultation.
7. Admit that The Czyz Law Firm, P.A. entered into a reduced rate of \$350.00 per hour with Erin Beth Neitzelt after the initial consultation.
8. Admit that the \$350.00 reduced rate was offered to as a courtesy to Erin Beth Neitzelt due to her being a friend of Catherine Elizabeth Czyz.
9. Admit that but for Catherine Elizabeth Czyz knowing Erin Beth Neitzelt from grade school and high school, she would have been charged \$500.00 per hour on March 28, 2016.
10. Admit that Erin Beth Neitzelt resided in Ohio at the time of the initial consultation.
11. Admit that Erin Beth Neitzelt resided in Ohio on March 28, 2016.
12. Admit that Erin Beth Neitzelt moved from Ohio to West Virginia.
13. Admit that Erin Beth Neitzelt became a West Virginia resident.
14. Admit that Erin Beth Neitzelt has never had a Florida driver's license.
15. Admit that Erin Beth Neitzelt did not become a Florida resident.
16. Admit that Erin Beth Neitzelt contacted Catherine Elizabeth Czyz after moving to West Virginia and stated that she had money problems.
17. Admit that Erin Beth Neitzelt contacted Catherine Elizabeth Czyz after moving to West Virginia and stated that she had money problems because she sold her businesses and spent the money from the sales of the businesses.
18. Admit that the representation contract was amended by addendum.
19. Admit that the addendum changed the compensation of The Czyz Law Firm, P.A. to a part hourly fee of \$175 per hour and a part contingency fee.
20. Admit that the contract rate was changed to an hourly fee of \$175.00 per hour and part contingency fee due to Erin Beth Neitzelt's statements of money problems.
21. Admit that Erin Beth Neitzelt contacted Catherine Elizabeth Czyz in or around the time of the filing of the lawsuit and wanted to convert to a contingency fee agreement.
22. Admit that prior to requesting a contingency fee agreement, Catherine Elizabeth Czyz advised Erin Beth Neitzelt that the law firm only represented personal injury cases on straight contingency fee agreements.

23. Admit that prior to Erin Beth Neitzelt requesting a contingency fee agreement, that Erin Beth Neitzelt confirmed more than once that the law firm did not represent clients on strict contingency fee agreements.

24. Admit that prior to Erin Beth Neitzelt requesting a contingency fee agreement that Catherine Elizabeth Czyz advised her that litigation expenses are costly, including retaining experts.

25. Admit that Catherine Elizabeth Czyz advised Erin Beth Neitzelt more than once prior to her requesting a contingency fee agreement, that litigation expenses are costly.

26. Admit that Catherine Elizabeth Czyz was the owner and operator of The Czyz Law Firm, P.A..

27. Admit that Catherine Elizabeth Czyz was an agent of The Czyz Law Firm, P.A..

28. Admit that as an agent of the corporation Catherine Elizabeth Czyz is not personally liable.

29. Admit that Catherine Elizabeth Czyz agreed to amend the contract of representation to a straight contingency fee agreement based upon an agreement that the law firm would associate with another attorney and/or law firm who would litigate the case.

30. Admit that the contingency fee agreement states that The Czyz Law Firm, P.A. may associate with another attorney.

31. Admit that Catherine Elizabeth Czyz informed Erin Beth Neitzelt that she would contact an attorney in Hallandale Beach, Florida to associate on the case and litigate the case after executing the contingency fee agreement.

32. Admit that Catherine Elizabeth Czyz informed Erin Beth Neitzelt at the initial consultation that she may want to consult with another Florida attorney who may take her case on a contingency fee basis.

33. Admit that Catherine Elizabeth Czyz informed Erin Beth Neitzelt at the initial consultation that her practice is/was in West Palm Beach, Florida.

34. Admit that at the initial consultation that Catherine Elizabeth Czyz advised Erin Beth Neitzelt that she primarily practices in South Florida.

35. Admit that Catherine Elizabeth Czyz advised Erin Beth Neitzelt at the initial consultation that due to her practice being in Palm Beach County, Florida that her fees are higher than a Florida attorney on the west coast.

36. Admit that when Catherine Elizabeth Czyz advised Erin Beth Neitzelt that she only took personal injury cases on straight contingency and advised her that her fees are higher than a Florida west coast attorney that she said, "That's okay."

37. Admit that Erin Beth Neitzelt wanted The Czyz Law Firm, P.A. to represent her even though she was advised that she could find a less expensive law firm.

38. Admit that Erin Beth Neitzelt contacted Catherine Elizabeth Czyz with the specific intent of hiring her law firm for her alleged action against her prior employer.

39. Admit that Erin Beth Neitzelt contacted Catherine Elizabeth Czyz for legal advice twice before retaining her for the Florida case.

40. Admit that Erin Beth Neitzelt contacted Catherine Elizabeth Czyz on two prior occasions to retaining her law firm regarding alleged cases in Ohio.

41. Admit that on the first occasion that Erin Beth Neitzelt contacted Catherine Elizabeth Czyz that she asked where the action occurred and that when she stated it occurred in Ohio she told her that she did not take cases in Ohio and ended the conversation.

42. Admit that on the second occasion Erin Beth Neitzelt wanted representation of the Czyz Law Firm, P.A. against her husband's, Scott Neitzelt's, half-sister for coming into the bar that she owned in Ohio and being loud and destroying property and for making problems against her because the half sister thought that she was going to spend all of Scott Neitzelt's money.

43. Admit that on the second occasion, Catherine Elizabeth Czyz advised Erin Beth Neitzelt again that her law firm did not take cases that occurred in Ohio.

44. Admit that Catherine Elizabeth Czyz advised Erin Beth Neitzelt to seek an Ohio attorney for the alleged case against her husband's half-sister.

45. Admit that Catherine Elizabeth Czyz advised Erin Beth Neitzelt to first attempt to resolve her problems with her husband's half-sister privately before using an Ohio attorney.

46. Admit that Erin Beth Neitzelt retained an Ohio attorney against her husband's, Scott Neitzelt's, half-sister.

47. Admit that Erin Beth Neitzelt informed Catherine Elizabeth Czyz at the initial consultation that the Principal, Rachel Gould, was taking action to block Erin Beth Neitzelt from advancing from a teacher to a Principal in the school district.

48. Admit at the initial consultation that Erin Beth Neitzelt alleged that Principal Rachel Gould made defamatory statements about her to the Dean of a University that she applied to for a doctorate to prevent her from advancing in her career.

49. Admit that Erin Beth Neitzelt alleged at the initial consultation that the Principal, Rachel Gould was out to get her.

50. Admit that at the initial consultation that Erin Beth Neitzelt alleged that the Principal, Rachel Gould was out to get her because she was jealous of her appearance, and her wealth, and the fact that she drove a Mercedes and that she owned a home on the water on a private island named Bokelia.

51. Admit that at the initial consultation that Erin Beth Neitzelt alleged that she immediately after starting work as a teacher, she applied for the next year Principal pool meeting.

52. Admit that at the initial consultation Erin Beth Neitzelt alleged that Principal Gould would not sign a paper granting her access to the Principal pool meeting.

53. Admit that Erin Beth Neitzelt alleged at the initial consultation that she had been a Principal at an Ohio school.

54. Admit at the initial consultation that Erin Beth Neitzelt stated that she could not apply for Principal positions in Florida prior to working at a school in another position for a year.

55. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that Principal Gould did not want Erin Beth Neitzelt to advance to a Principal position.

56. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that Principal Rachel Gould had groomed another woman to have a Principal position and wanted her to advance.

57. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that the school that she worked at in Lee County, Florida gave her a poor teacher evaluation.

58. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that the poor evaluation stated that she could not control her class.

59. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that she made written complaints about bad behaved students in her class, and that that was the reason why the school was evaluating her poorly and stating that she could not control her class.

60. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that the school planned on terminating her employment because she reported the bad behaved children.

61. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that she was hired by the school in Lee County, Florida to teach only "gifted children" with the highest IQs.

62. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that she had a special teaching certificate to teach "gifted students" with the highest IQs.

63. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that she applied for and attained this certificate to teach the gifted students with the highest IQs because she identified with them.

64. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that although she was hired to teach only the gifted students with the highest IQs that she was teaching regular students as well.

65. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that the school did not want children reported for bad behavior because it would lessen their student enrollment and effect everyone's possible employment.

66. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that she asked other teacher's if there were private meetings about her.

67. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that there were private meetings about her to terminate her.

68. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that she was told by other teachers that she was "on the chopping block".

69. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that she resigned by letter after learning that she was going to be terminated.

70. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that she resigned so that she could continue working as a teacher.

71. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that she stated in her resignation letter that she needed to be with her husband in Ohio.

72. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that she attempted to get a copy of the poor evaluation herself from her prior employer but it was not produced to her.

73. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that she wanted the evaluation removed because it was part of a conspiracy to terminate her for reporting bad behaved students.

74. Admit to Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that she reported one student for leaving her room.

75. Admit that Erin Beth Neitzelt alleged that she had another student in her room who cracked water bottles.

76. Admit that Erin Beth Neitzelt alleged that the one male student with bad behavior had violent behaviors and stated something under his breath to the student cracking water bottles

before leaving her room.

77. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that the students had bad behavior problems and that it was not true that she could not control her class.

78. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that Principal Rachel Gould was "big, fat and ugly".

79. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that because Principal Rachel Gould was "big, fat and ugly" that she was jealous of her.

80. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that Principal Rachel Gould was jealous of her because of her looks.

81. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that Principal Gould was jealous of her because of the car that she drove.

82. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that Principal Gould was jealous of her because of her wealth.

83. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that Principal Gould was jealous of her because she owns a home in Bokelia, Florida.

84. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that Principal Gould was jealous of her because of the type of woman that she is.

85. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that Principal Gould wanted to terminate her due to her jealousy of her.

86. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that Principal Gould wanted to stop her from going to the University that she applied for because of her jealousy of Erin Beth Neitzelt.

87. Admit that Erin Beth Neitzelt alleged to Catherine Elizabeth Czyz that an employee named Maggie told her that she overheard a conversation of Principal Rachel Gould and another employee stating that she talked to the Dean of the University about a teacher at the school.

88. Admit that Erin Beth Neitzelt stated to Catherine Elizabeth Czyz that she went to the Principal pool meeting even though Principal Gould did not sign a paper for her to attend.

89. Admit that as part of the representation of Erin Beth Neitzelt that Catherine Elizabeth Czyz contacted potential witnesses.

90. Admit that Catherine Elizabeth Czyz contacted potential witnesses as part of due diligence.

91. Admit that Catherine Elizabeth Czyz advised Erin Beth Neitzelt to go off of Facebook.
92. Admit that Erin Beth Neitzelt stated to Catherine Elizabeth Czyz that she did not want to go off of Facebook.
93. Admit that Catherine Elizabeth Czyz advised Erin Beth Neitzelt to unfriend anyone who worked with her at her prior employer in Lee County, Florida.
94. Admit that Erin Beth Neitzelt informed Catherine Elizabeth Czyz that she unfriended the past employee Facebook friends but made a fake account to look at Rachel Gould and the Dean of the University.
95. Admit that Erin Beth Neitzelt made a fake Facebook account in a name other than her own.
96. Admit that Erin Beth Neitzelt was watching Rachel Gould on Facebook even though she advised her to unfriend her.
97. Admit that Erin Beth Neitzelt was watching the Dean of the University on Facebook.
98. Admit that Erin Beth Neitzelt wanted Catherine Elizabeth Czyz to use an old picture of herself in Court where she was younger and slimmer than her present looks.
99. Admit that Erin Beth Neitzelt wanted to perpetrate a fraud upon the Court by using a old picture.
100. Admit that Erin Beth Neitzelt provided Catherine Elizabeth Czyz with a case about a class action of black employees versus the Lee County Schools.
101. Admit that Erin Beth Neitzelt stated to Catherine Elizabeth Czyz that she could be part of the class action because of her black genetics.
102. Admit that Erin Beth Neitzelt stated to Catherine Elizabeth Czyz that she had genetic testing done by ancestry.com.
103. Admit that Erin Beth Neitzelt stated to Catherine Elizabeth Czyz that both she and her husband, Scott Neitzelt had genetic testing done by ancestry.com.
104. Admit that Erin Beth Neitzelt stated to Catherine Elizabeth Czyz that she is nine (9%) black.
105. Admit that Erin Beth Neitzelt stated that her husband, Scott Neitzelt is seven percent (7%) black.
106. Admit that Catherine Elizabeth Czyz informed Erin Beth Neitzelt that she may be able to allege that her Irish and Italian heritage may be able to be part of her allegations in the Complaint because some northern Italians are blonde and tall and some Irish people are blonde and tall and



that this would support her allegations of the type of woman that she is being the reason for termination.

107. Admit that Erin Beth Neitzelt provided Catherine Elizabeth Czyz with a case of a tall, blonde woman alleging that she was terminated from her employment at Lee County Schools because of her ethnicity.

108. Admit that Erin Beth Neitzelt provided these cases to Catherine Elizabeth Czyz subsequent to the Charge Form being filed with the EEOC.

109. Admit that Erin Beth Neitzelt did not raise her ethnicity prior to the filing of the Charge Form with the EEOC.

110. Admit that Erin Beth Neitzelt's ethnicity was not waived.

111. Admit that Erin Beth Neitzelt's ethnicity was not determined to be waived by any Court.

112. Admit that Catherine E. Czyz, Esq. did not breach any duty to Erin Beth Neitzelt.

113. Admit that Catherine E. Czyz, Esq. did not commit legal malpractice on Erin Beth Neitzelt's case against Rachel Gould and/or Lee County schools..

114. Admit the Defendants did not breach any duty to Erin Beth Neitzelt.

115. Admit that Defendants did not commit legal malpractice on Erin Beth Neitzelt's case against Rachel Gould and/or Lee County schools.

116. Admit that Erin Beth Neitzelt's allegations of breach of duty against Catherine E. Czyz, Esq. have been made for harassment purposes.

117. Admit that Erin Beth Neitzelt's allegations of breach of duty against Catherine E. Czyz, Esq. have been made for defamatory purposes.

118. Admit that Erin Beth Neitzelt's allegations of breach of duty against Catherine E. Czyz, Esq. have been made for extortion purposes.

119. Admit that Erin Beth Neitzelt's allegations of legal malpractice against Catherine E. Czyz, Esq. have been made for harassment purposes.

120. Admit that Erin Beth Neitzelt's allegations of legal malpractice against Catherine E. Czyz, Esq. have been made for defamatory purposes.

121. Admit that Erin Beth Neitzelt's allegations of legal malpractice against Catherine E. Czyz, Esq. have been made for extortion purposes.

