IN THE SIXTH JUDICIAL CIRCUIT COURT IN AND FOR PINELLAS COUNTY, FLORIDA CIVIL DIVISION

MELVIN SEMBLER, Plaintiffs,

VS

UCN:

522003CA006649XXCICI

Ref. No .:

03-6649-CI-013

RICHARD BRADBURY, Defendant.

EMERGENCY MOTION FOR A PROTECTIVE ORDER AND OTHER RELIEF

COMES NOW Richard Bradbury by and through his undersigned counsel and moves this Court for a Protective Order and for other relief and as grounds therefor would show:

- This case arose as a claim by the Plaintiffs that the Defendant intentionally
 caused them emotional distress and invaded their privacy. It seeks damages and
 injunctive relief.
- To date the Plaintiffs have resisted any meaningful discovery into those claims, and there is still pending before this Court a Motion to Compel answers to interrogatories.

- 3. On December 7, 2004, Mr. Bradbury was deposed for approximately six hours.
 At the conclusion of this deposition, counsel for the Plaintiff announced that he was not halfway through his questioning, and the deposition was renoticed for continuation starting tomorrow, December 15, 2004.
- 4. During the deposition, counsel for the Plaintiff engaged in a course of conduct that was calculated to embarrass, humiliate, and traumatize the Defendant. For nearly three hours he asked the Defendant detailed questions about his financial affairs, an issue which has nothing to do with this case, but which the undersigned allowed to go forward in the spirit of the Rules of Civil Procedure, the local rules and the prevailing standards of conduct. One can only imagine what Plaintiff's counsel might do if the Semblers were subjected to harsh questions about their finances.
- 5. Some of this questioning went into the details of car repossessions: "So was every car you ever owned repossessed? (The answer is no)" and other lawsuits: "Isn't it true that Richard Mulholland also sued you for stalking? (The answer is no and a copy of the salient lawsuit is attached as Exhibit A)" Other questions

¹The quotations used here may not be verbatim because a transcript of the deposition has not yet been made available, but they are accurate paraphrases.

had to do with whether or not Bradbury has paid his federal income taxes, or filed timely tax returns. Several questions had to do with his income in the nineteen nineties. A number of questions began with phrases like "You understand you are under oath," and "Do you understand what happens if you do not tell the truth when you are under oath?" Another odious tack was the machine-gun like repetition of questions about other witnesses with whom Bradbury's testimony may not entirely corroborate. In those instances, whether they were real or imagined, counsel insisted on having Bradbury answer the question "Are you saying that Robin Guess (and in another instance the author of some document) is a liar?"

These kinds of questions must be seen in context. Bradbury was a victim of unlawful practices of an organization known as Straight, Inc. In Straight Bradbury was abused and falsely imprisoned. Bradbury lays blame for this at the feet of the Plaintiffs and has been an activist for his cause since the late nineteen eighties. After Bradbury posted a penis pump he found in trash outside the Semblers' home in 2003, counsel wrote him a letter saying he would now become the Semblers' "prey." Bradbury did not take this threat lightly.

As a victim of abuse, Bradbury suffers from Post Traumatic Stress Disorder.
 The day after the deposition he sought medical attention and on December 9, 2004

Exhibit B. The brutality of the questions put to him the length of time of the deposition last week, and the prospect of rescheduling it so soon will have a deleterious effect on Mr. Bradbury's health. An copy of an affidavit of Sidney Merin, Ph.D., the original of which is in the mail is attached and marked "Exhibit C." It is Dr. Merin's opinion that it will be harmful to Bradbury's mental health, and perhaps to Bradbury's physical safety if tomorrow's deposition goes forward.

- 7. Pursuant to the rules Counsel has tried to work out this issue with opposing counsel. Regrettably there has been no resolution, but instead there has been a threat that if Bradbury's deposition does not go forward that the Plaintiffs' will cancel the Semblers' deposition now scheduled for January, 2005.
- Bradbury has retained the undersigned to represent him in this cause and has agreed to pay reasonable fees therefor.

Wherefore Bradbury prays for an order protecting him from having to be deposed on December 15, 2004, and further protecting him from being asked questions that are not calculated to lead to the discovery of admissible evidence, and which are asked to him in a respectful tone. He further prays for attorneys fees for this motion and such other relief as this Court deems appropriate and just.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via facsimile and regular first class US Mail to Leonard S. Englander, Esq., and Ana Maria Carnesoltas, Esq. at 721 First Avenue North, St Petersburg, FL 33701 this 14th day of December, 2004.

Thomas H. McGowan, P.A. FBN: 0234052 SPN: 98632

150 Second Avenue North, Suite 870

St Petersburg, FL 33701

ph: 727-821-8900 fax: 727-821-3117

- 65. Same as #39 above.
- . 66. Denied.
- . 67. Denied.
 - 68. Denied.
 - 69. Fryer communicated with the Client as a paralegal under the direction of an attorney.
 - 70. Denied.
 - 71. Denied.
 - 72. Denied.

WHEREFORE, Defendants, Richard R. Mulholland, Robert Fryer, and Richard Mulholland and Associates, having fully answered the Amended Complaint filed herein, prays that the same be dismissed with prejudice and costs to the Plaintiff.

