

~~EXHIBIT 47~~

x		FW:	x
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Mike Becker
SFmail04/SFGOV

Inbox (2)
Drafts
Sent
Follow Up
Junk Mail
Trash

Views

Folders

Tools

Other Mail

Widgets

New
Reply
Reply To All
Forward
M

FW:
Ivory Madison
To: mike.becker@sfgov.org

Wednesday, January 04,

From: Eliana Lopez [mailto:]
Sent: Wednesday, October 19, 2011 2:03 PM
To: Ivory Madison
Subject:

hello dear!!

Thank you so much for call me today.

I'm having all this emotional experience lately that make me wonder if I'm doing right. My classes in LA are fantastic but at the same time it make me explore and face in a deeply way my own feelings.

On Monday I traveled to LA, very worry about Theo because the last week when I was traveling just for a day and Ross spent just 2 hours with Theo was a nightmare. I found Theo all wet, shoes, socks, pants, diaper, completely wet sleeping in the car at 8pm. When I asked: did you feed him? Ross did not have any answer. So I took Theo from the car seat and he was so weak, I changed his clothes and when I tried to feed him he just vomit over me pieces of food and a lot water. After that I could not study or do anything because Theo was having fever for days.

So, on Monday I decided to call a Nanny, leave her the house key so she was picking Theo up from the childcare, fed him, give him a bath a put him on bed at 9pm. I cooked food for this two days and I asked Ross to use the jeep to drive to the airport, leave the jeep in the parking lot and drive home yesterday. So, he leave the jeep in front of home on Monday and took the Van and told me: Use it, is in front.

Everything I planned was perfect, my class was fantastic, the shuttle, the little hotel close to the school, Theo, nanny, food etc.

So, I was driving last night coming home from the airport in the middle of the freeway and in a moment the jeep just stopped. it didn't work anymore and I was loosing velocity just in the middle of the freeway. I got so nervous that i could not remember were the emergency light was. And I started to think: If any car hits me I'm going to get hurt because this jeep is just Lona. And that make me more and more nervous. All the cars were passing me but thanks god the van behind me was with latinos workers and I just open the door and said: Please dont let me alone here!!! And they were so nice to

~~EXHIBIT 48~~

x

FW:

x

Mike Becker SFmail04/SFGOV	<div> New Reply Reply To All Forward </div>
Inbox (53) Drafts Sent Follow Up Junk Mail Trash	FW: Ivory Madison To: mike.becker@sfgov.org Thursday, January 05,
Views	-----Original Message----- From: [REDACTED] Sent: Sunday, January 01, 2012 5:13 PM To: Ivory cell Subject:
Folders	Hello dear!! It was so helpful to talk to you! Thank you so much! I feel better. I was talking with my dad as well, he is so smart and helped me to get in my center again. Please, send me the inf from your therapist. Looks like Ross in doing research too. I'm with Theo now. Don't get to worry, the problems are there to face them and solve them not for feel sorry. Love Eliana. Sent via BlackBerry by AT&T
Tools	----- No virus found in this message. Checked by AVG - www.avg.com Version: 2012.0.1901 / Virus Database: 2109/4716 - Release Date: 01/01/12
Other Mail	
Widgets	

EXHIBIT 49

x

FW:

x

Mike Becker SFmail04/SFGOV	New Reply Reply To All Forward M
Inbox (52) Drafts Sent Follow Up Junk Mail Trash	FW: Ivory Madison To: mike.becker@sfgov.org Thursday, January 05,
Views	-----Original Message----- From: [REDACTED] Sent: Monday, January 02, 2012 10:23 AM To: Ivory cell Subject: Re: Hi dear! We are leaving to Monterrey. Can you believe it? Today, monday. I'm so tired. I feel like the character in the book you were talking about: "my husband is taking me to a route trip!" We are coming back tomorrow and Ross will work again and I will have my life and peace back. I will call you!! Thank you! E
Folders	-----Mensaje original----- De: Ivory cell Para: Eliana Lopez Asunto: RE: Enviado: 2 Ene, 2012 09:47 Eliana, I called a couple of friends who aren't in the area for advice. I will call our therapist today. Are you home? I'd like to talk in person this morning if we can!
Tools	-----Original Message----- From: [REDACTED] Sent: Sunday, January 01, 2012 5:13 PM To: Ivory cell Subject: Hello dear!! It was so helpful to talk to you! Thank you so much! I feel better. I was talking with my dad as well, he is so smart and helped me to get in my center again.
Other Mail	
Widgets	