- 122. Admit that Erin Beth Neitzelt's allegations of breach of duty against the Defendants have been made for harassment purposes.
- 123. Admit that Erin Beth Neitzelt's allegations of breach of duty against the Defendants have been made for defamatory purposes.
- 124. Admit that Erin Beth Neitzelt's allegations of breach of duty against the Defendants have been made for extortion purposes.
- 125. Admit that Erin Beth Neitzelt's allegations of legal malpractice against the Defendants have been made for harassment purposes.
- 126. Admit that Erin Beth Neitzelt's allegations of legal malpractice against the Defendants have been made for defamatory purposes.
- 127. Admit that Erin Beth Neitzelt's allegations of legal malpractice against the Defendants have been made for extortion purposes.
- 128. Admit that Erin Beth Neitzelt went to grade school with Catherine E. Czyz, Esq. in Ohio.
- 129. Admit that Erin Beth Neitzelt went to high school with Catherine E. Czyz, Esq. in Ohio.
- 130. Admit that in grade school Erin Beth Neitzelt went to Catherine E. Czyz's birthday party at her parents' home.
- 131. Admit that Erin Beth Neitzelt invited Catherine E. Czyz, Esq. to lunch approximately six(6) or seven (7) years ago in St. Clairsville, Ohio with another high school classmate, Melinda Morgan Brothers.
- 132. Admit that Erin Beth Neitzelt reminded Catherine E. Czyz, Esq. of the grade school birthday party she attended at the lunch with Melinda Morgan Brothers.
- 133. Admit that Catherine E. Czyz, Esq. moved from Ohio after high school graduation.
- 134. Admit that after high school Erin Beth Neitzelt married Bo Olexo.
- 135. Admit that Bo Olexo is/was Erin Beth Neitzelt's first spouse.
- 134. Admit that Bo Olexo graduated from St. Clairsville High School, in St. Clairsville, Ohio.
- 135. Admit that Greg Malik is/was Erin Neitzelt's second spouse.
- 136. Admit that Greg Malik graduated from St. Clairsville High School in St. Clairsville, Ohio.
- 137. Admit that Scott Neitzelt is/was Erin Neitzelt's third spouse.

138. Admit that Scott Neitzelt graduated from St. Clairsville High School in St. Clairsville, Ohio.
139. Admit that Scott Neitzelt graduated in the same high school class as Catherine E. Czyz, Esq. and Erin Neitzelt.
140. Admit that after high school graduation, Catherine E. Czyz, Esq. did not speak to or have any contact with Erin Beth Neitzelt for decades.
141. Admit that the first contact that Catherine E. Czyz, Esq. had with Erin Neitzelt after high school graduation was through Facebook.
142. Admit that Erin Neitzelt was the high school class President.
143. Admit that as high school class President, Erin Neitzelt was in charge of high school class reunions.
144. Admit that Catherine E. Czyz, Esq. never attended a high school class reunion.
145. Admit that Erin Neitzelt was involved in student counsel in high school.
146. Admit that Erin Neitzelt was involved in singing in high school.
147. Admit that Erin Neitzelt that Erin Neitzelt never held a political office as an adult.
148. Admit that Erin Neitzelt did not become a professional singer as an adult.
149. Admit that Erin Neitzelt became a teacher as an adult.
150. Admit that Erin Neitzelt became a Principal of a Middle School as an adult.
151. Admit that Erin Neitzelt became a piano teacher as an adult.
152. Admit that Erin Neitzelt became a realtor as an adult.
153. Admit that Erin Neitzelt used her knowledge as a realtor to pull up deeds and/or mortgages on Catherine E. Czyz's properties.
154. Admit that Erin Beth Neitzelt used her knowledge as a realtor to pull up information on Dr. Anthony Czyz's properties.
155. Admit that Erin Beth Neitzelt defamed Catherine E. Czyz, Esq. to third parties.
156. Admit that Erin Beth Neitzelt defamed Dr. Anthony Czyz to third parties.

157. Admit that Erin Beth Neitzelt had political aspirations as a teenager that never came to fruition.

158. Admit that Erin Beth Neitzelt had singing aspirations of fame that never came to fruition.

159. Admit that during The Czyz Law Firm, P.A.'s representation of Erin Beth Neitzelt, Erin Beth Neitzelt stated that she wanted to settle the case quickly.

160. Admit that during The Czyz Law Firm, P.A.'s representation of Erin Beth Neitzelt, Catherine E. Czyz, Esq. suggested going to the press or local television news stations about the case after taking depositions substantiating her case.

161. Admit that just before terminating The Czyz Law Firm, P.A., Erin Beth Neitzelt stated that she "was ready to go!" to the local television stations with her case, and Catherine E. Czyz, Esq. refused because no depositions were taken.

162. Admit that Erin Beth Neitzelt terminated representation of The Czyz Law Firm, P.A..

163. Admit that Erin Beth Neitzelt terminated the representation of the Defendants.

164. Admit that Erin Beth Neitzelt settled her case against Rachel Gould and/or Lee County Schools with a different attorney.

165. Admit that Erin Beth Neitzelt settled her case against Rachel Gould and/or Lee County schools with a different attorney only days after retaining him.

166. Admit that Erin Beth Neitzelt settled her case against Rachel Gould and/or Lee County Schools for nuisance value.

167. Admit that Erin Beth Neitzelt settled her case against Rachel Gould and/or Lee County Schools for only a couple of thousands of dollars.

168. Admit that Erin Neitzelt requested Catherine E. Czyz, Esq. to settle her case in or about December, 2016, or January, 2017.

169. Admit that Catherine E. Czyz, Esq. attempted to settle Erin Beth Neitzelt's case in or about December, 2016 or January, 2017, at her request.

170. Admit that prior to representing Erin Beth Neitzelt, Catherine E. Czyz, Esq. posted a picture of herself and her husband, Dr. Anthony Czyz in a certain pose on Facebook on the white beach in Clearwater, Florida.

171. Admit that only hours after posting the picture mentioned in 170. That Erin Neitzelt posted a picture of herself and her husband in the same pose on a white sand Florida beach.

172. Admit that in or about December, 2016 Catherine E. Czyz, Esq. had eyelash extensions at a salon and posted a picture of herself holding her dog on her Facebook page.
173. Admit that only days after the aforementioned picture in 172. That Erin Beth Neitzelt posted a picture of herself with eyelash extensions.
174. Admit that Erin Beth Neitzelt contacted Catherine E. Czyz, Esq. subsequent to settling her case against Rachel Gould and/or Lee County schools and stated that her case was without merit.
175. Admit that Erin Neitzelt admitted to fraud after her case settled.
176. Admit that Erin Neitzelt attempted to extort Catherine E. Czyz, Esq. for money after her case settled.
177. Admit that Catherine E. Czyz, Esq. received a BS in Psychology from Florida Institute of Technology.
178. Admit that Catherine E. Czyz, Esq. received an MBA from Florida Institute of Technology.
179. Admit that Catherine E. Czyz, Esq. studied at Oxford University, Oxford, England, through a pre-law studies program offered through The Ohio State School of Law.
180. Admit that Catherine E. Czyz, Esq. received a JD from The University of Miami.
181. Admit that Catherine E. Czyz, Esq. education and degrees were shown on her personal Facebook page.
182. Admit that Erin Beth Neitzelt stated to Catherine E. Czyz, Esq. during representation that she had a graduate school education and businesses.
183. Admit that Erin Beth Neitzelt believes herself to be a highly intelligent woman.
184. Admit that Erin Beth Neitzelt did not understand why a man could not be part of her discrimination case based upon the type of woman she is.
185. Admit that Erin Beth Neitzelt compares herself to Catherine E. Czyz, Esq..
186. Admit that Erin Beth Neitzelt has cyberstalked Catherine E. Czyz, Esq..
187. Admit that Erin Beth Neitzelt has assumed the identity of Catherine E. Czyz, Esq..
188. Admit that during representation, Catherine E. Czyz, Esq. admonished Erin Beth Neitzelt for acting in an unethical manner.
189. Admit that Catherine E. Czyz, Esq. told Erin Beth Neitzelt that she was acting unethically.

190. Admit that Catherine E. Czyz, Esq. told Erin Beth Neitzelt that she was acting unethically by still talking to Maggie, an employee of the Defendant school, without representation.

191. Admit that Catherine E. Czyz, Esq. had told Erin Beth Neitzelt multiple times not to continue to talk to Maggie.

192. Admit that Catherine E. Czyz, Esq. told Erin Beth Neitzelt that she would withdraw if she kept talking to Maggie.

193. Admit that Catherine E. Czyz, Esq. told Erin Beth Neitzelt that she would risk her law license because Erin Beth Neitzelt was acting unethically.

194. Admit that the discussion in 192 and 193 occurred shortly before Erin Beth Neitzelt terminated the Defendants.

195. Admit that Catherine E. Czyz, Esq. at the end of the discussion that occurred in 192 and 193 that she helped Erin Beth Neitzelt draft a text to Maggie stating that she could not talk to her until the case was over.

196. Admit that Erin Beth Neitzelt sent a copy of the text in 195 to Catherine E. Czyz, Esq..

197. Admit that Erin Beth Neitzelt wanted to dismiss all of her case but the Count for emotional distress before terminating the representation of The Czyz Law Firm, P.A..

198. Admit that Erin Beth Neitzelt stated that she would help Catherine E. Czyz, Esq. find co-counsel to continue the case.

199. Admit that Erin Beth Neitzelt wanted to dismiss all but one Count of her case after Catherine E. Czyz, Esq. interviewed witnesses and discovered that some of her allegations were false.

200. Admit that after Catherine E. Czyz, Esq. discovered that some of Erin Beth Neitzelt's allegations were false that she terminated the representation of The Czyz Law Firm, P.A. and hired another attorney to immediately settle the case for nuisance value and then lied to Catherine E. Czyz, Esq. that she dismissed her case and demanded a refund of the money she paid in attorney's fees and costs.

201. Admit that Erin Beth Neitzelt lied to Catherine E. Czyz, Esq. and stated that she dismissed her case.

202. Admit that Erin Beth Neitzelt is an habitual liar.

203. Admit that Erin Beth Neitzelt is a fabricator of stories.

204. Admit that Erin Beth Neitzelt is a gossip.

205. Admit that Erin Beth Neitzelt does not have credibility.
206. Admit that Scott Neitzelt is Erin Neitzelt's husband.
207. Admit that Scott Neitzelt is Erin Neitzelt's third husband,
208. Admit that Scott Neitzelt had a crush on Catherine E. Czyz, Esq. in high school.
209. Admit that Erin Neitzelt has a small facial resemblance to Catherine E. Czyz, Esq..
210. Admit that Erin Beth Neitzelt impersonated Catherine E. Czyz, Esq.. to a drive-through teller of JP Morgan Chase Bank (Chase).
211. Admit that Erin Beth Neitzelt received account information about The Czyz Law Firm, P.A.'s business account from a teller at Chase.
212. Admit that Erin Neitzelt received The Czyz Law Firm, P.A.'s bank account information a drive through teller in Bellaire, Ohio.
213. Admit that Erin Neitzelt committed Felony Identity Theft when she impersonated Catherine E. Czyz, Esq. at Chase bank in Bellaire, Ohio.
214. Admit that St. Clairsville, Ohio is a small city in Ohio.
215. Admit that most people in St. Clairsville, Ohio know each other and/or are related to each other.
216. Admit that Bellaire, Ohio is a town that is adjacent to and/or near St. Clairsville, Ohio.
217. Admit that Ritch Snider is/was a high school classmate of Erin Neitzelt, Scott Neitzelt and Catherine E. Czyz, Esq. from St. Clairsville, Ohio.
218. Admit that Ritch Snider is Scott Neitzelt's cousin.
219. Admit that Ritch Snider was a Facebook Friend of Catherine E. Czyz, Esq. and be-friended her and went to activities with her prior to The Czyz Law Firm, P.A. representing Erin Neitzelt.
220. Admit that at the time that Ritch Snider be-friended Catherine E. Czyz, Esq. that she did not know that Ritch Snider and Scott Neitzelt were cousins.
221. Admit that Ritch Snider and Catherine E. Czyz, Esq. were only acquaintances in high school.
222. Admit that Ritch Snider asked Catherine E. Czyz, Esq. about her life and personal relationships and then gossiped about it with Erin Neitzelt.

223. Admit that Catherine E. Czyz, Esq. moved to St. Clairsville, Ohio from the New York City area when she was a child.
224. Admit that Catherine E. Czyz, Esq. does not have any relatives from Ohio.
225. Admit that because Catherine E. Czyz, Esq. is/was not related to people from St. Clairsville, Ohio that she was viewed as an outsider in grade school and high school.
226. Admit that Erin Neitzelt is obsessed with Catherine E. Czyz, Esq..
227. Admit that Erin Neitzelt has treated with a mental health counselor.
228. Admit that Erin Neitzelt threatened to make a false Florida Bar complaint and a false mal-practice action against Catherine E. Czyz, Esq. if she did not refund her money.
229. Admit that Erin Neitzelt threatened to blackmail and/or extort money from Catherine E. Czyz, Esq..
230. Admit that Catherine E. Czyz, Esq. refused to be blackmailed and/or extorted by Erin Neitzelt.
231. Admit that after Erin Neitzelt attempted to extort money from Catherine E. Czyz, Esq. that she impersonated her again at Chase and got all of the account information of The Czyz Law firm, P.A. including balances, payments and even types of accounts that were not held at Chase.
232. Admit that Erin Beth Neitzelt found out from Chase that The Czyz Law Firm, P.A. did not have an Escrow Account or a Trust Account at Chase bank by impersonating Catherine E. Czyz, Esq..
233. Admit that Erin Beth Neitzelt received and/or accessed and/or saw the bank statements of The Czyz Law Firm's account with Chase.
234. Admit that Erin Beth Neitzelt accessed The Czyz Law Firm, P.A.'s account with Chase with the intent to commit Felony Theft.
235. Admit that at the time Erin Beth Neitzelt accessed the account at Chase, she did not steal any money because the account did not have any money in it and it was closed.
236. Admit that Erin Neitzelt's theft attempt in The Czyz Law Firm, P.A.'s Chase bank account was foiled.
237. Admit that Erin Beth Neitzelt committed Felony Identity Theft when she accessed The Czyz Law Firm, P.A.'s Chase bank account for a second time.



238. Admit that after Erin Neitzelt's theft attempt was foiled that she made a false Florida Bar complaint against Catherine E. Czyz, Esq..
239. Admit that Erin Neitzelt swore under oath to false statements to the Florida Bar.
240. Admit that Erin Neitzelt committed perjury by filing false statements with The Florida Bar.
241. Admit that Erin Neitzelt committed perjury by filing false statements under oath in Lee County, Florida.
242. Admit that the pleading filed and titled "Complaint" is an affidavit.
243. Admit that Erin Beth Neitzelt attempted to file a Complaint pro se against Catherine E. Czyz, Esq. and The Czyz Law Firm, P.A..
244. Admit that by filing perjury in Lee County Florida that Erin Beth Neitzelt submitted herself to the jurisdiction of The Lee County Florida State Prosecutor's jurisdiction.
245. Admit that Erin Beth Neitzelt committed crimes in Lee County, Florida.
246. Admit that Erin Beth Neitzelt committed crimes against Catherine E. Czyz, Esq. in Lee County, Florida.
247. Admit that Erin Beth Neitzelt committed Felony Identity Theft.
248. Admit that Erin Beth Neitzelt committed Felony Perjury in Lee County, Florida.
249. Admit that Erin Beth Neitzelt committed criminal harassment against Catherine E. Czyz, Esq. in Lee County, Florida.
250. Admit that Erin Beth Neitzelt consulted with an attorney who informed her that Catherine E. Czyz, Esq. and/or The Czyz Law Firm, P.A. and/or Defendants did not commit legal malpractice.
251. Admit that Erin Beth Neitzelt consulted with more than one attorney who informed her that Catherine E. Czyz, Esq. and/or The Czyz Law Firm, P.A. and/or Defendants did not commit legal malpractice.
253. Admit that Erin Beth Neitzelt consulted with an attorney who informed her that Catherine E. Czyz, Esq. and/or The Czyz Law Firm, P.A. and/or Defendants did not breach any duty to Erin Neitzelt.
254. Admit that Erin Beth Neitzelt consulted with more than one attorney who informed her that Catherine E. Czyz, Esq. and/or The Czyz Law Firm, P.A. and/or Defendants did not breach any duty to Erin Neitzelt

255. Admit that Erin Neitzelt knew that that Defendants did not commit legal mal-practice but attempted to file a Complaint herself, pro se, anyway.

