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REPORT ON ANNE ASHBY CONFLICTS

Dolcefino Consulting was engaged to investigate and research the improper legal practices and conflicts of interest by the arbitrator in the malpractice litigation against former attorneys Nick Abaza, Jorge Borunda and Michael Trevino (the “Attorneys”) and their respective law firms. The Attorneys represented Caroline and Richard Allison, Jr., in the Collin County Probate Case No. PB1-1332-2019, *In the Estate of Richard Gerard Allison*. Michael Collins (“Collins”), through Collins Law Group, represented Robin Allison, stepmother of Caroline and Richard, Jr.

BACKGROUND

Ms. Caroline Allison and Mr. Richard Allison, Jr. (the “Allison Siblings”) engaged Nick Abaza and Jorge Borunda in the probate matter. Knowing that a possible settlement was forthcoming, an arbitration clause was entered into Ms. Caroline Allison’s contract and converted her hourly rate to a contingency based contract. It is also reported that Mr. Richard Allison did not provide authorization to hire Michael Trevino.

After the Allison Siblings signed a Mediated Settlement Agreement with their stepmother Robin Allison, Ms. Caroline Allison instructed the Attorneys to “cancel” the MSA. Per the Allison Siblings, they believed that they had been scammed by the Attorneys.

Having found their representation lacking in all facets, Ms. Caroline Allison filed suit for legal malpractice against the Attorneys in Harris County District Court Case No. 2021-80256, *Caroline Allison v. Borunda, PC, et al.* Ms. Caroline Allison only agreed to amend the contract due to her counsel’s specific recommendations, and now believes the amended contract was recommended after the attorneys discovered the multimillion-dollar value of her father’s estate. Moreover, the Allison Siblings believe that the probate lawsuit was brought in bad faith by the Attorneys as their father’s estate apparently made them the rightful beneficiaries.

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ANNE ASHBY DISCLOSURES

Paramount to the contract amendment of Ms. Caroline Allison is the addition of the arbitration clause. Enter Anne Ashby, former Dallas County Court at Law #3 Judge from 1987- 1988 and former Dallas County 134th District Court Judge from 1989-2009. Prior to Anne Ashby's affirmation of appointment through the American Arbitration Association—of which the date appears to be October 19, 2022—and per the *Code of Ethics for Arbitrators in Commercial Disputes*, Anne Ashby was required to disclose *any and all* potential conflicts of interest in order to provide counsel from both sides an opportunity to object to said appointment.

CANON II: An arbitrator should disclose any interest or relationship likely to affect impartiality or which might create an appearance of partiality.

Anne Ashby obliged and provided her initial disclosures prior to appointment on September 30, 2022. *See* Exhibit A. She also submitted an Arbitrator's Oath, declaring under the premises stated therein that "Failure to make timely disclosures may forfeit [her] ability to collect compensation. *See* Exhibit B. It is the belief of Dolcefino Consulting that Ashby's disclosures were inefficient in transparency and belated in timeliness and as such should result in said forfeiture.

Of particular interest in these disclosures is Anne Asby's response to Question No. 4: "Have you had any professional or social relationship with any parties or witnesses identified to date in this proceeding or the entities for which they work?" Anne Ashby replied, "No." *See* Exhibit A. It is imperative that arbitrators avoid even the appearance of impropriety. Anne Ashby, upon her research into the case before her Initial Disclosures, would have seen that Michael Collins was an attorney in the underlying case that led to this matter and as such would be called upon as a witness, requiring her to remove herself from consideration. Were that not clear enough to her at the time, she could have simply glanced at her provided resumé, which explicitly delineates her time as a partner at Collins's firm. *See* Exhibit C. That being said, it is the duty of the potential arbitrator to disclose this

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information as it is explicitly stated in the Arbitrator's Oath that "Any doubts should be resolved in favor of disclosure." *See* Exhibit B. This failure to disclose her long-standing relationship with Collins in her Initial Disclosures also contradicts her answer to Question No. 5. *See* Exhibit A. However, her failures of disclosure did not cease with the Initial Disclosures.

On October 4, 2022, Ashby then made her First Supplemental Disclosures. *See* Exhibit D. Yet again, she failed to disclose the extent of her relationship with Collins in this First Supplemental Disclosure. *Id.*

On June 2, 2023, nearly eight months after appointment, Ashby made her Second Supplemental Disclosures. *See* Exhibit E. She once again failed to disclose the extent of her relationship with Collins, instead only disclosing her relationships with other witnesses. *Id.*

In fact, it was not until over eight months later, on June 15, 2023, that Ashby finally disclosed her relationship with Collins in her Third Supplemental Disclosures, yet failed to delineate the true depth of said relationship. *See* Third Supplemental Disclosure (Next Page). Further, Ashby's reaffirmation of appointment came only eight days after her supplemental disclosure date of June 15, 2023, leaving little time for any independent review of her possible conflicts of interest.

Dolcefino Consulting was not provided with the witness designations to know when Collins was added as a witness, but it certainly begs the question of when Ashby was informed of the designations, how long she waited to provide her supplemental disclosures, and if she made any orders or decisions of consequence in between. It also begs the questions, of all the arbitrators in the State of Texas, how and why was Ashby chosen? Was it due to the past relationships and loyalties owed by Ashby? It certainly was *not* against the wishes of the Attorneys' counsel, Joseph R. Little, and it certainly *does* appear that the Attorneys' counsel may have viewed Ashby as a ringer for his clients. Little objected to one of only three proffered arbitrators earlier in the case—the Honorable Sylvia A. Matthews—due to her husband's connections with the Caroline Allison's representation—one singular

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instance of a conflict. See Exhibit F. Yet, Little and his clients possessed no qualms whatsoever in the appointment of Ashby, who has been shown to have at least seven stated conflicts.

From: AAA Kathleen Cantrell <KathleenCantrell@adr.org>
Sent: Thursday, June 15, 2023 11:04 AM
To: lance@kassab.law; nicholas@kassab.law; andrea@kassab.law; david@kassab.law; jrl@littlelawtexas.com; jefferson@mdjwlaw.com; Marciec@mdjwlaw.com; paulaj@mdjwlaw.com; suazo@mdjwlaw.com
Cc: AAA Kathleen Cantrell <KathleenCantrell@adr.org>
Subject: Caroline Allison v. Borunda, P.C., Jorge Borunda, Nicholas Abaza, Law - Case 03-22-0002-4507

Good morning,

Hon. Ashby has made the below supplemental disclosure.

"I have a supplemental disclosure to make.

I want to remind counsel the Dallas Bar Probate Section is a very active section and meets monthly. This probate section encourages attorneys and judges who practice in this area to attend monthly meetings and hang out. In addition, most of the firms are all involved in many of the cases, because it is a relatively small group of firms that handle probate litigation in Dallas and all over the state of Texas and end up in many cases. So, most everyone knows each other.

I have known Mr. Staubus and Mr. Collins. I practiced with Smith Underwood in 1986 for about 6 months. I was then elected to County Court at Law in the fall of 1986 and took the Bench in January of 1987.

Mr. Collins handled my divorce in 1986.

When I left the Bench Bench in 2009, I practiced law with Mr. Collins at Collins Basinger and Pullman for about two years. I started my own firm, The Law Office of Anne Ashby, PLLC in 2011.

I do not have an occasion to see Mr. Collins or Mr. Staubus as everyone is busy.

In August, 2016, I served as the mediator in a matter where Mr. Staubus represented a party.

I have known Mr. Wilburn for about 20 years and have handled some probate matters with him. I believe they were uncontested matters.

None of these disclosures will affect my ability to be fair and impartial in this matter.

*Sincerely,
Anne Ashby*

Please advise the Association of any objections to the continued services of Judge Ashby by **June 22, 2023**, with a copy to the other side. Please note, the Arbitrator shall not be copied on any comments related to the disclosure.

Thank you,
Nicole for Kathleen Cantrell

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ANNY ASHBY UNDISCLOSED CONFLICTS

Dolcefino Consulting believes Anne Ashby intentionally hid the full nature of her 35+ year relationship with key witness Michael Collins. She further failed to fully disclose her relationship with key witness Keith Staubus. In fact, Anne Ashby attempted to distance herself from Michael Collins and Keith Staubus by referring to them only as Mr. Collins and Mr. Staubus. There are innumerable attorneys in the State of Texas with the last name Collins and therefore could have been a reference to any of them. Dolcefino Consulting asserts that there exists no room for such vague references as it pertains to disclosures of potential conflicts of interest. Both Michael Collins and Keith Staubus worked with Anne Ashby at the Smith Underwood law firm. Anne Ashby does not disclose that she began her employment at Smith Underwood the very same year that Michael Collins was made a partner. *See below.*

ARTICLE II

The following Amendment to the Articles of Incorporation was adopted by the Shareholders of the Corporation on the 5th day of September 1986. Article I of the Articles of Incorporation is hereby amended so as to read as follows:

"The name of the Corporation is SMITH, UNDERWOOD, CARMICHAEL, COLLINS & MARTIN, a Texas Professional Corporation."

Michael Collins personally represented Anne Ashby in what could be considered a high-profile divorce from Jodie T. Packer, a successful Dallas businessman who got involved with a murder- for-hire plot that reads like an award-winning drama movie. As such, Michael Collins knows the deepest and most intimate details of Anne Ashby's life during this period. *See Exhibit G.* The files for the divorce case were not available for inspection, likely due to the age of the divorce action or a sealing order.

In short, Jodie Packer had an affair with a Joy Aylor who had paid to have the girlfriend of her estranged husband murdered. In 1988, Aylor was picked up for capital murder and upon bail release, Packer picked her up. She then confessed to

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Packer her actions and then fled to Canada and then Mexico – Packer rendezvoused with Aylor there. Packer procured a false birth certificate for Aylor that she then used to obtain an Oklahoma driver's license and passport. Packer and Aylor then travelled extensively in Europe. Aylor was discovered after fleeing the scene of an accident in Europe and was subsequently extradited back to the United States. Packer was also prosecuted for his involvement with Aylor, released on bail, fled the United States, and was ultimately picked up attempting reentry. Packer was sentenced to 27 months with a 16-month consecutive sentence. Aylor received life in prison and is currently, at the age of 75, being held at the Murray Correctional Unit at 1916 North Highway, 36 Bypass, Gatesville, Texas 76596.

On March 31, 2009, Anne Ashby resigned from the bench and then immediately began her employment with Collins, Basinger & Pullman on April 1, 2009, the *second* law firm where she and Collins worked together. Not only did Ashby practice law with Michael Collins, but she was also listed as a director on the firm's website. *See below.*

Director, Collins, Basinger & Pullman, P.C., Dallas, Texas

Currently Collins Law Group

April 1, 2009 – December 31, 2010

- Mediator, Litigator and Trial Consultant in a broad range of disputes including, Commercial Litigation and Probate.

Presiding Judge, 134th Judicial District Court, Dallas, Texas

January 1, 1989 – March 31, 2009

Further, Ashby failed to disclose the extent of her relationship with Steven L. Besly, another attorney at Michael Collins's firm. A search of the Secretary of State's database showed Steven L. Besly as the registered agent of Collins's law practice. Besly is listed in invoices from the probate case displaying his involvement in the case. *See below.*

You have agreed to additionally compensate this firm for services rendered in excess of those covered by the retainer fee. You will currently be charged as follows:

Michael J. Collins	\$350.00	per hour
Steven L. Besly	\$250.00	per hour
Paralegals	\$25.00 to \$125.00	per hour

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In reviewing documents created for the registration of Anne Ashby's law firm Dolcefino Consulting discovered that Steven L. Besly is also her registered agent. Steven L. Besly was concurrently Anne Ashby's registered agent and Michael Collins's entity's organizer. Steven L. Besly was employed as Ashby's registered agent for the years of 2011, 2014, 2015, 2021, 2022, 2023 [the year of the arbitration hearings], and 2024. *See below.*

The name of the entity is :
<u>Law Office of Anne Ashby, PLLC</u>
The file number issued to the entity by the secretary of state is: <u>801362907</u>
The registered agent and registered office of the entity as currently shown on the records of the secretary of state are:
<u>Anne Ashby</u>
<u>One Lincoln Centre, 5400 LBJ Freeway, Suite 525, Dallas, TX, USA 75240</u>
Change to Registered Agent/Registered Office
The following changes are made to the registered agent and/or office information of the named entity:
Registered Agent Change
<input type="checkbox"/> A. The new registered agent is an organization by the name of:
OR
<input checked="" type="checkbox"/> B. The new registered agent is an individual resident of the state whose name is:
<u>Steven Besly</u>

Also indicative of the many conflicts is Keith Staubus's use as a key witness by Abaza, Borunda, and Trevino in the arbitration hearing. As previously mentioned, Staubus worked with Anne Ashby at Smith Underwood in the 1980s. *See below.*

QUALIFICATIONS AND PERSONAL INFORMATION

The opinions expressed herein are based on my education and experience, which includes 40 continuous years of estate and trust litigation, with over 30 years of that experience gained while practicing in an estate litigation boutique practice. I am the managing partner for Staubus & Randall, L.L.P. My practice has included numerous will and trust contests in statutory probate courts in North Texas both on an hourly and contingent fee basis. I am also uniquely qualified to assess counsel for the proponent of the will that was being contested, Michael J. Collins, having practiced with him at Smith, Underwood, Carmichael and Floyd from 1983 through 1992. My scholarly writing includes a paper presented at the Advanced Estate Planning and Probate Course of the State Bar of Texas on will contests, entitled "Undue Influence and Lack of Capacity: How Much Evidence Is Enough?", which is a detailed review and analysis of evidence utilized in all will contests decided on the merits in the State of Texas directly from the appellate opinions for the past 50 years. This paper has now been updated for presentation to the Dallas Probate American Inns of Court to provide a 60-year survey of the effectiveness of particular types of evidence in will contests. I have handled numerous will and trust contests, as well as trust modifications over the course of my career. Finally, I have significant experience in litigating estate and trust matters in front of the Honorable Weldon Copeland in the Statutory Probate Court of Collin County, Texas spanning over the past three decades.