COUNTERCLAIM AND DEMAND FOR JURY TRIAL

COME NOW Counterclaimants, RICHARD MULHOLLAND AND ASSOCIATES and RICHARD MULHOLLAND, individually, and sue Counterdefendants, RICHARD BRADBURY, J. BENTON STEWART, and J. BENTON STEWART LAW GROUP, and state as follows:

GENERAL ALLEGATIONS

- 1. This is an action for monetary damages in excess of \$15,000.00, exclusive of interest and costs.
- All acts giving rise to this cause of action occurred in Hillsborough County, Florida.
- 3. At all times material to this cause of action, Counterdefendant J. BENTON STEWART was an agent, servant or employee of J. Benton Stewart Law Group and was acting in the course and scope of his employment with said law firm of J. Benton Stewart Law Group.
- 4. On or about September 22, 2000, Counterdefendant, RICHARD BRADBURY, was engaged in activity in front of the office building located at 101 East Kennedy Blvd., Tampa, Florida, with such activity being commonly known as "picketing" or "demonstrating". Said Counterdefendant, RICHARD BRADBURY, stationed himself in front of said building in order to attract the attention of the public and to distribute pamphlets titled "NOTICE TO POTENTIAL VICTIMS". Furthermore, said Counterdefendant was holding signs which read "ALLEGATIONS FRAUD, U.P.L. MALPRACTICE, MULHOLLAND'S LAW FIRM" and "JOIN MY LAWSUIT AGAINST MULHOLLAND LAW



- 5. As part of his "picketing" or "demonstrating" process, Counterdefendant, RICHARD BRADBURY, was publishing information to the public that was false, malicious, misleading, and injurious to the professional reputation of Counterplaintiffs. Furthermore, the actions of Counterdefendant, RICHARD BRADBURY, were intended by him to foster litigation and to induce and persuade members of the public to join in lawsuits against Counterplaintiffs.
- 6. At all times material to this cause of action, Counterdefendant, RICHARD BRADBURY was acting in concert with J. Benton Stewart, an attorney licensed to practice law in the State of Florida, who was advising Bradbury as to the goals, methods, means, and legalities vel non of conducting the so-called "picket" or "demonstration". The actions, utterances and publications of Bradbury were made with the full knowledge, consent and suggestion of Stewart in order that Stewart might induce members of the public to become clients of Stewart and join in litigation against Counterplaintiffs.
- 7. In his statements to the public, the Counterdefendant, RICHARD BRADBURY, uttered, interalia, the following false statements to members of the public:
 - (a) That there were a lot of lawsuits against Counterclaimant's law firm:
 - (b) That Counterclaimants did not care about their clients or about the results obtained for their clients:
 - (c) That Counterplaintiff, RICHARD MULHOLLAND, no longer practiced law;
 - (d) That the law firm of Counterplaintiff, RICHARD MULHOLLAND, would disband in less than a year and distribute the law firm's cases to paralegals.

All of the foregoing actions and statements were made in a conspiracy between Counterdefendants, BRADBURY and STEWART, in order to foster their own illicit litigation goals and to harm the professional reputation of Counterplaintiffs.

COUNT I

SLANDER

Counterclaimants, RICHARD MULHOLLAND and RICHARD MULHOLLAND AND ASSOCIATES, sue the Counterdefendants, RICHARD BRADBURY, J. STEWART BENTON, and J. STEWART BENTON LAW GROUP, and re-allege, reiterate, and adopt by reference all of the foregoing and further state as follows:

8. On or about September 22, 2000, Counterdefendant, RICHARD BRADBURY uttered false, malicious, dishonest, untruthful and misleading statements which were intended to and which did in fact

injure Counterclaimants. Such statements included, but were not limited to, those statements alleged herein in paragraph 7 of this Counterclaim.

- Such statements were intended to and did injure Counterplaintiffs relative to their professional standing in this community.
- 10. The slanderous statements uttered by Counterdefendant, RICHARD BRADBURY, were based upon information obtained by him from Counterdefendant, J. BENTON STEWART, with said Counterdefendants having conspired among themselves to publish false information to the public which publications were injurious to the Counterplaintiffs. Said information was uttered by Counterdefendants in an attempt to stir up litigation in Hillsborough Country, Florida.
- 11. Under Florida law, every person taking part in slanderous and defamatory statements, such as those uttered in this case, is jointly and severally liable to the injured party.

WHEREFORE, the Counterplaintiffs sue the Counterdefenants, RICHARD BRADBURY, J. STEWART BENTON and J. STEWART BENTON LAW GROUP, and demand compensatory damages and further demand trial by jury. Punitive damages will be sought in this case at the appropriate time.

COUNT II

LIBEL PER SE

Counterclaimants, RICHARD MULHOLLAND AND ASSOCIATES and RICHARD MULHOLLAND, individually, sue Counterdefendants, RICHARD BRADBURY, J. STEWART BENTON and J. STEWART BENTON LAW GROUP, and re-allege, reiterate, and adopt by reference all of the foregoing and further state as follows:

12. Counterdefendant, RICHARD BRADBURY, and Counterdefendant, J. STEWART BENTON, on or about September 22, 2000, were responsible for publishing false, misleading and malicious information to members of the public with regard to the professional competence and reputation of Counterplaintiffs. More specifically, said Counterdefendants were responsible for publishing to the public false statements that Counterplaintiffs had committed fraud and the unauthorized practice of law in the handling of Counterdefendant RICHARD BRADBURY's personal injury case.

WHEREFORE, Counterplaintiffs sue the Counterdefenants, RICHARD BRADBURY, J. STEWART BENTON and J. STEWART BENTON LAW GROUP, and demand compensatory damages and further demand trial by jury. Punitive damages will be sought in this case at the appropriate time.