256. Admit that Erin Beth Neitzelt had to file Complaint herself because no attorney would represent her against Catherine E. Czyz, Esq. and/or The Czyz Law Firm, P.A..

257. Admit that Erin Beth Neitzelt filed the pleading titled "Complaint" in Lee County, Florida because she is a lay person.

258. Admit any action regarding The Czyz Law Firm, P.A. 's representation of Erin Beth Neitzelt would have to be brought in Palm Beach County, Florida.

259. Admit that per the representation contract (s), the jurisdiction for bringing any action regarding any matter having to do with the representation by The Czyz Law Firm, P.A. of Erin Beth Neitzelt would have to be brought in Palm Beach County, Florida.

260. Admit that Lee County, Florida Court does not have jurisdiction over any action between The Czyz Law Firm, P.A. and/or its agents and Erin Beth Neitzelt.

261. Admit that The Czyz Law Firm, PLLC was wrongfully named as a party.

262. Admit that The Czyz Law Firm, PLLC was formed due to Erin Beth Neitzelt, cyberstalking Catherine E. Czyz, Esq. Impersonating her as an officer of The Czyz Law Firm, P.A., and accessing her business bank account at Chase.

263. Admit that Defendant(s) did not have a duty to tell Erin Beth Neitzelt that The Czyz Law Firm, P.A. was winding down, as it wound down due to her criminal activities.

264. Admit that Erin Beth Neitzelt came to Catherine E. Czyz, Esq. with a bogus case against Rachel Gould and/or Lee County schools.

265. Admit that Rachel Gould was not jealous of Erin Beth Neitzelt.

266. Admit that Rachel Gould was the boss of Erin Beth Neitzelt and wanted to terminate her because she was an incompetent teacher.

267. Admit that Erin Beth Neitzelt called Rachel Gould a bully over and over to Catherine E. Czyz, Esq..

268. Admit that Erin Beth Neitzelt called Catherine E. Czyz, Esq. a bully to The Florida Bar.

269. Admit that anyone who discovers that Erin Beth Neitzelt is not highly intelligent and good at her job, and also discovers that she is a person of low moral character, is called a bully by Erin Beth Neitzelt.

270. Admit that the action that Erin Beth Neitzelt brought against the Defendants is frivolous and without merit.

271. Admit that there is no cause of action in Florida for engorgement of legal fees.

272. Admit that the Defendants are entitled to 57.105 fees and costs from Erin Beth Neitzelt.

273. Admit that Defendants are entitled to 57.105 fees and costs from Erin Beth Neitzelt's counsel.

274. Admit that the Lee County does not have personal jurisdiction and/or subject matter jurisdiction and/or venue.

275. Admit that Erin Beth Neitzelt has made multiple false claims of higher payments to Catherine E. Czyz, Esq. and/or The Czyz Law Firm, P.A. than what she actually paid.

276. Admit that Catherine E. Czyz, Esq. reported Erin Beth Neitzelt to the local police and The F.B.I..

277. Admit that Erin Beth Neitzelt is currently under criminal investigation by the F.B.I..

278. Admit that Erin Beth Neitzelt stalked Catherine E. Czyz, Esq. for years on Facebook, saw pictures of her with her husband, pictures of her brother-in-law, a World Champion boxer, pictures of her as an attorney, pictures of her with Governor Rick Scott, pictures of her at The Sunshine Ball at President Trump's inauguration, and other pictures on her page and Erin Beth Neitzelt became jealous, and made up a bogus law suit as a plot and plan to defame Catherine E. Czyz, Esq., extort money from her, and mar her reputation with false accusations because she never became famous or a Politian, and is unhappy with her life.

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by e-courts, on September 11, 2018 to:

Scott E. Atwood, Esq.  
2248 First Street  
Ft. Myers, FL 33901

By:     /s/ Catherine E. Czyz    

Catherine E. Czyz, Esq.  
Florida Bar Number: 105627

The Czyz Law Firm, PLLC

USPS Mailing Address:

931 Village Boulevard, Suite 905-242

West Palm Beach, FL 33409

[catherineczyz@icloud.com](mailto:catherineczyz@icloud.com)

561-502-1542- direct

561-628-1044- office

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**The Czyz Law Firm, P.A.**

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e-mail: catherineczyz@icloud.com

Invoice No.: 101423

April 30, 2016

Erin Neitzelt  
40 Imperial Woods Drive  
Morgantown, WV 26508

**SENT VIA CERTIFIED MAIL AND E-MAIL TO NEITZELTNOV10@YAHOO.COM**

**BILL FOR QUANTUM MERUIT SERVICES FROM NOVEMBER 28, 2016 UNTIL FEBRUARY 13, 2017 PER THE CONTINGENCY FEE AGREEMENT**

**RE: ERIN NEITZELT V. RACHEL GOULD AND LEE COUNTY SCHOOLS**

Billable Rate: \$500.00/Hr

November 28, 2016 – Call to Florida Bar and transferred to Lawyers helping lawyers division about request for class action attorney on Title VII cases.....0.5...\$ 250.00  
(+\$ 87.50)

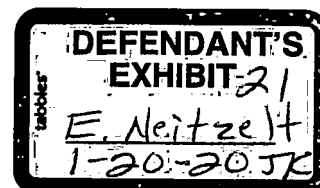
November 28, 2016 – Call to South Florida Legal Services about service of process charges , etc.....0.3...\$ 150.00  
(+\$ 52.50)

November 28, 2016 – Draft Amended Complaint.....0.6...\$300.00  
(+\$105.00)

November 28, 2016 – Draft Summons on Amended Complaint for Gould.....0.3...\$150.00  
(+\$ 52.50)

November 28, 2016 – Draft Summons on Amended Complaint for Lee County School District.....0.3...\$150.00  
(+\$ 52.50)

November 29, 2016 – Receipt/review of call/message from FL bar about e-mailing the names of requested



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attorney information.....0.3...\$150.00  
(+\$ 52.50)

November 29, 2016 – File the Amended Complaint on the e-portal system.....0.4...\$200.00  
(+\$ 70.00)

November 29, 2016 – Receipt/review of e-mail from Lee County Courthouse regarding the filing of Amended Complaint.....0.1...\$ 50.00  
(+\$ 17.50)

November 29, 2016 – email to SFLS about correspondence.....0.1...\$50.00  
(+\$ 17.50)

November 29, 2016 – Receipt/ review of attorney information (Benjamin H. Hill, Esq.) as class action referral.....0.3...\$150.00  
(+\$ 52.50)

November 29, 2016 – re-review of file and take notes for Mr. Hill.....2.0...\$1,000  
(+\$350.00)

November 29, 2016 – Call to SFLS about serving the Complaint.....0.3...\$150.00  
(+\$ 52.50)

November 29, 2016 – draft e-mail to South Florida Legal Services with Amended Complaint and Summons on Amended Complaint.....0.1...\$50.00  
(+\$ 17.50)

November 29, 2016 – Talk with Mr. Hill about the requirements to make a “class” for a class action, very stringent rules which he successfully combated in defense, and the facts of Erin’s case and the other Latfian woman and the BMW woman and the “good ol’ boy” club and decision to contact the attorney for the black person class action to coordinate a possible class action based upon sex discrimination.....1.0...\$500.00  
(+\$175.00)

November 30, 2016 – e-mail from SFLS about receipt of Amended Complaint and summons for service of process.....0.1...\$50.00  
(+\$ 17.50)

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November 30, 2016 – Filed both Summons on Amended Complaint for service issuance with Lee County on e-portal system.....0.5....\$250.00  
(+\$ 87.50)

November 30, 2016 – receipt/review of e-mail from Lee County Courthouse about Summons on Amended being filed.....0.1....\$50.00  
(+\$ 17.50)

November 30, 2016 - Six (6) e-mails back and forth with SFLS about credit card payment and service of Amended Complaint with turn-around time for the summons and process.....0.6....\$300.00  
(+\$105.00)

November 30, 2016 – Various texts back and forth from Erin acknowledging that November will be the last hourly bill and acceptance of Contingency Fee agreement from her and request that original must be received in the mail later and therapist.....0.3....\$150.00  
(+\$ 52.50)

November 30, 2016 – Review E-mail from Erin about prep work on case, etc.....0.1....\$50.00  
(+\$ 17.50)

November 30, 2016 – receipt/review of Contingency Fee agreement attached to e-mail from Erin.....0.1....\$50.00  
(+\$ 17.50)

November 30, 2016 – Compose e-mail to Erin about case.....0.1....\$50.00  
(+\$ 17.50)

December 2, 2016 – receipt review of email from Court with issued summons on Lee County Schools.....0.4....\$200.00

December 2, 2016 – receipt and review of issued summons on amended complaint on Gould.....0.4....\$200.00

December 3, 2016 – review of Principal Evaluation from Dr. Vincent Schmidt.....0.5....\$250.00

December 5, 2016 – text about bill and telephone consultation.....0.1....\$ 50.00 ember 6,

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December 6, 2016 – call from process server saying that Gould was sick and possibly evading and that the school asked for me to call back tomorrow and discussion of serving Gould at home...0.2...\$100.00

December 7, 2016 – receipt and review of email from process server giving December 7 service date and place and time.....0.3....\$150.00

December 7, 2016 – receipt and review from process server of service date and time (December 7) of Lee County Schools upon Keith Martin.....0.3....\$150.00

December 9, 2016 – telephone conference about case and her health and her treatment with various health professionals.....0.5....\$250.00

December 9, 2016 – various texts about her hands and health because of the case.....0.4....\$200.00

December 10, 2016 – texts about going to the gym and her computer.....0.1....\$ 50.00

December 15, 2016 – draft Medical Authorization for Erin.....1.0...\$500.00

December 15, 2016 – email Medical Authorization to Erin.....0.1...\$ 50.00

December 15, 2017 – text to Erin about emailed medical authorization.....0.1....\$50.00

December 16, 2017 – various texts about the case.....0.3...\$150.00

December 20, 2016 – receipt and review of email from Court regarding filings.....0.1...\$ 50.00

December 20, 2016 – review of notice of removal pleadings.....1.0...\$500.00

December 21, 2016 – call to federal court and left message that I am not getting any pleadings from Court on removed case to federal court.....0.2...\$100.00

December 21, 2017 – various texts about the case.....0.3...\$150.00

December 22, 2016 – call again to Court leaving message about issues and request for call.....0.2...\$100.00

December 22, 2016 – download application for Middle District and



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review.....0.3....\$150.00

December 23, 2016 – third call to clerk and leave message with issues and note no return call.....0.2....\$100.00

December 23, 2016 – finding and forwarding three messages from opposing counsel’s office.....0.5....\$250.00

December 23, 2016 – draft letter to Judge Chappel in Federal Court about case being sent to her and no service upon us and sanctions request.....0.5....\$250.00

December 23, 2016- Review/read email from Erin on research she did on the transferring of cases to Federal Court.....0.3....\$150.00

December 23, 2017 – various texts about the case.....0.1....\$ 50.0

December 24, 2016 – Forwarded e-mails from opposing counsel to Erin.....0.1....\$ 50.00

December 24, 2016 – email the letter to Fed. Judge to Erin.....0.1....\$ 50.00

December 24, 2016 – email to Erin asking her if she sent an email saying just interesting.....0.1....\$ 50.00

December 24, 2016 – Receipt/review of e-mail from Erin stating she received and will see what they do.....0.1....\$ 50.00

December 24, 2016 – compose email to Erin about case, removal and emails not to be sent as a chain.....0.3....\$150.00

December 24, 2016 – receipt/review of e-mail stating that she understood and questioned how the Court can address the state claims.....0.1....\$50.00

December 24, 2016 – various texts about the case.....0.2....\$100.00

December 25, 2016 – Receipt/review of e-mail from Erin with pictures from Gould and her husband; she is wondering if they are stalking or why and how they got to the private pier and use of Canadian comment in case.....0.3...\$150.00

December 26, 2016 – receipt and review of e-mail from Erin with screen shots and photos from Gould

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and her family with potential racist pictures.....0.2.....\$100.00

December 26, 2016 – receipt and review of Five (5) points from Erin about behavior of Gould and family with social media pictures.....0.3.....\$150.00

December 26, 2016 – receipt and review of e-mail from Erin about Canadians and Tammy Brown relationship.....0.1.....\$ 50.00

December 26, 2016 – two emails in response to grandson and posts.....0.2.....\$100.00

December 26, 2016 – e-mail from Erin about calling a young man a thug.....0.1.....\$ 50.00

December 26, 2016 – e-mail to Erin asking her where she is getting this information.....0.1.....\$ 50.00

December 26, 2016 – e-mail from Erin explaining she is searching using another’s account on Gould and her family.....0.1.....\$ 50.00

December 26, 2016 – e-mail from Erin with picture of Gould’s grandson and comments.....0.1.....\$ 50.00

December 26, 2016 – e-mail from Erin that Dr. Valesky retired.....0.1.....\$ 50.00

December 26, 2016 – e-mail to Erin asking her how she knew Dr. Valesky retired.....0.1.....\$ 50.00

December 26, 2016 – receipt and review of Erin’s message explaining she got the information from FB and review of his posts.....0.3.....\$150.00

December 26, 2016 – receipt and review of e-mail about Gould’s grandson.....0.1.....\$ 50.00

December 27, 2016 – email to opposing counsel attaching a copy of the letter to the Fed Judge.....0.1.....\$ 50.00

December 27, 2016 – E-mail from Erin about Dr. Valesky’s information.....0.1.....\$50.00

December 27, 2016 – make notes in file of Dr. Valesky’s address and telephone number for witness information.....0.3.....\$150.00

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Catherine E. Czyz, Esq.

