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**From:** [Brian Bowles](#)  
**To:** [Court Of Appeals Filings](#)  
**Cc:** [cblackburn@goodwynlaw.com](mailto:cblackburn@goodwynlaw.com); [cchase@goodwynlaw.com](mailto:cchase@goodwynlaw.com)  
**Subject:** Response to motion for dismissal Case 2023-001227 Neri Rodas v. Brian Bowles  
**Date:** Thursday, September 19, 2024 3:47:42 PM

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Dear Ms. Kitchings:

Enclosed is our response for the Motion to Dismiss filed by Mr. Blackburn.

It was our understanding that our previous attorney, Ranai Heidari, filed the Record on Appeal and even billed us for this filing. After learning that this was not filed, we terminated our contract with Ranai Heidari due to falsifying billing and not providing us with detailed billing statements. We filed the Proof of Service and understand that we have 30 days after a decision has made on this Motion to Dismiss the appeal. The original judgement was rendered due to our original attorney losing his license after we paid out several thousand dollars to retain him and discovery was completed but we lost him prior to our first court appearance. We hired Ms Ranai and she did not submit the discovery to the judge at that time. We would love to have our case heard due to the details that need to be heard.

Sincerely,

*Brian Bowles*