COLNTIII

OF EMOTIONAL DISTRESS

Counterclaimants, RICHARD MULHOLLAND AND ASSOCIATES and RICHARD MULHOLLAND, individually, sue Counterdefendants, RICHARD BRADBURY, J. STEWART BENTON and J. STEWART BENTON LAW GROUP, and re-allege, reiterate, and adopt by reference all of the foregoing and further state as follows:

- 13. On or about September 22, 2000, Counterdefendant, RICHARD BRADBURY, and Counterdefendant, J. BENTON STEWART, acted recklessly and/or intentionally in maliciously and falsely uttering or causing to be uttered defamatory statements against the Counterplaintiffs.
- 14. The outrageous conduct of Counterdefendants was intended to and did in fact injure the professional reputation of Counterplaintiffs and caused severe and dramatic emotional distress to Counterplaintiff, RICHARD MULHOLLAND.

WHEREFORE, Counterplaintiffs sue Counterdefendants, RICHARD BRADBURY, J. STEWART BENTON and J. STEWART BENTON LAW GROUP, and demand compensatory damages and further demand trial by jury. Punitive damages will be sought in this case at the appropriate time.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing Answer to Amended Complaint and Counterclaim has been served by hand delivery via process server on J. Benton Stewart, II, Esquire, The Stewart Law Group, P.L., 3525 Henderson, Tampa, Florida 33679; Scott Charlton, Esquire, Clark, Charlton & Martino, P.A., 3407 West Kennedy Boulevard, Tampa, Florida 33623; and William Winters, Esquire, 709 West Azeele, Tampa, FL 33606 on this 27th day of November, 2001.

KENNETH R. CATE, ESQUIRE Richard Mulholland & Associates

Bank of America Plaza

Suite 3900

101 East Kennedy Boulevard

Tampa, Florida 33602 Telephone: 813/225-1615

Facsimile No.: 813/229-2914

Attorneys for Defendants

Florida Bar # 179485

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IN THE SIXTH JUDICIAL CIRCUIT COURT IN AND FOR PINELLAS COUNTY, FLORIDA CIVIL DIVISION

MELVIN SEMBLER, Plaintiffs.

VS

UCN:

522003CA006649XXCICI

Ref. No.:

03-6649-CI-013

RICHARD BRADBURY, Defendant.

AFFIDAVIT OF SIDNEY MERIN

- 1. My name is Sidney Merin.
- I am a licensed psychologist in the State of Florida.
- 3. A copy of my curriculum vitae is attached.
- 4. On December 13, 2004, I evaluated Richard Bradbury for the purpose of determining whether or not he is able to withstand the pressures of the continuation of his deposition presently scheduled for December 15, 2004.



- 5. It is my understanding that Mr. Bradbury is the Defendant in a case brought by Melvin and Betty Sembler and that his deposition was taken on December 7, 2004, from approximately ten in the morning until four in the afternoon.
- It is also my understanding that for much of the time of that deposition Mr.
 Bradbury was questioned about his finances and his involvement in other lawsuits.
- 7. Having evaluated Mr. Bradbury to see if he can reasonable withstand another deposition in such proximity to his December 7, 2004 deposition, it is my opinion within reasonable psychological certainty that he cannot.
- 8. While I do not believe Mr. Bradbury poses a threat or danger to third parties, I am concerned that his being placed in another deposition without some controls on the manner in which he is questioned, and without allowing him more time to recover from the trauma of his last deposition, lest he may cause harm to himself.
- I believe Mr. Bradbury may be suffering from Post Traumatic Stress
 Syndrome as well as some form of paranoia, both of which will, in my opinion be
 exacerbated if he is to be deposed on December 15, 2004.

10. It is my intention to have Mr. Bradbury undergo testing so that I may better be able to determine if, how, and when he will be able to deal with a subsequent deposition. This testing will commence in the coming weeks.

FURTHER AFFLANT SAYETH NOT

Sedney Mein Pla

Date 2004

State of Florida County of Pinellas

Before me did appear Sidney Merin, (4) personally known to me or () who produced ______ as identification, and states that the foregoing is true to the best of his belief and knowledge.

Notary Public

My Commission Expires:

CURRICULUM VITAE

SIDNEY J. MERIN, Ph.D.

OFFICE:

RESIDENCE:

3703 Swann Avenue Tampa, FL 33609 813/871-5220 Fax: 813/877-1795 Tampa, FL 33629

EDUCATION:

Doctor of Philosophy Degree - Clinical Psychology - Pennsylvania State University - 1956

Master of Arts Degree - Psychology - Temple University - 1952

Bachelor of Science Degree - Psychology - Pennsylvania State University - 1950

LICENSED: (State of Florida)

Psychology - Lic. #0002443

Marriage and Family Therapy - Lic. #0000846

BOARD CERTIFIED:

Clinical Psychology

- American Board of Professional Psychology

Neuropsychology

 American Board of Professional Neuropsychology - Founding Board

Medical Psychotherapy

- American Board of Medical Psychotherapists

and Psychodiagnosticians

Behavioral Medicine

- American Board of Behavioral Medicine

(1980-2004)

Fellow – Academy of Clinical Psychologists

Member – American Board of Forensic Examiners

LISTED:

National Register of Health Service Providers in Psychology

American Men of Science

Who's Who in the South and Southeast

Sidney J. Merin, Ph.D. Page 2 of 19

PRIVATE PRACTICE:

Clinical Psychology -- psychological evaluation of adults and children; counseling, treatment, and testimony if necessary