December 27, 2016 – email from Erin asking me when I spoke to Dr. Valesky and the relationship to his retirement date.....0.1....\$50.00

December 27, 2017 – various texts back and forth about the case.....0.5....\$250.00

December 28, 2016 – receipt via email of Motion to Dismiss, Notice of pendency and CIP.....0.1....\$50.00

December 29, 2016 - emailed response about Valesky and also updated on case with Motion to Dismiss, and not being admitted to Middle District etc.....0.3....\$150.00

December 29, 2016 – email from Erin saying thank you.....0.1....\$50.00

December 29, 2016 – email to Denise Ludsford asking for the e-mail of the attorney of record.....0.1....\$ 50.00

December 30, 2016 – email from opposing counsel’s secretary stating that he is out of the office on vacation.....0.1....\$50.00

December 30, 2016 – call to opposing counsel’s office stating that he needs to call me because he’s filing pleadings and I’m not licensed in the Middle District.....0.2....\$100.00

December 30, 2016 – e-mail from Kyle Dudek another attorney working with attorney Akin attempting to address the problem.....0.1....\$50.00

December 30, 2016- email back to Kyle stating that I will speak to the Court next week.....0.1...\$ 50.00

December 30, 2017 – various texts about other attorney giving us extensions of time.....0.2...\$100.00

January 2, 2017 – various texts back and forth about Maggie and Bonny.....0.2...\$100.00

January 3, 2017 – talk with Bernadette (Bonny Gallo) with notes, she was blonde, drove a convertible mustang and was married to a doctor.....0.5.....\$ 250.00

January 5, 2017 – email from Denise Lunsford with letter from attorney Akin

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attached.....0.1....\$50.00

January 5, 2017 – receipt and review of letter from attorney Akin.....0.5...\$250.00

January 9, 2017 – e-mail from Denise L with the readable copies of the Motion to Dismiss, Notice of Pendency and CIP.....0.1.....\$ 50.00

January 9, 2017 – receipt and review of Motion to Dismiss, Notice of Pendency and CIP.....3.0.....\$1,500.00

January 9, 2017 – research case law for emergency motion to appear and transfer, etc.....3.0.....\$1,500.00

January 9, 2017 – draft emergency motion to appear, transfer case, etc.....1.0.....\$500.00

January 10, 2017 – texts about talking to Bonny.....0.2.....\$100.00

January 10, 2017 – research and download and review case law from Motion to Dismiss.....6.0.....\$3,000.00

January 10, 2017 – four (4) e-mails back and forth between atty Akin and me about the problem of me not being able to respond in the federal Court.....0.6.....\$ 300.00

January 11, 2017 – telephone conference with Erin about her communication with Maggie and how it's unethical to talk to the opposing party and that men would hurt her case and asking her if she understood her case and asking her to text Maggie not to contact her or I would have to remove myself.....0.6.....\$300.00

January 12, 2017 – texts about new attorney on case.....0.2.....\$100.0

January 13, 2017 – email from Denise Lundford with attachment of Response to Plaintiff's motion to appoint counsel transfer case, etc.....0.1.....\$ 50.00

January 13, 2017 – review Defendants' Response and eight exhibits.....1.0.....\$500.00

January 18, 2017 – email from Middle District Court about registration and not being admitted.....0.1.....\$ 50.00

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January 18, 2017 – receipt and review of medical authorizations from Erin and her doctors.....0.6.....\$300.00

January 23, 2017 – draft motion to stay case.....0.6.....\$300.00

January 24, 2017 various texts about the case.....0.3.....\$150.00

January 25, 2017 – e-mail pleadings to the Court.....0.1.....\$ 50.00

January 26, 2017 – email to Denise L stating that Erin does not have her w-2.....0.1.....\$ 50.00

January 26, 2017 – e-mail to Denise L. stating that we have not received any orders from the Court.....0.1.....\$ 50.00

January 26, 2017 – e-mail from Denise Ludsford with Orders from the Court...0.1.....\$ 50.00

January 26, 2017 – review of Orders.....0.3....\$150.00

January 26, 2017 – e-mail from attorney Akin stating that he doesn't have Erin's w-2.....0.1.....\$ 50.00

January 26, 2017 – texts about the case.....0.2....\$100.00

February 1, 2017 – email from Akin stating that he has heard nothing about the w-2.....0.1.....\$ 50.00

February 1, 2017 – receipt review of e-mail from Akin regarding case management report.....0.1.....\$ 50.00

February 1, 2017 – email to Akin asking him if his client would discuss settlement at this time.....0.1...\$ 50.00

February 1, 2017 – various texts about the case and asking for settlement etc.....0.5....\$250.00

February 2, 2017 – two emails to Akin about stipulation and Erin's accountant reaching out to the employer and stating that his client does not want to discuss settlement at this

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time.....0.2....\$ 100.00

February 2, 2017 – various texts about case being in middle district, and Erin helping to find an attorney to co-counsel or for me to refer the case to and talk about the attorney who is representing the tall blonde woman for national origin discrimination.....0.3...\$150.00

February 3, 2017 – do research online find attorney Leland Garvin and talk to him on telephone about case; he refers to attorney Benjamin Yormak.....0.5...\$ 250.00

February 3, 2017 – email to Leland stating that I will get back to him on Monday after I talk to other attorney.....0.1...\$ 50.00

February 3, 2017 – text to Erin stating I found atty to help.....0.1...\$ 50.00

February 6, 2017 – text from Erin about w-2 .....0.1....\$ 50.00

February 8, 2017 – texts from Erin about hotline.....0.1...\$ 50.00

February 9, 2017 – talk to attorney Benjamin Yormak about case and he offered to be local counsel for \$500.....0.5....\$ 250.00

February 9, 2017 – various texts back and forth about the case and the attorneys I spoke to and her settlement proposal and the defendants refusal to discuss settlement etc.....0.5..\$ 250.00

February 9, 2017 – two emails to Akin re: stipulation to continuance etc.....0.2...\$100.00

February 9, 2017 – e-mail from Akin stating that he understands that I want to stipulate to an extension of time.....0.1....\$ 50.00

February 9, 2017 – e-mail from Akin stating that he won't agree to a continuance.....0.1....\$ 50.00

February 9, 2017 – e-mail to Erin stating that Akin won't agree to the continuance –forward his message.....0.1....\$ 50.00

February 9, 2017 – email from Erin asking for the signed contingency fee agreement for review by an attorney she chose so he can “sign off” on it as she gave him the copy only signed by

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her.....0.2.....\$100.00

February 9, 2017- email to Erin telling her I will get a copy of the contract signed by me to her.....0.1...\$ 50.00

February 9, 2017 – email to Erin reminding her that I filed an emergency motion to appear and transfer that was denied and a motion to stay under her pro se.....0.2.....\$100.00

February 9, 2017 – e-mail from Erin stating that she talked to attorneys but does not have a relationship with anyone.....0.1...\$ 50.00

February 9, 2017 e-mail from Akin stating he needs to know ASAP if I will consent to conference.....0.1...\$ 50.00

February 9, 2017 – email from Akin asking if I'm not representing Erin.....0.1...\$ 50.00

February 9, 2017 – email to Erin stating that I will prepare a response for her asking for a continuance of the pre-trial otherwise she will have to talk to the attorney.....0.1...\$50.00

February 9, 2017- email from Erin asking for a refund on her fees and costs and questions about financing during a contingency fee case.....0.2....\$100.00

February 9, 2017 – email to Erin that she can't be refunded for work.....0.1....\$ 50.00

February 9, 2017 – receipt and review of document prepared by Akin to send to the Court regarding the conference.....0.4....\$200.00

February 10, 2017 – e-mail from Leland Garvin stating that he's interested in co-counseling the case with me.....0.1...\$ 50.00

February 10, 2017 – receipt and review email from Erin with attached signed response to endorsed Order.....0.3....\$150.00

February 10, 2017 – email from Erin stating no code yet from Court.....0.1...\$ 50.00

February 10, 2017 – texts from Erin stating that she didn't have the letter in her inbox and then to

Phillips Point  
777 S. Flagler Drive  
Suite 800, West Tower  
W. Palm Beach, FL 33401

**The Czyz Law Firm, P.A.**

Catherine E. Czyz, Esq.

**Mailing Address:**  
P.O.Box: 243  
Bloomington, NJ 07403  
Telephone: (561) 628-1044  
e-mail: catherineczyz@icloud.com

disregard.....0.1...\$ 50.00

February 10, 2017 – various texts back and forth through the day about mailing the pleading and the case and Leland and fees, etc.....1.0...\$500.00

February 11, 2017 – Email from Erin stating that Exhibit C was missing from the complaint (presumed amended complaint) and stated that she may have a Ft. Myers attorney who will want to take the case to litigate.....0.2...\$100.00

February 11, 2017 – various texts back and forth with Erin about Leland working with me on the case and her case and attorneys she spoke to etc..... 0.5...\$ 250.00

February 12, 2017 – Re-review of file for complaint and amended complaint and the exhibit of Dr. Valesky’s letter and the scans of the originals.....1.0....\$500.00

February 13, 2017 – email to Erin about not noticing the missing exhibit in the second scan and informing her that the exhibit can be refiled and ask her about Leland.....0.1.....\$ 50.00

February 13, 2017 – text to Erin about the case and asking if she wants me to check with Leland or if she intends to hire someone else new.....0.1....\$ 50.00

February 13, 2017 – text from Erin telling me to discontinue work on her case including talking to Leland.....0.1.....\$ 50.00



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777 S. Flagler Drive  
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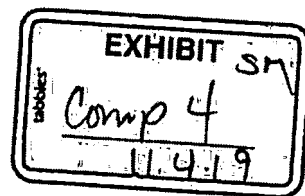
Mailing Address:  
P.O.Box: 243  
Bloomingdale, NJ 07403  
Telephone: (561) 628-1044  
e-mail: catherineczyz@icloud.com

Costs:

Copies @ \$1.00/copy.....\$328.00  
US Mail and certified mail.....\$ 5.31

**Amount Due.....\$ 25,745.81**

**DUE UPON RECEIPT.  
THERE ARE NO PAST DUE ACCOUNTS. UNPAID BILLS ARE FILED AS A LAWSUIT**



Compose

Inbox 1,234

Starred

Snoozed

Sent

Drafts 11

More



No recent chats  
Start a new one

Fwd: Photos nt. x

Catherine Czyz  
to me

Sent from my iPhone

Begin forwarded message.

**From:** Erin Neitzelt <[neitzeltnov10@yahoo.com](mailto:neitzeltnov10@yahoo.com)>  
**Date:** December 26, 2016 at 12:50:32 AM EST  
**To:** Catherine Czyz <[catherineczyz@icloud.com](mailto:catherineczyz@icloud.com)>  
**Subject:** Photos

Don't know if we can use? Sending maybe .

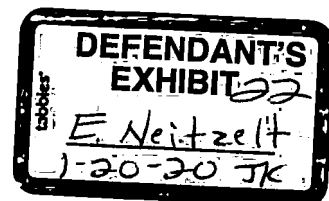
One, She is giving someone the finger online in one post.

Two, this is her Underage daughter. Rachel is drinking with her.

Three,  
Also, making joke reference to cocaine on her husband's nose at

Four, making reference to daughters being "adorable little alcoho  
name. Madison Fletcher is her other daughter Rick Fletcher is I

Five, making reference to their attractiveness. "You hate is beca

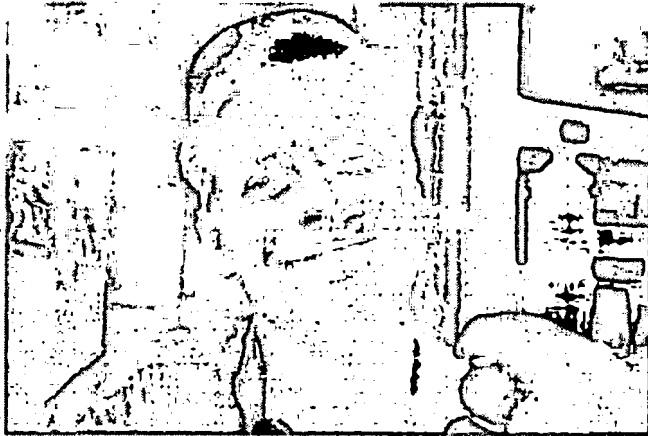




Madison's Post



1:16



I wish I could say that was powdered sugar..

5:11



Verizon

12:09 AM

100%



Search



Share

55

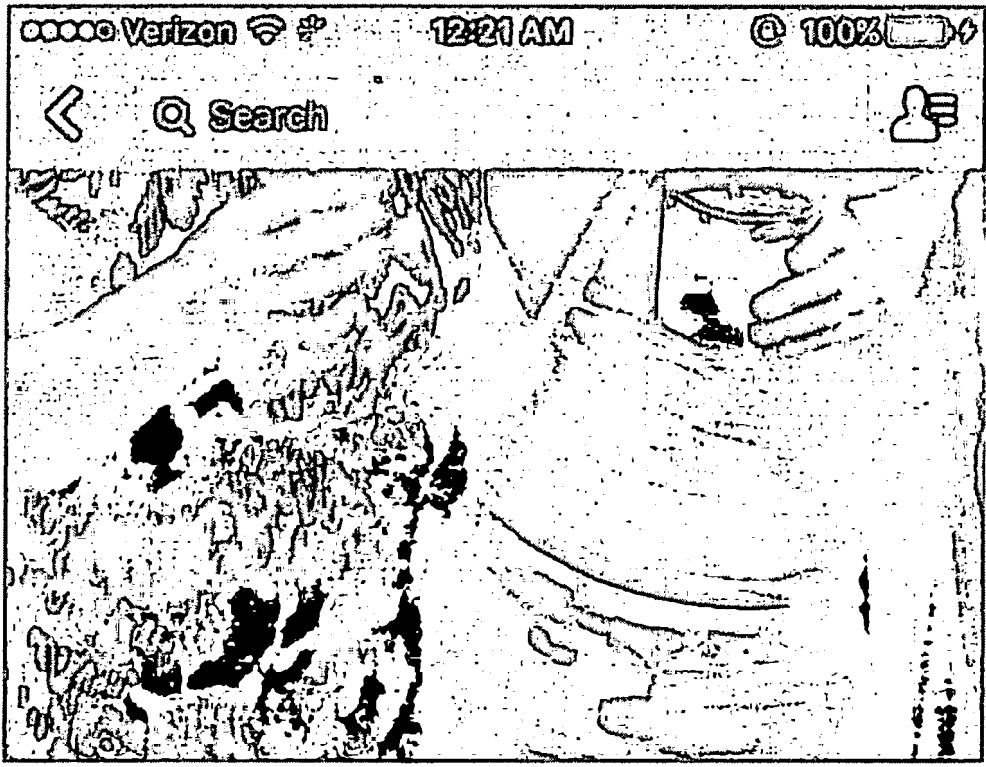


Rachel Gould



May 7 · 10 1





➦ Share

👍 2



**Sydney McRoberts**  
aren't we adorable little alcoholics?  
July 10, 2011



**Madison Fletcher**  
it's not alcoholism if you wash it down with a  
mojito.  
July 10, 2011



**Sydney McRoberts**  
spoken like a real fletcher  
July 10, 2011





# Madison's Post



1

Comment 1/15

Share

Verizon

12:35 AM

100%



Madison Fletcher



Madison Fletcher updated her profile picture.

June 26, 2011 ·

legal



7

72 Comments

Share



Madison Fletcher updated her profile picture.

June 24, 2011 ·



Compose

Inbox 1,232

Starred

Snoozed

Sent

Drafts 11

More



Sent from my iPhone

Begin forwarded message:

**From:** Erin Neitzelt <neitzeltnov10@yahoo.com>  
**Date:** December 26, 2016 at 3:24:17 PM EST  
**To:** Catherine Czyz <catherineczyz@icloud.com>  
**Subject:** Re: More

It is on PUBLIC pages with the globe icon next to it, so anyone in

Sent from Yahoo Mail for iPhone

On Monday, December 26, 2016, 3:20 PM, Catherine C.

Where are you getting this?