EXHIBIT 50

x

FW:

x

Mike Becker SFmail04/SFGOV	New Reply Reply To All Forward M
Inbox (51) Drafts Sent Follow Up Junk Mail Trash	FW: Ivory Madison To: mike.becker@sfgov.org Thursday, January 05,
Views	-----Original Message----- From: [REDACTED] Sent: Monday, January 02, 2012 11:18 AM To: Ivory cell Subject: Re: I am agree with everything. I'm realizing how serious it is and I have to be very smart to protect Theo and myself. I always believe in my instinct, and now I just would like to run away. Thank you so much!! I will call you back. E Sent via BlackBerry by AT&T
Folders	-----Original Message----- From: Ivory Madison [REDACTED] Date: Mon, 2 Jan 2012 10:59:06 To: [REDACTED] Subject: RE: Eliana, I have spoken to a few friends to get advice. The number one thing you must do is call the police (don't threaten to call, just take Theo and run into a neighbor's house or down the street or lock yourself in the car, or in the same room with him, even if he's calmed down, whatever is needed) every time there is an incident. There is no other type of evidence as important as this. Even if you call 911 and then by the time they get there everything is "fine" you have to call. Every single time he treats you like that or anything close to it, even just words not physical violence, call 911. Every time. And tell them everything so it's on record, the history, the context of past incidents, in which these types of actions (the turning the car
Tools	
Other Mail	
Widgets	

EXHIBIT 51

x

FW:

x


Mike Becker SFmail04/SFGOV 	<div> New Reply Reply To All Forward M </div>
Inbox (50) Drafts Sent Follow Up Junk Mail Trash	FW: Ivory Madison To: mike.becker@sfgov.org Thursday, January 05,
Views	<p>-----Original Message-----</p> <p>From: [REDACTED]</p> <p>Sent: Tuesday, January 03, 2012 2:45 PM</p> <p>To: Ivory cell</p> <p>Subject: Re:</p> <p>Hello!</p> <p>We are leaving Monterrey now. The Aquarium was so nice and Ross fed us regularly without complain. He needs to feel that we were taking a vacation even though it is not true. But the most funny is that he needs ta call everybody and says: "by the way, I'm in Monterrey in a family trip" He got scared and he needs to feel that he is trying even though the trip is just change the scenery. I will love to know what your therapist thinks we should do and I will push hard to take Ross to therapy. My poor Theo is so confused. The good thing is that we have a good and strong relationship. I talk to him a lot and he always understand. Thank you so much for be there in this moments. Sent via BlackBerry by AT&T</p> <p>-----Original Message-----</p> <p>From: Ivory Madison [REDACTED]</p> <p>Date: Mon, 2 Jan 2012 10:59:06</p> <p>To: [REDACTED]</p> <p>Subject: RE:</p> <p>Eliana,</p> <p>I have spoken to a few friends to get advice.</p> <p>The number one thing you must do is call the police (don't threaten to call, just take Theo and run into a neighbor's house or down the street or lock yourself in the car, or in the same room with him, even if he's calmed down, whatever is needed) every time there is an incident. There is</p>
Folders	
Tools	
Other Mail	
Widgets	

EXHIBIT 52

FW:

Mike Becker
SFmail04/SFGOV

Inbox (49)

Drafts

Sent

Follow Up

Junk Mail

Trash

Views

Folders

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Other Mail

Widgets

New

Reply

Reply To All

Forward

M

FW:

Ivory Madison

Thursday, January 05,

To: mike.becker@sfgov.org

-----Original Message-----

From: [REDACTED]

Sent: Tuesday, January 03, 2012 3:04 PM

To: Ivory cell

Subject: Re:

That sounds great!