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Although Anne Ashby stated that she has known Staubus, she fails to disclose they were co-workers, hiding the extent of their relationship. Staubus's expert report in the probate matter rebukes all claims made by the Allison Siblings in favor of the attorneys, even going so far as to state that one of Ms. Caroline Allison's claims is "preposterous." Anne Ashby later awarded Staubus \$53,100 solely for preparation of his report; the Allison siblings believe this to be a ploy to enrich one of her affiliates. The amount of this award is highly problematic for a singular report. *See below.*

Through March 31, 2024, the Lawyers incurred **\$102,418.00** in expert witness fees and expenses for the preparation of the reports that were produced at the direct request of the Arbitrator that, in my opinion, are reasonable and necessary. See, Exhibit D. These expert fees and expenses include \$15,023.00 in fees and expenses relating to the expert reports of Karl Schwabauer, \$34,295.00 in fees and expenses relating to the expert reports of Dan Tostrud, and \$53,100.00 in fees and expenses relating to the expert report of Keith Staubus. The attached bills from these expert witnesses have been redacted only to eliminate fees and expenses that were billed and paid, but were not specifically incurred for the preparation of the reports that were produced at the direct request of the Arbitrator. AAA Commercial Rules R-47(c) and R-54 provide a stand-alone, independently sufficient basis for the Arbitrator to award expert witness fees and expenses as set out in this Affidavit. Applicable Texas law provides a second separate, stand-alone, independently sufficient basis for the Arbitrator to award expert witness fees and expenses as set out in this Affidavit.

PHONE CALL BETWEEN REPORTER AND MICHAEL COLLINS

On May 1, 2025, Dolcefino Media reporter Andrea Palacio contacted Michael Collins via telephone to inquire about his relationship with Anne Ashby. *See Exhibit H.*

The conversation went as follows:

ANDREA: [00:02:13] YOU KNOW, THERE'S A JUDGE, ANNE ASHBY, THAT'S CONNECTED TO THAT CASE TOO. DO YOU, DO YOU KNOW, YOU KNOW ANNE, RIGHT?

MICHAEL COLLINS: [00:02:20] YES.

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ANDREA: [00:02:20] JUDGE ASHBY?

MICHAEL COLLINS: [00:02:21] MM-HMM.

ANDREA: HOW WELL DO YOU KNOW HER?

COLLINS: [00:02:24] I'VE KNOWN HER FOR PROBABLY 35, 40 YEARS.

ANDREA: [00:02:28] OH, OKAY

COLLINS: [00:02:30] WHEN YOU PRACTICE IN DALLAS YOU'RE GOING TO KNOW THE JUDGES PRETTY WELL.

ANDREA: [00:02:32] RIGHT, I MEAN, BUT SHE WORKED AT YOUR LAW FIRM OR SOMETHING?

MICHAEL COLLINS: [00:02:36] WAY BACK WHEN, YES. SHE WORKED A BRIEF PERIOD OF TIME.

MICHAEL COLLINS: HER ROLE IN THIS CASE WAS AS AN ARBITOR.

ANDREA: [00:02:53] RIGHT.

MICHAEL COLLINS: [00:02:54] DEALING WITH THE CLAIMS RELATING TO THE ATTORNEY'S FEES THAT CAROLINE AND RICHARD JR. OWED THEIR ATTORNEY.

ANDREA: [00:03:02] ARE YOU AWARE OF ALL OF THAT ARBITRATION GOING ON?

MICHAEL COLLINS: [00:03:06] OH YEAH, YEAH, I WAS ADDRESSED. DIFFERENT THINGS WERE ADDRESSED AT DIFFERENT TIMES. I WAS NEVER CALLED AS A WITNESS OR ANYTHING LIKE THAT. I WAS NAMED

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AS A WITNESSED AT ONE TIME, BUT I NEVER APPEARED OR MADE ANY KIND OF TESTIMONY RELATING TO THAT CASE.

Reporter Andrea Palacio then, in this same phone call, scheduled a Zoom interview with Michael Collins – Collins then reneged within an hour.

PHONE CALL BETWEEN REPORTER AND ANNE ASHBY

On May 1, 2025, Dolcefino Media Reporter Andrea Palacio contacted Anne Ashby via telephone to inquire about Ashby's conflicts. *See Exhibit I.*

The call went as follows:

ANDREA: [00:00:13] I AM WITH DOLCEFINO MEDIA AND WE'RE WORKING ON A STORY ABOUT THE ALLISON PROBATE CASE AND YOU WERE ACTUALLY THE ARBITER IN THE ALLISON MALPRACTICE CASE.

ANNE ASHBY: [00:00:25] I NEED YOU TO STOP RIGHT THERE AND I'M JUST GOING TO TELL YOU I HAVE NO KNOWLEDGE OF ANYTHING. IT'S ALL CONFIDENTIAL AND I'D LOVE TO VISIT WITH YOU, BUT I CAN'T, OKAY?

ANDREA: [00:00:38] BUT YOU HAD SO MANY CONFLICTS.

ANNE ASHBY: [00:00:40] BYE BYE.

ANDREA: [00:00:40] WITH THAT ARBITRATION.

PHONE CALL BETWEEN REPORTER AND DEBRA JORDAN

On May 1, 2025, Dolcefino Media Reporter Andrea Palacio contacted Debra Jordan, purported trustee of Robin Allison's trust, to inquire about Jordan's status as trustee and potential information concerning Collins's relationship with Ashby. *See Exhibit J.*

The call went as follows:

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ANDREA: [00:01:18] HELLO? HELLO, IS THIS DEBORAH?

DEBRA JORDAN: [00:01:22] WHO'S CALLING.

ANDREA: [00:01:24] ANDREA PALACIO. I'M CALLING FROM DOLCEFINO MEDIA. AND I'M CALLING REGARDING MS. ALLISON AND I'M TRYING TO JUST VERIFY IF YOU'RE A TRUSTEE FOR HER.

DEBRA JORDAN: [00:01:41] I DON'T KNOW WHO YOU ARE.

ANDREA: [00:01:43] ALL RIGHT, WELL, I AM A REPORTER IN HOUSTON, TEXAS, WORKING ON A STORY THAT INVOLVES MS. ROBIN ALLISON. AND I'M JUST TRYING TO VERIFY IF YOU ARE A TRUSTEE FOR HER.

DEBRA JORDAN: [00:01:59] WELL, YOU WOULD NEED TO SPEAK TO MY ATTORNEY. DON'T CALL ME AGAIN.

ANDREA: [00:02:04] WHY IS THAT? WHY CAN'T YOU TALK TO ME? I DON'T, IS MS. ALLISON STILL ALIVE MA'AM?

ASHBY BANKRUPTCY RESEARCH

Michael Duren, Anne Ashby's second husband [deceased as of 8/16/2019], declared bankruptcy on April 29, 2009, listing Anne Duren [Ashby] as joint debtor. Ashby joined Michael Collins's law firm on April 1, 2009, per her resumé, yet failed to list income from her position at Collins, Basinger & Pullman on the income statements, listing only monthly payments in the amount of \$10,416.66 from "Comptroller's Judiciary Section" and monthly payments in the amount of \$1,153.84 from "Income from County." *See next page.*

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Current Monthly Income Calculation Details

In re: Michael Duren
Anne Duren

Case Number: 09-10216
Chapter: 7

3. Gross wages, salary, tips, bonuses, overtime commissions.

Debtor or Spouse's Income	Description (if available)						
	6 Months Ago	5 Months Ago	4 Months Ago	3 Months Ago	2 Months Ago	Last Month	Avg. Per Month
<u>Spouse</u>	<u>Comptroller's Judiciary Section</u>						
	\$10,416.66	\$10,416.66	\$10,416.66	\$10,416.66	\$10,416.66	\$10,416.66	\$10,416.66
<u>Spouse</u>	<u>Income from County</u>						
	\$1,153.84	\$1,153.84	\$1,153.84	\$1,153.84	\$1,153.84	\$1,153.84	\$1,153.84

Such could potentially constitute bankruptcy fraud and/or perjury.

FURTHER NOTES OF INTEREST

As part of the Attorneys' request for reimbursement, heavily redacted invoices were provided. Dolcefino Consulting believes that such heavily redacted invoices warrant further investigation as it is reasonable to presume that they could indicate further conflicts of interest by the aforementioned parties and/or communications from the Attorneys to Michael Collins. See below.

11/10/2023	DDT	0.30	Telephone conference with Joe regarding analysis of issues, and recent case law critical of Ms. Hardwick	120.00
[REDACTED]	DDT	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	DDT	[REDACTED]	[REDACTED]	[REDACTED]
11/12/2023	DDT	1.30	Lengthy telephone conference with Joe Little regarding underlying facts and analysis of issues	520.00
11/13/2023	DDT	0.80	Telephone conference with Joe Little regarding underlying facts and analysis of issues,	320.00
11/13/2023	DDT	1.30	Initial review and analysis of expert report of Lillian Hardwick and consider issues and strategy in light of case law critical of her	520.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

CONCLUSION

As part of Dolcefino Consulting's review and investigation, all available documents were examined including, but not limited to, case filings for the probate matter and malpractice

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matter, submitted invoices, expert reports, resumé, campaign finance reports, bankruptcy filings, Secretary of State filings, and State of Texas statutes and rules. Dolcefino Consulting also attempted to locate other cases in which Anne Ashby was the appointed arbitrator but the records were not publicly available.

It is thus the opinion of Dolcefino Consulting that Anne Ashby intentionally and knowingly hid and failed to properly disclose, in her supplemental disclosures, the extent and depth of her decades-long relationships with the principal attorney in the probate matters that is the basis of this malpractice action.

It is further the opinion of Dolcefino Consulting that Anne Ashby intentionally and knowingly hid and failed to properly disclose, in her supplemental disclosures, the extent and depth of her decades-long relationship with key witness Keith Staubus.

It is further the opinion of Dolcefino Consulting that Anne Ashby intentionally and knowingly hid and failed to properly disclose, in her supplemental disclosures, the extent and depth of her 10+ year relationship with Steven L. Besly.

This is not complicated – with potentially hundreds, if not thousands, of potential arbitrators in the State of Texas, it is suspicious at the least, that Anne Ashby was chosen. Had Anne Ashby properly disclosed her conflicts of interest, which she is legally obligated to do, she would have never been accepted as a purported neutral party. Moreover, for an arbitrator from North Texas with deep ties to attorneys and witnesses in this action to accept a position as arbitrator in a Harris County action appears highly suspect. And while this may have just been a fast one pulled on the Allison Siblings and their current attorneys, Anne Ashby should have known better and as such, declined the position.

Dolcefino Consulting, based upon the findings stated above, recommends a complaint filed with the American Arbitration Association as well as the State Bar of Texas. In short, the appointment of Anne Ashby has the stench of cronyism. It looks rigged to benefit the attorneys who stand to make millions of dollars.

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Respectfully submitted,

Wayne Dolcefino

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September 30, 2022

Terri Martinez (TerriMartinez@adr.org)

American Arbitration Association
Manager of ADR Services
45 E. River Park Place West, Suite 308
Fresno, CA 93720

RE: AAA Case No. 01-22-0000-9524; Nicholas Abaza and Jorge Borunda (Lawyers) v.
Richard Allison, Jr. (Client) and Caroline Allison

Dear Ms. Martinez:

Thank you so much for the invitation to serve as arbitrator in the above styled and numbered cause. I have read the AAA Invitation to Serve dated September 28, 2022, and all documents filed to date and make the following disclosures:

No. 1 – Do you or your law firm presently represent any person in a proceeding involving any party to the arbitration?

No

No. 2 – Have you represented any person against any party to the arbitration?

No

No. 3 – Have you had any professional or social relationship with counsel for any party in this proceeding or the firms for which they work?

I was Judge of the 134th District Court, Dallas, Texas from January 1, 1989 through March 31, 2009. I was Judge of County Court at Law Number 3 from January 1, 1987 through December 31, 1988. During the time I was sitting on the 134th, I heard 244 jury trials to verdict; many bench trials and injunctions; and many thousands of hearings. In County Court at Law, I heard 65 jury trials to verdict and many bench trials, injunctions, and motions. Other than the matters listed below, I do not specifically recall any cases I had with any of the attorneys or their firms but I assume it more likely than not that most attorneys in Dallas and surrounding counties may have appeared before me as a Judge.

