

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

In re:

**GORDON PROPERTIES, LLC,
CONDOMINIUM SERVICES, INC.,**

Debtors.

Case No. 09-18086-RGM
(Jointly Administered)

HOWARD SOBEL, et al.,

Plaintiffs,

v.

BRYAN SELLS, et al.,

Defendants.

Adv. Pro. No. 12-1562-RGM

**PLAINTIFFS’ NOTICE OF ADDITIONAL AUTHORITY IN RESPONSE TO
DEFENDANT’S MOTION TO DISQUALIFY REED SMITH LLP**

Plaintiffs Howard Sobel, Dewanda F. Cuadros, F.J. Pepper, Connie King, Steven Greenberg, Marietta Jones, Elizabeth Moore, Stephen Langone, Betty Gilliam, Evelyn Cantrell and Abdon Alexandre Zoghaib (collectively “Plaintiffs”), by counsel, file this notice of additional authority in further response to Defendant First Owners Association’s (“FOA”) Motion to Disqualify Reed Smith LLP (the “Motion to Disqualify” or “Motion”) and state as follows.

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Counsel for Plaintiffs Howard Sobel, et al.

On January 22, 2013, during the hearing on the Motion to Disqualify, counsel for Gordon Properties, LLC represented to the Court that Reed Smith LLP had appeared before the Honorable T.S. Ellis during a recent status conference and represented that it was still counsel for FOA. On January 22, 2013, after the hearing on the Motion to Disqualify had concluded, Judge Ellis issued an Order (attached as Exhibit 1) in which he made clear that Reed Smith LLP informed Judge Ellis that its representation of FOA had been terminated and that Reed Smith was appearing at the status conference as FOA's former counsel. Plaintiffs respectfully submit as additional authority Judge Ellis' Order to the Court for its consideration during its deliberation of the Motion to Disqualify.

CONCLUSION

WHEREFORE, Plaintiffs respectfully request that this Court enter an Order: (1) denying First Owners Association of Forty Six Hundred Condominium, Inc.'s Motion; (2) remanding this matter to the Circuit Court for the City of Alexandria, Virginia, where it was pending as Civil Action No. CL12005183 and (3) awarding Plaintiffs such further relief as is just and proper.

Respectfully submitted,

/s/ Alison R.W. Toepp

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I have this 28th day of January, 2013, caused a copy of the foregoing to be served electronically through the CM/ECF system upon all persons entering their appearance and requesting notice in this adversary proceeding.

/s/ Alison R.W. Toepp

Alison R.W. Toepp