Sent from my iPhone

On Dec 26, 2016, at 1:00 AM, Erin Neitzelt <neitzeltnov10

Here she is calling a young man a thug. Just not p  
it, not making jokes about it on public forums online

<IMG\_7184.PNG>

No recent chats  
Start a new one

Sent from Yahoo Mail for iPhone

<IMG\_7184.PNG>

**Catherine Czyz**  
to me



From: Erin Neitzelt <[neitzeltnov10@yahoo.com](mailto:neitzeltnov10@yahoo.com)>  
Date: December 26, 2016 at 5:44:31 PM EST  
To: Catherine Czyz <[catherineczyz@icloud.com](mailto:catherineczyz@icloud.com)>  
Subject: Her grandson

He would not eat spinach, so she posted him distraught and posted "Hates this shit. He will learn to love it!!!" Not too nice to an infant. :(

Compose

Inbox 1,231

Starred

Snoozed

Sent

Drafts 11

More



+

### Fwd: Her grandson 0:00 x

Catherine Czyz

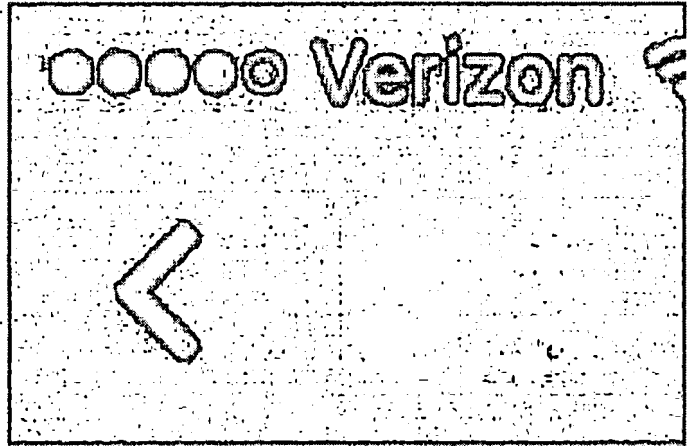
10 min

Sent from my iPhone

Begin forwarded message:

From: Erin Neitzelt <[neitzeltnov10@yahoo.com](mailto:neitzeltnov10@yahoo.com)>  
 Date: December 26, 2016 at 5:44:31 PM EST  
 To: Catherine Czyz <[catherineczyz@icloud.com](mailto:catherineczyz@icloud.com)>  
 Subject: Her grandson

He would not eat spinach, so she posted him distraught and post



No recent chats  
Start a new one



Rache  
October



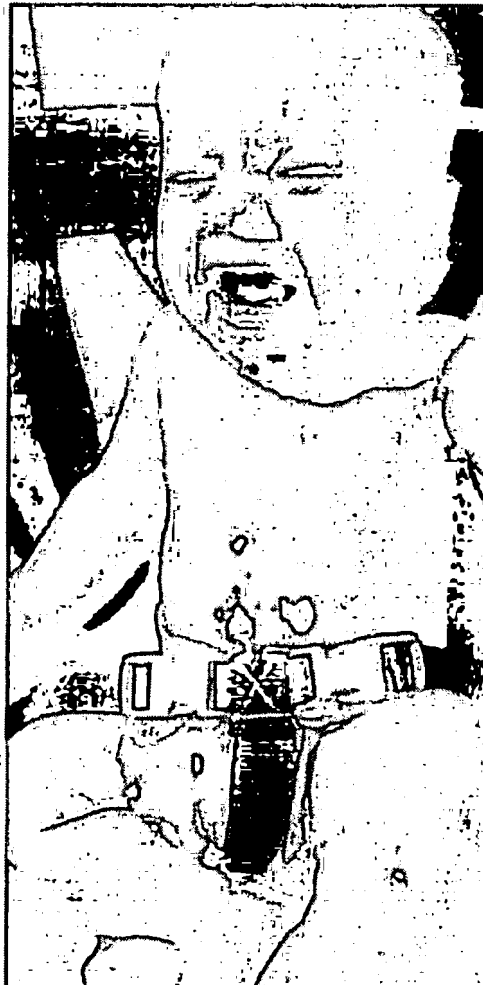
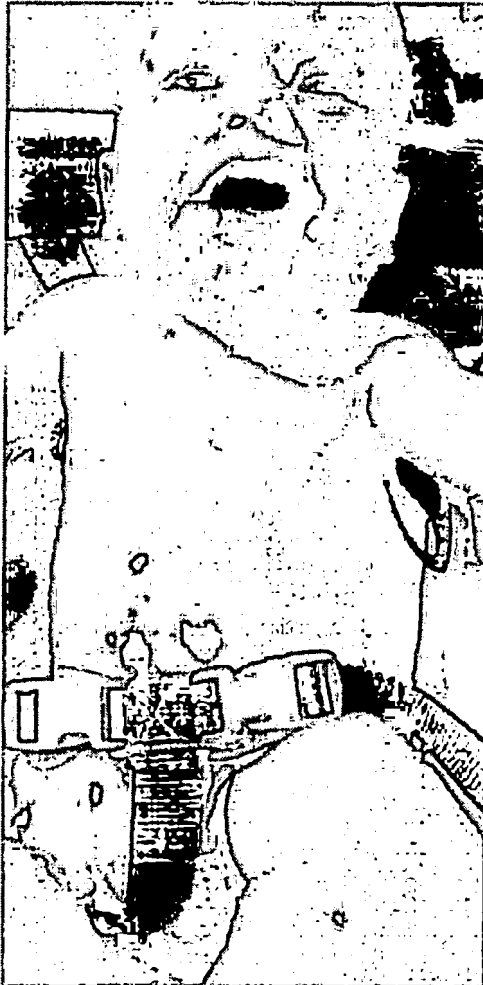
Rachel Gould



Rachel Gould added 2 new photos.

October 17 · Bonita Springs, FL

Hates this shit. He will learn to LOVE it!!!



19

11 Comments

Like

Comment

Share





C C <catherineczyk@gmail.com>

## Fwd: Canadians

1 message

Catherine Czyz <catherineczyk@icloud.com>  
To: catherineczyk@gmail.com

Sun, Nov 3, 2019 at 7:42 PM

Sent from my iPhone

Begin forwarded message:

**From:** Erin Neitzell <neitzellnov10@yahoo.com>  
**Date:** December 26, 2016 at 10:19:10 AM EST  
**To:** Catherine Czyz <catherineczyk@icloud.com>  
**Subject:** Canadians

About the Canadians, I don't know to whom she was referring, but Tammy Brown, my good friend in Bokeelia AND my realtor who helped me find and buy my house there is a Canadian. Also, when I first got hired at Mariner, I could not yet move into my new house for two weeks, so I rented a canal front home on Bokeelia island from a Canadian tv personality and his tv wife. They own a beach house there but live in Canada. They are friends of Tammy, and fellow Canadians, and they helped me to have a place to live so I could take the job at Mariner.

Sent from Yahoo Mail for iPhone

Phillips Point  
777 S. Flagler Drive  
Suite 800, West Tower  
W. Palm Beach, FL 33401

## The Czyn Law Firm, P.A.

Mailing Address:  
5500 Military Trail, Suite 22 - 292  
Jupiter, Florida 33458  
Telephone: (561) 628-1044  
Facsimile: (561) 366-7277

Catherine E. Czyn, Esq.

Invoice No.: 101245

April 30, 2016

Erin Neitzelt  
118 Martha Drive  
St. Clairsville, OH 43950

### RE: ERIN NEITZELT V. RACHEL GOULD AND LEE COUNTY SCHOOLS

Billable Rate: \$350.00/Hr

Billable Rate: \$400.00/Hr (in Court Appearances)

March 28, 2016 to April 8, 2016 – Initial Consultation Fee: Initial discussion regarding forced resignation from the school.....1.0.....\$350.00

April 11, 2016 – Messenger messages to set-up telephone conference for 04/13/16...0.1.....\$ 35.00

April 12, 2016 – Messenger messages confirming telephone conference and retainer deposit.....0.1.....\$ 35.00

April 13, 2016 – Telephone conference: discussion of entire case, facts and claims...2.6.....\$910.00

April 15, 2016 – Messenger messages re: need for employee manual, brief/statement of feeling of sex discrimination/harassment by Gould, etc., second half of retainer money.....0.1.....\$ 35.00

April 20, 2016 – Research on Florida Statute re : limitations of liability and Florida case law with 4<sup>th</sup> DCA case re: \$100K per claim.....2.5.....\$875.00

April 21, 2016 – Review of case file/records sent by client and notes made.....3.0.....\$1,050.00

April 21, 2016 – Telephone conference regarding case file/records.....1.4.....\$490.00

April 21, 2016 – Text re: follow-up discussion of case for 04/22/16.....0.1.....\$ 35.00

April 22, 2016 - Telephone conference re: oral and written notices of work problems/incompetence.....0.5.....\$175.00



P000062

Phillips Point  
777 S. Flagler Drive  
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W. Palm Beach, FL 33401

**The Cxyz Law Firm, P.A.**

Catherine E. Cxyz, Esq.

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5500 Military Trail, Suite 22 - 292  
Jupiter, Florida 33458  
Telephone: (561) 628-1044  
Facsimile: (561) 366-7277

April 22, 2016 – Text messages re: retainer money not received.....0.1.....\$35.00  
April 24, 2016 – Text message re: personnel file received by client and missing teacher  
evaluation.....0.1.....\$35.00  
April 28, 2016 – Text messages re: receipt of personnel file and apt for telephone conference on  
05/02/16.....0.1.....\$35.00  
Total fees:.....\$4,095.00  
Fee retainer\$6,000.00  

---

+1,905.00

Costs: File folders.....\$31.99  
Copies @ \$1.00/copy.....\$12.00  
Legal pad/papers.....\$ 6.99  
Hole punch.....\$15.99  
Zip envelope/receipt envelope.....\$ 3.49  
Tax on products.....\$4.09  
Total costs: \$74.55  
Cost retainer \$1500.00  

---

+1,425.45

Amount Due.....\$4,169.55

Service charge of 1.50% per month added to all PAST DUE Accounts

Phillips Point  
777 S. Flagler Drive  
Suite 800, West Tower  
W. Palm Beach, FL 33401

## The Cxyz Law Firm, P.A.

Catherine E. Cxyz, Esq.

**Mailing Address:**  
5500 Military Trail, Suite 22 - 292  
Jupiter, Florida 33458  
Telephone: (561) 628-1044  
Facsimile: (561) 366-7277

Invoice No.: 101254

May 30, 2016

Erin Neitzelt  
118 Martha Drive  
St. Clairsville, OH 43950

RE: ERIN NEITZELT V. RACHEL GOULD AND LEE COUNTY SCHOOLS

Billable Rate: \$350.00/Hr

Billable Rate: \$400.00/Hr (in Court Appearances)

May 2, 2016 – Review of personnel file from Lee county schools.....	3.0.....	\$1,050.00
May 2, 2016 – Telephone conference re: personnel file, missing documents, missing teacher evaluation, application for various positions at Lee County, notice of resignation, letter from Scott to employer, discussion of breach of contract action for improper pay, general review of facts of case.....	2.4.....	\$840.00
May 2, 2016 – Review of letter from Scott Neitzelt to employer taking job/continuing work (dated and sent prior to resignation).....	0.1.....	\$ 35.00
May 3, 2016 – text message as to whether employment contract was included in personnel file that was sent (contract is missing document).....	0.2.....	\$ 70.00
May 3, 2016 – Re-review of personnel file documents. No document titled “Employment Contract”. Missing contract needed for lawsuit.....	0.5.....	\$175.00
May 5, 2016 – Review of documents from past co-worker/James Rivera (he details Gould as a “bully” and uses bullying tactics on first year teachers bc contract may be cancelled without cause; he wasn’t given planning period time, etc, and treated unfairly.....	2.0.....	\$700.00
May 6, 2016 – Research on first year teacher contracts in the state of Florida. Florida statute 1012.335 and case law; result: teacher may be dismissed without cause or resign and no breach of contract. At-will employment terms.....	2.0.....	\$700.00



P000068

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777 S. Flagler Drive  
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W. Palm Beach, FL 33401

**The Czyz Law Firm, P.A.**

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Jupiter, Florida 33458  
Telephone: (561) 628-1044  
Facsimile: (561) 366-7277

Catherine E. Czyz, Esq.

May 13, 2016 – Text messages from Erin re: e-mail and message to her re: employment contract being an employee at will.....0.1.....\$ 35.00

May 13, 2016 – Review of e-mail re: call from Margaret Walters re: Dr. Sanchez, etc. and review of employee handbook attached (45 pages).....2.5.....\$875.00

May 16, 2016 – Call to Dr. Valesky, left message.....0.1.....\$35.00

May 16, 2016 – Text messages to and from Erin about payment not received.....0.1.....\$35.00

May 17, 2016 – Call to Dr. Valesky, left message.....0.1.....\$35.00

May 18, 2016 – text to Erin confirming /rescheduling telephone conference.....0.1.....\$35.00

May 20, 2016 – texts about EEOC letter.....0.1.....\$35.00

May 18, 2016 – Call from Dr. Valeski (he left personal phone number on voicemail).....0.1.....\$35.00

May 20, 2016 – Draft letter to EEOC charge form.....0.5.....\$175.00

May 20, 2016 – Call to Erin re: message from Dr. Valesky.....0.2.....\$70.00

May 20, 2016 – Email from Erin about EEOC letter.....0.1.....\$35.00

May 21, 2016 – Review of e-mail and zip attachment documents (reference letters, resume {no mention of Gould} and licenses).....1.5.....\$525.00

May 21, 2016 – print and made changes to previously drafted letter per corrections....0.3.....\$105.00

May 21, 2016 –Email from Erin about education mistake.....0.1.....\$ 35.00

May 23, 2016 – Call to Erin re case.....0.2.....\$ 70.00

May 23, 2016 – Call to Dr. Valesky and took notes.....0.2.....\$ 70.00

May 23, 2016 – Email from Erin youtube video review.....0.3.....\$105.00

May 23, 2016 – email from Erin about attachments.....0.1.....\$ 35.00



Phillips Point  
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W. Palm Beach, FL 33401

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Jupiter, Florida 33458  
Telephone: (561) 628-1044  
Facsimile: (561) 366-7277

Catherine E. Czyz, Esq.

May 23, 2016 – Draft letter of representation to EEOC.....	0.5.....	\$175.00
May 24, 2016 – Draft letter of representation to school board.....	0.5.....	\$175.00
May 24, 2016 – text to schedule talk re Dr. Valesky.....	0.1.....	\$ 35.00
May 24, 2016 – text messages about payment, and Valesky and impeaching him, etc.....	0.2.....	\$ 70.00
May 24, 2016 – Call to Erin; discussion of talk with Dr. Valesky and his reasons why she was not accepted into the program and his possible credibility issues.....	0.9.....	\$315.00
May 25, 2016 – Review of e-mail regarding classroom management. Etc.....	0.3.....	\$105.00
May 25, 2016 – Review of e-mail on cars /Gould/ videotape.....	0.1.....	\$ 35.00
May 25, 2016 – Review of e-mail about names.....	0.1.....	\$ 35.00
May 25, 2016 – Review of email about names and addresses.....	0.1.....	\$ 35.00
May 25, 2016 – Review of e-mail about media and pictures of Erin and Gould.....	0.1.....	\$ 35.00
May 25, 2016 – Review of e-mail with photo that makes Erin look kind.....	0.1.....	\$ 35.00
May 25, 2016 – Review of e-mail about media stations and request for damages etc.....	0.3.....	\$105.00
May 31, 2016 – e-mails from Erin about payment.....	0.1.....	\$ 35.00
May 31, 2016 – Text messages about strange e-mail from Erin (roaming?).....	0.1.....	\$ 35.00
Total fees:.....		\$4,095.00 (past due)
Interest.....		\$ 61.43
New charges.....		\$7,140.00

Phillips Point  
777 S. Flagler Drive  
Suite 800, West Tower  
W. Palm Beach, FL 33401

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5500 Military Trail, Suite 22 - 292  
Jupiter, Florida 33458  
Telephone: (561) 628-1044  
Facsimile: (561) 366-7277

Catherine E. Cxyz, Esq.

Amount Due

\$11,296.43  
Fee retainer \$6,000.00  

---

-\$ 5,296.43

Costs: Copies @ \$1.00/copy.....\$85.00  
Certified mailings.....\$ 3.77  
US Mail.....\$0.49

Total costs: \$74.55(past  
due)  
Interest \$ 1.12  
New charges \$93.03

Due: \$168.70  
Cost retainer \$1500.00

---

+1,331.30

Amount Due.....\$11,465.13

Service charge of 1.50% per month added to all PAST DUE Accounts

Phillips Point  
777 S. Flagler Drive  
Suite 800, West Tower  
W. Palm Beach, FL 33401

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5500 Military Trail, Suite 22 - 292  
Jupiter, Florida 33458  
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Facsimile: (561) 366-7277

Catherine E. Czyz, Esq.