Neuropsychology - brain injury consultation, examination, and testimony

Individual Forensic Psychology - children, adolescents, adults

Testified -- in all major and many smaller jurisdictions in Florida; testified in the State courts of Texas, Louisiana, and Georgia; Testified in Federal courts in Florida and Georgia

Impaired Brain Function - examinations and testimony

Personal Injury -- examinations and testimony

Soft Tissue Injury – examinations and testimony

Wrongful Death - examinations and testimony

Death Penalty -- evaluations and testimony

Civil Competency -- examinations re: wills and inheritances

Child Custody and Child Abuse - examination and testimony

Criminal Competency Evaluations - examination and testimony

Psychological Injury Following Trauma - Post Traumatic Stress Disorders, etc., examinations and testimony

Sexual Harassment - workplace and home, examination and testimony

Domestic Violence -- examination and testimony-- criminal or civil

Confidential Examinations -- State and Federal Courts -- Phase I and/or Phase II testimony

Marriage and Family Counseling

Sidney J. Merin, Ph.D. Page 3 of 19

PRIVATE PRACTICE: (Cont'd)

Lectures and Seminar Discussions -- with community agencies and professional groups re: neuropsychology, forensic psychology, personality development, learning disabilities; etc.

Criminal Responsibility - insanity issues

Criminal Court Panel -- determination of competency and sanity in the State of Florida

OFFICES HELD:

Florida Psychological Association

President, 1970

Chairman, 1969 (Committee on Professional Affairs)

Chairman, 1967 (Committee on Standards and Ethics)

Chairman, 1967-1968 (Committee on Professional Workshops)

Florida State Board of Examiners of Psychology - Vice President, 1972-1975

Tampa Bay Psychological Association - President, 1957
Chairman, 1958-1959 (Committee on Standards and Ethics)

Bay Regional Society of Clinical Psychologists - Vice President, 1963

FOUNDER:

1968-1971 The Clinical Center of Reading and Learning, Director of Psychological Services
1987-1990 Florida Neurobehavloral Institute (brain injury rehabilitation)

APPOINTMENTS:

1964-1970 Clinical Assistant Professor, Dept. of Psychiatry, Univ. of So. Florida College of Medicine
 1979-1982 Visiting Lecturer, Western Carollna University, Dept. of Psychology-Graduate Level

Sidney J. Merin, Ph.D. Page 4 of 19

APPOINTMENTS: (Cont'd)

1972-1975 Florida State Board of Examiners of Psychology, Vice President

and Secretary

1964-1973 Adjunct Professor, Dept. of Psychology, Univ. of So. Florida

1970-Present Criminal Court Panel for Forensic Examinations

FORENSIC PSYCHOLOGY:

Criminal; personal injury; brain injury; wrongful death; competency; general mental status evaluation; psychological damages; child abuse; custody litigation and evaluations; parent evaluations; domestic violence; sexual harassment; sentencing.

Court appointments; confidential evaluations, State and Federal Prosecutor's Office; Public Defender's Office; private attorneys

Examinations re. Mitigation or Aggravation

Sexual Harassment

Domestic Violence

Estimated distribution of Forensic cases:

More than 7500 Forensic Examinations including:

Depositions

Trial or hearing appearances and testimony-estimated above 1200

Examinations of accused murderers

Personal injury examinations; soft tissue injury; brain impairment (neuropsychology), wrongful death, etc.

Child custody examinations

Orlminal justice examinations

Homicide evaluations-estimated 600+

PROFESSIONAL EXPERIENCE:

1964-present	Private Practice - Tampa & Clearwater, Florida; Clinical; Neuropsychological; Forensic
1960-1964	Senior Psychologist – Samuel G, Hibbs, M.D. & Associates –Psychiatry -Tampa, FL: Psychological evaluation of adults, child therapy, individual and group psychotherapy with adults and adolescents, lectures and seminar discussions with community agencies, marriage and family counseling.
1961-1964	Consultant and Therapist (part-time) - Adult Mental Health Clinic-Clearwater, FL
1956-1960	Staff Psychologist - Byron Harless & Associates - Tampa, FL:
	General Clinical Practice including evaluation of Industrial Clients
1956	School Psychologist - Commonwealth of Pennsylvania
1955-1956	Clinical Psychologist – Child Guidance Clinic – St. Petersburg, FL Diagnosis and treatment of children and adults, psychological research, group and individual therapy, consultant status with various community agencies, lectures and talks to community agencies and schools.
1954-1955	Psychological Assistant & Assistant Supervisor – Psychology Clinic, Pennsylvania State University, University Park, PA Evaluation of students in need of psychological help, interpretation of incoming freshman students' psychological test results, training of graduate students in psychology.
1953	Psychological Intern - Elgin State Hospital - Elgin, IL: Evaluation and Diagnosis of mental patients.
1950-1951	Psychological Assistant - Temple University Psychological Clinic - Philadelphia, PA: Training and supervising of psychology graduates.

Sidney J. Merin, Ph.D. Page 6 of 19

PROFESSIONAL ORGANIZATIONS AND ASSOCIATIONS:

Florida Psychological Association (1965-present); President (1970), President Elect (1969); Chairman, Committee on Professional Affairs (1969); Chairman, Committee on Standards and Ethics (1967); Chairman, Committee on Professional Workshops (1967-1968).

Florida State Board of Examiners of Psychology (1972-1975), Vice President (1974-1975).

Academy of Clinical Psychologists (1994-present); Fellow

American Psychological Association (1954-present); Member Division of Consulting Psychology, Division of Psychotherapy, Division of Clinical Neuropsychology, The Psychology and Law Society, Division of Psychologists in Independent Practice.

