

No. 21-363

**In the
Supreme Court of the United States**

Wendy Marie Meigs,
Petitioner

v.

Trey Bergman and Bergman ADR Group,
Respondents

On Petition for Writ of Certiorari to the
Supreme Court of Texas

**REPLY TO BRIEF IN OPPOSITION TO
PETITION FOR A WRIT OF CERTIORARI**
(Corrected to Meet Font Guidelines)

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Questions Presented for Review

1. Contrary to opponents, Meigs raised claims beginning in the First Petition, in “Objection to ADR” and in opposition to Summary Judgment and supplemental opposition which appears no one has ever read. Mediation runs as a free-for-all with only suggested guidelines leading to severe abuses. Should a mediation follow normal courtroom guidelines as courts defer court functions to mediation which creates the expectations of participants that mediation will run under the same protections and guidelines of a regular courtroom? Should mediation participants and mediator be held liable for allowing the abuse and manipulation of a vulnerable-victim? (Murphy, 2021)(*United States of America v. Goldberg, Defendant-appellant*, 406 F.3d 891 (7th Cir. 2005)).
2. Meigs addressed all grounds throughout documents and story of abuse plus a new perspective for today. The demise of pro-se, as not one of the “good ole boys”, can be seen throughout this case and the case against Bergman’s Friend, Todd Zucker, as examples of “rough-housing” by lawyers without recourse until now. Should individuals be allowed to represent themselves in court, especially against educated, trained, and highly-skilled lawyers? (If the institution of justice continues to allow individuals to represent themselves, then the institution is geared against the self-litigant, Pro-se.)

Parties Involved

The parties involved are identified in the style of the case.

Related Cases

Meigs v. Trey Bergman and Bergman ADR,
No. 2017-73032 of the 270th District Court
of Texas. Judgment entered: December 4th,
2018.

Meigs v. Trey Bergman and Bergman ADR,
No. 14-19-00167-CV, Fourteen Court of
Appeals: Judgment entered on December
4th, 2018 and affirmed on October 13th,
2020.

Meigs v. Trey Bergman and Bergman ADR,
No. 20-0949 of the Texas Supreme Court.
Judgment denied on April 9th, 2021.

Citations Explanation

1RR(page): Recorder Record 1 (Nov. 9th, 2018)
2RR(page): Recorder Record 2 (Nov. 30th, 2018)

(NOTE: Both documents docketed on Nov. 28th, 2018. 2RR loaded two days BEFORE the actual dismissal hearing took place. Small issues more severe in the Zucker case with Document Tampering predominant in the petition currently at Texas Supreme Court.)

1CR(page) Clerk Record: Volume 1
2CR(page) Clerk Record: Volume 2
3CR(page) Clerk Record: Volume 3

1SCR(page): Supplemental Record 1
2SCR(page): Supplemental Record 2
3SCR(page): Supplemental Record 3

TMCA: Reference to Texas Mediation Credentialing Association and hearing. *(Extensive emails available. Even with clear proof against their rules, Bergman walked. TMCA refused to give me the recorder record.)*

TSC-P(Page): Texas Supreme Court–Bergman
TSC-PZ(Page): Texas Supreme Court–Zucker
(Please note that the same law firm represented both Respondents, Bergman, and Todd Zucker, in district and appellate court. Same situation, same protection of Frankfort. and same use of courts for self-serving interest.)

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Citations of Opinions

1. 270th District Court of Texas:
Case# 2017-73032
2. 14th Circuit Court of Appeals:
Case#14-19-00167-CV.
3. Texas Supreme Court: 20-0949

Solid Basis for Jurisdiction

The Judgment of the 14th Court of Appeals was entered on December 4th, 2018 and affirmed on October 13th 2020. A timely petition for rehearing was denied on April 9th, 2021 by the Texas Supreme Court. This court granted 150 days extension from Covid over the usual 90 days to file a Writ of Certiorari due September 6th, 2021. The Court's Jurisdiction rests on 42 USC § 1983 and has Federal Jurisdiction as issues pertain to violations of the First Amendment, due process and equal protection, Fifth and Fourteenth amendments reaching all citizens in all states, deals with the growing mediation numbers to substitute for courts in all states and the vast growing number of self-litigants, both requiring federal input for standardized guidelines to protect the public. (*Haines v. Kerner*) Having mentioned the questions as pertaining to issues presented to all lower courts, this Court retains Jurisdiction.

