

IN THE SUPREME COURT OF FLORIDA
(Before a Referee)

THE FLORIDA BAR,

Complainant,

v.

LORA S. SCOTT,

Respondent.

Supreme Court Case
No. SC21-190

The Florida Bar File
No. 2020-30,156(09D)

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RESPONDENT'S ANSWER TO COMPLAINT

The Respondent, Lora Scott, through her undersigned attorney, answers the complaint of the Florida Bar and admits or denies the allegations as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.

8. Admitted that some responses were not filed. However, Respondent contends that to a large degree, that is a result of Mr. Strong

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failing to promptly comply with requested information and documents.

Respondent forwarded all documents provided by Mr. Strong.

9. Admitted.

10. Admitted.

11. Admitted.

12. Admitted.

13. Admitted.

14. Admitted.

15. Upon information and belief, this is correct. Respondent again asserts that to a large degree, failures to respond were driven by Mr. Strong not complying with requests for information and documents.

16. Admitted.

17. Admitted

18. Admitted.

19. Admitted.

20. Admitted.

21. Admitted that Mr. Strong did a *pro se* objection.

22. Admitted.

23. Admitted. However, Respondent could have also indicated that there were cooperation problems with Mr. Strong, but she did not do so in

order to not harm him in the case.

24. Admitted.

25. Admitted. Respondent believed, based on communications from Mr. Strong, that he was securing replacement counsel.

26. Admitted.

27. Admitted.

28. Admitted. Mr. Strong had previously indicated that he was going to secure replacement counsel and would enter into a stipulation for substitution. Furthermore, Respondent had exchanged e-mails with the Judge's assistant from February 12 - 15, 2019 regarding the Judges' procedure for entry of an order which would allow the withdrawal, without the necessity of a hearing. These were procedures with which the Respondent complied.

29. Admitted.

30. Admitted.

31. Neither admitted, nor denied. Upon information, Respondent believes this hearing may have been recorded.

32. Admitted in part. There were orders which were provided to Respondent timely, and other orders where Respondent did not act as timely, in part because Respondent was anticipating new counsel coming

into the case.

33. Admitted.

34. Admitted.

35. Admitted.

36. Admitted.

37. Admitted. However, this is not an uncommon sanction, because it is anticipated that the purge can readily be accommodated.

38. Admitted.

39. Upon information and belief, these numbers are correct.

Therefore, admitted.

40. Admitted.

41. Neither admitted, nor denied.

42. Any allegation not specifically admitted, is denied.

**NOTICE OF TRIAL COUNSEL AND
DESIGNATION OF EMAIL ADDRESSES**

The trial counsel for the Respondent in this matter is Barry Rigby, whose address is Law Offices of Barry Rigby, P.A., 1881 Lee Road, Winter Park, FL 32789, 407-650-1985, whose primary email address is barryrigbylaw@gmail.com, and secondary email address is rigbylaw@yahoo.com. Complainant need not address pleadings, correspondence, etc. intended for Respondent, to anyone other than trial counsel.

CERTIFICATE OF SERVICE

I certify that the foregoing has been e-filed with the Supreme Court of Florida, and a true and correct copy has been furnished to the Honorable Robert W. Hodges, Circuit Judge/Referee, 110 NW First Avenue, Suite 3017, Ocala, FL 34475-6601, via email to cmatthews@circuit5.org; to Ashley Taylor Morrison, Bar Counsel, 1000 Legion Place, Suite 1625, Orlando, Florida 32801, via email to amorrison@floridabar.org; and to Staff Counsel, The Florida Bar, 651 East Jefferson Street, Tallahassee, FL 32399-2300, via email to psavitz@flabar.org, this 1st day of March, 2021.

/s/ Barry Rigby
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