



Ross Leonoudakis
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Via Email:

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Counsel for Defendants

Re: *John Doe 1 v. Kingfisher, et al* – Improper Witness Communications

Counsel, Members of the Board of Education, Defendant Coaches, and Others to Whom this Concerns:

It has recently come to our attention that an individual associated with Kingfisher Public Schools, the Defendants, and the allegations in this lawsuit has attempted to contact a witness in this matter in an effort to dissuade them from participating and providing evidence in support of Plaintiff. Worse still, it appears that these efforts have been undertaken as a result of communications with the School's / Defendants' lawyers.

Specifically, we know that a former Kingfisher football coach recently contacted the player involved in the 2010 incident detailed in Plaintiff's April 26th demand letter (the incident in which Coach Myers attempted to squeeze puss from the player's staph-infected knee, recklessly endangering the player's health—and his life—in an effort to make him available to play in an upcoming football game). In his conversation with the player, the former coach said that he received a call "yesterday from an attorney dealing with the KF fiasco," that "[the player's] name came up," and that the coach "wanted to talk to [the player] about it." The coach said that "this was something [the player] would prob[ably] want to stay out of." After the player rebuffed the coach's invitation to talk, the Coach told the player: "For sure. But they [the lawyers] are saying you are in it already. That's why I think your [sic] going to have to tell them you don't want in it."

We demand that this sort of behavior CEASE AND DESIST now. Witness tampering and intimidation is a crime. It is sanctionable. And, when done at the direction of an attorney, it is a violation of our ethical rules and grounds for discipline. This School and its administration have been bullying students and parents for speaking out against bullying and hazing for years. This conduct is a continuation of that practice and goes to the heart of what is wrong in Kingfisher ISD.

We are going to investigate these matters further. And we will be sharing this letter, as well as any further information we uncover, with the District Attorney, the Court, and the Bar Association where appropriate. In the meantime, we encourage you to contact your lawyers, your clients, and anyone else at your direction and inform them that this sort of behavior will not be tolerated.

Respectfully,

A handwritten signature in black ink, appearing to read "Ross Leonoudakis". The signature is written in a cursive style with a large initial "R" and "L".

Ross Leonoudakis
Bradley E. Beckworth