

ACFLS FAMILY LAW SPECIALIST

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HAGUE CHILD ABDUCTION CONVENTION APPLICATION PROCEDURE

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Background/Overview of the Hague Child Abduction Convention

The Hague Child Abduction Convention¹ was established “to protect children internationally from the harmful effects of their wrongful removal or retention and to establish procedures to ensure their prompt return to the State of their habitual residence, as well as to secure protection for rights of access.”² Seventy-eight countries are signatories (“contracting states”) to the Hague Child Abduction Convention, including the United States³ and Mexico.

The removal of a child from the child’s country of habitual residence⁴ is wrongful, “where it breaches the petitioner’s rights of custody, providing that the petitioner was exercising those rights” at the time of the removal.⁵ Such removal would still be deemed wrongful under the Hague Child Abduction Convention, even when both parents have equal custodial rights under the law of the child’s country of habitual residence.

The Hague Child Abduction Convention is a powerful tool for a parent seeking the return of a child to the child’s country of habitual residence. A petitioner seeking relief

under the Hague Child Abduction Convention must successfully prove, by a preponderance of the evidence, that the child was wrongfully removed or retained from their country of habitual residence. If the burden is met, the court is mandated to return the child to the child’s country of habitual residence unless the respondent successfully proves one of a few affirmative defenses,⁶ some of which require a proof by clear and convincing evidence.⁷

Central Authority Application Procedure

The Hague Child Abduction Convention directs each contracting state to designate a central authority to receive and process applications and initiate judicial proceedings in its territory for the return of wrongfully removed children.⁸ A person may submit an application for the return of a wrongfully removed child to the central authority of the child’s country of habitual residence, which then forwards the application to the central authority of the country to which the child has been removed. The central authority of the country to which the child has been removed then initiates a judicial proceeding (i.e. files a petition in court) in the jurisdiction where the child is located for the child’s

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HOW CAN I HAVE MY OPPOSING COUNSEL SANCTIONED FOR OBSTRUCTIVE BEHAVIOR? UTILIZING CODE OF CIVIL PROCEDURE SECTION 128.5 IN FAMILY LAW CASES

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Why Code of Civil Procedure section 128.5?

Family law attorneys are notorious for their obstructive behavior, including delay tactics, insulting letters, and emails without addressing the issues of the case, etc. Like me, you have encountered this illegitimate conduct or have been drawn in to thinking that the only response is a response in kind. This becomes a self-perpetuating cycle. I hope to offer a way out of this trap.

Unlike Family Code section 271, this tool, section 128.5, allows you to request the court to sanction counsel, not just the client.¹

Please note, this article is not for what I call, “I can’t ers.” Attorneys who will not try anything new because “I can’t.” Or, “The judge will not do that around here” should not bother reading this article. This type of attorney is destined for mediocrity and never experimenting with and discovering new tools to win for their clients.

My goal with section 128.5 (hereinafter 128.5) is to help my client get what they want, whether it be a completed custody evaluation, support calculation, settlement of their case, etc. In reality, it is unlikely the court will grant you monetary sanctions on the first go around. But, the goal is to get results for your client. And, lawyers tend to back down when they know their own pocketbook is on the line, often resulting in your client’s case resolving sooner than later.

The family court has the power to utilize any tools you put before it, including issuing sanctions per 128.5.² I also suggest reading the thorough discussion of applying 128.5 sanctions in family law cases in the Matthew Bender Practice Guide: California Family Law, Practice and Procedure, Second Edition, starting at section 62.04[4][b] (book 2) by Kathryn Kirkland.

Differences Between 128.5 “Safe Harbor” and that of Section 128.7

It is likely that many are familiar with the “safe harbor” provisions of 128.7 because it was not removed from the Code of Civil Procedure, whereas section 128.5 was removed for a period of time.

However, the difference is that in addition to counsel filing a motion for sanctions, the court can sua sponte issue an order to show cause why sanctions should not be levied against opposing counsel and/or the client pursuant



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Trial Lawyers and achieved the rating AV Preeminent® by Martindale Hubbell in his first 4 years of practice. He is also the author of The Divorce Handbook for California Women.

to 128.5. Consequentially, you can raise all the issues to opposing counsel in your meet and confer letter, add that to your opposition, and urge the court, on its own accord, to issue an OSC for 128.5 sanctions.³

The safe harbor provision is only applicable to making or opposing a written motion, the filing and service of a complaint, cross complaint, answer, or other responsive pleading. Still, the safe harbor provision does not preclude you from requesting the court, sua sponte, for an order to show cause why sanctions should not be imposed against opposing counsel and/or their client. The safe harbor provision does not appear to be required when making a 128.5 sanctions motion due to the *pattern* of bad faith or frivolous conduct. As my example below shows, many times the bad faith or frivolous conduct does not involve a pleading or motion but can be the “non-response” response. Delay can be a tactical choice in some cases. 128.5 will make delay for the sake of delay a risky course of conduct.