Tampa Bay Psychological Association (1954-to present); President (1957); Vice President (1956); Chairman, Committee on Standards and Ethics.

Bay Regional Society of Clinical Psychologists (1963-1980); Vice President (1963)

Professional Member National Academy for Neuropsychology (1980-present)

International Neuropsychology Society (1978) - Withdrawn September 2003

Society for Neuroscience (1980-2003)

American Association for the Advancement of Science (1970-1981)

International Academy of Law Science (1970-present)

Florida Association for the Advancement of Psychology (1978-1980)

International Society for Advanced Education (1975)

Pinellas County Mental Health Association (1970)

Hillsborough County Mental Health Association (1970)

Sidney J. Merin, Ph.D. Page 7 of 19

HONORARY PROFESSIONAL ORGANIZATIONS:

Sigma Alpha Eta, Professional Speech & Hearing Fratemity

Psy Chi, Professional Psychology Fraternity

Phi Delta Kappa, Professional Education Fraternity

CONSULTANT RELATIONSHIPS - PAST AND PRESENT:

Doctoral Dissertation Defense-Member of Committee-University of South Florida

United States Air Force, MacDill Air Force Base

Lutheran Synod; Evaluations for seminary

Florida State Dopartment of Business and Professional Regulation, consultant and advisor

MacDonald Training Center for Retarded Children (1957-1959); Organized the testing program.

Parents Without Partners (1974-1976); Lectures.

Florida State Alcoholic Rehabilitation Clinic (1957-1960); Consultant for Diagnosis and Treatment.

Veteraris Administration Hospital (1976); Regarding Court Testimony.

Anclote Manor Psychiatric Hospital (1957-1959); Consultant and aid in organizing Psychology Dept.

Horizon Hospital (1975-1977); Supervisor for Psychology Training.

Hillsborough County Association for Mental Health, Board of Directors (1960); Professional Advisory Board (1958-1959).

Professional Advisory Board - Cambridge School for Learning Disabled.

Polymer International: Management evaluations



Sidney J. Merin, Ph.D. Page 8 of 19

ADDENDUM RESEARCH & PROFESSIONAL CONTRIBUTIONS:

STUDIES:

- Psychological Factors in Identical Twins (Temple University)

- Wives of Men on Hazardous Duty

 Psychological and Psychiatric Influences in Court Decisions Regarding Custody of Children (Interprofessional Family Counsel)

- Independent Study of Battered Spouse Syndrome

DOCTORAL DISSERTATION:

The Influence of Sociometric Classification on

the Predictability of Children's Behavior

MAJOR PRESENTATIONS:

- Intrafamily Relationships (presented in association with the Interprofessional Family Council, 1961, 1962, 1963)

- Assessment of Impairment of Head Trauma

- Post Concussion Syndrome

- Dyslexia, Learning Disabilities, Minimal Brain Dysfunction, and other problems reading and learning

- Psychology and the Law

- Developmental Psychology

- Personality Development

- Psychological Testing

- Forensic issues, criminal, personal injury, child custody, etc.

Lectures, workshops, and seminars to various county bar associations and the Florida Bar Association

Monograph on psychological testing published by the American Trial Lawyers Association, testing and expert witness, October 1983. "The Use of Psychological Tests in Trial Testimony," reprinted by Florida Defense Lawyers Association Publication, 1986

PERSONAL:

Born and reared - Altoona, Pennsylvania

Military: U.S. Army -- Infantry and Special Troops -- ETO

Sidney J. Merin, Ph.D. Page 9 of 19

POST-DOCTORAL CONTINUING EDUCATION:

Varied workshops on Developmental Psychology, Psychological Assessment Techniques, Alcoholism, Rorschach Techniques, Neuropsychology Seminars, Group Therapy Workshops, and Individual Therapy Workshops, extending from 1953 to 1967. This training not recorded here.

Neuropsychology Training Seminar, University of Indiana Medical Center (1967 & 1969)

Presentation to Florida Prosecuting Attorneys Association – Insanity Defense, Jury Selection (5/70)

Neuropsychology, University of Florida Department of Neuropsychology, College of Medicine (1971)

Seminar on New Sexual Therapy (1975)

Biofeedback (1975 & 1977)

International Symposium on Stress (1975)

Child Abuse Conference (1975)

Human Dovelopment Workshop (Dr. Masserman)

Forensic Psychology Seminar (1975)

Workshop on Alcoholism (1978)

Forensic Psychologists Seminar, Trial Psychology (1978)

Luria Neuropsychological Workshop, Dr. Golden (1979)

Forensic Psychology Seminar, University of South Florida, College of Medicine (1979)

Neuropsychological Seminar, Pittsburgh, PA (1979)

Luria Neuropsychological Workshop (1980)

MMPI & Rorschach Workshop - Personality Assessment (1980, 1981)

Sidney J. Merin, Ph.D. Page 10 of 19

POST-DOCTORAL CONTINUING EDUCATION: (Cont'd)

Neuropsychological Workshop, Tom Boll (1980)

Luria Neuropsychological Workshop, Dr. Golden (1981)

Criminal Justice Workshop (1981)

Child Neuropsychology, L. Hartlage, Ph.D. (1981)

Psychology and Trial Law, University of South Carolina (1981)

Pain Seminar - Tampa (1982)

Hypnosis, Imagery and Behavior Modification, institute for Comprehensive Medicine – Houston (1982)

Post Concussion Syndrome, Southern California Neuropsychiatric Institute – California (1983)

Basic Computer Literacy for Psychologists - Orlando (1983)