In March, 2015, I was the Mediator in a matter where Ryan Geddie, Esq. of Martin Disiere Jefferson & Wisdom, LLP (Dallas) represented a party.

As a judge for over 20 years I know many lawyers throughout the state of Texas. It is very likely I know lawyers at most of the firms, particularly those with Dallas offices. This does not impact my ability to be impartial and fairly hear this dispute.

No. 4 – Have you had any professional or social relationship with any parties or witnesses identified to date in this proceeding or the entities for which they work?

No

No. 5 – Have you had any professional or social relationship of which you are aware with any relative of any of the parties to this proceeding, or any relative of counsel to this proceeding, or any of the witnesses identified to date in the proceeding?

No

No. 6 – Have you, any member of your family, or any close social or business associate ever served as a neutral in a proceeding in which any of the identified witnesses or named individual parties gave testimony?

No

No. 7 – Have you, any member of your family, or any close social or business associate been involved in the last five years in a dispute involving the subject matter contained in the case which you are assigned?

No

No. 8 – Have you ever served as an expert witness or consultant to any party, attorney, witness or other arbitrator identified in this case?

No

No. 9 – Have any of the party representatives, law firms or parties appeared before you in past arbitration cases?

I was appointed as the Arbitrator in a multi party matter where David E. Kassab, Esq. of The Kassab Law Firm and Dale Jefferson, Esq. of Martin Disiere Jefferson & Wisdom, LLP (Houston) each represented a party. This matter did not go beyond the appointment stage. It settled in June, 2015, prior to any involvement on my part.

I served as the Arbitrator in a matter where Jason Spivey, Esq. and Aileen Glaeser, Esq. of Martin Disiere Jefferson & Wisdom, LLP (Dallas) represented a party. That matter settled in June, 2021 prior to the final hearing.

No. 10 – Are you a member of any organization that is not listed on your resume that may be relevant to this arbitration?

In February of 2014, I joined Shields Legal Group as “Of Counsel.” My main focus with the firm is to represent entrepreneurs from the growth to exit stage. I conducted a computerized conflicts search within Shields Legal Group “SLG” and have discovered no conflicts.

I am a member of an informal breakfast study group compiled of arbitrators around the DFW metroplex who meet from time to time to discuss topics of ADR interest.

I am a member of LinkedIn and handle some of my marketing through LinkedIn.

I also serve on arbitration panels with Judicial Workplace Arbitrations, Inc. (“JWA”), DII Industries, LLC Asbestos PI Trust, Dispute Solutions, Inc. (“DSI”) and FORUM.

No. 11 – Have you ever sued or been sued by either party or its representative?

No

No. 12 – Do you or your spouse own stock in any of the companies involved in this arbitration?

No

No. 13 – If there is more than one arbitrator appointed to this case, have you had any professional or social relationships with any of the other arbitrators?

No

No. 14 – Are there any connections, direct or indirect, with any of the case participants that have not been covered by the above questions?

The 134th District Court and County Court at Law Number 3 were elected positions. I have raised money at every election cycle during the course of my political career. I have run for re-election and appeared on the ballot 6 times. I do not know if any of the attorneys, parties, or entities made any contributions to any of my campaigns, but it would not make a difference in this arbitration if contributions were made. I made it a habit not to look back after campaign reports were filed. I hired an independent accountant to file all of my campaign reports. For a list of my contributors, please go to the Texas Ethics Commission. Here is my number—000020796.

No. 15 – Are you aware of any other information that may lead to a justifiable doubt as to your impartiality or independence or create an appearance of partiality?

If anyone knows of any other case that we might have been involved in that I missed that you believe is relevant, please disclose for all of us. If anyone has any other issue that I did not disclose that you believe is important, I would appreciate it very much if you would bring it up now. If anything comes up along the course of our arbitration that anyone believes anyone should know about, please know we have a continuing duty or responsibility to update our disclosures.

STATEMENT OF NEUTRALITY:

After reviewing all the material on file to date about this arbitration and considering the disclosures, I can be fair and impartial, consider the evidence from both sides and rule for the party's position that is supported by the evidence in accordance with whatever standards of decision are applicable. By this I mean that I could rule for or against either side; and fulfill my oath of appointment that I "will faithfully and fairly hear and decide the matters in controversy between the parties in accordance with their arbitration agreement, the Code of Ethics, and the rules of the American Arbitration Association and will make an Award according to the best of the Arbitrator's understanding."

Signed this 30th day of September, 2022.

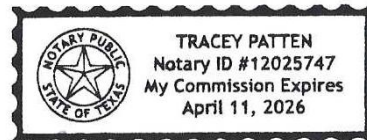


Anne Ashby

SWORN TO AND SUBSCRIBED BEFORE ME, by Anne Ashby, on this 30th day of September, 2022.



NOTARY PUBLIC IN AND FOR
THE STATE OF TEXAS



I look forward to working with you and assisting in the resolution of your dispute.

Sincerely yours,

THE LAW OFFICE OF ANNE ASHBY
A Professional Limited Liability Company



Anne Ashby

General Arbitrator Oath Form

American Arbitration Association

Nicholas Abaza and Jorge Borunda (Lawyers)

Vs.

Richard Allison, Jr. (Client)

Vs.

Caroline Allison

Case# 01-22-0000-9524

Notice of Appointment for Hon. Anne Ashby

Disclosure Obligations

It is most important that the parties have complete confidence in the arbitrator's impartiality. Therefore, please disclose any past or present relationship with the parties, their counsel, or potential witnesses, direct or indirect, whether financial, professional, social or of any other kind. This is a continuing obligation throughout your service on the case and should any additional direct or indirect contact arise during the course of the arbitration or if there is any change at any time in the biographical information that you have provided, it must also be disclosed. Any doubts should be resolved in favor of disclosure. If you are aware of direct or indirect contact with such individuals, please describe it below. Failure to make timely disclosures may forfeit your ability to collect compensation. All disclosures will be brought to the attention of the parties.

Instructions

You will not be able to serve until this duly executed Notice of Appointment has been completed and submitted. Please review the *Disclosure Guidelines* found by navigating to the *My Tasks* screen from the menu on the left, and after conducting a conflicts check, answer the following questions and complete the remainder of this Notice of Appointment.

Should the answer to any of the following questions be "Yes", or if you are aware of any other information that may lead to a justifiable doubt as to your impartiality or independence or create an appearance of partiality, then describe the nature of the potential conflict(s) in the space provided.

1. Do you or your law firm presently represent any person in a proceeding involving any party to the arbitration?

Answer : NO

2. Have you represented any person against any party to the arbitration?

Answer : NO

3. Have you had any professional or social relationship with counsel for any party in this proceeding or the firms for which they work?

Answer : YES

Comments : Please see my disclosure letter dated September 30, 2022.

4. Have you had any professional or social relationship with any parties or witnesses identified to date in this proceeding or the entities for which they work?

Answer : NO

General Arbitrator Oath Form

5. Have you had any professional or social relationship of which you are aware with any relative of any of the parties to this proceeding, or any relative of counsel to this proceeding, or any of the witnesses identified to date in the proceeding?

Answer : NO

6. Have you, any member of your family, or any close social or business associate ever served as an arbitrator in a proceeding in which any of the identified witnesses or named individual parties gave testimony?

Answer : NO

7. Have you, any member of your family, or any close social or business associate been involved in the last five years in a dispute involving the subject matter contained in the case which you are assigned?

Answer : NO

8. Have you ever served as an expert witness or consultant to any party, attorney, witness or other arbitrator identified in this case?

Answer : NO

9. Have any of the party representatives, law firms or parties appeared before you in past arbitration cases?

Answer : YES

Comments : Please see my disclosure letter dated September 30, 2022.

10. Are you a member of any organization that is not listed on your panel biography that may be relevant to this arbitration?

Answer : YES

Comments : Please see my disclosure letter dated September 30, 2022.

11. Have you ever sued or been sued by either party or its representative?

Answer : NO

12. Do you or your spouse own stock in any of the companies involved in this arbitration?

Answer : NO

13. If there is more than one arbitrator appointed to this case, have you had any professional or social relationships with any of the other arbitrators?

Answer : NO

14. Are there any connections, direct or indirect, with any of the case participants that have not been covered by the above questions?

Answer : YES

General Arbitrator Oath Form

Comments : Please see my disclosure letter dated September 30, 2022.

15. Are you aware of any other information that may lead to a justifiable doubt as to your impartiality or independence or create an appearance of partiality?

Answer : NO

Files Attached to Oath

Name	Description
Initial Disclosures A Ashby Abaza v Allison.pdf	Please see my disclosure letter dated September 30, 2022.

Arbitrator's Oath

I attest that I have reviewed my biographical information provided to the parties on this case and confirm it is current, accurate and complete.

I attest that I have diligently conducted a conflicts check, including a thorough review of the information provided to me about this case to date, and that I have performed my obligations and duties to disclose in accordance with the Rules of the American Arbitration Association, Code of Ethics for Arbitrators in Commercial Disputes, the parties' agreement, and applicable law pertaining to arbitrator disclosures.

I further affirm that consistent with the applicable Rules of the American Arbitration Association, the Code of Ethics for Arbitrators in Commercial Disputes, the parties' agreement, and applicable law:

- That I am fit to serve on the above-referenced arbitration and able to fully execute my responsibilities during all phases of the case;
- That I will keep confidential all matters relating to the above-referenced arbitration;
- That I will maintain a professional demeanor and appearance of impartiality during all phases of this case;
- That I will endeavor to effectively manage all phases of this case with a commitment to speed, economy and just resolution in a manner consistent with the parties' expectations;
- That I will bill parties responsibly and ethically and will review my bills for reasonableness relative to the nature and scope of the activity performed prior to submitting them to the AAA.

The arbitrator being duly sworn, hereby accepts this appointment.

Terms of Compensation

Before proceeding, please indicate that you have reviewed the Notice of Compensation Arrangements for this case.



Once completed, please indicate your acceptance of this appointment as arbitrator by entering your initials in the space provided.

(AA)

Hon. Anne Ashby
30-Sep-22



Hon. Anne Ashby

Panelist Video

[View Video](#)

Current Employer-Title

Law Office of Anne Ashby, PLLC – Principal
Shields Legal Group – Of Counsel

Profession

Arbitrator, Mediator, Attorney, Judge

Work History

President, Law Office of Anne Ashby, PLLC, 2011 - present;
Of Counsel, Shields Legal Group, 2014 - present;
Mediator, Burdin Mediations, 2011-present;
Director, Collins Basinger & Pullman, P.C., 2009-2010;
Presiding Judge, 134th Civil District Court, Dallas, Texas, 1989-2009;
Presiding Judge, County Court at Law No.3, Dallas, Texas, 1987-1988;
Litigator, Smith & Underwood, P.C., 1986;
Master/Referee, 304th Judicial District Court, Dallas, Texas, 1982-1986;
Assistant District Attorney, Dallas County District Attorney's Office, 1980-1982;
Administrative Assistant/Law Clerk, Probate Court No. 3, Harris County, Texas, 1978-1979.

Experience

Vast experience as a trial judge, arbitrator and mediator who applies judicial insight in a variety of complex cases involving commercial/business law, employment, contracts, unfair trade practices, healthcare, personal injury with catastrophic injuries, traumatic brain injuries, wrongful death, insurance and insurance coverage, appellate, energy, asbestos, environmental claims, oil and gas, real estate, will contests, guardianship and trust disputes, partnerships, mergers and acquisitions, liens, zoning, transportation, construction defective workmanship, homeowner/builder disputes including fraud in the inducement and professional malpractice.

Employment: Extensive experience as an arbitrator on complex employment cases involving: non-subscriber issues, person injury (on the job injury), ERISA, age discrimination "ADEA", Family and Medical Leave Act "FMLA", Fair Labor Standards Act "FSLA", Americans with Disabilities Act "ADA", Title VII, wrongful termination, retaliation, whistleblower, gender discrimination, sexual assault, harassment, hostile work environment, departing employees and trade secrets, workers compensation, OSHA violations, violations of non-solicitation provisions and violation and/or misappropriation of trade secrets.

Healthcare: Well versed as an arbitrator in complex healthcare cases that have addressed violations of the Texas Insurance Code including prompt pay, retaliation and wrongful termination, Texas Prompt Pay Act, unpaid or underpaid claims, medical, nursing and psychiatric malpractice, intricacies of billing issues including Medicare and Medicaid billing with home health agencies, asset purchase agreement of pharmacies and FDA regulations, HIPPA violations, protective

orders, tortious interference, contractually covered services, facility participation agreements, nursing homes, whistleblower, litigation concerning all aspects inside hospitals, hospital administration litigation, peer review of physicians and fraud in pharmaceutical sales.