The court is permitted to look at your prior attempts to resolve the dispute. “[T]he court shall consider whether a party seeking sanctions has exercised due diligence” when attempting to resolve the dispute.⁴

Nonetheless, there are significant differences between the two.

128.5 generally, but does not always, requires the *safe harbor provisions* of section 128.7. 128.5, subdivision (f)(1) (B), requires you to prepare the 128.5 motion when seeking sanctions for meritless court filings, not file it, serve on opposing counsel, and then give them 21 days to withdraw their offensive pleading. This is identical to section 128.7. But, section 128.7 only applies to pleadings, motions, or similar papers submitted to the court where the attorney makes a certification as to the filings of legal and factual merit.

128.5 goes beyond pleadings and motions and seeks to curb conduct, as detailed below. And, the safe harbor does not apply for 128.5 motions based on a pattern of conduct.

Procedural Considerations

No award of sanctions can be made under 128.5 unless a request for them is contained in a party's moving or opposing papers, or the award is made on the court's own motion after notice and opportunity to be heard.⁵ Put another way, you must file a motion for 128.5 sanctions or raise the issue in your opposition to a motion or the award is made, *sua sponte*, by the court.

Background

128.5 was not available to me when I started practicing. Reason being, the prior version only applied to actions filed in 1994 or prior.⁶ The Legislature revived 128.5 in 2015.⁷ Thus, 128.5 is back and in full effect.

Purpose

"A trial court may order a party, the party's attorney, or both, to pay the reasonable expenses, including attorney's fees, incurred by another party as a result of actions or tactics, made in bad faith, that are frivolous or *solely intended to cause unnecessary delay*. This section also applies to judicial arbitration proceedings under Chapter 2.5."⁸

You have likely had cases where opposing counsel has unnecessarily delayed related to settlement, initiation of a custody evaluation, repeated court filings, etc.

Sanctionable Conduct—Show a Pattern of Abuse!

Do not use a threat of 128.5 sanctions loosely. Otherwise, you could be looking at sanctions for your baseless 128.5 motion.

There must be a solid basis for bringing a 128.5 motion for sanctions against opposing counsel and/or their client when evaluating their conduct in the context of an entire pattern of conduct over the course of litigation.⁹

"Bad faith 'actions or tactics' include, but are not limited to, the making or opposing of motions or the filing and service of a complaint or cross-complaint. They do not include the mere filing of a complaint without service on an opposing party."¹⁰

Further examples of sanctionable conduct under 128.5 are:

- Causing unnecessary hearings;¹¹

- Failing to inform the court or opposing counsel of an inability to appear at a hearing or deposition (constituting "delaying tactics" within the meaning of 128.5);¹²
- Bad faith conduct when counsel has reneged or "dragged their feet" on a stipulation¹³;
- A motion or opposition that misrepresents material facts may be sanctionable under 128.5 as well.

"Frivolous" means totally and completely without merit or for the sole purpose of harassing an opposing party.¹⁴ Also, willfulness is not required for a showing of 128.5 sanctions.¹⁵

However, sanctions under 128.5 may *not* apply to, "disclosures and discovery requests, responses, objections or motions."¹⁶ Please see Civil Procedure Before Trial (The Rutter Group, California Practice Guide), chapter 8M for sanctions available to you for opposing counsel's discovery abuses. But, I use discovery abuses coupled with other obstruction to show a pattern of sanctionable conduct.

The ultimate point is how to show a *pattern of abuse*.

Meet and Confer Letters

Document abuses immediately in a letter to opposing counsel. You may use an email. But, remember, this may be viewed by a judge. I would rather have the judge reading a series of letters evidencing opposing counsel's abuse rather than a string of emails because a letter on stationary is far more impressive.

I have created scenarios for the two examples below. But, substitute in your circumstances. Your letters should not be name calling. Be objective and factual. For example,

Dear Mr./Ms. Lawyer,

This correspondence shall confirm that you and your client have not responded to my client's August 2018 settlement proposal. This is in addition to the two months it took you and your client to file a response to the petition.