Constitutional and Federal Rules

Provisions Involved

The First, Fifth, Sixth, Seventh, and Fourteenth Amendments apply. Federal of Civil Procedure 8(a)(20) provides a claim for relief.

REPLY TO COUNTER-STATEMENT OF CASE

Meigs lacks access to Westlaw and cannot verify the Respondents reference.

REPLY TO BRIEF IN OPPOSITION

I. Meigs' long response and supplemental response to Bergman's summary judgment address all claims on Respondents' brief from page 3 through 9 with emphasis on Fraud, Conspiracy, and Fraud on the Court starting with Evans asking Frankfort who he represents, through a mediation not of law, ending with Quid Pro Quo as Judge Gamble grants summary judgment with apparently never having read Meigs' responses and then begins mediating with Bergman less than a month after signing the order to dismiss. Subsequent courts followed. This case correlates with Meigs v. Zucker currently at the Texas Supreme Court #21-0545 and all case files there.

II. Texas Supreme Court (TSC): Again, Meigs did address the reasons the appellate court confirmed the district court. Due process failures, ignoring caselaw and claims, and more.

1. Bergman offered Gamble a place to mediate after losing his judge position. In return, Gamble granted summary judgment without ever reading Meigs opposition or considering a trier of fact, jury, should decide. Approving a summary judgment by a judge with immunity for his decisions in a legal malpractice case, requires significant investigation. (Pictures on Facebook site: @WomenAgainstLegalAbuse)

2. Meigs went section by section in the summary judgment to ensure each and every claim was addressed. As for the numerous issues addressed in the Texas Supreme Court as emphasized by Bergman, and then condensed into two questions for this Court, Meigs continues to learn on procedures foreign to her world. Multiple caselaw and federal rules lean less on technicality and more on the truth. As a pharmacist ranked for honesty at one to two on the Gallup poll, I present you the truth.

3. Meigs performing perfectly in the legal world would be like asking you to describe the pharmacological interaction between statins and the intravenous use of Daptomycin in an 82yo female with a creatinine of 1.6 and slow elevation of SGPT. First, you would need to research the meaning of various pharmacological interactions. Writing as a Pro-se is more than difficult, but I persist because no one should be exposed to the constitutional and due process violations as I experienced... and people are exposed all over the nation.

REASONS FOR ACCEPTING THE PETITION

1. Meigs presented every issue to every level of court albeit in a different manner, but expressed the same issues. The state court could have addressed the federal question as mediation abuse, corruption, et al was presented, in great detail, and the demise of a Pro-se also presented as Meigs even asked for the district judge to assign her a lawyer (1RR) due to the inability of a Pro-se to obtain an expert witness, difficulties as Pro-se and fears of Bergman. Basically, the appellate court believed Gamble as Meigs is no one in the legal environment.
2. As for the rest of the issues presented, they were met at a Pro-se level. Texas and Federal laws also state that technicalities are second to the truth. Preservation of the issues and objections occurred by Meigs. Meigs raised these issues and objections to these courts, just not with the precision that she learned through the process to reach this Court .
3. In construing the presentation of a Pro-se liberally, contrary to the evaluation of jurisdiction by Respondents, Meigs did meet and preserve the right for jurisdiction by this Court. Besides, Meigs learned that no check or balance exists in courts surrounded by corruption. A Pro-se' best opportunity for a check and balance lies in the last court of appeals, this one.