Kaufman Assessment Battery for Children Workshop (1983)

Treatment of Sex Offenders, Rush Presbyterian-St. Luke's Medical Center, Rush Medical College – Chicago (1983)

Psychology and the Lawyer, Florida International University of Miaml (1983)

Forensic Neuropsychology, National Academy of Neuropsychologists - Houston (1983)

Behavioral Neurology and Neuropsychology, University of Florida – Sarasota (1983)

Clinical Applications of the MMPI, University of Minnesota – St. Petersburg (1984)

Rehabilitation in Post Concussion Syndrome, Southern California Neuropsychiatric Institute – Jamaica (1984)

Neurology and Neuropsychology, Florida Medical Foundation and Florida Society of Neurology – Sarasota (1984)

POST-DOCTORAL CONTINUING EDUCATION: (Cont'd)

Neuropsychological Aspects of Aphasia, University of South Florida – Tampa (1984)

Advanced Neuropsychology, Neuropsychological Assessment of Memory, Florida Psychological Association – Miami (1984)

Divorce Mediation, Florida Psychological Association - Tampa (1984)

Head Injury Rehabilitation: Beyond the Basics, Dallas Rehabilitation Institute - Texas (1985)

Houston Conference on Neurotrama -May 1985

Biological & Laboratory Aspects of Depression, Tampa Heights Hospital Seminar – July 27, 1985

Paper Presented - Florida Criminal Justice Group - September 1985

Presentation to Criminal Justice Representatives – Forensic Psychology – September 11, 1985

Behavioral Assessment Symposium - MMPI, Rorschach, Neuropsychology - Clearwater - November 1-3, 1985

Neuropsychological Assessment – Lezak & Pirozollo – Lake Buena Vista – January 16-18, 1986

Psychology & Law Conference, APA Division 41 - Tucson, AZ - March 1986

Florida Mental Health Institute Seminar on Forensic Evaluation Training - May 1-3, 1986

Communications in the Courtroom as Viewed by the Different Disciplines Sominar - Tampa - October 24, 1986

Psychology and the Law Seminar Presented to Tampa Bay FPA - November 1, 1986

Behavioral Neurology and Neuropsychology Seminar - Lake Buena Vista - December 3-6, 1986

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POST-DOCTORAL CONTINUING EDUCATION: (Cont'd)

Child Custody Seminar - Clearwater, FL - March 11, 1987

Forensic Neuropsychology Seminar - Clearwater, FL - March 12, 1987

Jury Selection Procedures Seminar - Clearwater, FL - March 13, 1987

Annual Conference of Medical Psychotherapists – Cancun, Mexico, May 6-8, 1987

Dysfunctions of Memory Seminar - St. Petersburg, FL - October 24, 1987

National Academy of Neuropsychologists - Toxicology, Learning Disabilities, Subcortical Diseases - Chicago, Illinois - October 27-November 1, 1987

Florida Psychological Association Workshop on Denman Neuropsychology Memory Scale, University of South Florida, Tampa – May 14, 1988

University of Minnesota, Department of Psychology Workshop – Forensic Psychology, Child Abuse

Neuropsychology, Criminal Dangerousness – Lake Buena Vista – May 20-22, 1988

National Academy of Neuropsychology, Special Workshops on Dementia (Butters), Neuropsychological Assessment of Children (Rourke) – November 3-4, 1988

Serial Killers Seminar by FBI Agents Ressier and Douglas – Orlando, Florida – November 5, 1988

Space Coast Institute for Medical & Legal Education – Sexual Homicide – November 5-6, 1988

Florida Society of Neurology and Neuropsychology – Memory, Apraxia, Language – Lake Buena Vista – December 7-10, 1988

Academy of Florida Trial Lawyers Annual Workhorse Seminar – Presentation: Damages – Detecting the Minimally Brain Damaged – Tampa – February 3, 1989

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POST-DOCTORAL CONTINUING EDUCATION: (Cont'd)

Florida Association for Marriage and Family Therapy and Valencia College, Annual State Conference – Couples Violence, May 5-6, 1989; AIDS Update Seminar – State required training – Orlando – May 7, 1989

University of South Florida Psychiatry Center – Stress and the Immune System – Tampa – May 18, 1989

Florida Psychological Association – Diagnostic Criteria for Attention Deficit Hyperactivity Disorder: Antecedents and Sequelae, by Nadine M. Lambort, Ph.D. – Stuart, Florida – June 8, 1989

Florida Society of Neurology Seminar – Hemi-spatial Neglect, Perceptual Disorders of Children, Attention Deficit Disorders, Memory – Tampa, Florida – November 29-December 2, 1989

Sixth Annual Mental Health and Law Conference – The Credibility of Children as Witnesses, workshop leader Theodore H. Blau, Ph.D.; Developments in Psychological Evaluation for Malingering and Symptom Exaggeration, workshop leader J. Randall Price, Ph.D. – Clearwater – March 21-22, 1990

Calusa Chapter of the Florida Psychological Association – Standard of Care and Malpractice, by Steven B. Bisbing, Psy.D., J.D. – Fort Myers, Florida – March 24, 1990

University of Minnesota Dept. of Psychology – MMPI-2 Workshop and Symposia, James N. Butcher, Ph.D. and John Graham, Ph.D. – Tampa – May 18-19, 1990

National Academy of Neuropsychology – Forensic Examinations; Memory Functions; Malingering; Children's Neuropsychological Examinations – Reno, Nevada – November 1-3, 1990

Presentation to Pinellas County Trial Lawyers Association – Psychiatric Testing in Our Courts – St. Petersburg – March 21, 1991