Commercial/Business Law: Broad range of large complex and small commercial disputes as an arbitrator encompassing breach of contract, DTPA, force majeure, partnerships, distributions, business law, real estate leases, co-tenants in real property, joint ventures, development, improvement and financing of real estate, foreclosures and foreclosure property management, tenant damages including personal injury, death and property damages, premises liability, HOA disputes, landlord/tenant, condemnation, bad faith, debt payout, buyer/seller agreements, factoring, misrepresentation, fraud, omissions, duress, mitigation, consulting agreements, shareholder buy outs, shareholder agreements, legal malpractice, sworn accounts, tortious interference, oil and gas, investments in the oilfield, pipeline investment, deep water drilling blow outs and injuries, Dram Shop Act, franchise, copyrights, cyber security, frustration of purpose, business interruption and business work out deals.

First elected to the Dallas judiciary in 1986, then served as the presiding Judge of the 134th Civil District Court from 1989-2009. Re-elected 5 times. Tried 244 cases to verdict in the 134th.

Alternative Dispute Resolution Experience

Frequently serves as an arbitrator and mediator in complex commercial, employment and healthcare cases involving a variety of subject matter including, but not limited to, asbestos damages, attorneys' fees, businesses, D&O liability, DTPA, partnerships, contracts, wrongful termination, mergers and acquisitions, buyer/seller, trusts, marketing/sales agreements, commissions, franchises, health care, Medicare and Medicaid billing issues, violations of Texas Insurance Code, Texas Prompt Pay Act, insurance, consumer, Fair Credit Reporting Act, construction, construction defects, residential construction, energy, oil and gas, trusts, personal injury, sexual assault, products liability, professional malpractice, real estate fraud, landlord/tenant, religious disputes, non-subscriber, hostile work environment, sexual harassment, sexual discrimination, age discrimination, trade secrets, violations of non-solicitation provisions, whistleblower, Section 143 Local Government Code -- Matters Affecting Firefighters and Police Officers, Special Judge Chapter 151 appointment by the Courts, closed head injuries, wildfire litigation, transportation, railroad rail car rates and pro se litigants.

Widely known as an objective and fair arbitrator and mediator who is recognized for bench wisdom whether serving as the Panel Chair or in the capacity of a sole arbitrator. Specializes in superior case management and skillful handling of party and case dynamics including difficult parties, complex e-discovery, emergency measures, protective orders and cybersecurity concerns all while keeping cases moving to a timely resolution. Has served on the AAA's Complex Case Panel since 2013. Handles pro se litigants with ease and grace.

Handled procedural motions as Judge of 134th District Court, including temporary restraining orders, temporary injunctions, and discovery requests. 244 jury trials, hundreds of non-jury trials, motions, arbitration motions to compel, stay, confirm, vacate or correct arbitration Awards. Case size ranged from \$500 to multi-million

dollar cases.

**Alternative Dispute
Resolution Training**

ACE 22 - Process Essentials for AAA Arbitrators, 2022; ACE 21 – Impartiality: Do You Know Where Your Biases Are?, 2021; ACE20 Cyber Security: A Shared Responsibility, 2020; AAA/ICDR/AAA Mediation.org Panel Conference, 2019; Arbitrator Performance and Demeanor ~ Meeting Participant Expectations, 2018; Advanced Mediator Training Series: Managing the Dynamics of a Multi-Party Case, 2018; Advanced Mediator Training Series: Managing the Dynamics of a Multi-Party Case, 2018; Resolving Energy Disputes in Times of Crisis: Energy Arbitration 2017: The Chartered Institute of Arbitrators (CIArb), 2017; Red Flags & Risk Areas for Arbitrators ACE14, American Arbitration Association (AAA), 2017; Accelerated Path to Fellowship: International Commercial Arbitration Workshop: CIArb, 2016; AAA/ICDR/Mediation.Org Panel Conference, AAA, 2016; Mediation-Arbitration (Med-Arb): Benefits & Challenges, Academy of Professional Family Mediators, 2016; Effective Advocacy and Management in Arbitration, AAA, 2016; ITA Workshop: International Arbitration, The Center for American and International Law, 2017, 2016, 2015, 2013, 2009; Securities Customer Arbitrations: A Map of the Road Away From eDiscovery: Arbitration in a Digital World (ACE12), AAA, 2015; Top Techniques for Improving Arbitration Case Management Efficiency Before and During the Hearing, AAA, 2015; Representing Clients in Mediation: A Master Class in, American Bar Association (ABA), 2015; Panel Discussion of Mediation in Probate matters, Dallas Bar Association (DBA), 2015; Principled Deliberations: Arbitration Clauses in Estate Planning Documents, DBA, 2013; Essential Mediation Skills for the New Mediator, AAA, 2012; Disclosures, Depositions and Dispositive Motions in Employment Arbitration, AAA, 2012; Settlement Decision Making and Mediation Challenges, DBA, 2012; Alternative Dispute Resolution 2011, State Bar of Texas, 2012; Alternative Dispute Resolution Tactical Interventions in Mediation, Planning Committee, State Bar of Texas, 2011; New AAA Healthcare Payor Provider Judicial Orientation, AAA, 2011; Subterfuge in Mediations, DBA, 2010; Office of Lifelong Learning, Family Mediation, Texas Woman's University (TWU), 2010; Mediating the Car Accident Case, Dispute Mediation Service of Dallas, Inc., 2009; Trial & Negotiating Tactics from the Mediator Viewpoint, DBA, 2009; Learn from the Masters Basic Mediation Training, Sidney Stahl, 2009; 4th Annual Arbitration Training Institute: A Comprehensive Training, ABA, Inc., 2009; Mediating the Employment Law Case, Dispute Mediation Service of Dallas, Inc., 2009; Resolving Construction Disputes, DBA, 2009; The Stages of Mediation: Conflict, Communication and Compromise, DBA, 2009; Advanced Mediation: Skills and Techniques, State Bar of Texas, 2009; Women & Negotiation, JAMS, Inc., 2008; A Systematic Approach to Mediation Strategies, Pepperdine University School of Law, Vermont, 2008; ITA Workshop: International Arbitration, The Center for American and International Law, 2008; Securities Customer Arbitrations: A Map of the Road Away From Courthouse, Alternative Dispute Resolution, 2008; Collection Law: Default Judgments, Arbitration Awards, DBA, 2008; and various other ADR trainings

**Professional
Associations**

Chartered Institute of Arbitrators Fellow; Women in Dispute Resolution {WIDR}; American Bar Association (Labor and Employment Law, Litigation, ADR); State Bar of Texas (ADR, Construction Law, Labor & Employment Law, Litigation); College of the State Bar of Texas (30+ year member); Texas Bar Foundation (Life Fellow); Dallas Bar Association (ADR, Construction Law, Labor & Employment

Law, Probate, Trusts & Estates); Dallas Bar Foundation (Fellow and Charter Member); Texas Mediator Credentialing Association Credentialed Distinguished Mediator; Association of Attorney-Mediators; American Arbitration Association, Neutral (Asbestos, Commercial Expedited & Large-Complex, Consumer, Healthcare, Judicial, Labor & Employment, Mediation, Non-Subscriber and Special Master Panels); American Health Lawyers Association.

Professional Licenses Admitted to the Bar: State of Texas, 1979; U.S. District Court: Northern (1981), and Eastern (2013) Districts of Texas.

Education South Texas College of Law (JD, 1979); University of Texas (BBA, 1975).

Publications and Speaking Engagements Has spoken to 119 audiences including the American Bar Association and the State Bar of Texas. Presented, taught and served on panels throughout the nation including: "Damages in Civil Litigation" 2020 State Bar of Texas Conference, "Litigation vs Arbitration ... What's the Difference" 2019 AAA Staff, "Commercial Arbitration: History, Current Practices, and Special Considerations," 2017 Annual Conference, The Association of Conflict Resolution (ACR), 2017; "Winning Arbitrations and Mediations --- Paralegal Style!" Dallas Area Paralegal Association (DAPA), 2017; "Will Somebody Please Pay The Bathroom Bill? Perspectives, Implications and the Impact of "Grimm," 2017 Management & Professional Liability Conference, Claims and Litigation Management Alliance (CLM), 2017 Boston and Pennsylvania; Arbitration in Texas, Practically Speaking," Lloyds of London, LMA Academy, 2016; Moderator of DBA Texas Trial Legends, Dallas Bar Association, 2016; "Arbitration for the Entrepreneur", Cox School of Business, Southern Methodist University, 2016; "Arbitration, Practically Speaking," Collin County Bar Association, 2015 and many more.

Complete list of presentations available upon request.

Awards and Honors Fellow, The Chartered Institute of Arbitrators, 2017; Distinguished Credentialed Mediator, Texas Mediator Credentialing Association (TMCA), 2017-2018; Pro Bono Pledge, State Bar of Texas, 2017; Advanced Credentialed Mediator, TMCA, 2016; Credentialed Mediator, TMCA, 2010-2015; AV ® Preeminent™ Peer Review Rated by Martindale-Hubbell, 2009 – Present; Dallas Bar Association Resolution (Outstanding Judicial Service) 2009; Prestigious "Judge of the Year" Award presented by the American Board of Trial Advocates ABOTA), 2001.

Citizenship United States of America
Languages English
Locale Dallas, Texas, United States of America

Compensation

Cancellation Period:	0 Days
Comment:	Compensation rates, established by the AAA, are set forth in the applicable Consumer Arbitration Rules.

From: Anne Ashby
Sent: Tuesday, October 04, 2022 2:28 PM
To: AAA Terri Martinez
Cc: Anne Ashby; Tracey Patten
Subject: RE Nicholas Abaza and Jorge Borunda Lawyers v Richard Allison Jr
Client Case 012200009524

*** External E-Mail – Use Caution ***

Dear Terri,

I have a supplemental disclosure to make. I was just advised by Shields Legal Group, for whom I am Of Counsel, that they had a client they represented in an intellectual property matter prior to the filing of a suit in Harris County. Once the suit was filed Dale Jefferson, Esq. of Martin Disiere Jefferson & Wisdom, LLP took over representation as he is in Harris County. They were no longer involved once Mr. Jefferson took over representation. I was not involved in this matter and had no knowledge of it prior to the conflicts check for this case. This will in no way prevent me from being fair and impartial in this matter.

Sincerely,

Anne Ashby

Anne Ashby

The Law Office of Anne Ashby, PLLC

11700 Preston Road

Suite 660 #252

Dallas, Texas 75230

T: 469-200-5753

F: 214-889-9999

aashby@anneashbylaw.com

www.aneashbylaw.com

From: TerriMartinez@adr.org <TerriMartinez@adr.org>
Sent: Monday, October 3, 2022 1:41 PM
To: jefferson@mdjwlaw.com; jrl@littletexas.com; lance@kassab.law
Cc: nicholas@kassab.law; andrea@kassab.law; david@kassab.law
Subject: Nicholas Abaza and Jorge Borunda (Lawyers) v. Richard Allison, Jr. (Client) - Case 01-22-0000-9524

Hello,

Please review the attached correspondence regarding the above-referenced case.

Feel free to contact me with any questions, comments or concerns you have related to this matter.

Thank you.

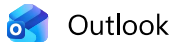
AAA Terri Martinez
Manager of ADR Services

American Arbitration Association

T: 559 490 1871 F: 855 433 3046 E: TerriMartinez@adr.org
45 E River Park Place W, Suite 308, Fresno, CA 93720
adr.org | icdr.org | aaamediation.org

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FW: Caroline Allison v. Borunda, P.C., Jorge Borunda, Nicholas Abaza, Law - Case 03-22-0002-4507

From AAA Kathleen Cantrell <KathleenCantrell@adr.org>

Date Mon 6/5/2023 3:42 PM

To Lance Kassab <lance@kassab.law>; Nicholas <nicholas@kassab.law>; Andrea Mendez <andrea@kassab.law>; David Kassab <david@kassab.law>; jrl@littlawtexas.com <jrl@littlawtexas.com>; jefferson@mdjwlaw.com <jefferson@mdjwlaw.com>; Marciec@mdjwlaw.com <Marciec@mdjwlaw.com>; paulaj@mdjwlaw.com <paulaj@mdjwlaw.com>; suazo@mdjwlaw.com <suazo@mdjwlaw.com>

Cc AAA Kathleen Cantrell <KathleenCantrell@adr.org>

Counsel,

Judge Ashby has made the below supplemental disclosure.

Please advise the Association of any objections to the continued services of Judge Ashby by June 12, 2023, with a copy to the other side. Please note, the Arbitrator shall not be copied on any comments related to the disclosure.

Thank you,
Cheryl Johnson on behalf of



AAA Kathleen Cantrell
Manager of ADR Services

American Arbitration Association

T: 866 440 1792 F: 855 267 4082 E: KathleenCantrell@adr.org
13727 Noel Road, Suite 1025, Dallas, TX 75240
adr.org | icdr.org | aaamediation.org



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From: Anne Ashby <aashby@anneashbylaw.com>

Sent: Friday, June 2, 2023 3:10 PM

To: AAA Kathleen Cantrell <KathleenCantrell@adr.org>

Cc: Anne Ashby <aashby@anneashbylaw.com>; Tracey Patten <TPatten@anneashbylaw.com>

Subject: RE: Caroline Allison v. Borunda, P.C., Jorge Borunda, Nicholas Abaza, Law - Case 03-22-0002-4507

***** External E-Mail – Use Caution *****

Dear Kathleen,

I have a supplemental disclosure to make based on the expert designations.