NEW DISCOVERY,
CONTINUED ISSUES / CITES

1. Further references regarding the issues may also be found at Texas Supreme Court, Meigs v. Zucker, 21-0545. The Texas Mediation Credentialing Association (TMCA) holds documents and hearing records of which Shelly Hudson refused to supply to Meigs. Meigs feels confident the US Supreme Court could obtain the records. If lost, Meigs retained all emails and documents.
2. Meigs discovered the 2016 mediation with Bergman lacked a signed court-order (3SCR314-316). Bizarrely, no one discussed anything at the 2016 mediation with Bergman, no drugging, no lawyer leaving for alcohol... resembled a regular mediation... except absolutely nothing was discussed. Bergman collected his fee, and all left. I add this information in comparison to the 2015 mediation (3SCR115-126) defining vulnerable-victim (1CR10-12)(406 F.3d 891). Given enough words, Meigs can prove that the 2015 mediation was not law based on the trail of evidence in emails and interactions. (2CR306-361)(*Chu v. Hong*)
3. After no signed order for the 2016 mediation, Meigs questioned the signed court-order for this 2015 mediation, Harris County Texas case# 2015-27321-7 filed 10.13.2015, an order never referenced. Meigs discovered why.

4. As Meigs learns more law while working full-time in the healthcare field as an essential employee, Meigs ability to find more Constitutional cites, code cites, and FRCP references should improve. However Meigs greets this court with significant issues not addressed at state level that require addressing to protect the public.

5. Respondents need to read the Zucker memorandum again. Respondents cannot submit a memorandum, supporting it through affidavit, and then deny it here when advantageous. Such should clarify their misstatements of fact.

6. Due to the sheer nature of Meigs' case and the gravity of what she presents to this court, Meigs' never had true legal representation. Only the pleadings she wrote fully illustrate this. Texans need help.

7. And yes, the assertions of estoppel were solely for nefarious intent as Bergman knew the mediation was not law. With a full brief, Meigs can prove this.

8. Had Respondents clearly read what Meigs submitted, they would see that Meigs did not present to this court what was filed in the Fourteenth Court of Appeals, but what was filed in the last court of appeals, the Texas Supreme Court, and so it states in the Brief.

The docketed and only signed court-order for the 2015 mediation signed by Judge Warne indicates **Bergman failed to follow the court-order on mediation** which I believe is contempt and invalidates the 2015 mediation giving rise to further due process violations.

9. All lawyers know the standard requirements of a court-order including Bergman, a seasoned experienced mediator and teacher; hence, the continuation of the 2015 mediation after Jody left was not law. (Hague p.732)(Model Rules)(Honest Service Fraud)

10. Unlike the “suggestions” of credentialing agencies like the Texas Mediation Credentialing Association (TMCA) or the states, the signed court-order is not a suggestion, but an order. Included in this signed order:

a. The date Judge Warne signed and approved the court-ordered mediation was October 2015 with no actual day included. Family court-ordered mediation.

b. All lawyers signed this court-order with Koonsfuller, the “divorce” lawyer, being the first name on the order. Family court 257th. Bergman as a seasoned mediator and national president of ADR would fully understand the conditions of a court-ordered mediation.

c. The Harris County, Texas case number is 2015-27321-7, "in the matter of the marriage of". No rule 11 on the community property existed at that time; thus, both Jody and Wendy Meigs' owned 50% of the corporation, Asyntria, during the 2015 mediation. The rule 11 over community property occurred, Feb 9th, 2016 after the October 30th, 2015 mediation. Jody was listed as an attendee and required by signed court-order to stay at mediation. Bergman, per court-order, was required to stop mediation without all attendees. Due process violations.

