

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

DONALD J. TRUMP FOR PRESIDENT,)	
INC., et al.,)	
)	
Plaintiffs,)	
)	CIVIL ACTION
v.)	
)	
KATHY BOOCKVAR, et al.,)	
)	No. 20-CV-02078
Defendants.)	
)	

**PLAINTIFFS' REPLY IN SUPPORT OF ITS MOTION FOR AN ORDER TO SHOW
CAUSE RELATING TO HARASSMENT OF PLAINTIFFS' COUNSEL BY
DEFENDANT BOOCKVAR'S LEGAL COUNSEL, KIRKLAND & ELLIS**

In general, every lawyer at a firm is counsel to every client of that firm. That bedrock principle of the Rules is supposed to ennoble the profession and humble its practitioners. Yet one of the world's largest law firms thinks its very size excuses the conduct of one of its lawyers. But size is not a defense. And one could be forgiven for being skeptical that this voicemail had nothing whatsoever to do with Kirkland & Ellis's representation in this case out of the same office. A Kirkland & Ellis lawyer violated the Rules of Professional Conduct. A Kirkland & Ellis partner, in this case, attempted to deflect and deny responsibility even while being confronted with caller ID saying the call came from his firm. And the associate who foolishly chose to vent his ideological hatred in a way no lawyer should has yet to even apologize. If he had, or if counsel had not deflected and denied, this motion would not have been brought. But that is how Kirkland & Ellis does business. It is not how the Rules demand business be done.

Dated: November 16, 2020

Respectfully submitted:

/s/ Linda A. Kerns

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CERTIFICATE OF SERVICE

I hereby certify that this 16th day of November, 2020, I filed a copy of the foregoing **PLAINTIFFS' REPLY IN SUPPORT MOTION FOR AN ORDER TO SHOW CAUSE RELATING TO HARASSMENT OF PLAINTIFFS' COUNSEL BY DEFENDANT BOCKVAR'S LEGAL COUNSEL, KIRKLAND & ELLIS**, which will serve all parties registered to receive same.

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