Ok, let me see at what time we are finally in San Francisco.

I will text you.

:)

Sent via BlackBerry by AT&T

-----Original Message-----

From: Ivory Madison [REDACTED]

Date: Tue, 3 Jan 2012 14:50:23

To: [REDACTED]

Subject: RE:

I have a male therapist for you, recommended by my therapist, with experience in dealing with highly successful men who are complete assholes like your husband. :)

Also, I have other good news.

Can you come over tonight, or in the morning? I'd like to see you tonight if possible! Even late.

-----Original Message-----

From: [REDACTED]

Sent: Tuesday, January 03, 2012 2:45 PM

To: Ivory cell

Subject: Re:

Hello!

We are leaving Monterrey now.

The Aquarium was so nice and Ross fed us regularly without complain.

He needs to feel that we were taking a vacation even though it is not

true. But the most funny is that he needs to call everybody and says: "by

EXHIBIT 53

<div style="text-align: center;"> × FW: × </div>	
<div> Mike Becker SFmail04/SFGOV <hr/> <div> Inbox (49) Drafts Sent Follow Up Junk Mail Trash Views Folders Tools Other Mail Widgets </div> </div>	<div style="text-align: right;"> New Reply Reply To All Forward M </div> <hr/> <div> FW: Ivory Madison Thursday, January 05, To: mike.becker@sfgov.org </div> <hr/> <div> <p>-----Original Message-----</p> <p>From: [REDACTED]</p> <p>Sent: Tuesday, January 03, 2012 3:04 PM</p> <p>To: Ivory cell</p> <p>Subject: Re:</p> <p>That sounds great!</p> <p>Ok, let me see at what time we are finally in San Francisco.</p> <p>I will text you.</p> <p>:)</p> <p>Sent via BlackBerry by AT&T</p> <p>-----Original Message-----</p> <p>From: Ivory Madison [REDACTED]</p> <p>Date: Tue, 3 Jan 2012 14:50:23</p> <p>To: [REDACTED]</p> <p>Subject: RE:</p> <p>I have a male therapist for you, recommended by my therapist, with experience in dealing with highly successful men who are complete assholes like your husband. :)</p> <p>Also, I have other good news.</p> <p>Can you come over tonight, or in the morning? I'd like to see you tonight if possible! Even late.</p> <p>-----Original Message-----</p> <p>From: [REDACTED]</p> <p>Sent: Tuesday, January 03, 2012 2:45 PM</p> <p>To: Ivory cell</p> <p>Subject: Re:</p> <p>Hello!</p> <p>We are leaving Monterrey now.</p> <p>The Aquarium was so nice and Ross fed us regularly without complain.</p> <p>He needs to feel that we were taking a vacation even though it is not true. But the most funny is that he needs to call everybody and says: "by</p> </div>

EXHIBIT 54

x

FW:

x

Mike Becker SFmail04/SFGOV	New Reply Reply To All Forward M
Inbox (48) Drafts Sent Follow Up Junk Mail Trash	FW: Ivory Madison Thursday, January 05, To: mike.becker@sfgov.org
Views	<p>-----Original Message-----</p> <p>From: [REDACTED]</p> <p>Sent: Tuesday, January 03, 2012 8:36 PM</p> <p>To: Ivory cell</p> <p>Subject:</p> <p>Hello! We are at home. I'm going to read to Theo to put him down. Ross is out.</p> <p>Looks like better tomorrow.</p> <p>:(</p> <p>Sent via BlackBerry by AT&T</p>
Folders	<p>-----</p> <p>No virus found in this message.</p> <p>Checked by AVG - www.avg.com</p> <p>Version: 2012.0.1901 / Virus Database: 2109/4721 - Release Date: 01/03/12</p>
Tools	
Other Mail	
Widgets	