11. The court-order shows many hand alterations with dark ink color similar to the signature line for Todd Frankfort indicating Frankfort made the changes. Such changes prove true as emails indicate Frankfort needed the assurance that the judge would not appoint another mediator (3SCR303-305). Zucker emailed Bohrer that Meigs did have dual-representation claims, to keep the "business" memorandum of claims given to Bergman before mediation... unknown to Meigs, and to let Bergman handle Meigs' claims. Does that tie Evans asking who Frankfort represented to the mediation? (3SCR139)

12. The court-order shows Frankfort drew lines through referral to the Dispute Resolution Center Family Mediation Room and added Bergman's name. Based on the multiple alterations to the two handwritten mediation agreements to discuss later, was this done before or after the judge's signature?

13. Four dates on one court-ordered document?

14. Meigs knows Gamble did not read Meigs opposition (3SCR24-78) as Gamble would not need to ask Jahani how mediators can be sued. (2RR) "Suing Mediators" cited in opposition paper.

15. Is respondent, mediator Trey Bergman required to follow a court-ordered mediation guideline, signed by the judge?

a. The court-order states in paragraph three, "*Named Parties shall be present during the entire mediation process*". According to all paperwork, Jody Meigs was required to be at the Family court-ordered mediation. Jody is named to be a participant. When Jody Meigs left, Bergman should have canceled mediation per court-order.

b. Counter to misleading statements by Respondents, Jody would have paid for mediation. Mediation was not law. Sheri Evans did not sign and file the rule 11 releasing funds for Jody to pay Bergman until after noon (2CR252-253), day before mediation. By Evans actions, Jody lacked timely access to money. Allowed to detail later, such action proves strategic. Bergman refused to accept later payment for mediation from Jody; thus, Jody was forced to leave due to Evans and Bergman. This isolated Meigs from her only support against Johnston, a support Evans and Zucker knew per emails from Meigs to work to eliminate Johnston in the company (2CR254, 257) (2CR262-269).

Hence, mediation was NOT law, nothing that happened at mediation was valid, and such skilled lawyers as all involved in the conspiracy for protecting Frankfort would know this. Known use of a court-order for a self-serving process.

c. Last line of the court-order reads, *“Referral to mediation is not a substitute for trial and the case will be tried if not settled.”* Emails show Evans, Zucker and Bergman knew that Bergman forgot the family court code 6.602, that Evans thought opposition could enforce the MSA as family court has remedy to enforce, and that only remedy to enforce a Texas family court mediation is the code 6.602 (2CR270). THUS, all knew that Meigs rightfully revoked the MSA including respondent before the first summary judgment hearing, unruled. About six or more summary judgments followed, unruled. The next several years contained expensive vexatious litigation on a revoked and void MSA ((1CR101-107)(2CR271-273). Meigs continued to be abused by the courts as Pro-se. (3SCR159, 172)(*James v Easton*, 2021)

16. Even the Texas Mediation Credentialing Association (TMCA) failed to enforce their guidelines against Bergman (2CR385-388). Although Meigs asked for her own court reporter at the hearing, TMCA refused and provided their own. TMCA, Shelly Hudson, refused to give Meigs a copy of the reporter record; however, the US Supreme Court may wield more power. If requested, Meigs retained all emails and documents with TMCA.

MEDIATION

1. Meigs relied upon Bergman to conduct a mediation as advertised, following his noted credentials. Bergman needed referrals (1CR221). Meigs relied upon all lawyers to act with candor towards the court rather than abusing, threatening and causing harm. Respondent uses the term “alleged” multiple times in referencing the abuses in mediation allowed by Bergman. Of fact, Respondent used and allowed the use of Zucker’s post-mediation memorandum in court, submitted and purported as truth, with excerpts. Egregious?

2. Thus, the abuses are not “alleged” as presented by Respondent but indicate serious failure in candor to the court, show the manipulation of the courts and documents, insult the process of a court-ordered mediation, and demonstrate how even the most well-renowned and respected mediator, then sitting chair of the Texas State Bar on ADR, can become corrupted. www.Facebook.com/WomenAgainstLegalAbuse where one article, “*Woman Victim of Court Abuse, Lawyer Fraud, and Manipulation Request Help!*” received over 9.8K responses, 486 comments and 2.3K shares since July 26th this year.