I know and have worked with Kevin Spencer. In May, 2021, I was the mediator in a matter where Kevin Spencer, Esq. was listed as co-counsel. His firm did not appear at the mediation. I was the Temporary Administrator in a will contest matter in 2015, for approximately a year. Alexandra Wales, Esq. of Spencer Law was one of the attorneys in that matter. That matter eventually settled.

I recall around 2019, I mediated a matter with Price Johnson, Esq. who I believe was associated with Mr. Spencer at the time.

The Dallas Bar Probate Section is a very active section and meets monthly. This probate section encourages attorneys and judges who practice in this area to attend monthly meetings and hang out. In addition, most of the firms are all involved in many of the cases, because it is a relatively small group of firms that handle probate litigation in Dallas and all over the state of Texas and end up in many cases. So, most everyone knows each other.

In 2008, I appeared on a webcast for the State Bar of Texas where Lillian Hardwick also appeared. The topic was recusal and disqualification of judges.

I do not believe I know Daniel Tostrud, Esq. with Cobb Martinez Woodward. In February, 2020, I was the mediator in a matter where Ramona Martinez, Esq. of Cobb Martinez Woodward represented a party.

These disclosures will not affect my ability to be fair and impartial in this matter.

Sincerely,
Anne Ashby

Anne Ashby

The Law Office of Anne Ashby, PLLC

11700 Preston Road

Suite 660 #252

Dallas, Texas 75230

T: 469-200-5753

F: 214-889-9999

aashby@anneashbylaw.com

www.anneashbylaw.com

AAA CASE NO. 01-22-0000-9524

NICHOLAS ABAZA AND
JORGE BORUNDA

Claimants

VS.

RICHARD ALLISON, JR.

Respondent

§
§
§
§
§
§
§
§
§
§

CLAIMANTS' OBJECTION TO ARBITRATOR APPOINTMENT

Claimants respectfully object to the appointment of Hon. Sylvia A. Matthews as arbitrator.

Judge Matthews is an eminently qualified and experienced jurist. Still, Claimants respectfully object to Judge Matthews being appointed as arbitrator because her husband is an attorney who currently represents a lawyer and law firm who are directly involved in the dispute at issue in this arbitration proceeding.

I.

To provide an extremely brief factual context, Respondent's mother and father divorced. His father re-married Robin Allison ("Robin"). Respondent and his sister Caroline became largely estranged from their father, who -- after many years of marriage to Robin -- signed a will in which he left his estate to her. Robin filed the will for probate, but Respondent and his sister contested the will. Respondent and his sister also filed a lawsuit to challenge certain changes that their father had made to a trust that was not part of his probate estate.

Respondent and his sister retained Claimants to represent them in these inheritance disputes with their step-mother. The litigation matters between Respondent/Caroline and their

step-mother involved approximately \$20,000,000.00. Perhaps not surprisingly, these litigation matters were extremely complex, extremely complicated and extremely contentious.

After many months, the litigation matters eventually settled. Respondent and his sister received approximately half of their father's probate and non-probate assets, resulting in a recovery to them that exceeded \$10,000,000.00. They have received the entire \$10,000,000+ settlement, but they refuse to pay Claimants the attorneys' fees that are due.

Respondent's sister has filed a lawsuit against Claimants in which she makes intentionally dishonest allegations against Claimants in an attempt to cheat Claimants out of their fee. Respondent's sister is represented in this meritless lawsuit by Houston attorney Lance Kassab and his law firm.

II.

In a high profile lawsuit currently pending in Houston, Mr. Kassab and his law firm are defendants accused of stealing information regarding another lawyer in order to solicit barratry claims. One article regarding this case can be found here: <https://setexasrecord.com/stories/555395243-justices-allow-suit-against-kassab-law-to-proceed-firm-accused-of-stealing-client-list-to-pursue-barratry-claims>. In this lawsuit, Mr. Kassab and his law firm are being represented by Judge Matthews' husband.

Claimants have reason to believe that Mr. Kassab and his firm may already be providing "behind the scenes" legal advice to Respondent. Further, it is possible that Mr. Kassab and his firm may eventually make an appearance in this proceeding as counsel for Respondent. Additionally, Claimants have filed a motion to compel arbitration in the lawsuit that Respondent's sister filed against them, and the arbitration of her claims may eventually be consolidated with this arbitration.

In any of these events, Judge Matthews would be presiding in an arbitration proceeding in which Claimants' opposing counsel are a lawyer and a law firm who are currently being represented by Judge Matthews' husband in a high profile pending lawsuit. While Claimants do not in any way question Judge Matthews' impartiality or her good faith, this seems like a situation that all concerned would want to avoid.

Respectfully submitted,

THE LITTLE LAW FIRM, P.C.

/s/ Joseph R. Little

Joseph R. Little
State Bar No. 00784483
440 Louisiana Street, Suite 900
Houston, Texas 77002
(713) 222-1368 - Telephone
(281) 200-0115 - Facsimile
jrl@littlawtexas.com

Attorney in Charge for Claimants

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above document has been served upon all parties in accordance with the applicable Consumer Arbitration Rules on this the 6th day of May, 2022.

/s/ Joseph R. Little

Joseph R. Little



Crime & Scandal

Fatal Obsessions

Nobody connected Joy Aylor, the wellbred daughter of a wealthy developer, with the brutal murder of her husband's lover. Then Joy's own sister, the black sheep of the family, decided to get even.

By Glenna Whitley | July 1, 1991 | 12:00 am



The great painters—Picasso, Matisse, Chagall—came for the light. The walls of the small hotel Colombe d’Or, in the medieval town of St. Paul de Vence, are lined with their renderings, often exchanged for food and lodging. Frenchmen and their women came to escape the heat of Paris during the summer, to sniff the sea breeze in fresh-air markets, to bask topless on the pebbly beaches. Tourists from America and all over the world followed,

drawn to the blue Mediterranean coast of the French Riviera by its natural beauty and cosmopolitan chic.

In late December of last year, an obviously well-bred American woman strolled into the tourism office in Vence, an exquisite jewel of a village just west of Nice, to inquire about renting a villa. Elizabeth Sharp said she and her husband, Don, had driven from Switzerland through Vence and fallen in love with the picturesque town. Though she was from Texas, the woman said she had a huge house and two sons in college in California. She wanted to enjoy Vence for a few months while Don traveled through Europe and the Middle East on business; she would often be alone and wanted a place with a garden, to tend flowers.

Though Liz Sharp wore only simple jeans and sweaters and little makeup, her beauty and gentility got her noticed. “She was like an angel,” says the French woman who runs the tourism office: soft-spoken, sweet, delicately attractive, obviously but not ostentatiously wealthy. One of the tourism office workers, Françoise (not her real name), helped Liz find the right place—a small but luxurious, fully furnished one-bedroom villa that hugged a mountainside several hundred meters from the famous Matisse Chapel and overlooked the walled village of St. Paul de Vence.

Liz Sharp made friends, signed up for French lessons, and began putting in the garden with the landlady, teaching her English names for the flowers. Liz asked Françoise’s hairdresser to cut her wavy, dark hair short and give it strong blond highlights. Though she frequently ate lunch with Françoise—always insisting on picking up the check, always paying in cash—Liz didn’t mingle with the small American expatriate community in Vence.

With her handsome, sandy-haired husband gone most of the time, Liz explored the Riviera’s historic towns, perfume factories, and exquisite small museums. Though she often rode the bus, her husband finally rented a small Corsa for her use.

In early March, Liz told Françoise she wanted to extend her stay, and asked her to find another villa she could rent. Françoise’s mother, who adored Liz, agreed to lease her an apartment she owned in Vence.



Roland Seja, a French detective, brought Joy’s 10-month flight to an end.

Two weeks before Liz was scheduled to move, she was awakened in the early morning when Roland Seja, a debonair French inspector who favors double-breasted suits, knocked on the door. Police were there to talk about an accident involving her rental car, he said, which she had abandoned, dented, by the side of the road. She had to come down to the station. The police let her take a shower and put on a jogging outfit before leaving for Nice.

But in Nice, Liz’s French idyll came to a jarring end when she was confronted with an international warrant for her arrest. She argued,

but there was no mistake. When fingerprints proved her real identity, Seja says, the result was “catastrophic.” The woman’s beautiful face crumpled, her body collapsed. A 10-month global search had ended. Her secret was out. But almost as quickly as she collapsed, she composed herself.

Left alone in a room, she found a razor blade she had concealed in the waistband of her sweat pants and slit her wrists. Forty-one-year-old Joy Davis Aylor, knowing what awaited her in Dallas, tried to end her life.

Bewildered, her friends in Vence read lurid stories about their “angel,” who was dubbed by the French press “la diabolique de Dallas”-the devilish woman from Dallas-and who stood accused of hiring a hit man to kill her estranged husband’s lover, 33-year-old Rozanne Gailiunas.

The 1983 attack was particularly gruesome-Rozanne had been stripped naked, tied to her bed, and strangled. Tissue had been pushed down her throat, and she had been shot twice in the back of the head. Her 4-year-old son, asleep in another room when the attack occurred, found his mother, still alive. She died two days later. It seemed like the proverbial perfect crime, at least for a time. After investigating, police concluded that Rozanne’s murder was the sick act of a serial killer.

Three years later, police say, Joy Aylor decided to hire another killer, this time to get rid of her husband, Larry Aylor. An ambush in a hail of bullets failed to kill him, though a friend was wounded. Still, Joy’s involvement went undetected.

It wasn’t until 1988-five years after the first murder-that the intricate schemes began to unravel with the help of a mysterious informer. After a massive investigation, Assistant District Attorney Kevin Chapman announced that Joy had a “hit list” of five other people targeted for murder. The state was going for the death penalty.

However, shortly before Joy Aylor was scheduled to go to trial in May 1990, she disappeared, fleeing to Canada with Mike Wilson, an attorney who was facing criminal proceedings for conspiracy to distribute 46 pounds of cocaine. But Joy abandoned Wilson in Canada, leading police on an international chase for 10 months before being captured in Vence. Along the way, she was helped by “Don,” who was really a Dallas man named Jodie Packer, a lover she had once spurned in favor of Wilson.

Francoise at first couldn’t believe that her new friend was capable of such crimes. “I’m a very good judge of character,” Francoise told *D Magazine*. “She didn’t seem like somebody who was on the run. She was calm. I never saw her get upset.”

But the landlady told Francoise something that hinted that her friend’s serenity was a facade. After police allowed her into the villa, the landlady discovered filth everywhere. Joy, who seemed so meticulous, had not cleaned the place for three months. Even stranger, Joy had sealed the windows and doors with newspaper and tape, as if keeping something or someone out.

Seated in the tiny tourism office on the main square in Vence, Francoise shakes her mass of blond curls as if to say: To be so fooled! “She always kept to the same story,” Francoise says. “She said she missed her house and kids. She talked about a marriage needing a relationship of trust, that the important thing is to communicate. About the importance of family.”

Now Francoise knows it was all a lie. That instead of “communicating” with her spouse, Joy is accused of trying to kill him. That her pious statements about family were also a falsehood: Her oldest sister is the informer who turned her in to police, and her youngest sister had a long affair with her husband Larry. And she does not have two sons in college: Her only son was killed in 1989.

This is really a story about secrets-private obsessions that led three generations of a family to destroy each other in greed, envy, love, sex, rage, resentment.

And death.

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In 1982, Peter and Rozanne Gailiunas were ready to move up. After relocating to Dallas from Boston in 1978 to become assistant professor of medicine and medical director of the kidney transplant program at Southwestern Medical School, Dr. Peter Gailiunas Jr. had invested in a successful medical equipment supply business. Like many in the prosperous Dallas of the early Eighties, the Gailiunases were awash in cash; he and Rozanne wanted to build a new house to reflect their success. In November, after interviewing a number of builders, the Gailiunases signed a contract with a likable man named Larry Aylor to construct a \$400,000 house on Bobbin Drive in the heart of North Dallas.

The Gailiunases had met in 1977 in the intensive care unit at a Massachusetts hospital where she was a nurse and he was moonlighting. His first impression; “She’s gorgeous.” Rozanne had luxurious dark hair, creamy skin, and a voluptuous figure. More than that, she was warm, funny, full of life.

It was a hot, passionate relationship, an irresistible infatuation. Neither was really looking for someone new; though Peter didn’t know it, Rozanne was already married to a teacher. After a failed first marriage, Peter was dating another woman, but he abruptly broke off the relationship when he met Rozanne. “I’ve asked myself a thousand times, what got into me?” Gailiunas says of his attraction to Rozanne. Apparently, Rozanne felt the same way about the tall doctor with a prestigious career ahead of him. After meeting in out-of-the-way places for several months, she finally told him that she was married, but was getting a divorce. She began living with him. Shortly after moving to Dallas in 1978, they married.

