

From: Michael Langan mllangan1@me.com
Subject: Supplement to Motion
Date: November 16, 2015 at 6:42 PM
To: Bryan Bertram Bryan.Bertram@state.ma.us

Mr Bertram,

Nice speaking with you the other day. Attached is my response to your Motion to Enlarge Time which I am okay with as you are seeing much of this for the first time. This will be filed tomorrow in the A.M. I only ask that you address the pertinent issues in your response.

I estimate that 90% of what I submitted to the Board over the past 4 years is missing from the Administrative Record. The SJC already has all of these materials (as does the Board as they were attached to both the 2014 and 2015 Certiorari complaints; in addition most are directly addressed to the Board c/o Deb Stoller). Nevertheless I will send the current response and supplementary materials out to the Board in the AM as well.

You had noted that some of the materials may be missing as the Board was only addressing the matters at hand. I do not believe that this is a plausible response from the Board due to the limited basis for my suspension which involves just 3 allegations spanning both the initial Board Order and subsequent Suspension. All materials provided to the Board are directly related to this matter and their absence is concerning. In addition the missing January 20, 2015 Petition to Invalidate Suspension specifically states "Due to the serious nature of these allegations, the prima facie evidence of the fraud and the fact that the Board is well aware of the issues surrounding my case by reference to all previous pleadings, attachments and submissions I request that this re-petition be expedited and decided by the next Board meeting" and I end with "I incorporate herein by reference all previous pleadings, attachments and submissions by reference that have been submitted by me." Thus there is no excuse for excluding this relevant and critical information (including the 9/3/2015 Petition attached). As we discussed, it is my assumption Deb Stoller intercepted and removed all of this information since 2011. Judging by the language in the Board Order none of it was ever seen.

I have attached these documents below:

Sincerely, Michael Langan

Other attachments to follow:



Supplement to
Motions.pdf



2/24/2015 Petition to
Board.pdf