**THE VARIOUS HANDWRITTEN AGREEMENTS
INDICATE FORGERY AND INCAPACITATION.**

1. (1CR204). Meigs' "Objection to Mediation" (3SCR115-125). Meigs never remembered the MSA version that all lawyers and mediator submitted to the courts as truth (1CR72-76).
2. The severe incapacitation of Meigs at mediation frightened her greatly. As the only woman among five men, drugged, hallucinating and counting breaths to not faint, Meigs signed the MSA after Zucker physically pushed on her arm twice telling her to sign even though Meigs told Zucker that she could not see anything. Meigs signed, realized the shade of ink was not there, and signed again... two signatures. The next time Meigs saw the MSA, her relief pharmacist company, EaglesKlaw had been added under the second signature to what could only be was to mask Meigs incapacitation. The MSA presented to all courts indicates forgery, and document tampering as shown below. (1CR204-220)
3. Meigs would never have included her relief pharmacist company in any negotiations, never had any relationship to negotiations, never was included on any letters for mediation before or after (1CR49), and occurred after Meigs signed the agreement. Meigs was refused a copy at the end of mediation. All occurred with Bergman's presence and thus Bergman condoned forgery and document tampering.

All lawyers attended the summary judgment to enforce the MSA. Emails that Bergman forgot the remedy code and Meigs rightfully revoked occurred prior (2CR270, 271, 277, 279, 279, 280, 288, 290, 293)(3SCR26, 27f, 63-64)

4. The two various handwritten mediation agreements contain over 17 changes. Most notable and confirming forgery:

a. Page 3 where MSA one, top section has no “EaglesKlaw” with “and” lined through. MSA two, page 3 now has “EaglesKlaw” in a previously empty spot with “and” written over the line.

b. Page 3, MSA one has nothing. MSA two adds “including Attachment A”

c. Page 4, MSA one contains no signature or “EaglesKlaw”. MSA two contains Meigs’ signatures in black as a copy with EaglesKlaw included in copied format.. whilst all other signatures are blue indicating new additions. Note that EaglesKlaw is the only company not represented by a lawyer.

d. Page 4, MSA one has no attachment whereas MSA two has an attachment.

INFLUENCE ON GAMBLE AND SUMMARY JUDGMENT DISMISSAL

1. Bergman filed for summary judgment on 10.09.2018, and Meigs objected in detail with over 55 pages and an additional supplemental response covering every claim (3SCR24-78, 302-371). After this, Meigs filed multiple subpoenas. (3SCR177-199, 204-364, 369-428) The presiding Judge Gamble lost re-election on November 6th, 2018 and made comments being a “sitting duck”. Once the numerous subpoenas were filed, a summary judgment hearing took place on November 9th. Meigs prepared a binder separating each of the stated claims with responses and caselaw to back her objections (3SCR24-78) and (3SCR302-317). Gamble took a firm stance that Meigs needed a lawyer(1RR). Meigs explained the issues and need for an appointed lawyer whereas Gamble laughed and said lawyers are only appointed to criminals. Case law shows differently. (1RR6-7)

2. Jahani signed as lawyer two days before the second hearing (3SCR365-366) on November 30th. (2RR). Thus, Meigs finding representation as requested by Gamble was just a delay tactic or Gamble required a lawyer to intimidate as told that anyone to take Meigs case would be “blacklisted” for suing the “Fraternity”. Gamble asked Jahani how a mediator could be sued (2RR) Gamble never read Meigs’ lengthy objection quoting (*Moffit,2003*) (3SCR71-72.) Signed: 12.04.2018 (3CR401)(Code of Conduct Canons). (3SCR412-413).

Meigs filed significant subpoenas only for Bergman to file a summary judgment that released all lawyers from responding to the subpoenas.