Even two months after they met, the passion was wearing thin, Peter says. But the early force of their ardor propelled them through the wedding. The move to Dallas, however, made the chinks in their relationship more apparent. Peter loved the Texas heat; Rozanne hated it. She didn’t like the pool; he did. And after working three months in the burn unit at Parkland

Hospital, Rozanne got pregnant. The news was a shock to Peter, who had been told he was sterile.

When the baby was born six weeks prematurely in 1979, Peter insisted Rozanne stop working. He realizes now it was a mistake. The few friends she'd made were through work. Now, it seemed as if she spent half her time planning trips back East to see her family, a large, warm Italian clan.

Though their marriage was faltering, they went ahead with plans to build the new house. Larry Aylor's crew broke ground in January 1983. But in May, Rozanne abruptly moved to a house in Richardson. She didn't want to clean up after her Great Dane, Elvira, so she left the enormous dog in Peter's care. He wonders if things would have turned out differently if she had kept the very protective canine with her.

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The grave of Chris Aylor. After his death, Joy began to talk of leaving Dallas.

It was 1966. Typical Texas romance: Joy Jeannine Davis and Larry Wayne Aylor met at a football game, the Hillcrest High School Panthers against some now-forgotten team. In the mid-1960s, Dallas high school social life, at least in the fall, revolved around the game. Indeed, under Larry Aylor's name in the 1966 yearbook, the year he graduated, the only extracurricular interest is "intramural football." They should have added "clothes." Even at 18, Larry was a dapper dresser.

One year younger, Joy Jeannine Davis was cute, happy, friendly, a girl the word "pert" might have been invented to describe—her blond hair usually worn in the ubiquitous bouffant flip of the times. As a senior in 1967, she had a few more "interests" in the annual, though she was hardly a teen queen.

In many ways, Joy was privileged. She was the beloved middle daughter of Frances and Henry Davis, a couple who had moved to Dallas after World War II with nothing but a dream of making it big. By the mid-Sixties, they were well on their way to realizing those financial fantasies. Henry and a brother began developing property in Lake Highlands and Richardson. That led to seats on the boards of Dallas banks. By the mid-Eighties the Davises were worth somewhere between \$10 and \$25 million.

Though Joy never had ostentatious tastes, it was clear to Larry that the Davises were well-to-do. Even before they married in 1968, Joy bought Larry a horse, according to someone close to the family. But the Davises didn't hand them everything on a silver platter. Joy got a job at a women's boutique in NorthPark. Larry worked—naturally—at a clothing store. He made a living, but he knew it was not a route to riches.

As their fortunes soared, Joy's parents acquired some of the accouterments of wealth in Dallas: a lake house at Cedar Creek, a 1,000-acre ranch in Ennis.

To Frances's delight, they were able to buy tickets to the Cattle Baron's Ball and other glitzy charity affairs. But in many ways, Frances and Henry remained the down-home folks from East Texas.

Children were always hanging around Henry and Frances. After the births of Carol, the oldest daughter, and Joy, two years later, they had a late baby, Elizabeth, who was almost 11 years younger than Joy. Joy's son Chris, born in 1970, virtually lived at his grandparents' house, as did Michelle, Carol's daughter.

It seemed to grate on Larry that Henry Davis had launched him into business as a home builder. In 1978, he incorporated as Larry W. Aylor Custom Builders, Inc., but Henry guaranteed his credit, greasing the skids. Joy toiled alongside Larry, designing the interiors and taking care of details so that Larry could focus on the larger construction.

Despite their work together, Larry and Joy didn't seem to have a particularly close relationship. "They were always in separate cars going in different directions," says one neighbor. Another, Pat Moeck, frequently went out to lunch with Joy. They talked about many things—current events, politics, children—but not Larry.

Joy always seemed happy and upbeat when she was around Pat. She was comfortable around teenagers: Pat's daughter Errin and many of Chris's friends regarded Joy as a second mother, one they could really talk to. She adored her son Chris.

But unease seemed to be Joy's dominant reaction to Larry. "She was always nervous when Larry was around." says another friend close to the family. "It was like he owned her." Sherry Bradshaw, who moved in across the street from the Aylors in 1979, says Larry kept constant tabs on Joy, calling the house or her car on a CB radio. What was she doing? Who had she seen? Where was she going? His demands were sometimes relentless. Kathy De Falco, a friend who now lives in California, says Larry once insisted Joy leave a party at her home early because "she was talking too long with my 19-year-old son Rick." Joy told Kathy she had to be extremely careful on job sites, "If somebody whistled at her or made a comment, Larry thought it was her fault."

David East, who met Chris when they were both toddlers, says he remembers Larry and Joy being close until the boys were about 7 years old. "Then, it seemed Larry was always screaming at Joy," says East, now 21. "He was always upset about the business. She'd make a mistake and he'd yell at her, then she'd get real frantic looks on her face and try to do whatever would please him."

Sherry Bradshaw at first thought Joy was very quiet and shy, but she soon realized that was true only when Joy was around Larry. "She never opened her mouth unless he virtually gave her permission," says Bradshaw. "When he wasn't around, she was charming, with a great sense of humor." Bradshaw remembers Joy, depressed, asking her in the early Eighties: "Am I selfish and stupid?" Bradshaw was dumbfounded. Though she reassured Joy that she was

anything but selfish and stupid, her friend was unconvinced. Bradshaw says Joy had heard those accusations from Larry so often, she had begun to believe them.

“He always had her under his thumb,” de Falco says. “He’s saying stuff like, ‘She can’t make it on her own.’”

In 1982, she bought what she hadn’t been born with; medical records confirm that a plastic surgeon at Baylor performed a breast enhancement. “If your husband is always drooling over other women’s breasts, you start thinking how nice it would be if he would do that at home,” a close friend says.

In the early 1980s, Joy told another friend that she knew Larry had affairs with other women. The friend wasn’t surprised. “His reputation was that he tried to sleep with every woman he built a house for,” the friend says

Despite the rumors, several women Larry built homes for say he made no advances toward them. Others declined to comment. (Larry Aylor declined to be interviewed for this story. In interviews for television, he has depicted Joy as a spoiled brat who treated him with open contempt.)

Despite the cracks in their relationship, by the early Eighties the Aylors had begun to reap their rewards. They had their own ranch in Kaufman County. Joy drove a Porsche; Larry had a Jaguar, a motorcycle, several Jeeps, a pickup with a matching trailer, and a boat. Though Joy usually wore simple clothes-jeans and button-down shirts were her “uniform”-she was very aware of the things money could buy. She enjoyed her Porsche and her Rolex watch. Her house was meticulously decorated. “Joy liked quality things,” de Falco says, “but she didn’t care a whit if anybody knew she had it. Larry wanted to show he had them. He had every damn toy that came down the pike.”

In the process of becoming wealthy, the Aylors established a solid reputation as builders of very fine, custom, four- and five-bed- room houses in North Dallas-the kind of home the Gailiunases wanted.

After he and Rozanne separated, Peter asked his home builder, Larry, who had taken him quail hunting on his ranch, whether he thought Rozanne was seeing someone else. “No way,” Larry told him. “She’s not that kind of person.”

Not satisfied, Peter hired a private detective. The investigator came back with disturbing news: Rozanne was indeed having an affair.

With Larry Aylor.

Peter confronted Rozanne, who denied it. He then took his proof to Larry. “He was abrasive and insulting,” says Peter. Rozanne and Larry continued to deny they were lovers, though they filed for divorce four days apart, using the same lawyer. Rozanne’s sister, Paula Donahue, says that Rozanne began talking about a nice man she had met who treated her well.

People in Dallas say that Larry, who also had moved out of his home, clearly

was smitten with Rozanne. He seemed happier than he had in years. But the happiness was tempered by a series of harassing phone calls which Larry believed came from Joy.

During this time, many of Joy's friends say they had no idea anything was wrong; many didn't even know that Joy and Larry were separated. One who did know. Sherry Bradshaw, claims that Larry was the one harassing Joy. "He was always calling and bugging her and giving her hell during the separation," Bradshaw says, "I would be sitting there when he would call." On top of it, Larry had closed their joint bank accounts before he told Joy he was leaving. Joy complained that she and Chris had little money to live on. Bradshaw says Joy was reluctant to go to her wealthy parents and admit that she needed more money.

On October 4, just a few days before the Aylor and Gailunas divorces were scheduled to go to court, Peter was talking on the phone after work when another call clicked in. It was his son. During the separation, Rozanne had taught the 4-year-old to dial his father's number. "Dad, Mom's sick," little Peter said. "She won't wake up."

The child had awakened to find his mother nude, tied to the bed, and bleeding. Richardson police captain David Golden later described it as one of the worst crime scenes he had ever inspected.

Peter hired a lawyer, who recommended he take a lie detector test. He passed, as did Joy and Larry Aylor. Detective Morris McGowan and other detectives were stymied. There was no forced entry and little physical evidence to go on. They finally concluded that Rozanne's torture-murder was the work of a serial killer. For five years, there would be no new leads. Shortly after Rozanne's burial, Larry, stunned and grief-stricken, returned to Joy, who took him back. That Christmas, the Aylors attended a neighborhood party. For a married couple rarely seen together, they were unusually close that night. "They seemed glued together," says one friend.

To celebrate their rapprochement, Larry bought Joy a new Porsche. But the bloom on their reconciliation faded. Larry continued to talk about his relationship with Rozanne in front of Joy. For several years, he continued to send flowers to Rozanne's grave. Joy told her friends she had gotten pregnant, but got an abortion rather than have the baby. They struggled through 1984 and 1985.

Joy filed for divorce on June 26, 1985, but Joy and Larry's attorneys filed a motion to dismiss the case on January 8, 1986. The Aylors were going to try yet again to make a go of it.

Then something bizarre happened. On June 14, 1986, Joy asked Larry to meet her for a horseback ride at their Kaufman ranch. Joy didn't show up. Larry and a friend, Don Kennedy, were returning to Dallas on a farm road when they were ambushed by a hail of rifle fire. Larry's Suburban was riddled with bullets, but he escaped unharmed; Kennedy was shot in the elbow.

Terrified, Larry asked Richardson police if the attack could be somehow connected with Rozanne's murder three years earlier. McGowan didn't seem

to think so.

The attack coincided with the abrupt end of the Aylors' marriage. A day or so later, one source says, Larry apparently discovered that Joy had started dating Jodi Packer, owner of a plumbing company. Larry filed for divorce. After a battle over their assets, the Aylors were divorced on August 19, 1986.

Chris's friends say that the mid-Eighties were erratic years for Joy. One night, if they stayed out too late, she would yell at Chris; after another late night out, she would say nothing. She seemed to be dressing flashier keeping long hours herself, dating a lot. Other times, she seemed frightened. In 1987, Chris told several friends that his mother had found a strange package in their mailbox; when she opened it she found the stinking head of a dead fish. But as the Eighties drew to a close, David East says, Joy seemed to return to the calm, serene woman he recalled from early childhood. She seemed to have a solid relationship with Packer, an athletic, laid-back businessman. She looked better than she had in years.

On January 30, 1988, Larry married a woman named Jan Bell, though friends say he still seemed obsessed with Joy. "Larry always talked about Joy." says Kristen Yunker. "Jan was jealous of her. If you supposedly hate your ex-wife, why do you talk about her all the time?" Joy, in contrast, never said a word about Larry. It was as if she'd built a wall around her feelings.

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Joy Aylor was arrested by Richardson police and charged with Rozanne's murder on May 26, 1988, the same day a tall hulk of a man named William Wesley Garland was taken into custody by detectives. While officers watched closely, Joy was walked slowly through a room where Garland was being held. There was no sign of recognition from either Joy or the man police initially thought was her "hit man."

The mystery of Rozanne Gailiunas's death started to unravel in the spring of 1988, when Carol, Joy's older sister, walked into Morris McGowan's office at the Richardson Police Department and began to narrate a strange and convoluted tale. So strange, in fact, that McGowan didn't believe her; she seemed to be a hysterical wife mad at her husband, whom she accused of putting a gun to her head.

Carol had little credibility with the police at that point-and for good reason. Since her late teens, she had had an extremely strained relationship with her family; she had been diagnosed with mental problems in the Seventies and had been treated in Baylor Hospital's psychiatric unit in 1979; she continued outpatient therapy through 1980 and 1981. And there were the run-ins with police, called by the Davises who reported that she was creating a disturbance at their house. When daughter Michelle was about a year old. Carol's parents began raising the girl as their own, convinced that their daughter was incapable of caring for her properly. For years, she had seen her family only on holidays. But despite her problems, the Davises always

provided for her. In the early 1980s, the Davises gave her \$2, 500 every two weeks. After Henry suffered a stroke in August 1987. the payments ended.

Though McGowan declined to comment for this story-citing a judge's gag order-it's clear that he believed Carol knew something about the brutal five-year-old murder.

As it turned out, Carol's information and assistance led to the arrest and indictment of eight people. The indictments allege that an elaborate conspiracy existed: that Joy paid Garland, a pest exterminator, to find someone to kill Rozanne. Garland then paid an auto mechanic named Brian Lee Kreafler, who delivered money to a sometime car salesman named George Anderson Hopper Jr. -the man who actually committed the murder. Each go-between took some money; one source says Hopper made about \$6, 000.

