

Jeff Hoverson
[REDACTED]
[REDACTED]
[REDACTED]

Real Party in Interest Responding to Application for Protective Order by Former Court Appointed Counsel

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF AMADOR

DONALD HOVERSON,)	CASE NO. 94FL0084
Petitioner)	OBJECTION TO APPLICATION FOR
)	PROTECTIVE ORDER FILED BY
v)	FORMER COURT APPOINTED
)	COUNSEL RE: RELEASE OF
KAREN ANDERSON,)	FILE WITH DECLARATION
Respondent)	Hearing Date: July 7, 2004
)	Time: 9:00 a.m.
)	Judge: Glenn Ritchey
_____)	Dept. TBA

OBJECTION TO APPLICATION FOR PROTECTIVE ORDER

My name is Jeff Hoverson. I am an interested party to the Application for a Protective Order filed by Larry Dixon because Larry Dixon used to be my court appointed attorney. The file Larry Dixon is trying to avoid releasing is about his representation of me. I have been informed by an attorney that the file of an attorney's client belongs to the client, so I am legally entitled to the file that contains information about me.

It seems that Larry Dixon is making up excuses not to release the file. First of all, I don't have to provide him with a reason for why I want a copy of my file. I have a legal right to my file, regardless of my reason for wanting it. I may want to refer to it

sometime in the future. It is not up to Larry Dixon to decide whether I “need” my file or not. And since I am officially an adult, it is up to me to decide whether or not it is in my “best interest” for him to release my file to me. Larry Dixon says the financial records are “of no value” to the “minors.” I am no longer a minor, and the records of his billings and itemized activity for those billings are of great value to me. It is not up to Larry Dixon to determine what is of value to me and what is not.

I know that the file also contains information about my sisters, Kami and Stacey, because Larry Dixon was appointed to represent all of us at the same time. If Mr. Dixon is worried about my sister’s confidentiality, he can black out their names like they do in police reports in any record that he releases to me, but it would be pointless because I would know who he was referring to anyway.

If Larry Dixon didn’t have anything to hide then he wouldn’t object to releasing the file to me.

June 30, 2004

(Original signed on file in the court)

Jeff Hoverson, Real Party in Interest

DECLARATION

I, Jeff Hoverson, declare:

My name is Jeff Hoverson. I live at [REDACTED]

[REDACTED] My phone number is [REDACTED] I am 18 years old and I can competently testify to the fact in this declaration.

When I was a minor, I was represented by Larry Dixon in my parents family law case (Hoverson v. Anderson 94FL0084.)

I sent a letter to Larry Dixon on May 20, 2004 requesting a copy of my file. He did not respond to me at all. Then on June 10, he filed an Application for Protective Order in an attempt to avoid releasing my file to me. He also asked for a secret hearing about not giving me my file.

During the time Larry Dixon represented my sisters and me, he acted corruptly by plotting with my father and Marsha Nohl to get whatever my father wanted, which was to try to turn my sisters and me against our mother and push her out of our lives completely. He did this through illegal conversations and meetings with my father and Marsha Nohl.

Larry Dixon trashed our mother to my sisters and me, lied to the court to cover up our father's true character, and made motions that were the exactly the opposite of what we wanted and what was in our best interests, all for my father's benefit, and to make money from needlessly going to court.

I was told lies and kept in the dark for years about what was going on in our court case. After twenty plus volumes I had only been to two hearings. I had only heard one side of the story. Now I am an adult and I want to have access to everything that was hidden from me.

I believe Larry Dixon is trying to keep my file from me because releasing it will incriminate him to all the illegal things he did. He has no legitimate reason to hide it.

I declare under the penalty of perjury that the foregoing is true and correct and that this declaration is signed this 30th day of June, 2004.

(Original signed on file in the court)

Jeff Hoverson