3. Has anyone questioned Bergman's ethic and running of mediation/ADR in the past?

- a. *Laughlin v Bergman* . 962 S.W.2d 64, 66 (Tex.App.-Houston [1st Dist] 1997)
- b. *Bates v. Laminack*,
- c. David Sheller-

4. Meigs objected to exhibits and affidavits as self-serving in a conspiracy. (3SCR316) (*McKnight v. Riddle-Brown, PC*, 877 S.W.2d at 61).

5. A person deprives another of a constitutional right, within the meaning of §1983, "if he does an affirmative act, participates in another's affirmative act, or omits to perform an act which he is legally required to do that causes the deprivation of which complaint is made." *Preschooler II v. Clark Cnty. Sch. Bd. of Trs.*, 479 F.3d 1175, 1183 (9th Cir. 2007) (quoting *Johnson v. Duffy*, 588 F.2d 740, 743 (9th Cir. 1978)

CONCLUSION

The Court holds jurisdiction. Meigs addressed the plight of the Pro-se in every state court as well as the dangers of mediation without accountable guidelines. The state courts ignored Meigs complaints and pleadings. The growing corruption in Texas limits the ability to fight and prevent corruption. The extensive files and emails from Meigs own case files show the path taken to obstruct mediation and prevent Pro-se from success. Please see the trail of fraud and conspiracy, a situation happening throughout the Nation.

Respectfully Submitted,



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APPENDIX
APPENDIX A
Case # 20-0949
UNITED STATES
SUPREME COURT OF TEXAS
(last pleading)

Wendy Meigs,
Plaintiff-Appellant-Petitioner,

v.

Trey Bergman and Bergman ADR Group
Defendants-Appellees-Respondents.

From the Fourteenth Judicial District Court of
Appeals, Cause No.14-19-00167-CV, and the
270th District Court of Harris County, Cause No.
2017-73032, Honorable former Judge Brent
Gamble

Brief of Appellant
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APPENDIX A (page 2) STATEMENT OF FACTS

During 2015, Jody and Wendy Meigs filed for divorce. One of the community property issues was the 50% shareholder ownership in Asyntria also owned 50% by Micheal Johnston. Sheri Evans, divorce lawyer, contacted Michelle Bohreer of Bohreer and Zucker LLP, in reference to the company. Michael Johnston attempted to take over the company through fraudulent contracts that effectively stole shares of stock and misappropriated up to and over by now, millions of dollars. At that time Todd Frankfort, lawyer to Johnston and Asyntria, dual represented and appeared to have something to do with the writing of the contract that fraudulently stole shares of the Meigs. Evans noticing Frankfort's signature representing Johnston and Asyntria, Evans asked who Frankfort represented as seen in emails.

At deposition, evidence of dual representation appeared. Bohreer asked if Meigs wanted them to represent her and Meigs said, "yes". Nothing else was said even upon asking later as if attempting to ignore the dual representation. An email from Bohreer to Zucker and back discuss that Meigs has claims of dual representation and **Zucker said that those claims would be given to Bergman to handle**. Frankfort requested Bergman to mediate and Bergman responded in seven minutes by email.

APPENDIX A (page 3)

Discovery indicating the embezzlement and thefts by Johnston were intentionally not obtained before the mediation per email leaving Meigs with no knowledge of the significant losses to the company. Mediation occurred October 30th, 2015 at Heights Mediation, Bergman's location and where Judge Brent Gamble mediated after affirming summary judgment against Meigs' claims.