That wasn't all: A second series of indictments said that Joy paid Garland to find another killer, this one for Larry Aylor. Garland went to an acquaintance named Joseph Walter Thomas, who hired two brothers named Buster James and William Gary Matthews to shoot Larry in 1986.

But it seems police didn't believe Carol was simply an innocent bystander caught in her sister's web. Much to Carol's surprise, police also indicted her for conspiracy in the attempted murder of Larry Aylor.

That wasn't the end of the surprises; not only did Joy find out her sister had betrayed her. but she was also stunned to discover that Carol had married William Garland-and that the two of them had been blackmailing her with a crazy tale about the girlfriend of one of the "hit men." It seems the Garlands told her the girlfriend was threatening to go to police to expose them all, and needed to be "taken care of. "

Carol claims Joy paid Bill Garland about \$12, 500 for yet a third "hit." Except this woman was fictitious.

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'I am the black sheep of the family,' admits Carol Davis Walker Garland. At 44, Carol is a few pounds overweight, but pretty-blond, well dressed, poised. Old hurts seem fresh to her. wounds from a family she says was abusive, both verbally and physically, though people close to the family recall no signs of abuse. She took the brunt of that anger, Carol says. "Joy was the favorite child. Joy could do no wrong. They needed a scapegoat, and I was it."

Though she's articulate, it's sometimes difficult to follow Carol's conversation and thought processes. Events described by other people are given totally different twists by Carol, explanations that are hard to believe. Mixed in with apparent fabrications are bits and pieces of verifiable information.

Carol says that after an early failed marriage, she lived the life of a "nouveau-poor, divorced woman, " while Joy, Liz. and her parents lived lives of

affluence. Except for holiday visits three times a year, she did not see her family.

That's why she thought it was strange when Joy started calling her in January 1986. She says Joy began asking her what she knew about Larry, confiding that she had just found out that Larry had had an affair with their youngest sister Liz-an affair that lasted for several years. Carol says she already knew about the affair.

"Elizabeth and Larry were always together," Carol says. "They acted more like a married couple than Joy and Larry did." In 1985, when Liz married Michael Goacher, a young technical designer. Larry flew into a rage, threatened to beat the man up, and would not allow Chris and Joy to attend her wedding. (During a phone interview with *D*, Liz Davis confirmed the affair. Other friends and family members verified the events around the wedding.)

Carol says Joy began talking about the murder of Larry's girlfriend, a woman she called "the doctor's wife." Joy claimed that Larry had her killed, that she had wanted to leave him. but was afraid she too would be murdered.

The conversation surprised and baffled Carol, she says-until she found out Larry did have a girlfriend who was murdered. She eventually went to the Dallas Public Library and read the old clips about Rozanne Gailiunas's murder, discovering in the process that there was a \$25,000 reward offered by Peter Gailiunas for information leading to the killer's arrest and conviction.

The conversations with Joy continued, Carol says. Joy confided that she had decided to kill Larry, that she'd found a hit man. Joy asked Carol to be a go-between of sorts: If someone called Carol and asked for "Mary," Carol was to let Joy know.

Carol claims that she thought Joy was kidding, that she was simply having an affair. From there, Carol's recitation of events is confusing, but several things are clear: She met Bill Garland in the spring of 1986, probably when taking money from Joy to him for the hit on Larry. The two began seeing each other and, unbeknownst to Joy, married on October 4, 1986, exactly three years after the attack on Rozanne. Carol claims he threatened to kill her and her daughter, Michelle, unless she married him; others who saw her with Garland say she clearly was obsessed with him.

At 6-foot-5, Garland has a physically imposing presence. Except for some traffic tickets, he has no criminal record. Indeed, of those accused in this tangled conspiracy, only the Matthews brothers have criminal histories-consisting mostly of drug and burglary offenses.

Carol says Joy initially got in touch with Garland through a man named Carl Noska, a shutter maker who had done work for Joy. According to Carol, Joy didn't ask him to find a killer, just someone who could scare Larry. Noska has not been indicted in connection with the affair.

But no one disputes that the labyrinthine schemes began unraveling in April

1988. Carol says that Garland put a .357 Magnum to her head and threatened to kill her. Others say that Garland had put everything he owned in his white Blazer and was leaving her. Whatever the reason, she called the police and accused him of assault.

After his arrest, Carol says she disguised her voice and called Crimestoppers, Peter Gailiunas's office, and Larry Aylor, telling them that Garland was involved in Rozanne's murder. Aylor urged her to go to the police. Reluctantly, she says, she finally called McGowan.

Carol says she cooperated fully with police, even wearing a wire and setting up a meeting with Joy in a restaurant. On the tape, Joy allegedly admits her involvement in Rozanne's death.

During their conversation, Carol dropped her bombshell: She was married to Bill Garland. "Joy looked as if I'd physically struck her," says Carol, with a trace of satisfaction.

Because the background noise on the tape was so loud, the police asked Carol to make another recording of Joy—this time in a quiet hotel room. Shortly after that conversation, Joy was arrested.

It's clear Carol had no involvement in the death of Rozanne Gailiunas. She also tried to distance herself from the contract on Larry Aylor, but police didn't buy that. Carol claims that she tried to alert him, and that she warned Joy when Garland began blackmailing her, sending the fish head and messages from a post office box rented in the name of Rozanne Gailiunas. The intent of the blackmailing was to scare Joy into paying \$12,500 to have the fictitious girlfriend murdered.

Now, three years after setting her sister up, Carol is furious at McGowan and the Richardson Police Department. She says they used her, then refused to pay her the reward offered by Peter Gailiunas for information about Rozanne's murder, and wouldn't put her in the federal witness program. Carol says she plans to file suit this summer against the police, claiming harassment and violation of her civil rights.

Carol devoutly believes that a contract to kill her—paid for by Joy—is still in force. She says her name was on (the list of five murders allegedly ordered by Joy. (Despite Assistant DA Chapman's comments, it's unclear if the list actually exists.)) She refuses to divulge her phone number and address and would not allow her face to be shown in this story. But Carol plans to testify that the FBI made mistakes in transcribing the restaurant tape.

The prosecution will surely be reluctant to say Carol makes a credible witness. Her first husband, Michael Walker, says that Carol has threatened him frequently. In the Seventies, after he was late with his child support payments, Walker says, Carol called. "I know people who make people disappear," she told him. He changed his phone number numerous times to escape her harassment; he even put his utilities contracts in friends' names.

"Carol was locked out [of the family money] because of her antics," Walker says. "To her, it was all Joy's fault. She was out to get even." To Walker, it

doesn't make sense that if Joy was guilty of a crime, she would involve Carol in any way.

Because of Carol's past, it's easy to understand that Joy's family and friends are having a hard time believing the soft-spoken, genteel Joy would be involved in such a scheme. But whatever Carol's quirks and faults, people are not charged with murder simply because someone accuses them of it. "They didn't arrest her because I said she did it," Carol says. "They arrested her because *she* said she did it."

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In the three years since Joy Aylor, Bill and Carol Garland, et al. were indicted, much has happened in the lives of those involved. Paula Donahue, Rozanne's sister, says her parents' lives will never be the same. "They are devastated," Mrs. Donahue says, Rozanne's son Peter, now 12, has been through years of therapy; Dr. Gailunas, now remarried, says the boy never talks about his mother.

For a while, friends say, Chris Aylor was convinced someone was stalking him as well. But he blamed his mother's troubles on his aunt Carol, swearing to several friends that if Joy were convicted, he would kill Carol himself. Few doubted that he meant it; Chris owned an arsenal of weapons, including an Uzi and an AK-47.

Liz divorced her husband and moved back home with her parents. For a while, the family managed to keep the news of Joy's problems away from Henry, who was confined to a wheelchair. But the publicity got so bad, the charade was impossible, especially after Frances, Liz, and Henry were ambushed by a TV crew outside their new home in Glen Lakes.

After the indictments, Larry moved to Virginia with his new wife and set up a home building business. He returns frequently to Dallas to testify in many of the various suits he has brought since 1988. He filed suit against Joy and other members of the alleged conspiracy, as well as Henry Davis, claiming that his former father-in-law was involved. Larry alleged that Joy embezzled the funds from his company to pay extortion money, but the blackmail occurred long after their divorce. (Davis was later dropped from the suit.)

Shortly after midnight of Christmas 1989, 19-year-old Chris was killed in the fiery crash of his Corvette on LBJ Freeway, when he and a friend named Raymond Slupecki Jr. were drag-racing with another teenager. Raymond also died in the crash. Though a TV tabloid show would later intimate that Joy somehow had something to do with Chris's death, few except Larry Aylor seem to take that notion seriously.

Even in death, Chris was a battleground between Larry and Joy. His body lay in the morgue for almost three weeks while he and Joy fought over where to bury their only son. Joy wanted him laid to rest at the Ennis farm; Larry thought he would never see his son's grave if that happened. After a legal

tussle, Chris was finally buried at Sparkman Hill-crest, with a plaque that reads “Chris Aylor.” Larry dropped Chris’s middle name-Davis-from the marker. Only a few days after Chris’s death. Larry filed a letter with the probate court demanding that the Davises turn over all his son’s guns, insurance policies, and jewelry, including a Rolex watch worth \$2, 500. a graduation gift from Joy.

Larry won a default judgment for \$31. 2 million against Joy several weeks after she disappeared. Larry also filed suit against the parents of Raymond Slupecki, who was driving the Corvette the night Chris was killed. They settled out of court for \$67, 500.

After Chris’s death, friends say, Joy began to talk of leaving Dallas. She told Mike Wilson she would rather die than go to trial. So, racing a summer court date, she liquidated her assets. Carrying almost a half-million dollars in cash, she jumped her \$140, 000 cash bond and disappeared with Wilson, who was facing trial on charges of cocaine distribution. He had been arrested while driving her red Porsche.

Police tracked her through Wyoming to Canada, where she split up with Wilson. Wilson told a psychologist after his return to Texas that Joy began acting “mamecky”- she talked about the killing of Rozanne, saying “she deserved it.” Wilson, convinced she would kill him, decided to turn himself in but was arrested first.

In an attempt to find Joy, McGowan went on “America’s Most Wanted” last September. From that, police learned that after leaving Wilson, Joy flew to Mexico, where she enrolled in a language school in Cuemavaca under the name Jodie Packer. (Packer told police she had stolen his credit card and voter registration.) She also apparently slipped back into the United States several times.

But police lost Joy after she flew to Frankfurt, Germany. She took a train to Zurich, then hopped another to Nice, entering France on a passport in the name of Elizabeth Sharp, a Dallas woman who had died not long before.

Sometime during Joy’s flight, a mollified Packer came back into the picture. He told people at one of his businesses that he wanted to get contracts in the rebuilding of Kuwait after the Persian Gulf war was over. State Department officials say that strategy allowed him to travel extensively out of the country, helping Joy with travel arrangements, and meeting her in Venice. Packer was arrested at the Davises’ lake house and charged with passport fraud soon after Joy was captured. The indictments say he was traveling with a passport in the name of Donald Averille Airhart, a dead relative. Packer says he “categorically denies” that he was in France with Joy or assisted her in any way.

Today, Joy Davis Aylor is sharing a 15-meter square cell with three other women in the Nice prison, a grim, 104-year-old edifice that is one of the oldest, most overcrowded penitentiaries in France. A middle-aged female volunteer visits her several times a week, teaching her French. Despite her affair with Larry, her sister Liz staunchly supports Joy; she immediately flew

over after she was arrested and has stayed in France to be close to Joy. The scars from Joy's suicide attempt are healing.

George Anderson Hopper Jr. goes on trial for capital murder this summer. Sources say that Garland, who now runs a small oil company called Rincon Oil in Sulphur Springs, has signed a confession. It is still not known when Joy will be returned to Texas to stand trial. As *D Magazine* went to press, Carol's trial date had not been set.

Whatever her reason for leaving the country, Joy Aylor may have saved her life by flee-ing. The French refuse to return anyone to a country where he or she would face the "barbaric" practice of capital punishment. Though observers say that the Dallas DA's office hoped to get around that by extraditing Joy on the attempted murder charge, which doesn't carry the death penalty, it's unlikely French authorities will buy that ploy. To get her back, the DA's office might have to strike a deal agreeing not to seek the death penalty. That might create a bizarre paradox if Hopper is convicted as the triggerman and given capital punishment, but the person accused of hiring him gets a prison sentence.

Oddly, residents of Nice, both in and out of law enforcement, say that the crimes Joy Aylor is accused of - 'crimes de passion' - would evoke sympathy for her in their country. But a Dallas jury may have a harder time believing that such carefully planned crimes were the result of wildfire passion.

Likewise, Joy Aylor might receive a more sympathetic judgment were she standing trial for the murder of her husband, Larry Aylor. Sources close to the investigation speculate that Joy's defense attorney, Doug Mulder, will introduce testimony that Larry verbally and physically abused Joy, as well as evidence of his sexual involvement with Joy's sister. Hiring someone to kill a husband like that might be viewed by a jury as wrong, but understandable.