Presentation - Seminar to Southwest Florida Regional Physicians Group - Ft. Myers, Florida: Psychological Factors in Malpractice Litigation

Presentation to Cape Coral Hospital Physicians – Defending Against Medical Malpractice

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POST-DOCTORAL CONTINUING EDUCATION: (Cont'd)

Attended Florida Society of Neurology and Behavioral Neuropsychology – Lake Buena Vista, FL - December 15-19, 1991

National Academy of Neuropsychology, Special Workshops on Neuropsychological Assessment of Learning and Memory in Adults and Children (Delis), Clinically Relevant Dimensions of Memory: Tests, Cases, and Theory (Osmon), and The Psychometric Approach to Neuropsychological Assessment (Russell) — October 31-November 2, 1991

Florida Mental Health Institute - Legal and Psychological Aspects of Divorce - Tampa - May 27, 1992

Charter Hospital of Tampa Bay, The Survival of Psychiatry: Economic Healthcare Trends of the 90's – September 24, 1992

12th Annual Conference of the National Academy of Neuropsychology
Assessment of Malingering and Other Pseudoneurological States, The Validity of
Forensic Neuropsychological Testimony, Neuropsychology in the Legal Arena:
Real Word Issues, Malingering as a Special Problem for Neuropsychology,
Capital Murder: Do Acquired Frontal Lobe Brain Injuries Have a Role in
Causations, Culpability, and Competency? – Pittsburgh, Pennsylvania –
November 5, 6, 7, 1992

Assessment of Child Sexual Abuse Allegations: Child's Memory and Memory Contamination – Kathryn Kuehnle, Ph.D., University of South Florida – Tampa – February 19, 1993

MMPI-2 Workshop and Symposia, Updating Interpretations – Dr. James Butcher, et al; - St. Petersburg Beach, Florida – March 25-28, 1993

Legal and Malpractice Issues Associated with Managed Care Involvement – John Petrila, J.D.; University of Florida – Tampa – April 15, 1993

Presentation – Invited Guest Expert on National Television Program – Re: Bonding and Psychological vs. Biological Parents – Tampa, Fl. – May 10, 1993

Sexual Violence Against Women and Children: Things You Should be Aware Of, Judith v. Becker, Ph.D.; TGH-University Psychiatry Center - Tampa, Florida - June 17, 1993

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POST-DOCTORAL CONTINUING EDUCATION: (Cont'd)

Neuropsychological Assessment: Recent Developments and Applications — Department of Veterans Affairs, Psychology Service – Miami, Florida – October 1, 1993

Evaluation and Treatment of True and False Child Sexual Abuse, Richard A. Gardner, M.D. – Orlando, Florida – October 29, 1993

Forensic Neuropsychology: Going Beyond the Test Data, Neuropsychological Associates of California – Lake Buena Vista, FL – December 10-12, 1993

Differential Diagnosis: Using the DSM IV - Florida Mental Health Institute; University of South Florida - Tampa, FL; March 25, 1994

Presentation to University of South Florida School of Medicine: Grand Rounds – Medical Students, Lecture on Forensic Presentation in Psychiatry and Psychology; April 22, 1994

American Board of Medical Psychotherapists Annual Conference; Phoenix, Arizona; May 27-29, 1994

Presentation to Convention, Florida State Prosecuting Attorneys – Mental Health Defense; Marco Island, Florida; August 1, 1994

Family Law Seminar - Child Custody Litigation - Parental Responsibilities; Tampa, FL; August 4, 1994

National Academy of Neuropsychology: Practical Approaches to Puzzling Problems in Clinical Neuropsychology – Ralph Reitan; Child Forensic Neuropsychology – Lawrence C. Hartlage; Neuro-Imaging and Neuropsychological Assessment – Erin Bigler; Presence of Third Party Observers During Forensic Neuropsychological Evaluations – Robert J. McCaffrey; Neuropsychology in the Courtroom - Base Rates – William D. Gouvier; Buena Vista, FL, November 2-5, 1994

Florida Psychological Association: Ethical Practice in the 1990's; Tampa, Florida; January 6, 1995

Brain Injury Cases and Trial Advocacy - Dr. Russell; Tampa, Florida; January 27, 1995

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POST-DOCTORAL CONTINUING EDUCATION: (Cont'd)

Annual Course in Behavioral Neurology and Neuropsychology; Orlando, FL; December 3, 4, & 5, 1995

Florida Psychological Association 1995 Winter Conference; Domestic Violence: Forensic Issues – Mary Ann Dutton, Ph.D.; Ft. Lauderdale, FL; Docember 9, 1995

Institute for Cortext Research and Development; The Aging of the Brain, The Aging of the Mind – David Morgan, Ph.D., Tampa, FL; October 10, 1996

National Academy of Neuropsychology: Forensic Practice in Neuropsychology; Malingering; Memory Factors in Neuropsychological Deficits and Related Issues; New Orleans; October 31, November 1, November 2, 1996

Florida Psychological Association: Law and Ethics in Clinical Practice: Select Issues; Sarasota, FL; November 4, 1996

Florida Psychological Association: Domestic Violence Home Study Program; Tampa, FL; January 31, 1997

Clinical Assessment of Malingering and Deception - Phillip Resnick, M.D.; Ft. Lauderdale, FL; February 20, 1997

Fourth Annual Headache Symposium – University of South Florida College of Medicine; Tampa, FL; March 14, 1997

Seminar: New Tests, WAIS-III and WMS-III; Dade Community College, Miami, FL: October 1997

