

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**ELIOT I. BERNSTEIN, et al.**

**DOCKET NO:  
07Civ11196 (SAS)**

**Plaintiffs,**

**-against-**

**APPELLATE DIVISION FIRST  
DEPARTMENT DEPARTMENTAL  
DISCIPLINARY COMMITTEE, et al.**

**MOTION**

**Defendants**  
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**MOTION TO ALLOW FILING OF AN AMENDED COMPLAINT**

**PLAINTIFFS, ELIOT I. BERNSTEIN, Pro se, individually and P. STEPHEN LAMONT, Pro se and Plaintiff BERNSTEIN on behalf of shareholders of Iviewit Holdings, Inc., Iviewit Technologies, Inc., Uview.com, Inc., Iviewit Holdings, Inc., Iviewit Holdings, Inc., Iviewit.com, Inc., Iviewit.com, Inc., I.C., Inc., Iviewit.com LLC, Iviewit LLC, Iviewit Corporation, Iviewit, Inc., Iviewit, Inc., and other John Doe companies (collectively, "Iviewit Companies"), and patent interest holders, move this honorable Court for:**

**ALLOWING THE FILING OF AN AMENDED COMPLAINT**

1. Where it can be seen by Appendix B to Plaintiffs' Opposition to Motion to Dismiss of the Florida Bar defendants<sup>1</sup>, the draft Amended Complaint, Plaintiffs have added their claims of, *inter alia*, patent sabotage, intellectual property ("IP") theft, and breaches of contract by many parties conducting the unauthorized use of Plaintiffs' IP, that all

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<sup>1</sup> Should the Court request a copy of the draft Amended Complaint to be attached herein, Plaintiffs will so comply but have also submitted a draft as exhibit in the Motion in Opposition to the Florida Bar Motion to Dismiss filed April 7,2008 with this Court.

predated the issues from which the claims of “white washing” and “rubber stamping” of complaints by attorney disciplinary bodies flowed from.

2. That while the issues of “white washing” and “rubber stamping” of attorney complaints are complex and convoluted in and of themselves, adding the multinational complexities, from Tokyo to Munich and all places in between, of the knowing and willful backbone and enabling IP sabotage, the knowing and willful backbone and enabling IP theft, and the knowing and willful unauthorized use of backbone and enabling IP, the claims stated in Appendix A, in conspiracy by several hundred defendants that the RICO claims will assert, requires the time and opportunity to be addressed properly by Plaintiffs. Plaintiffs would need much additional time if they possessed the resources of an international law firm or possessed even Pro Bono counsel, including but not limited to counsel in all of the following legal niches necessary to successfully bring these claims in support of the related *Anderson* case to this Court: copyright law; corporate law; information & technology law; corporate finance law; intellectual property law; securities litigation and enforcement law; criminal law and tax law.

3. Incidentally, similar to the claims of Plaintiffs, the filing of false patent oaths is a crime against domestic and foreign agencies, foreign nations, and international patent treaties, all requiring even more specialized legal aid to successfully present.

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4. Accordingly, and light of your continuing to grant defendants motion to extend their time period to answer to May ~~10~~, 2008, Plaintiffs deem it reasonable and request the time and opportunity to file an Amended Complaint by May 10, 2008 as we are two Pro Bono guys with none of the legal departments or even a one lawyer to aid us in preparing this case and that date seems almost impossible to achieve considering the complexity of the RICO charges and the number of defendants that claim will include in this complaint.

**WHEREFORE**, Plaintiffs respectfully request this Court, in light of the complex issues and the finalization of drafting of the Amended Complaint, the time and opportunity to file an Amended Complaint by May 10, 2008.


Respectfully submitted,

Attorney for Petitioners

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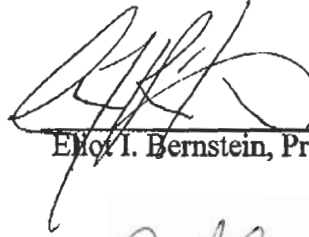
By:   
Eliot I. Bernstein

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By:   
P. Stephen Lamont

**AFFIDAVIT OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been furnished by facsimile and U.S. Mail this 9<sup>th</sup> day of April 2008.



Elio I. Bernstein, Pro se



P. Stephen Lamont, Pro se