Invoice No.: 101254

May 30, 2016

Erin Neitzelt  
118 Martha Drive  
St. Clairsville, OH 43950

RE: ERIN NEITZELT V. RACHEL GOULD AND LEE COUNTY SCHOOLS

Billable Rate: \$350.00/Hr

Billable Rate: \$400.00/Hr (in Court Appearances)

**CORRECTED BILL TO REFLECT \$0.47 FOR STAMP NOT \$0.49**

May 2, 2016 – Review of personnel file from Lee county schools.....3.0.....\$1,050.00

May 2, 2016 – Telephone conference re: personnel file, missing documents, missing teacher evaluation, application for various positions at Lee County, notice of resignation, letter from Scott to employer, discussion of breach of contract action for improper pay, general review of facts of case.....2.4.....\$840.00

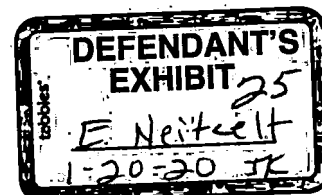
May 2, 2016 – Review of letter from Scott Neitzelt to employer taking job/continuing work (dated and sent prior to resignation).....0.1.....\$ 35.00

May 3, 2016 – text message as to whether employment contract was included in personnel file that was sent (contract is missing document).....0.2.....\$ 70.00

May 3, 2016 – Re-review of personnel file documents. No document titled “Employment Contract”. Missing contract needed for lawsuit.....0.5.....\$175.00

May 5, 2016 – Review of documents from past co-worker/James Rivera (he details Gould as a “bully” and uses bullying tactics on first year teachers bc contract may be cancelled without cause; he wasn’t given planning period time, etc, and treated unfairly).....2.0.....\$700.00

May 6, 2016 – Research on first year teacher contracts in the state of Florida. Florida statute 1012.335 and case law; result: teacher may be dismissed without cause or resign and no breach of contract. At-will



P000064

Phillips Point  
777 S. Flagler Drive  
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W. Palm Beach, FL 33401

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Catherine E. Cxyz, Esq.

employment terms.....2.0.....\$700.00

May 13, 2016 – Text messages from Erin re: e-mail and message to her re: employment contract being an employee at will.....0.1.....\$ 35.00

May 13, 2016 – Review of e-mail re: call from Margaret Walters re: Dr. Sanchez, etc. and review of employee handbook attached (45 pages).....2.5.....\$875.00

May 16, 2016 – Call to Dr. Valesky, left message.....0.1.....\$35.00

May 16, 2016 – Text messages to and from Erin about payment not received.....0.1.....\$35.00

May 17, 2016 – Call to Dr. Valesky, left message.....0.1.....\$35.00

May 18, 2016 – text to Erin confirming /rescheduling telephone conference.....0.1.....\$35.00

May 20, 2016 – texts about EEOC letter.....0.1.....\$35.00

May 18, 2016 – Call from Dr. Valeski (he left personal phone number on voicemail).0.1.....\$35.00

May 20, 2016 – Draft letter to EEOC charge form.....0.5.....\$175.00

May 20, 2016 – Call to Erin re: message from Dr. Valesky.....0.2.....\$70.00

May 20, 2016 – Email from Erin about EEOC letter.....0.1.....\$35.00

May 21, 2016 – Review of e-mail and zip attachment documents (reference letters, resume {no mention of Gould} and licenses).....1.5.....\$525.00

May 21, 2016 – print and made changes to previously drafted letter per corrections....0.3.....\$105.00

May 21, 2016 –Email from Erin about education mistake.....0.1.....\$ 35.00

May 23, 2016 – Call to Erin re case.....0.2.....\$ 70.00

May 23, 2016 – Call to Dr. Valesky and took notes.....0.2.....\$ 70.00

May 23. 2016 – Email from Erin youtube video review.....0.3.....\$105.00

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Catherine E. Czyz, Esq.

May 23, 2016 – email from Erin about attachments.....	0.1.....	\$ 35.00
May 23, 2016 – Draft letter of representation to EEOC.....	0.5.....	\$175.00
May 24, 2016 – Draft letter of representation to school board.....	0.5.....	\$175.00
May 24, 2016 – text to schedule talk re Dr. Valesky.....	0.1.....	\$ 35.00
May 24, 2016 – text messages about payment, and Valesky and impeaching him, etc..	0.2.....	\$ 70.00
May 24, 2016 – Call to Erin; discussion of talk with Dr. Valesky and his reasons why she was not accepted into the program and his possible credibility issues.....	0.9.....	\$315.00
May 25, 2016 – Review of e-mail regarding classroom management. Etc.....	0.3.....	\$105.00
May 25, 2016 – Review of e-mail on cars /Gould/ videotape.....	0.1.....	\$ 35.00
May 25, 2016 – Review of e-mail about names.....	0.1.....	\$ 35.00
May 25, 2016 – Review of email about names and addresses.....	0.1.....	\$ 35.00
May 25, 2016 – Review of e-mail about media and pictures of Erin and Gould.....	0.1.....	\$ 35.00
May 25, 2016 – Review of e-mail with photo that makes Erin look kind.....	0.1.....	\$ 35.00
May 25, 2016 – Review of e-mail about media stations and request for damages etc.....	0.3.....	\$105.00
May 31, 2016 – e-mails from Erin about payment.....	0.1.....	\$ 35.00
May 31, 2016 – Text messages about strange e-mail from Erin (roaming?).....	0.1.....	\$ 35.00
Total fees:.....		\$4,095.00 (past due)
Interest:.....		\$ 61.43
New charges.....		\$7,140.00

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777 S. Flagler Drive  
Suite 800, West Tower  
W. Palm Beach, FL 33401

## The Czyn Law Firm, P.A.

Catherine E. Czyn, Esq.

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Jupiter, Florida 33458  
Telephone: (561) 628-1044  
Facsimile: (561) 366-7277

Amount Due

\$11,296.43  
Fee retainer \$6,000.00  

---

-\$ 5,296.43

Costs: Copies @ \$1.00/copy.....\$85.00  
Certified mailings.....\$ 3.77  
US Mail.....\$0.47

Total costs: \$74.55(past  
due)  
Interest \$ 1.12  
New charges \$93.01  
  
Due: \$168.68  
ost retainer \$1500.00  

---

+1,331.32

Amount Due.....\$11,465.11

Service charge of 1.50% per month added to all PAST DUE Accounts

Phillips Point  
777 S. Flagler Drive  
Suite 800, West Tower  
W. Palm Beach, FL 33401

**The Czyz Law Firm, P.A.**

Catherine E. Czyz, Esq.

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Invoice No.: 101265

June 30, 2016

Erin Neitzelt  
118 Martha Drive  
St. Clairsville, OH 43950

**RE: ERIN NEITZELT V. RACHEL GOULD AND LEE COUNTY SCHOOLS**

Billable Rate: \$350.00/Hr  
Billable Rate: \$400.00/Hr (in Court Appearances)

June 1, 2016 – Review of messenger message from May 24, 2016 and review of video and article on Ft. Myers bathroom sex scandal.....0.5.....\$175.00

June 6, 2016 – Call to Miami EEOC with a voicemail answering system with “mailbox full” and call to main EEOC number with voicemail answering system stating the office is closed until May 31, 2016 due to weather.....0.3.....\$105.00

June 13, 2016 – Text message to Erin re: continuing work on case.....0.1.....\$ 35.00

June 13, 2016 – Call from Erin stating to continue with work on the case..0.1.....\$ 35.00

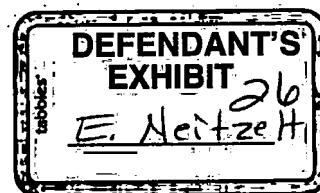
June 14, 2016 – re-review of FL statute on \$100k limitation on torts against a municipality or state or state agency.....0.3.....\$105.00

June 15, 2016 – Call to Penny Boggs’s work, spoke to receptionist/male and left voicemail for her to call me.....0.2.....\$ 70.00

June 15, 2016 – Text to Erin re: telephone conference on June 16, 2016 re: case and updates.....0.1.....\$ 35.00

June 15, 2016 – Text from Erin re: confirming telephone conference and payment via refinance of bike.....0.1.....\$ 35.00

June 16, 2016 – Call to Penny Boggs’s work for second time and spoke to receptionist and left voicemail message again for her to call me.....0.2.....\$70.00



P000001

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June 16, 2016 – I spoke to Penny Boggs re: conversation with Dr. Valesky and took notes; she gave good and bad points. she stated she was easy to work with and good with the gifted students but thought that her work history seemed unstable and she stated that Dr. Valesky stated it was confirming what they already knew.....0.2.....\$ 70.00

June 16, 2016- Preparation of notes for telephone conference with Erin for key points of case update.....0.4.....\$140.00

June 16, 2016 – Telephone conference with Erin re: talk with P. Boggs, need names of schools and addresses of prior employers not children, teachers union and voluntarily in or out, need full name of Bonnie and telephone number and discussed knowledge of video tape, March 30, 2016 e-mail to Dr. Valesky with no response to request for records, discussion of allowable damages per the statutes, and discussion of \$100k cap on liability and case law of per claim cap from other jurisdiction.....0.6.....\$210.00

June 19, 2016 – Text to Erin about deposit of funds and need to do so to avoid me transferring funds from another account.....0.1.....\$ 35.00

June 19, 2016 – Text messages from Erin stating payment will be by end of week.....0.1.....\$ 35.00

June 21, 2016 – Texts from Erin re: payment issues and inability to pay.....0.1.....\$ 35.00

June 21, 2016 – Text to Erin re: \$4k deposit to bring bill positive.....0.1.....\$ 35.00

June 21, 2016 – research on application of caps to Title VII and Florida discrimination statute in Florida against municipality/state/state agency and determination that there is conflicting interpretations of cap limit.....1.0.....\$350.00

June 21, 2016 – research and review of salary of principals in Lee County Schools/Ft. Myers - The median annual **School Principal** salary in **Fort Myers, FL** is **\$88,294**, as of May 31, 2016, with a range usually between **\$77,989-\$99,326** not including bonus and benefit information and other factors that impact base pay.....0.4.....\$140.00

June 22, 2016 – Draft release for work history information.....0.4.....\$140.00

June 22, 2016 – Draft release for educational institution information.....0.4.....\$140.00



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June 22, 2016 – e-mailed one release/work.....0.1.....\$ 35.00

June 23, 2018 – various texts between us regarding payment of \$4k, sending the release, and making a telephone conference time.....0.2.....\$ 70.00

June 23, 2016 – e-mailed one release/education.....0.1.....\$ 35.00

June 23, 2016 – e-mails from Erin re: one release and misspelling of name.....0.1.....\$ 35.00

June 23, 2016 – revise releases / correct name and resend.....No Charge

June 24, 2016 – text to Erin delaying telephone conference ½ hour.....No Charge

June 24, 2016 – Telephone conference with Erin re: payment and revising payment terms of the representation agreement.....0.3.....\$105.00

June 24, 2016 – Call to bank about funds not being in the account and told there was a delay until July 6, 2016.....0.2.....\$ 70.00

June 24, 2016 – Various texts between us re: problem with check being returned for insufficient funds, etc. and telephone calls with bank in between.....0.6.....\$210.00

June 25, 2016 – Various texts between us re: redeposit of money into your account and telephone calls to bank simultaneously.....0.8.....\$280.00

June 25, 2016 – Drive time to and from bank and talk with bank rep. with no results/refusal to clear returned check.....0.9.....\$315.00

June 25, 2016 – Texts between us about stop payment options etc.....0.1.....\$ 35.00

June 25, 2016 – E-mail message from Erin re: prior employers and list attachment review.....0.4.....\$140.00

June 27, 2016 – Call to bank about fees assessed, refusal to clear funds.....0.1.....\$ 35.00

June 27, 2016 – Various texts between us about re-deposit of \$4k and keeping of log of expenses for compensatory damages and call from/to bank.....0.3.....\$105.00

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e-mail: info@czynlawfirm.com

June 28, 2016 – Various texts between us re: notarized releases not being received (email from June 25, 2016 was in box) therefore..... No Charge

June 28, 2016 – Receipt and review of e-mail with notarized releases.....0.1.....\$ 35.00

June 29, 2016 – Draft letter to records cust. of Gulf Coast with release enclosure.....0.5.....\$175.00

June 30, 2016 – Draft letter to EEOC re: lack of claim information.....0.5.....\$175.00

Total fees:.....\$11,296.00

(past due)

Interest.....\$ 169.45

New charges.....\$3,850.00

Amount Due

\$15,315.45

Payment posted on June 28, 2016

Fee retainer\$6,000.00

\$4,000.00

-\$ 5,315.45

Costs: Copies @ \$1.00/copy.....\$52.00

Certified mailings.....\$ 3.77

\$ 6.47

US Mail.....\$ 0.47

Returned check fee.....\$34.00

Mileage @ \$0.54/mile.....5.8 miles \$ 3.13

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Total costs:	\$168.68(past
due)	
Interest	\$ 2.53
New charges	\$99.37
Due:	\$270.58
	cost retainer \$1500.00
	<hr/>
	+1,229.42

**Amount Due.....\$7,836.03**

Service charge of 1.50% per month added to all PAST DUE Accounts

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Invoice No.: 101273

July 31, 2016

Erin Neitzelt  
118 Martha Drive  
St. Clairsville, OH 43950

RE: ERIN NEITZELT V. RACHEL GOULD AND LEE COUNTY SCHOOLS

Billable Rate: \$175.00/Hr  
Billable Rate: \$175.00/Hr (in Court Appearances)

- July 14, 2016 – Text message to Erin reminding to mail the contract addendum....0.1.....\$17.50
- July 15, 2016 – Review of past employer list; very comprehensive . Good for potential witnesses but not good for getting records.....0.8.....\$140.00
- July 25, 2016 – Text message from Erin re: needing the evaluation from Lee County schools and I requested contract addendum back, etc. and confirmed I would fax it to Osborn....0.4.....\$70.00
- July 25, 2016 – Re-review of file to locate specific evaluation.....0.5.....\$87.50
- July 25, 2016 – prepare fax cover sheet and fax pages to Osborn.....0.4.....\$70.00
- July 25, 2016 - Text message to Erin notifying her that fax to Osborn completed...0.1.....\$17.50
- July 26, 2016 – Text message to Erin re: availability for telephone conference on Friday, and messages re: Erin’s Facebook page whether open to public, posts she’s made, the Lee county school employees who are friends, any posts they’ve made.....0.5.....\$87.50
- July 26, 2016 – receipt and review of e-mail message from Erin re: contacts/ people with problems with Gould.....0.8.....\$140.00
- July 26, 2016- receipt and review of e-mail re: Bonnie Gallo.....0.1.....\$17.50



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July 28, 2016 – Text messages about whether Lee County employees post anything about the school and my desire to review their pages but too late she deleted/blocked them.....0.2.....\$35.00

July 29, 2016 – Notes taken for discussion topics for telephone conference with Erin about Facebook, the list of past employers, the addendum to contract and the pre-prep for deposition.....0.5.....\$87.50

July 29, 2016 – text message about conference call.....0.1.....\$17.50

July 29, 2016 – Telephone conference with Erin about Facebook posts and people from Lee county school and how it can effect the case. Advised her not to shut down page at this time but be aware of posts and possibility of being used as an information gathering source by attorneys. Pre-preparation for deposition discussion. Request addendum; it was emailed by Scott, request direct send. Review need for past employer direct contact information, not supervisors, for employee records for expert review.  
Etc.....1.0.....\$175.00

July 29, 2016 - receipt review of e-mail from Erin with bid sheet.....0.3.....\$52.50