EXHIBIT 55

✕

FW: Dinner ... ✕

Mike Becker
SFmail04/SFGOV

Inbox (47)
Drafts
Sent
Follow Up
Junk Mail
Trash

Views

Folders

Tools

Other Mail

Widgets

New

Reply

Reply To All

Forward

M

FW: Dinner party Friday night 6 Pm

Ivory Madison

Thursday, January 05,

To: mike.becker@sfgov.org

From: [REDACTED]**Sent:** Wednesday, January 04, 2012 8:33 AM**To:** Ivory cell**Subject:** RV: Dinner party Friday night 6 Pm

Hello!

Untie Pat, even though Ross is insulting her all the time, she is doing everything she can for Ross.

She sent me this email last night. I don't want to go. I would like to get sick and stay in bed :(

Let me know at what time today works for you and I will stop by to talk.

E

Sent via BlackBerry by AT&T

From: [REDACTED] >**Date:** Tue, 3 Jan 2012 23:08:34 -0800**To:** Eliana Lopez >**Subject:** Dinner party Friday night 6 Pm

Hi Eliana,

You know the campaign staff asked me to help plan the dinner party on Friday night, so it's at Delancey Street restaurant. I visited the room today, and it's small but cozy. Do you want to include Ivory and Abe in the party. I realize they are very close. Let me know.

Hugs.

whata week...!

[REDACTED]
[REDACTED]
[REDACTED]
a nonprofit agency

EXHIBIT 56

AT&T

11:45 AM

Ethana Lopez

Ethana, are you available to
come over this morning?

Jan 4, 2012 8:28 AM

Are you free at 9am? I'm
on a call until then.

Yes!

Jan 4, 2012 11:45 AM

Turns out my call is at
12:30, are you free now?
On phone with dad?

Jan 4, 2012 12:24 PM

Hello Ivory, I'm not going
to call the police. I'm going
to open a record with my
doctor.



Send

x

FW:

x

Mike Becker SFmail04/SFGOV	New Reply Reply To All Forward More
Inbox (46) Drafts Sent Follow Up Junk Mail Trash	FW: Ivory Madison Thursday, January 05, To: mike.becker@sfgov.org
Views	-----Original Message----- From: [REDACTED] Sent: Wednesday, January 04, 2012 9:02 AM To: Ivory cell Subject: Are you ready? Sent via BlackBerry by AT&T
Other Mail	----- No virus found in this message. Checked by AVG - www.avg.com Version: 2012.0.1901 / Virus Database: 2109/4722 - Release Date: 01/04/12
Widgets	

EXHIBIT 57

AT&T

11:40 AM

Messages

Eliana Lopez

Eliana, are you available to
come over this morning?

Jan 4, 2012 8:29 AM

Are you free at 9am? I'm
on a call until then.

Yes!

Jan 4, 2012 11:45 AM

Turns out my call is at
12:30, are you free now?
On phone with dad?

Jan 4, 2012 12:24 PM

Hello Ivory, I'm not going
to call the police. I'm going
to open a record with my
doctor.



Send

EXHIBIT 58

x

FW:

x

Mike Becker
SFmail04/SFGOV

Inbox (45)

Drafts

Sent

Follow Up

Junk Mail

Trash

Views

Folders

Tools

Other Mail

Widgets

New

Reply

Reply To All

Forward

M

FW:

Ivory Madison

Thursday, January 05,

To: mike.becker@sfgov.org

-----Original Message-----

From: [REDACTED]

Sent: Wednesday, January 04, 2012 4:14 PM

To: Ivory cell

Subject:

Dear Ivory, I really hope you respect my feelings and work with me in a healthy way without to mess it up. This is my family and my son's dad.

Sent via BlackBerry by AT&T

No virus found in this message.