National Academy of Neuropsychology – Seminars re: memory; rare cases; ADHD; neuro-toxins; pediatric neuropsychology; Las Vegas, Nevada; November 10, 11, 12, 1997

Conference on Personality Assessment – Clinical Workshops on the MMPI-2 and MMPI-A; Clearwater Beach, FL; March 11-13, 1998

Presentation to Stetson Law School - Value of Psychological Testimony in Court, St. Petersburg, FL; April 2, 1998

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POST-DOCTORAL CONTINUING EDUCATION: (Cont'd)

Presentation to Fen-Phen Science and Medicine Conference; Washington, D.C.; May 7 & 8, 1998

Workshop: Prescribing Psychologists' Register Series Two Course Overview of Neurobiology and Basic Pharmacology; Biscayne Rehabilitation Institute; Miami, FL; October 24 & 25, 1998

Workshop: Prescribing Psychologist's Register Series Four Course Overview and Differential Diagnosis of Mood Disorders, Psychotropic Treatments; Biscayne Rehabilitation Institute; Miami, FL; February 12-14, 1999

Workshop: Prescribing Psychologists' Register Series Three Course: Pathophysiology, Drug Interactions, Side Effects, Laboratory & Serology, Biochemistry and Medical Aspects of Psychotropic Prescriptions; Biscayne Rehabilitation Institute; Miami, FL; April 11, 1999

Florida Psychological Association: Avoiding Ethical and Legal Problems; Guidelines for Mental Health Practice in the 21st Century; Orlando, FL, October 8, 1999

Prescribing Psychologists' Register: Series Five Course on Psychopharmacology & Related Sciences; Miami, FL; October 23 & 24, 1999

Florida Society of Neurology – 25th Annual Course in Behavioral Neurology and Neuropsychology: The Right Hemisphere – Lake Buena Vista, FL; December 2-4, 1999

The Florida Psychological Association: Seminar on Domestic Violence – January 28, 2000

National Academy of Neuropsychology Seminars: Aging in Alzheimer Patients; Exaggerating and Malingering; Use of Neurocognitive Models; Connors CPT II; Woodcock Johnson; Neuro Imaging – November 15-18, 2000

Seminar, USF Department of Neurology et al: Pediatric Neurology: Epilepsy, Headaches, and Psychiatry – March 10, 2001

Conference, MMPI-2: New Scales, Forensic, and Update; University of Minnesota, Continuing Education Dept. – Safety Harbor, FL, March 15 & 16, 2001

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POST-DOCTORAL CONTINUING EDUCATION: (Cont'd)

Conference: USF College of Nursing, Traumatic Brain Injury II re: forensic implications – Key West, FL; May 19 & 20, 2001

Conference: Emotional Disorders in Children-Recognition & Intervention St. Petersburg, FL-September 19, 2001

Conference: Avoiding Liability in Mental Health Practice-Ethics and Laws; Incorporating Morality And Social Responsibility In Clinical Practice St. Petersburg, FL-November 2, 2001

Conference: Florida Society of Neurology and The Center For Neuropsychological Studies-Emotions and the Brain: The Behavioral Neurology of Emotional Disorders December 13-15, 2001-Lake Buena Vista, Florida

Conference: Pain Control: Fibromyalgia, Migraines, Chronic Pain, & Sore Feet Institute For Natural Resources (INR) 3/7/2002-Tampa, FL

Second Annual Updates in Clinical Psychiatry-USF College of Medicine, conducted in Lake Buena Vista, FL-September 14, 2002

The Florida Society of Neurology 28th Annual Course in Behavioral Neurology and Neuropsychology 12/12/02-12/14/02 Lake Buena Vista, Florida

The Florida Psychological Association HIPAA Compliance: Basic Seminar For Mental Health Professionals; Coming Into Compliance 1/31/2003 St. Petersburg, Florida

New Dimensions in Brain Rehabilitation 9/13/03-9/14/03 in Miami, Florida

Bay Area Psychological Association (Largo Police Department)
Domestic Violence: What We Do Makes A Difference
9/26/03

Cross Country University: The Bipolar Child: Assessment and Intervention Tampa, FL 10/9/03

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The Florida Society of Neurology: Twenty-ninth Annual Course in Behavioral Neurology and Neuropsychology Lake Buena Vista, FL 12/11/03-12/13/03

Annual FPA Convention: The Halstead Russell Neuropsychological Evaluation System Method for Neuropsychological Assessment; The WISC-IV Integrated Naples, FL 7/16/04

Presentation to Stetson School of Law, October 2004-Value of Psychological Testing and Psychologists' Testimony

Forensic Psychology Workshop; Legal and Ethical Risks; Risk Management in Professional Psychological Practice-Sequence II and Risk Management in Specific High-Risk Areas; Strategies regarding Suicidal Ideation, Planning, and Attempts
Ft. Lauderdale, FL 12/4/04-12/5/04

The Florida Society of Neurology and The Center For Neuropsychological Studies re: Behavioral Neurology and Neuropsychology; Memory, Executive Functions, and Dementia Lake Buena Vista, FL December 9-11, 2004

CONSULTATION AFFILIATIONS - Past or Present

Social Security Disability - HRS

Worker's Compensation

MacDill Air Force Base Hospital

Polymer International Corporation

Lutheran Synod of Florida

State of Florida, Department of Business and Professional Regulation

Health and Rehabilitative Services (now, Department of Children and Families)

Member of Examining Committee for Board Cerlification, December 1091

HRS Evaluation re: Child Abuse

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