Please let me know when we can expect a response and/or counter proposal so we may work towards resolution of this case.

Sincerely,
Your Name.

Generally, you will either receive no response or a knee jerk offensive and insulting response. Both are good for you to show a pattern of abuse by opposing counsel. This is assuming your opposing counsel does not respond intending to settle the case, which is the most common reply in my experience.

Your follow up letters should sound something similar to,

Dear Mr./Ms. Lawyer,

This letter shall confirm that you and your client have not provided my office with your mandatory financial disclosures. Further, this is in

spite of my numerous inquiries requesting to know when I should expect those disclosures.

It appears this has been your pattern in this case given that you never responded to our client's August 2018 settlement proposal.

Sincerely,
Your Name

You will have a nice set of exhibits for your meet and confer letter after sending a few of these letters.

You will want to conclude your letter writing before filing your 128.5 motion with a meet and confer letter. The following is an example of a meet and confer letter.

August 1, 2020
ATTORNEY NAME
FIRM NAME
ADDRESS
Facsimile:

Sent via: Facsimile & First Class Mail

*Re: IRMO Smith;
Marin County Superior Court Case No.:
5555555;
Meet and Confer Prior to Seeking Sanctions
for Misconduct;
Deadline to Respond: August 15, 2020*

Dear Mr./Ms. Attorney,

As you are aware, this office represents Petitioner JOE SMITH in the above entitled action. This letter shall serve as Petitioner's final effort to resolve this case prior to filing a motion for sanctions under Family Code section 271 against your client; and, against you under Code of Civil Procedure section 128.5.

Petition Filed in April 2018 & Respondent Personally Served in May 2018

Petitioner filed in this action in April 2018. Shortly thereafter, Respondent was personally served with the Summons and Petition in May 2018. Your office did not file Respondent's response until prompted to do so by Petitioner's counsel or face a default.

Respondent Does Not File a Response for Two Months

Finally, you filed on behalf of Respondent a response to the Petition in August 2018.

Petitioner's Counsel Conveys Settlement Offers to Respondent in October 2018

Starting in October 2018, my office conveyed Petitioner's global settlement proposal to you and your client. See **Exhibit 1** attached hereto. This was the first proposal to fall on deaf ears.

Still, No Response to the Settlement Offer

In December 2018 and January 2019, Petitioner's counsel requested a response to the settlement proposal to no avail. See **Exhibit 2** attached hereto.

Respondent Retains Counsel in July 2019

Then, you did not serve Respondent's mandatory financial disclosures until 145 days after filing the response and only after being prompted to do so by my meet and confer attempt. See **Exhibit 2** attached hereto. Note, Petitioner had served his/her disclosures on Respondent in September 2018. See **Exhibit 3** attached hereto.

Petitioner's Counsel Requests a Response to the Settlement Proposal at the August Status Conference

The court held a status conference in August 2019 where Respondent's counsel complained to the court that Petitioner's counsel was making absurd settlement offers. In response, Petitioner's counsel asked for any response since that was the most he had heard from Respondent concerning Petitioner's settlement proposal. As well, the court ordered Respondent's counsel to file a declaration of disclosure within two weeks of that status conference. See **Exhibit 4** attached hereto.¹⁷

September 16, 2019 – the Parties' Agreement

The Parties appeared to reach the terms of a settlement proposal on their own during the first half of September 2019. I then drafted those terms into an outline of a settlement agreement and sent that outline for your review on September 16, 2019. See **Exhibit 5** attached hereto.

October 5, 2019 – Petitioner's Third Settlement Proposal

My office first conveyed to you Petitioner's third settlement proposal on October 5, 2019. See **Exhibit 6**. You did not respond for 21 days. It took you 21 days to respond in spite of Petitioner's settlement offer clearly stating we needed a response, at least concerning custody, by October 12, 2019, because the Petitioner wished to take the children to her parents out of state for Thanksgiving and wanted to purchase airplane tickets before the prices became prohibitive.

Yet, I did not hear from you. I called your office on Monday, October 12, and Wednesday, October 14, requesting a response. And, when you finally did respond, you did not make any mention of the proposed Thanksgiving family trip.