Contrary to what Bergman states, the 2015 mediation was a Family Court-Ordered mediation by a family court judge under family court rules regarding community property, Asyntria. When Jody Meigs left, the mediation should have ended unless there was another agenda. Unlike regular mediations, family court mediations must meet specific requirements to not be revocable. Bergman forgot one element from the family court document, the family code 6.602 which states that the document cannot be revoked. With the element missing, the document can be revoked and VOIDED without any further litigation. Bergman mentions repetitively that the mediation agreement was AVOIDED... but it was not. Such a statement by Bergman is an attempt to divert the honorable Justices who have judged on MSAs in the past. **The agreement is VOID.** Summary judgments have been written and presented to force validity but a judge cannot rule on a VOID document so litigation continued on a document that did not require litigation, which I had been

APPENDIX A (page 4)

led to believe did require litigation, and such happened for several years at great expense so that when I decided to file against Bergman and Zucker to protect the rest of abused women who may get further abused in mediation, I could not find anyone to represent me and filed on my own.

After the 2015 abusive mediation and Meigs revoking the document the next week, Sherri Evans, Todd Zucker and Michelle Bohreer began to use various threats in an attempt to force me to sign the printed version of the agreement which looked nothing like the agreement that I could barely remember and found another agreement indicating manipulation years later when I received my case files. I refused. They became more forceful with threats of abandonment, excessive legal expenses, and refusal to finish the divorce unless I signed which was followed through. Based on emails, they appear to show Bergman, Evans, Bohreer, Zucker, Frankfort, and Brady working together to attempt to force my signature. Rather than represent me by acknowledging the family court code 6.602 was missing and my revoking VOIDED the document, they appeared to collude and conspire based on emails. Multiple useless and vexatious litigation again occurred over the “void” agreement by Rodney Castille and Bruce Jamison of which I later found out that Jamison was good friends

APPENDIX A (page 5)

with Bergman. Meigs had no idea that the agreement was VOID as she was led to believe the agreement required consistent litigation. Only recently did Meigs find out the truth.

After filing against Zucker and Bergman, Meigs had to overcome a large learning curve to understand and keep up with filings and timing of filings and succeeded with each except one never seen in the case against Zucker. After multiple requests for my case files, I had to enter the fact into an amended pleading for Zucker that I could not get my case files and within thirty minutes of uploading, I received a call to pick up the case files. Receipt of my case files did not finally occur until 2018. **Bergman filed for summary judgment on a no-evidence motion for summary judgment and Meigs responded with addressing each claim and stating that Meigs needed more discovery for evidence.** Meigs sat on a large number of documents from case files received from Rodney Castille/Bruce Jamison which should have been evidence and came from Bohreer/Zucker and Sherri Evans. **Meigs even received emails originating from Todd Frankfort in the files.** More discovery required.

Case files demonstrated consistent linear appearance of fraud on the court with the omission being Todd Frankfort and his dual representation.

APPENDIX A (page 6)

[12] Multiple subpoenas were issued by Meigs to all involved in the situation before the signed summary judgment. However, Judge Gamble affirmed the summary judgment before Meigs could receive discovery and thus freed Bergman from Meigs gathering evidence in the case.

Cheryl Jahani finally accepted to represent Meigs a few days before the approval of summary judgment and filed almost immediately for a motion for new trial. Such short notice into the case by Jahani indicates a lack of representation at the summary judgment even with her presence as a week is not enough time to understand a case; yet, Gamble did not stop the hearing to allow Jahani to file for continuance whilst it was Gamble pushed that Meigs needed a lawyer for the hearing. Concerned that Jahani may be threatened as Meigs had been, Meigs continued to inquire with Jahani on her status until Jahani told Meigs early on that Zucker was extremely well connected. Meigs understood what that meant. In search for representation, one attorney told Meigs that going against Bergman was “legal suicide” and no one would represent her. Such proved true. The court clerk told Meigs that she did not know who she was suing and that Meigs was suing the “Fraternity”, a syndicate of lawyers and judges who protect each other. This syndicate of corruption and power even reaches into the Texas State Bar as Meigs was told that the “Fraternity” can ensure a lawyer gets disbarred if they go