Checked by AVG - www.avg.com

Version: 2012.0.1901 / Virus Database: 2109/4722 - Release

Date: 01/04/12

EXHIBIT 59

FW: x


Mike Becker SFmail04/SFGOV 	New Reply Reply To All Forward M
Inbox (44) Drafts Sent Follow Up Junk Mail Trash	FW: Ivory Madison Thursday, January 05, To: mike.becker@sfgov.org
Views	<p>-----Original Message-----</p> <p>From: [REDACTED]</p> <p>Sent: Wednesday, January 04, 2012 4:16 PM</p> <p>To: Ivory cell</p> <p>Subject:</p>
Folders	<p>Hello dear!</p> <p>I have been calling social workers, therapist and lawyers. I don't want to make impulsive decisions because Ross is a victim as well.</p> <p>He couldn't escape from his circumstances. How you said: he could get married with a shy and quiet person, but he got married to me that face and scream if I have to be heard.</p> <p>I want to teach that to Theo as well.</p> <p>Sent via BlackBerry by AT&T</p>
Tools	<p>-----</p> <p>No virus found in this message.</p> <p>Checked by AVG - www.avg.com</p> <p>Version: 2012.0.1901 / Virus Database: 2109/4722 - Release Date: 01/04/12</p>
Other Mail	
Widgets	

EXHIBIT 60

14-00000-104 - from evidence1/mikekerney/Notes/Mail/OregonDocumentExhibit-dyno fromo&l-a 1/1/17

~~EXHIBIT 61~~

LAW OFFICES OF
PAULA CANNY
840 HINCKLEY ROAD, SUITE 101
BURLINGAME, CALIFORNIA 94010

650.652.7862
FAX 650.652.7835
www.paulacanny.com

February 16, 2012

Ivory Madison
[REDACTED]
[REDACTED]

Re: Cease and Desist Disclosure of Confidential Communications

Dear Ms. Madison,

I represent Eliana Lopez. The purpose of this letter is to state in writing the obvious.

Please cease and desist any further disclosure of any communications that you shared with Eliana Lopez on or about January 1, 2012 and thereafter.

As you well know the communications that you shared with Ms. Lopez on January 1, 2012 were confidential and privileged pursuant to California Evidence Code Section 954 et seq. Ms. Lopez sought your advice and assistance and believed your shared discussions were confidential and privileged. Ms. Lopez formed this belief because you advised her the communications were confidential and privileged, that you had graduated from law school, had been trained as an attorney, were Editor In Chief of Law Review, worked at the California Supreme Court, served as a law fellow at Americans United for Separation of Church and State, and you further advised Ms. Lopez that you had been to Court many times, that you knew what to do in custody dispute cases, and that you were helping her in her custody dispute case.

Based upon your representations Ms. Lopez reasonably believed that what she said to you, as well as what you said to her, as well as your creation of the instrument to be used in the custody proceedings, (the video you scripted and directed) would remain confidential and privileged and that Eliana Lopez held the privilege.

I know as does the whole world know, that you have disclosed confidential and privileged communications to various numbers of the San Francisco Police Department, possibly Deputy District Attorneys, their investigators, your husband, other friends and acquaintances, as well as media.

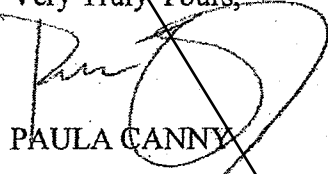
Your conduct is improper and illegal. On behalf of Ms. Lopez I hereby request that you cease and desist from any further breach of said confidential and privileged communications. Again, Ms. Lopez was and is the holder of the privilege. Ms. Lopez has steadfastly stated to you

Letter to Ivory Madison - 1 - February 16, 2012



that you did not and do not have permission to disclose the contents of the confidential and privileged communications. Please cease and desist in any further disclosures as your conduct has caused Ms. Lopez and her family great harm.

Very Truly Yours,

A handwritten signature in cursive script, appearing to read "Paula Canny", is written over the typed name.

PAULA CANNY

PKC/rf