October 26, 2019 – You Finally Respond

You wrote that your client did not accept our settlement proposal. See **Exhibit 6**. However, glaringly absent from your correspondence was a counter-offer of any sort. More importantly, your response was completely void of a response to our proposed Thanksgiving family trip.

October 28, 2019 – Thanksgiving Family Trip

I wrote you requesting a response to which part of Petitioner's settlement proposal your client did or did not accept and requesting a counter-proposal. See **Exhibit 7**. Further, I requested a response to Petitioner's proposed Thanksgiving holiday family trip reiterating to you that airline ticket prices were increasing.

November 2, 2019 – Still No Response

Still, you continued not to respond. Therefore, I wrote you again on November 2, 2019, requesting a response, at least to the Thanksgiving family trip. See **Exhibit 8**. You finally responded by email on November 10, 2019. See **Exhibit 9**.

November 10, 2019 – You Have to Check with Your Client

You eventually responded to my October 28, 2019 letter via email on November 10, 2019, stating you had been unavailable, in trial, but that you would check with your client on the Thanksgiving trip. See **Exhibit 10**.

November 13, 2019 – You Respond that Your Client Accepts Our Settlement Proposal Except for Minor Changes to Custody.

My office received your responses 16 days after I first wrote you on October 28, 2019, stating your client had accepted the majority of Petitioner's settlement proposal with minor requests to changes related to custody. See **Exhibit 11**. Again, silence on the Thanksgiving family trip.

November 18, 2019 – We Sent You a Marital Settlement Agreement

My office sent you a Marital Settlement Agreement on November 18, 2019, based upon the parties' agreement. See **Exhibit 12** – cover letter accompanying MSA.

December 14, 2019 – You Still Have Not Responded

I wrote you on December 14, 2019, asking for an update on the proposed Marital Settlement Agreement I provided to you on November 18, 2019. See **Exhibit 13**. Your voicemail stated you were unavailable and out of the office returning on December 21, 2019.

December 23, 2019 – I Followed Up Again

You were to return to your office on December 21, 2019. Therefore, I wanted you to have a couple of days to reacclimate yourself to your office after your vacation as a professional courtesy. As a result, I followed up with you on the Marital Settlement Agreement on December 23, 2019, to learn that, again, you were unavailable until January 6, 2020. See **Exhibit 14**.

January 6, 2020 – I Follow Up Again

I followed up with you on January 6, 2020, upon your return to the office in the hopes of not missing you again before you departed. You responded on January 14, 2020, that you were meeting with your client to review the Marital Settlement Agreement together. See **Exhibits 15-16**.

To date, I have heard nothing from you.

January 13, 2020 – Your Client Cannot Reach You

Interestingly, Petitioner has spoken to your client and learned that he signed the Marital Settlement Agreement back in December. And, he has not been able to reach you since the last time he saw you in the middle of December.

In conclusion, this shall serve as Petitioner's final request to provide me with the signed Marital Settlement Agreement by January 20, 2020, or you will force me to file a motion for sanctions against your client pursuant to Family Code section 271 and against you, personally, for your bad faith conduct per Code of Civil Procedure section 128.5.

Sincerely,
You Attorney

This is an example of a letter I wrote in a case with names omitted. Magically, I received notice that Respondent was accepting our latest settlement proposal the next day. Most often, just informing counsel that you will pursue 128.5 sanction against *them personally* with all the facts laid out will curb the delay or other unruly behavior and/or resolve your case in its entirety.

On the other hand, you may say you have never encountered such abuse in a case from opposing counsel. But, think about it and you will probably remember a case. You may not have documented the obstruction as I did but you may be surprised in the obstruction you have run into when looking at the past.

Be wary of obnoxious and vicious counsel who call you with a newfound pleasant tone following a letter similar to the one above. Remember, you still need to document everything.

On the other hand, you now can take this last letter, copy, and paste it onto pleading paper with a few adjustments and you have your statement of facts for your 128.5

motion. Moreover, you also have all your exhibits for your motion.

I recommend you read the Point Made by Ross Guberman; this is a quick read and the most effective legal writing book I have found. Point Made and California Family Law – Practice and Procedure are never far from my desk, usually sprawled out on the floor behind my desk. And, no, I do not receive free books or royalties from either.

Lastly, I have a template 128.5 motion for sanctions I will send to anyone who calls my office at (415) 341-1144 and provides their name, email or fax, or address.