APPENDIX A (page 7)

against them. If such is true, then such an amazing level of corruption should be investigated, cleared, and justice rebuilt. Considering the power, expertise, connection and ability to get lawyers disbarred for going against them, Meigs does not see how any court or justice could ever consider that Meigs was ever effectively represented or even state in any document that any presentation, response, signature or statement made by any lawyer representing Meigs ever held any authority to represent her. Meigs is working very hard to ensure the exposure of those who disrupt and corrupt the judicial courts and dishonor the Justices, and prays for leniency for errors as she maneuvers the maze of the legal profession as an essential employee in the healthcare field and hopes this honorable Texas Supreme Court sees clear the opportunity Meigs hands it to make a change to ensure no lawyer or judge ever attempts to manipulate documents and the court process to their benefit by exposing the corrupt to the public so the public sees change is occurring and by imposing sanctions to deter further Due Process abuse.

These events are all disputed material issues of fact which further discovery will expose as evidence, as Meigs learns better to do such, and must be presented to a jury.

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(Petitioner submitted the above as the last court of appeals, The Texas Supreme Court, who failed to acknowledge the injustices done to Texans and Texas women in courts. Submitting anything else fails to thoroughly clarify and establish the influence of corruption within all courts and the State Bars.)

APPENDIX B

**Supreme Court of Texas
Case # 20-0949
Motion Denied for Rehearing via Mail**

SUMMARY ORDER via MAIL

RE: Case No. 20-0949 DATE: 4/9/2021

**COA #: 14-19-00167-CV TC#: 2017-73032
STYLE: MEIGS v. BERGMAN**

Today the Supreme Court of Texas denied the motion for rehearing of the above-referenced petition for review.

**DISTRICT CLERK HARRIS COUNTY
HARRIS COUNTY CIVIL COURTHOUSE**

P.O. BOX 4651 HOUSTON, TX 77210

*** DELIVERED VIA E-MAIL ***

APPENDIX C

Fourteenth Court of Appeals of Texas
Meigs v. Bergman and Bergman ADR
NO. 14-19-00167-CV
SUMMARY JUDGMENT ORDER

October 13, 2020
The Fourteenth Court of Appeals

Wendy Meigs, *Appellant*
v.
Trey Bergman and Bergman ADR Group,
Appellees

NO. 14-19-00167-CV

This cause, an appeal from the judgment in favor of appellees, Trey Bergman and Bergman ADR Group, signed, December 4, 2018, was heard on the appellate record. We have inspected the record and find no error in the judgment. We order the judgment of the court below AFFIRMED.

We order appellant, Wendy Meigs, to pay all costs incurred in this appeal. We further order this decision certified below for observance.

Judgment Rendered October 13, 2020.

Panel Consists of Justices Christopher, Wise, and Zimmerer. Opinion delivered by Justice Zimmerer

APPENDIX D

270th District Court of Harris County, Texas

Cause No. 2017-73029

Meigs v Bergman and Bergman ADR Group

SUMMARY ORDER

Defendants Trey Bergman and Bergman ADR Group's Traditional and No-Evidence Motion for Summary Judgment. The Court, having reviewed the pleadings, response, and argument of counsel, is of the opinion that Defendants Trey Bergman and Bergman ADR Group's Traditional and No-Evidence Motion for Summary Judgment should be granted in its entirety. It is therefore, ORDERED, ADJUDGED AND DECREED that Defendants Trey Bergman and Bergman ADR Group's Traditional and No-Evidence Motion for Summary Judgment is GRANTED in its entirety. It is further,

ORDERED that Plaintiff Wendy Meigs take nothing on her claims and causes of action asserted against Defendants Trey Bergman and Bergman ADR Group and that all Plaintiff's causes of action are hereby DISMISSED with prejudice.

Signed by /s/Judge Brent Gamble
Date: 12/4/2018

For the signature of the Clerk of the Court, use this format:

FOR THE COURT:

s/ Chris Daniel, District Clerk

Chris Daniel

Clerk of Court