July 29, 2016 – receipt and review of bid sheets from Erin in e-mail.....0.5.....\$87.50

July 29, 2016 – receipt review of email from Erin re: Cambridge OVESC.....0.1.....\$17.50

July 29, 2016 – print out Cambridge OVESC attachment and review document.....0.6.....\$105.00

July 29, 2016 – receipt and review of email re: ECOT.....0.1.....\$17.50

July 29, 2016 – Print our ECOT attachment and review it.....0.5.....\$87.50

July 29, 2016 – receipt review of e-mail re: Union Local evaluations.....0.1.....\$17.50

July 29, 2016 – print and review Union Local documents.....1.0.....\$175.00

July 29, 2016 – receipt review of e-mail re: Barnsville evaluation.....0.2.....\$35.00

July 29, 2016 – print and review Barnsville evaluations and dox.....1.5.....\$262.50

July 29, 2016 – receipt and review of e-mail re: Dr. Hansen.....0.2.....\$35.00

July 29, 2016 – receipt and review of e-mail re: fax to Osborn.....0.2.....\$35.00

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July 29, 2016 – Print and review of Evaluation sent to Osborn.....0.3...\$52.50  
July 29, 2016 – receipt and review of e-mail forwarded from Donna Clark.....0.2...\$35.00  
July 29, 2016 – Could not open and print attachment to email from forwarded dox of Donna  
Clark.....0.1...\$17.50  
July 29, 2016- receipt and review of jobs applied for by Erin.....0.1...\$17.50  
July 29, 2016 – receipt and review of e-mail re: interviews.....0.2...\$35.00  
July 29, 2016 – email with more bid sheets; review 4.....0.8...\$140.00  
July 29, 2016 – receipt and review of email and attached addendum signed.....0.3...\$52.50

Total fees:.....\$15,315.45  
(past due)  
Interest.....\$ 113.33  
New charges:.....\$2,240.00

Amount Due \$17,668.78  
Fee retainer\$6,000.00  
Payment posted on June 28, 2016 \$4,000.00  

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-\$ 7,668.78

Costs: Copies @ \$1.00/copy.....\$103.00  
US Mail.....\$ 0.47  
Fax: @ \$2.50/page.....\$20.00

Total costs: \$359.47(past

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due)	
Interest	\$ 5.39
New charges	\$123.47
Due:	\$364.86
	cost retainer \$ 750.00
	<hr/>
	+ 385.14

\$7,668.78 (past due fees and interest)  
\$3,000.00 ( fee retainer)  
\$750.00 (cost retainer)  
\$(+385.14) (cost retainer remaining)

**Amount Due.....\$11, 033.64**

Service charge of 1.50% per month added to all PAST DUE Accounts

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Catherine E. Cxyz, Esq.

Invoice No.: 101285

September 9, 2016 (August 31, 2016 bill)

Erin Neitzelt  
118 Martha Drive  
St. Clairsville, OH 43950

**RE: ERIN NEITZELT V. RACHEL GOULD AND LEE COUNTY SCHOOLS**

Billable Rate: \$175.00/Hr

Billable Rate: \$175.00/Hr (in Court Appearances)

August 5, 2016 – Text messages about payment.....	0.1.....	\$17.50
August 10, 2016 – E-mail regarding black educators.....	0.2.....	\$35.00
August 10, 2016 – Review of attachment/ article.....	0.4.....	\$70.00
August 10, 2016 – e-mail to Erin about getting hired and applying for principal positions and discussion of letter to EEOC director.....	0.1.....	\$17.50
August 10, 2016 – Search and review of more articles on the black employee case in federal court.....	0.8.....	\$140.00
August 10, 2016 – Draft letter to Director of EEOC and fax it.....	0.5.....	\$87.50
August 11, 2016 – Call from EEOC’s Director’s assistant. Given charge number, date assigned and file manager assigned to the case.....	0.2.....	\$35.00
August 13, 2016 – Email review of email and list of employers.....	0.5.....	\$87.50
August 14, 2016 – email from Erin –update.....	0.2.....	\$35.00
August 15, 2016 – call to case manager about case left message.....	0.1.....	\$17.50
August 16, 2016 – call to case manager again and left message.....	0.1.....	\$17.50



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August 23, 2016 – Conference call with Erin about case.....0.8.....\$140.00  
August 30, 2016 – email from Erin about text messages to Scott and rumor.....0.2.....\$35.00  
August 30, 2016 – second email re texts to Scott with attachment.....0.3.....\$52.50  
August 30, 2016 – email response to Erin to ignore.....0.2.....\$35.00

New charges.....\$822.50

Amount Due \$18,491.28  
Fee retainer \$3,000.00  
Payment posted on August 20, 2016 \$11,033.64  
+ \$2,177.50

Costs: Copies @ \$1.00/copy.....\$22.00  
US Mail.....\$ 0.47  
Fax: @ \$2.50/page.....\$2.50

New charges \$24.47  
Due: \$24.47  
cost retainer \$ 750.00  
+ 725.53

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\$3,000.00 ( fee retainer)  
\$750.00 (cost retainer)  
\$ (+2,177.50) (fee retainer remaining)  
\$ (+ 725.53) (cost retainer remaining)

**Amount Due.....\$846.97**

Service charge of 1.50% per month added to all PAST DUE Accounts

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Catherine E. Cxyz, Esq.

Invoice No.: 101296

September 30, 2016

Erin Neitzelt  
40 Imperial Woods Drive  
Morgantown, WV 26508

RE: ERIN NEITZELT V. RACHEL GOULD AND LEE COUNTY SCHOOLS

Billable Rate: \$175.00/Hr  
Billable Rate: \$175.00/Hr (in Court Appearances)

September 1, 2016 – E-mail from Erin regarding WVU Associate Professor salary; read, review and print for file.....0.3.....\$52.50

September 1, 2016 – E-mail from Erin with more salary information on Assistant Professor salary; read, review and print for file.....0.3.....\$52.50

September 2, 2016 – Text message from CEC to Erin stating the bill was being sent late.....No charge

September 9, 2016 – receipt and review of letter dated August 12, 2016 from EEOC about receiving our August 10, 2016 letter and regarding their investigation.....0.4.....\$70.00

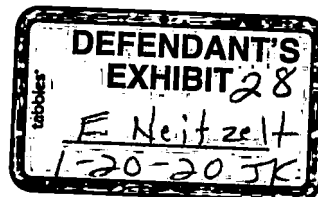
September 9, 2016 – various text messages about address, enforcement of capping statute, etc.....0.3.....\$52.50

September 19, 2016 – receipt and review of entire file from Gulf Coast University and preparation of questions for Valesky.....3.0.....\$525.00

September 25, 2016 – text messages re: expenditure list etc.....0.1.....\$17.50

September 27, 2016 – telephone call from EEOC with message to call the case worker.....0.1.....\$17.50

September 27, 2016 – Call placed to EEOC case worker and discussion of the notice of right to sue letter



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being issued.....0.3.....\$52.50

September 27, 2016 – text messages re: setting up telephone conference etc.....0.1.....\$17.50

September 29, 2016 – preparation of questions for Erin regarding her file at Gulf Coast and list of subject for update on case.....0.5.....\$87.50

September 29, 2016 – draft letter to prior employer, Ohio State Patrol, with release enclosure.....0.5.....\$87.50

September 29, 2016 – draft letter to prior employer, Catholic Diocese of Wheeling, with release enclosure package.....0.5.....\$87.50

September 29, 2016 – draft letter to prior employer, Carrolton School District, with release enclosure package.....0.5.....\$87.50

September 30, 2016 – draft letter to prior employer, Ohio Dept. of Jobs and Family Services, with release enclosure package.....0.5.....\$87.50

September 30, 2016 – draft letter to prior employer, Electronic School of Tomorrow, with release package.....0.5.....\$87.50

September 30, 2016 – E-mail from Erin showing an e-mail from her to Mary about her post graduate classwork.....0.1.....\$17.50

September 30, 2016 – E-mail from Erin regarding GRE scores with grid on scoring: read, review and print for file.....0.3.....\$52.50

September 30, 2016 – E-mail from Erin containing e-mails to and from the Gulf Coast University about her interview with copy sent to Kenny; read, review and print for file.....0.3.....\$52.50

September 30, 2016 - Telephone conference with Erin re: case.....1.0.....\$175.00

September 30, 2016- various text messages during and after call re: Gulf Coast....0.4.....\$70.00

September 30, 2016 - rereview of file for e-mailed message to school from Erin...0.3.....\$52.50

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New charges.....\$1,802.50

Amount Due \$20,319.10  
Fee retainer \$3,000.00

Payment posted on September 10, 2016 \$ 846.97  
+ \$1,197.50

Costs: Copies @ \$1.00/copy.....\$11.00

US Mail.....\$ 0.47

Certified Mail.....\$13.85

New charges \$25.32

Due: \$25.32  
cost retainer \$ 750.00

+ 724.68

\$3,000.00 ( fee retainer)  
\$750.00 (cost retainer)  
\$ (+1,197.50) (fee retainer remaining)  
\$ (+ 724.68) (cost retainer remaining)

**Amount Due.....\$1,827.82**

Service charge of 1.50% per month added to all PAST DUE Accounts

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Invoice No.: 101308

October 31, 2016

Erin Neitzelt  
40 Imperial Woods Drive  
Morgantown, WV 26508

RE: ERIN NEITZELT V. RACHEL GOULD AND LEE COUNTY SCHOOLS

Billable Rate: \$175.00/Hr

Billable Rate: \$175.00/Hr (in Court Appearances)

October 5, 2016 – Receipt and review of right to sue letter from EEOC

.....0.3.....\$52.50

October 7, 2016 – Research on constitutional law, violation of the sovereign immunity statute by being too old to be relevant anymore, etc.....1.5.....\$262.50

October 7, 2016 – Draft letter to east Muskingum Schools with release enclosure.....0.5.....\$87.50

October 7, 2016 – Draft letter to Belmont College with release enclosure.....0.5.....\$87.50

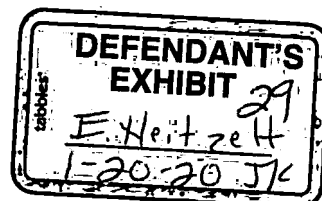
October 7, 2016 – Draft letter to east Union Local Schools with release enclosure.....0.5.....\$87.50

October 10, 2016 – Research on Title VII sex discrimination updated statute/law for pleading requirements.....3.0.....\$525.00

October 10, 2016 – research on Case N. Franke cases. I found several old cases, mostly regarding debts, but no new cases filed.....4.0.....\$700.00

October 11, 2016 – research on new/updated libel and slander forms of pleading.....4.0.....\$700.00

October 11, 2016 – re-review of file for information for general



P000038

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allegations.....2.0.....\$350.00

October 11, 2016 – draft Complaint.....6.0.....\$1,050.00

October 12, 2016 – draft Complaint.....3.0.....\$525.00

October 12, 2016 – receipt and review and sectioning of Barnesville employment records and W2s.....1.3.....\$227.50

October 12, 2016 – Call to FL bar about lawyers helping lawyers for secondary review of unconstitutionality issue and Title VII sex issue, left message.....0.3.....\$52,50

October 13, 2016 – draft Complaint.....6.0.....\$1,050.00

October 13, 2016 – Call from Bar; spoke with lawyers helping lawyers FL Bar rep., she said no one in either field was available for secondary review.....0.2.....\$35.00

October 14, 2016 – Draft Complaint.....8.0.....\$1,400.00

October 17, 2016 – receipt, review and section, employment records from Belmont County Job and Family services.....1.0.....\$175.00

October 17, 2016 – Draft Complaint.....6.0.....\$1,050.00

October 18, 2016 – Draft Complaint.....10.0.....\$1,750.00

October 19, 2016 – Call to Sheriff's department to talk to Officer Diego Orjuela and was transferred to a voicemail.....0.2.....\$35.00

October 19, 2016 – Draft Complaint.....7.0.....\$1,225.00

October 20, 2016 – Call to Sheriff's office and transferred twice; I spoke to a female intake officer who kept asking why I needed to speak to Officer Orjuela and she informed me he would be in tomorrow morning so I left another message with her for him to call me.....0.4.....\$70.00

October 20, 2016 – Draft Complaint.....4.0.....\$700.00

October 20, 2016 – Call to Erin; discussion of Complaint at 21 pages and still working on

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e-mail: info@czyzlawfirm.com

it.....	0.3.....	\$52.50
October 21, 2016 – Call from Officer Orjuela, he left message.....	0.1.....	\$17.50
October 21, 2016 – Call to Officer Orjuela; he denied any knowledge of any slander against him by Gould, he did not acknowledge any belief of any slander about him and any female teacher, he did not acknowledge any knowledge of any meetings or teacher meeting regarding you and/or any knowledge of any lawsuits by any other teachers against Gould or the school board.....	0.3.....	\$52.50
October 21, 2016 – draft Complaint.....	3.0.....	\$525.00
October 22, 2016 – find e-mailed records from Barnsville and e-mailed to Erin...0.2.....	0.2.....	\$35.00
October 24, 2016 – scanned and e-mailed employment records and Gulf Coast records to Erin for review.....	0.7.....	\$122.50
October 24, 2016 – draft Complaint.....	3.0.....	\$525.00
October 25, 2016 – draft Complaint.....	4.0.....	\$700.00
October 26, 2016, 2016 – draft case information statement.....	0.5.....	\$87.50
October 31, 2016 – read and review three (3) e-mails from Erin.....	0.4.....	\$70.00
New charges.....		\$14,700.00
		Fee retainer\$3,000.00
Payment posted on October 17, 2016		\$ 1,827.82
		<hr/> -\$11,700.00
Costs: Copies @ \$1.00/copy.....		\$185.00



Phillips Point  
777 S. Flagler Drive  
Suite 800, West Tower  
W. Palm Beach, FL 33401

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Telephone: (561) 628-1044  
e-mail: info@cxyzlawfirm.com

US Mail.....	\$ 0.47
Certified Mail.....	\$13.85
New charges	\$199.32
Due:	\$199.32
	cost retainer \$750.00
	<hr/>
	+ 550.68

\$3,000.00 ( fee retainer)  
\$750.00 (cost retainer)  
\$ (0.00) (fee retainer remaining)  
\$ (+ 550.68) (cost retainer remaining)

**Amount Due.....\$14,899.32**

Service charge of 1.50% per month added to all PAST DUE Accounts

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e-mail: info@cxyzlawfirm.com

Invoice No.: 101317

November 30, 2016

Erin Neitzelt  
40 Imperial Woods Drive  
Morgantown, WV 26508

RE: ERIN NEITZELT V. RACHEL GOULD AND LEE COUNTY SCHOOLS

Billable Rate: \$175.00/Hr  
Billable Rate: \$175.00/Hr (in Court Appearances)

November 1, 2016 – re-review of file for missing information, etc. to advise  
Erin.....2.0.....\$350.00

November 1, 2016 – Call to Carrollton about their missing records.....0.3.....\$ 52.50

November 1, 2016 – Compose e-mail to Erin about missing info, etc.....0.2.....\$ 35.00

November 1, 2016 – Receipt and review of e-mail from Erin and sent responding e-mail.....0.2.....\$ 35.00

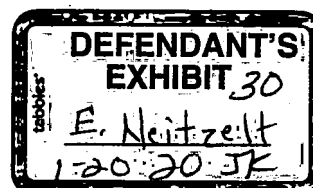
November 2, 2016 – text messages between Erin and me about new discrimination suit she found, and Officer Orjuela and contacting her on Monday about Complaint.....0.3.....\$ 52.50

November 3, 2016 – Receipt review of e-mail from Erin re.: college classes, etc.....0.3.....\$ 52.50

November 3, 2016 – Forward to computer, Download and Review of classes/grades/document.....0.5.....\$ 87.50

November 3, 2016 – Take notes re: e-mail and college classes.....0.5.....\$ 87.50

November 4, 2016 – texts between Erin and me about changing contract to full contingency fee.....0.2.....\$ 35.00



P000042

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Catherine E. Cxyz, Esq.