Purpose of and Sanctions Available per 128.5

The purpose of levying sanctions against opposing counsel and/or their client, “shall be limited to what is sufficient to deter repetition of the action or tactic or comparable action or tactic by others in similar situation.”¹⁸ And, “[a]bsent exceptional circumstances, a law firm shall be held jointly responsible for violations committed by its partners, associates, and employees.”¹⁹

You must also specify the basis for the sanctions, type of sanctions sought, and from whom you are seeking sanctions. Your proposed order must state the same as well.

A 128.5 sanctions award may include “reasonable expenses, including attorney’s fees, incurred by another party as a result of” sanctionable conduct.²⁰

Note, you are not permitted to receive the sanctions when raised in an opposition to a motion. However, the court is entitled to those sanctions so you can still raise the argument.

My Use of 128.5

Opposing Motions: I have begun making requests for 128.5 sanctions, payable to the court, in my opposition to ridiculous motions. I still use similar meet and confer letters shown above but oppose the motion with letters as exhibits and ask the court to issue an order to show cause why sanctions should not be levied against opposing counsel and their client as well as seeking sanctions per section 271.

Realize, not every opposition I file has a request for 128.5 sanctions. Instead, I reserve those requests to motions that are baseless and lack merit.

Showing a Pattern of Abuse: I will file a 128.5 motion for sanctions where I can lay out a pattern of abuse, as shown in the examples above. And, I always couple the 128.5 request with a request for section 271 sanctions. I want to give the judge as many options as possible for handling the opposing side’s obstructive behavior.

Like everything in the law, there is not a clear answer as to how many attempts you should make to resolve a dispute before filing a 128.5 motion. As a general rule, I like four attempts.

For example, I recently had a case where my client wanted to move away to the east coast with the parties’ children. I attempted to informally resolve the issue prior to filing. But, my attempts were ignored by Respondent

and his counsel. Then, we filed for modification of custody. Respondent responded by requesting a custody evaluation.

We attempted for four months to have Respondent submit his intake forms to the evaluator. Respondent’s counsel would only respond that I was impeding the settlement process. How? I did not know, particularly given that Respondent was the one who had requested the custody evaluation!

Nonetheless, I wrote to Respondent’s counsel and the evaluator asking the date by when we could expect Respondent to submit his evaluation intake forms, but to no avail, as shown in four written attempts.

I then filed my case status conference statement with my four requests attached as exhibits to have Respondent submit his custody evaluation intake forms, a timeline of events, opposing counsel’s obstruction referring to the attached exhibits, and a request for the court to issue an Order to Show Cause why Respondent’s counsel should not be personally sanctioned per 128.5 for her obstructionist delay tactics and Respondent, himself, should not be sanctioned pursuant to Family Code section 271 and Code of Civil Procedure section 128.5. In addition, I stated that I would file a 128.5 motion for sanctions against counsel and her client if the court did not issue the OSC.

Astonishingly, Respondent immediately agreed to the move away with his counsel preparing the stipulation with all our requests and more included before the status conference took place.

In that case, I used the opportunity to show the judge Respondent’s counsel’s obstruction through the use of a conference statement with 30 pages of exhibits instead of a final letter to counsel.

In sum, you will need to decide when to pull the trigger of a 128.5 motion. But, I generally attempt to resolve any dispute four times before moving on to 128.5. I write letters to opposing counsel on a weekly, bi-weekly, or monthly schedule following up to resolve any dispute and laying out the facts for my potential 128.5 letter and subsequent motion, if needed.

Safe Harbor Motion: As mentioned previously, I will be happy to provide my template for a 128.5 motion to serve when you must do so, i.e., opposing a specific motion or opposing counsel’s baseless opposition to a motion I file. Having a template takes much of the onerous time out of having to prepare the motion.

In conclusion, 128.5 sanctions are an underutilized tool in your sanctions tool kit. Again, I use the tactics in this article only when there are true abuses. Unfortunately, these abuses appear to be prevalent in family law matters.