However, Joy will be facing trial for the murder of Rozanne Gailunas.

And Rozanne's only crime seems to be falling in love with the wrong person.

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MICHAEL COLLINS PHONE CALL WITH ANDREA 5-1-2025

ANDREA: [00:00:00] HELLO, THIS IS ANDREA. [00:00:01][0.7]

MICHAEL COLLINS: [00:00:02] ANDREW, THIS IS MIKE COLLINS. [00:00:03][0.9]

ANDREA: [00:00:04] HOW ARE YOU, SIR? [00:00:04][0.6]

MICHAEL COLLINS: [00:00:05] FINE, THANK YOU. [00:00:06][0.4]

ANDREA: [00:00:07] HEY LISTEN, WE WANTED TO SEE, WE'RE WORKING ON A STORY ABOUT ALLISON, SORT OF NOT REALLY ABOUT THE ALLISON PROBATE, BUT IT INVOLVES THE ALLISON PROBATE CASE AND WE WANTED TO FIND OUT IF YOU'D GIVE US AN INTERVIEW. [00:00:20][13.3]

MICHAEL COLLINS: [00:00:22] I DON'T KNOW WHAT I CAN HELP YOU WITH, BUT I'LL BE HAPPY TO ANSWER QUESTIONS IF I CAN. [00:00:26][3.4]

ANDREA: [00:00:28] CAN WE SET UP A ZOOM MEETING OR SOMETHING? [00:00:30][2.0]

MICHAEL COLLINS: [00:00:31] NO, RIGHT NOW I'M OUT OF TOWN, SO THE ANSWER WOULD BE, DEPENDING UPON WHEN YOU NEED THIS DONE. ALL RIGHT,. [00:00:38][6.3]

ANDREA: [00:00:38] SOMETIME NEXT WEEK WOULD BE WONDERFUL. [00:00:39][0.9]

MICHAEL COLLINS: [00:00:41] OKAY, LET ME LOOK AT MY CALENDAR, SEE WHAT NEXT WEEK LOOKS LIKE. HOW MUCH TIME ARE YOU THINKING YOU'RE GONNA NEED? [00:00:47][5.9]

ANDREA: [00:00:48] HONESTLY, WE COULD PROBABLY DO IT IN 15 MINUTES AT THE MOST. [00:00:51][2.5]

MICHAEL COLLINS: [00:00:52] OKAY. POSSIBLY COULD DO IT MONDAY. IF I CAN'T DO IT THAT WEEK, I KNOW I CAN DO IT THE FOLLOWING WEEK, EITHER THE 12TH OR THE 19TH. WANNA SEE? IF YOU'LL TELL ME WHAT YOU'RE GONNA BE TALKING ABOUT, I CAN BE PREPARED. [00:01:08][15.9]

ANDREA: [00:01:09] YEAH, IT WOULD BE BASICALLY ABOUT THE, I GUESS, WHAT HAPPENED WITH THE ALLISON SETTLEMENT AND HOW THE MEDIATION WENT, THAT KIND OF THING. AND BY THE WAY, IS ROBIN ALLISON, IS SHE, WE HEARD THAT SHE HAD A STROKE AND SHE'S STILL TRYING TO RECOVER OR IS SHE STILL IN A COMA? [00:01:35][26.1]

MICHAEL COLLINS: [00:01:36] NO, SHE'S NOT IN A COMA, NO, BUT SHE'S HAD MEDICAL PROBLEMS IN THE LAST YEAR, AND SHE'S HAD DIFFERENT ISSUES RELATING TO THE MEDICAL MATTER. [00:01:45][9.0]

ANDREA: [00:01:46] ALL RIGHT, BUT SHE'S STILL WITH US, IS THAT TRUE? [00:01:48][2.0]

MICHAEL COLLINS: [00:01:48] OH YEAH, SHE'S STILL ALIVE, YES. [00:01:50][1.6]

ANDREA: [00:01:50] OKAY, ALL RIGHT. [00:01:51][0.8]

MICHAEL COLLINS: [00:01:53] YOU'RE DEALING WITH THE CAROLINE AND RICHARD JUNIOR VERSUS ROBIN ALLISON DEALING WITH DR. ALLISON'S ESTATE IS WHAT YOU'RE TALKING ABOUT. [00:02:03][10.3]

ANDREA: [00:02:03] THAT'S RIGHT. [00:02:04][0.3]

MICHAEL COLLINS: [00:02:05] THAT'S NOT A PROBLEM. I REPRESENTED ROBIN IN THAT CASE. I WANT TO MAKE SURE THAT I HAD MY DUCKS IN A ROW AS TO WHO WAS PRESENTING TO WIN. [00:02:12][7.0]

ANDREA: [00:02:13] YOU KNOW, THERE'S A JUDGE, ANNE ASHBY, THAT'S CONNECTED TO THAT CASE TOO. DO YOU, DO YOU KNOW, YOU KNOW ANNE, RIGHT? [00:02:19][6.1]

MICHAEL COLLINS: [00:02:20] YES. [00:02:20][0.0]

ANDREA: [00:02:20] JUDGE ASHBY? [00:02:20][0.0]

MICHAEL COLLINS: [00:02:21] MM-HMM.

ANDREA: HOW WELL DO YOU AND HER? [00:02:22][1.8]

COLLINS: [00:02:24] I'VE KNOWN HER FOR PROBABLY 35, 40 YEARS. [00:02:27][2.9]

ANDREA: [00:02:28] OH, OKAY. [00:02:28][0.5]

COLLINS: [00:02:30] WHEN YOU PRACTICE IN DALLAS YOU'RE GOING TO KNOW THE JUDGES PRETTY WELL. [00:02:31][1.5]

ANDREA: [00:02:32] RIGHT, I MEAN, BUT SHE WORKED AT YOUR LAW FIRM OR SOMETHING? [00:02:34][2.1]

MICHAEL COLLINS: [00:02:36] WAY BACK WHEN, YES. SHE WORKED A BRIEF PERIOD OF TIME. SHE WAS ON THE COUNTY BENCH BEFORE SHE WENT TO THE DISTRICT BENCH. AND THEN SHE'S RETIRED FROM BOTH THOSE BENCHES AND NOW DOES ARBITRATIONS AND THOSE TYPES OF MEDIATIONS. HER ROLE IN THIS CASE WAS AS AN ARBITER. [00:02:52][16.0]

ANDREA: [00:02:53] RIGHT. [00:02:53][0.0]

MICHAEL COLLINS: [00:02:54] DEALING WITH THE CLAIMS RELATING TO THE ATTORNEY'S FEES THAT CAROLINE AND RICHARD JR. OWED THEIR ATTORNEY. [00:03:01][6.7]

ANDREA: [00:03:02] ARE YOU AWARE OF ALL OF THAT ARBITRATION GOING ON? [00:03:05][2.5]

MICHAEL COLLINS: [00:03:06] OH YEAH, YEAH, I WAS ADDRESSED. DIFFERENT THINGS WERE ADDRESSED AT DIFFERENT TIMES. I WAS NEVER CALLED AS A WITNESS OR ANYTHING LIKE THAT. I WAS NAMED AS A WITNESSED AT ONE TIME, BUT I NEVER APPEARED OR MADE ANY KIND OF TESTIMONY RELATING TO THAT CASE. [00:03:21][15.4]

ANDREA: [00:03:22] MM-HMM, MM-HMM. [00:03:23][0.6]

ANDREA: [00:03:24] ALL RIGHT, FINE. [00:03:25][0.7]

ANDREA: [00:03:26] SO IT'S POSSIBLE YOU SAID THAT MONDAY WOULD BE OKAY FOR AN INTERVIEW. WOULD YOU LIKE TO SUGGEST A TIME? [00:03:33][7.3]

MICHAEL COLLINS: [00:03:35] YEAH, PROBABLY IT'S GONNA BE MONDAY BE 10 O'CLOCK. IF YOU CAN DO ME A FAVOR AND CONFIRM THIS BY SENDING ME AN EMAIL. [00:03:41][6.0]

ANDREA: [00:03:42] ABSOLUTELY. [00:03:42][0.0]

MICHAEL COLLINS: [00:03:43] I'M OUT OF POCKET RIGHT NOW. I DO MOST OF MY CONSULTING TYPE WORK. I'M IN THE TWILIGHT OF MY CAREER, SO I DO A LOT OF THAT BY MYSELF. AND SO I'LL DO A LOTTA ZOOM TYPE WORK, AND I NEED TO MAKE SURE I'M AT A LOCATION THAT I CAN PICK UP YOUR ZOOM INVITATION AND PICK IT UP AND GO WITH THAT. BUT THAT 10 O'TCLOCK WOULD BE BEST ON THE MONDAY WE'RE TALKING ABOUT. [00:04:04][20.9]

ANDREA: [00:04:04] OKAY, GIVE ME THE BEST EMAIL, YOUR EMAIL FOR ME. [00:04:08][4.0]

MICHAEL COLLINS: [00:04:09] MCOLLINS AT CBLEGAL.COM [00:04:10][1.1]

ANDREA: [00:04:12] AND COLLINS AT CB, LEAD GOAL. [00:04:14][2.1]

MICHAEL COLLINS: [00:04:16] CHARLES BOY LEGAL, CB LEGAL. [00:04:18][2.0]

ANDREA: [00:04:22] THAT SOUNDS GREAT. THANK YOU, MR. COLLINS. LOOK FORWARD TO INTERVIEWING YOU. [00:04:22][0.0]

ANNE ASHBY PHONE CALL WITH ANDREA 5/1/2025

ANNE ASHBY: [00:00:04] HELLO,. [00:00:04][0.0]

ANDREA: [00:00:04] HELLO, IS THIS ANNE ASHBY? IT IS. [00:00:06][1.6]

ANNE ASHBY: [00:00:06] HOW ARE YOU, MA'AM? [00:00:07][0.7]

ANNE ASHBY: [00:00:08] I'M GOOD, AND YOU? [00:00:09][0.9]

ANDREA: [00:00:11] I'M GOOD. HEY, LISTEN, I AM WITH DOLCEFINO MEDIA AND WE'RE WORKING ON A STORY ABOUT THE ALLISON PROBATE CASE AND YOU WERE ACTUALLY THE ARBITER IN THE ALLISON MALPRACTICE CASE. [00:00:25][13.9]

ANNE ASHBY: [00:00:25] I NEED YOU TO STOP RIGHT THERE AND I'M JUST GOING TO TELL YOU I HAVE NO KNOWLEDGE OF ANYTHING. IT'S ALL CONFIDENTIAL AND I'D LOVE TO VISIT WITH YOU, BUT I CAN'T, OKAY?

ANDREA: [00:00:38] BUT YOU HAD SO MANY CONFLICTS.

ANNE ASHBY: [00:00:40] BYE BYE.

ANDREA: [00:00:40] WITH THAT ARBITRATION.

DEBRA JORDAN CALL FROM ANDREA 5-1-2025

ANSWERING MACHINE: [00:00:00] THE COLLINS LAW GROUP. IF YOU KNOW YOUR PARTY'S EXTENSION, YOU MAY DIAL IT AT ANY TIME. FOR THE OPERATOR, PRESS 0 OR STAY ON THE LINE. FOR THE DIAL BY NAME DIRECTORY, PRESS 9. TO REPEAT THIS MENU, PRESS THE PINKIE. PLEASE ENTER AT LEAST THE FIRST THREE LETTERS OF THE PERSON'S LAST NAME. FOR Q, PRESS 7. FOR Z, PRESS 9. DEBORAH JORDAN, EXTENSION 102. TO SELECT THIS EXTENSION, PRESS 1. TO REPEAT THE CURRENT NAME, PRESS 3. PLEASE HOLD WHILE I TRY TO CONNECT YOU.
[00:00:54][54.0]

ANDREA: [00:01:18] HELLO? HELLO, IS THIS DEBORAH? [00:01:20][2.0]

DEBRA JORDAN: [00:01:22] WHO'S CALLING. [00:01:22][0.0]

ANDREA: [00:01:24] ANDREA PALACIO. I'M CALLING FROM DOLCEFINO MEDIA. AND I'M CALLING REGARDING MS. ALLISON AND I'M TRYING TO JUST VERIFY IF YOU'RE A TRUSTEE FOR HER. [00:01:39][14.7]

DEBRA JORDAN: [00:01:41] I DON'T KNOW WHO YOU ARE. [00:01:42][1.0]

ANDREA: [00:01:43] ALL RIGHT, WELL, I AM A REPORTER IN HOUSTON, TEXAS, WORKING ON A STORY THAT INVOLVES MS. ROBIN ALLISON. AND I'M JUST TRYING TO VERIFY IF YOU ARE A TRUSTEE FOR HER. [00:01:57][13.8]

DEBRA JORDAN: [00:01:59] WELL, YOU WOULD NEED TO SPEAK TO MY ATTORNEY. DON'T CALL ME AGAIN. [00:02:03][3.7]

ANDREA: [00:02:04] WHY IS THAT? WHY CAN'T YOU TALK TO ME? I DON'T, IS MS ALLISON STILL ALIVE MA'AM? [00:02:04][0.0]

[89.1]