November 7, 2016 – various text messages back and forth about the parts of the Complaint, about Erin’s ethnicity, and Gould not liking her affluence, therapist, etc.....1.1.....\$192.00

November 7, 2016 – Forward Complaint from computer to icloud then forward to Erin in an e-mail for her review.....0.3.....\$ 52.50

November 7, 2016 – text message confirming telephone conference for November 8, 2016 at 3:00pm.....0.1.....\$ 17.50

November 8, 2016 – Review e-mail from Erin re: several corrections/edits.....0.3.....\$ 52.50

November 8, 2016 – Forward Erin’s e-mail to computer e-mail, download and make notes for appropriate legal edits.....0.6.....\$105.00

November 8, 2016 – Receipt and review of Erin’s e-mail about appointment with therapist.....0.1.....\$ 17.50

November 8, 2016 – Email back to Erin re: therapist.....0.1.....\$ 17.50

November 8, 2016 – Go through Complaint and make edits/revisions.....3.0.....\$525.00

November 9, 2016 – Receipt/review of e-mail from Erin changing the relief requested in the Complaint to not include the request of her job back or better position due to election results.....0.1.....\$ 17.50

November 9, 2016 - Re-edit Complaint to take out language of job requests and renumber.....0.6.....\$105.00

November 10, 2016 – Text message to and from Erin about Complaint.....0.1.....\$ 17.50

November 10, 2016 – Forward Complaint to icloud e-mail and send to Erin for review.....0.2.....\$ 35.00

November 10, 2016 – Review of e-mail from Erin re: number 5.....0.1.....\$ 17.50

November 10, 2016 – Review of e-mail from Erin re: another set of edits.....0.1.....\$ 17.50

November 10, 2016 – E-mail to Erin re: edits and tell her I will make changes.....0.1.....\$ 17.50

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e-mail: info@czynlawfirm.com

November 10, 2016 – Review E-mail from Erin with more edits 72 and 73.....0.1.....\$ 17.50

November 10, 2016 – Review E-mail from Erin with more edits about gifted classes, start of work date, etc.....0.1.....\$ 17.50

November 10, 2016 – Forward the six e-mails to my computer, print, review and take notes on which edits can be placed into the Complaint.....0.7.....\$122.50

November 10, 2016 – Re-edit/revise with edits that I should put in.....1.0.....\$175.00

November 11, 2016- Receipt and review of e-mail from the secretary at the Catholic Dioces and review of Erin's e-mail thanking her, with attachment.....0.2.....\$ 35.00

November 11, 2016 – Forward scanned evaluation to computer, print it, read/review evaluation and take notes. Over-all good evaluation.....1.0.....\$175.00

November 12, 2016 – Texts back and forth to Erin about payment and straight contingency fee agreement.....0.1.....\$ 17.50

November 14, 2016 – Review of e-mail from Erin approving Complaint.....0.1.....\$ 17.50

November 16, 2016 – E-mail sent back to Dr. Schmit's secretary re: talk with Dr. Schmit and evaluation and file.....0.2.....\$ 35.00

November 16, 2016 – Research on Federal and FL state law about violation of constitution and having the FL statute for limiting damages on Erin's case deemed unconstitutional. Fed statute on this states to make motion to Court to address this to Attorney General of State of FL after filing.....5.0.....\$875.00

November 18, 2016 – Receipt and review of 96 pages of material from Carrollton regarding Erin's employment, and take notes for discussion on her quitting and her pay and evaluations, etc.....6.0.....\$1,050.00

November 19, 2016 – Draft Contingency Fee Agreement for Erin.....0.9.....\$157.50

November 19, 2016 – send Erin e-mail with Contingency Fee Agreement attached..0.1.....\$ 17.50

November 21, 2016 – research on Latvian woman, Regina Hunter, civil rights case and pull Complaint

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e-mail: info@czyzlawfirm.com

from Courthouse in Middle District.....5.0....\$875.00

November 22, 2016 – Research on Black person class action in Middle District, pull case and review and compare three case similarities, and possible class action for our case.....5.0....\$875.00

November 23, 2016 – Initiate case online with e-portal system. Data entry on case parties, type of case, create/draft case information statement, create PDF file of Complaint and count pages for upload on e-portal, enter service of process parties and e-mail addresses of service on new account, etc. and file Complaint online for service on Defendants.....3.2....\$560.00

November 23, 2016 – Draft Summons for Rachel Gould, look up service address, etc.....0.6...\$105.00

November 23, 2016 – Draft Summons for Lee County School District, look up service address, etc.....0.5....\$ 87.50

November 23, 2016 – Receipt/review of e-mail from Lee County Courts about filed Complaint.....0.1...\$ 17.50

November 23, 2016 – call to Legal Advocate Services for reliable process server in Lee County.....0.2....\$ 35.00

November 26, 2016- Texts back and forth from Erin about amending Complaint to add the requested relief of job back or higher position.....0.2....\$ 35.00

November 28, 2016 – Call to Florida Bar and transferred to Lawyers helping lawyers division about request for class action attorney on Title VII cases.....0.5...\$ 87.50

November 28, 2016 – Call to South Florida Legal Services about service of process charges , etc.....0.3....\$ 52.50

November 28, 2016 – Draft Amended Complaint.....0.6....\$105.00

November 28, 2016 – Draft Summons on Amended Complaint for Gould.....0.3...\$ 52.50

November 28, 2016 – Draft Summons on Amended Complaint for Lee County School District.....0.3....\$ 52.50

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November 29, 2016 – Receipt/review of call/message from FL bar about e-mailing the names of requested attorney information.....0.3....\$ 52.50

November 29, 2016 – File the Amended Complaint on the e-portal system.....0.4....\$ 70.00

November 29, 2016 – Receipt/review of e-mail from Lee County Courthouse regarding the filing of Amended Complaint.....0.1....\$ 17.50

November 29, 2016 – email to SFLS about correspondence.....0.1....\$ 17.50

November 29, 2016 – Receipt/ review of attorney information (Benjamin H. Hill, Esq.) as class action referral.....0.3....\$ 52.50

November 29, 2016 – re-review of file and take notes for Mr. Hill.....2.0....\$350.00

November 29, 2016 – Call to SFLS about serving the Complaint.....0.3....\$ 52.50

November 29, 2016 – draft e-mail to South Florida Legal Services with Amended Complaint and Summons on Amended Complaint.....0.1....\$ 17.50

November 29, 2016 – Talk with Mr. Hill about the requirements to make a “class” for a class action, very stringent rules which he successfully combated in defense, and the facts of Erin’s case and the other Latfian woman and the BMW woman and the “good ol’ boy” club and decision to contact the attorney for the black person class action to coordinate a possible class action based upon sex discrimination.....1.0....\$175.00

November 30, 2016 – e-mail from SFLS about receipt of Amended Complaint and summons for service of process.....0.1....\$ 17.50

November 30, 2016 – Filed both Summons on Amended Complaint for service issuance with Lee County on e-portal system.....0.5....\$ 87.50

November 30, 2016 – receipt/review of e-mail from Lee County Courthouse about Summons on Amended being filed.....0.1....\$ 17.50

November 30, 2016 - Sx (6) e-mails back and forth with SFLS about credit card payment and service of Amended Complaint with turn-around time for the summons and process.....0.6....\$105.00

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November 30, 2016 – Various texts back and forth from Erin acknowledging that November will be the last hourly bill and acceptance of Contingency Fee agreement from her and request that original must be received in the mail later and therapist.....0.3.....\$ 52.50

November 30, 2016 – Review E-mail from Erin about prep work on case, etc.....0.1...\$ 17.50

November 30, 2016 – receipt/review of Contingency Fee agreement attached to e-mail from Erin.....0.1.....\$ 17.50  
17.50

November 30, 2016 – Compose e-mail to Erin about case.....0.1.....\$ 17.50

New charges.....\$8,785.00

Fee retainer\$3,000.00

Payment posted on November 16, 2016 \$ 15,000.00  
+100.68

-\$5,684.32

### Costs:

Filing fee in Lee County for Complaint.....\$400.00

Lee County convenience fee for filing.....\$ 5.00

Filing fee for Summons (Gould).....\$ 20.00

Filing fee for Summons (Lee County School District).....\$ 20.00

Lee County Summons issuance fee.....\$ 25.00

South Florida Legal Services (service of process fee) \$40.00 \*2.....\$ 80.00

Copies @ \$1.00/copy.....\$206.00

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Scanned documents @ 2.00/page.....	\$1,046.00
US Mail.....	\$ 0.47
New charges	\$1,802.47
Due:	\$1,802.47
	cost retainer \$ 750.00
	<hr/>
	-\$1,052.47

\$3,000.00 ( fee retainer)  
\$750.00 (cost retainer)  
\$ (0.00) (fee/cost retainer remaining)

**Amount Due.....\$10,486.79**

Service charge of 1.50% per month added to all PAST DUE Accounts



# 2016-2017 Teacher Assignment Preference Sheet

In developing a master schedule, the primary obligation is to construct a program to meet all the needs of the students. We also have to consider the training, interests, and preference of teachers. Please understand that while your preferences will be given careful consideration, the total program, as affected by student needs, will determine your assignment. While it is always a goal to match teacher preference with position, this objective is not always possible. Please give serious thought to the following questions and place your teaching assignment preference sheet in my mailbox by March 24, 2016.

1. Teacher Name (Last name, First name): Neitzelt, Erin

2. Please list all of your certifications (including grade level) that are on your teaching certificate in the table below. If not sure of all your areas then you can "look up" your license at <http://www.fldoe.org/teaching/certification/>

	Certification Areas
1.	English Middle Grades 5-9
2.	Teacher K-6
3.	Gifted
4.	Education Leadership
5.	
6.	
7.	

Do not wish to return next year. Thank you.

Please list any advanced, post graduate, or professional degree/certification work in progress:

	Advanced, Post Graduate, or Professional Degree/Certification work in progress
1.	Doctorate, Education Leadership (Have completed all 4 years all but dissertation now.)
2.	
3.	Finishing dissertation at FGCU this fall.

4. Please list any areas extracurricular activities/special assignments you are interested in:

	Extracurricular/Special Assignments
1.	Music - Choir - Pianist - Singer. Have been a piano accompanist for 36+ years now.
2.	Leadership
3.	

5. If possible, do you want to keep common planning within your department?

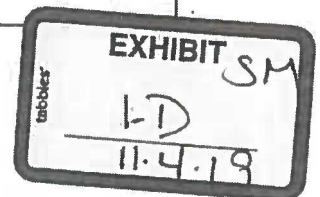
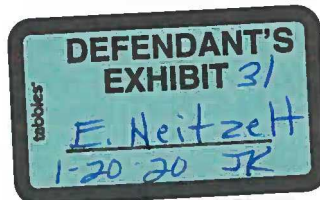
Yes  No

Re: Schedule - I love mine now. 😊

6. If you could make up your own hypothetical DREAM schedule what would it look like:

**DREAM SCHEDULE**	
1.	Block ELA
2.	Block ELA
3.	Block ELA
4.	Block ELA
5.	Plan
6.	Lunch
7.	Block ELA
8.	Block ELA
9.	Triton Time
10.	Triton Time

I am as full year. I like my schedule now. 😊



I do not wish to return to Maurine Middle  
school next year. I do not seek  
a contract for next year.

Please do not include me in  
planning for next year. Erin Kettell.



October 15, 2019

12:37 PM

Edit

be a case of someone coming in and taking over a place. Columbus was mostly an explorer, but his view that the ppl living here were savages lead to an attitude about them that spawned a lot of painful treatment. I think the point of let... See More

20h Like Reply



**Catherine E. Pellizzari Czyz**  
**Andrew Miles** I just read your last post. What exactly do you mean by the statement, "trying to inject your own personal vendettas"?

Just now Like Reply





Department of State / Division of Corporations / Search Records / Detail By Document Number /

**Detail by Entity Name**

Florida Limited Liability Company  
ROYAL ATLANTIC TITLE, L.L.C.

Filing Information

<b>Document Number</b>	L05000084411
<b>FEI/EIN Number</b>	03-0568846
<b>Date Filed</b>	08/25/2005
<b>Effective Date</b>	08/25/2005
<b>State</b>	FL
<b>Status</b>	INACTIVE
<b>Last Event</b>	ADMIN DISSOLUTION FOR ANNUAL REPORT
<b>Event Date Filed</b>	09/28/2012
<b>Event Effective Date</b>	NONE

Principal Address

5500 MILITARY TRAIL  
#22-292  
JUPITER, FL 33458

Changed: 04/20/2011

Mailing Address

5500 MILITARY TRAIL  
#22-292  
JUPITER, FL 33458

Changed: 04/20/2011

Registered Agent Name & Address

THE CZYZ LAW FIRM, P.A.  
5500 MILITARY TRAIL  
#22-292  
JUPITER, FL 33458

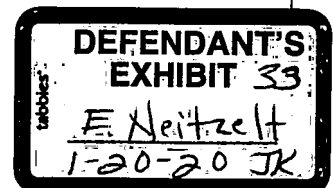
Name Changed: 03/01/2008

Address Changed: 04/20/2011

Authorized Person(s) Detail

**Name & Address**

Title MGRM



CZYZ, CATHERINE  
5500 MILITARY TRAIL  
JUPITER, FL 33458

**Annual Reports**

<b>Report Year</b>	<b>Filed Date</b>
2009	06/16/2009
2011	04/20/2011

**Document Images**

<a href="#">04/20/2011 -- REINSTATEMENT</a>	<a href="#">View image in PDF format</a>
<a href="#">06/16/2009 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">03/01/2008 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">11/29/2007 -- REINSTATEMENT</a>	<a href="#">View image in PDF format</a>
<a href="#">04/06/2006 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">08/25/2005 -- Florida Limited Liability</a>	<a href="#">View image in PDF format</a>

**Business Cash Manager Checking**

01 2000023596052 036 130 0 40

Electronic Delivery

ROYAL ATLANTIC TITLE, L.L.C.  
ESCROW ACCOUNT  
5805 BLUE LAGOON DR SUITE 110  
MIAMI FL 33126

CB

**Business Cash Manager Checking**

5/01/2007 thru 5/31/2007

Account number: [REDACTED]  
Account owner(s): ROYAL ATLANTIC TITLE, L.L.C.  
ESCROW ACCOUNT

**Account Summary**

Opening balance 5/01	\$50,459.76
Deposits and other credits	21,625,922.92 +
Checks	3,526,559.18 -
Other withdrawals and service fees	18,059,090.17 -
Closing balance 5/31	\$90,733.33

**Deposits and Other Credits**

Date	Amount	Description
5/01	123,424.29	DEPOSIT
5/01	829,098.79	[REDACTED]
5/02	816,097.47	[REDACTED]
5/03	798,093.77	[REDACTED]
5/04	1,000.00	DEPOSIT
5/04	43,383.92	DEPOSIT
5/04	343,039.54	[REDACTED]
5/07	110,201.39	[REDACTED]
5/07	339,116.96	[REDACTED]
5/07	448,598.11	[REDACTED]

Deposits and Other Credits continued on next page.

DEFENDANT'S  
EXHIBIT 34  
E. Neitzelt  
1-20-20 JK