1 Code Civ. Proc., § 128.5, subd. (a).

2 FC, § 2010, subd. (f).

3 Code Civ. Proc., § 128.5, subd. (f)(1)(B).

4 Code Civ. Proc., § 128.5, subd. (f)(1).

5 Code Civ. Proc., § 128.5, subd. (c); Lesser v. Huntington Harbor Corp. (1985) 173 Cal.App.3d 922, 932 (includes sanctions imposed on court’s own motion); Kleveland v. Siegel &

- Wolensky, LLP (2013) 215 Cal.App.4th 534, 540 (request for attorney fees and costs set forth in opposition to anti-SLAPP motion complies with notice requirements of Code of Civil Procedure section 128.5, subdivision (c)).
- 6 See *In re Marriage of Drake* (1997) 53 Cal.App. 1139, 1169; see also 7 Witkin, Cal. Proc. (5th ed. 2020) Trial, § 227.
 - 7 Code Civ. Proc., § 128.5, subd. (i).
 - 8 Code Civ. Proc., § 128.5, subd. (a).
 - 9 Kirkland, Matthew Bender Practice Guide: Cal. Fam. Law, Practice and Procedure (2d ed.) § 62.04[4][b][1] (book 2).
 - 10 Code Civ. Proc., § 128.5, subd. (b)(1). See *Lesser v. Huntington Harbor Corp.* (1985) 173 Cal.App.3d 922, 928, 933 (frivolous actions or tactics include entire lawsuit); *Southern Christian Leadership Conference v. Al Malaikah Auditorium Co.* (1991) 230 Cal.App.3d 207 (quoting *Lesser, supra*, 173 Cal.App.3d 922; statute applies to “the opposing of an entire action without proper justification, or to the interposing of a frivolous defense to an action”); *Andrus v. Estrada* (1995) 39 Cal.App.4th 1030, 1043 (in deciding whether to impose sanctions, trial judge may consider party’s entire course of conduct, even if this includes earlier behavior that was

- found by another judge not to merit sanctions); *Sherman v. Kinetic Concepts* (1998) 67 Cal.App.4th 1152, 1164 (Code of Civil Procedure section 128.5 applies to bad faith tactics in supplemental and reply papers; tactics of this type are “as repugnant to the orderly conduct of legal proceedings as are bad faith tactics in the first round of papers.”). 7 Witkin, Cal. Proc., *supra*, Trial, § 227.
- 11 Cal. Prac. Guide Civ. Pro. Before Trial, Ch. 9(III)-B [9:1038].
 - 12 *Marriage of Gunabao* (1984) 150 Cal.App.3d 572, 573-574.
 - 13 *M.E. Gray Co. v. Gray* (1985) 163 Cal.App.3d 1025, 1034-1035
 - 14 Code Civ. Proc., § 128.5, subd. (b)(2).
 - 15 *Marriage of Gunabao, supra*, 150 Cal.App.3d at p. 575.
 - 16 Code Civ. Proc., § 128.5, subd. (e).
 - 17 I often purchase hearing transcripts from the court reporter post hearing when I expect opposing counsel to be a problem. They usually run between \$20-60 depending on the length of the hearing or status conference.
 - 18 Code Civ. Proc., § 128.5, subd. (f)(2).
 - 19 Code Civ. Proc., § 128.5, subd. (f)(1)(C).
 - 20 Code Civ. Proc., § 128.5, subd. (a).

UPCOMING PROGRAMS

If the live presentation is missed, a recorded version of the webinar can be accessed through the ACFLS library on the website.

June 21, 2021 5:00 -7:00 p.m.
2021 Speaker Series Part Two - Main Event
“Income Available for Support: It’s Not What You Think”
 Presented by: *Robert Benavente & Judge Donald F. Gaffney*

July 28, 2021 12:00 - 1:00 p.m.
The Art of getting Your Client Paid: Tips and Tricks for Enforcement of Family Law Orders
 Presented by: *Christopher Dietrich*

August 30, 2021 12:00 - 1:00 p.m.
2021 Speaker Series Part Three - Behind The Scenes “Sole Proprietorships: Uncle Sam Isn’t the Last Word”
 Presented by: *Michele Brown and Dennis Pearson CPA*

September 1, 2021 12:00 - 1:00 p.m.
Set Asides and Other Post Judgment Relief; Pointers and Pitfalls
 Presented by: *Andrew Botros*

September 13, 2021 12:00 - 1:00 p.m.
2021 Speaker Series Part Three - Main Event “Sole Proprietorships: Uncle Sam Isn’t the Last Word”
 Presented by: *Comm. Jeanne Lowe and Michele Brown*

October 2, 2021 8:30 a.m. - 4:00 p.m.
“Introduction to a Family Law Case” - A Virtual Event
6 Hours of Legal specialization and participatory may be earned
 Presented by: *Honorable Sue Alexander, Honorable Michael J. Convey, Peter M. Walzer, CFLS, and Leena S. Hingnikar, CFLS*