

"In a last nail in the coffin scenario James Damiano's movie "Eleven Years" draws the straw that breaks the camel's back, rivets Bob Dylan to his secret past of plagiarism and rewrites musical history"

The New York Times

Orin Snyder's Modus Operandi The Real Scoop

By James Damiano



Orin S. Snyder
Gibson Dunn LLP

How beautiful would your world be if you were earning nine hundred And ten dollars an hour? Beautiful right?

Although unverified that figure is the hourly fee that Orin Snyder charges for his services. It may even be a higher figure.

Who is Orin Snyder?

Orin Snyder a former Assistant United States Attorney for the Southern District of New York has done very well for himself in fact Orin Snyder is recognized as one of the "Top 100 Trial Lawyers in America." His home in Manhattan cost 2.9 million.

Orin's clients include Cablevision, Capital One, CNN, Chrysler, Facebook, Home Box Office, NBC, Universal, Sony, Time Warner, Turner Broadcasting Systems, and Warner Music Group. Snyder's list of clients comprises many competitors of one another. Oh did I mention that little four letter word S-O-N-Y hold on let me go back and checkYes I did.



Snyder doesn't mind the monopoly or the conflict after all why not control all the cards in the deck if our Judges allow it.

Other clients include Julie Andrews, Marc Anthony, Mariah Carey, Anderson Cooper, Cindy Crawford, LeBron James, Kid Rock, Jennifer Lopez, Ozzy Osbourne, The Rolling Stones, Jerry Seinfeld, Paul Simon,

Barbara Walters, Montel Williams, Mark Zuckerberg of Facebook, The Andy Warhol Foundation for the Visual Arts, The Larson Foundation, Freddie Mac, and The Clinton Foundation.

Yes Mr. Snyder has represented even a President of these here United States.

The kicker is Mr. Snyder's bio on the powerhouse law firm of Gibson Dunn's website humbly and shyly announces that he has represented none other than the one and only Bob Dylan.



Bob Dylan

A classic case of the name speaks for itself no introduction needed however the name Bob Dylan listed as a client of one of the "top one hundred litigators in the United States" begs to be researched by the reader.

Certainly the listing is a double edged sword for Mr. Snyder.

Why would he not tell a half-truth to try to protect Dylan from the public learning the reason Mr. Snyder represented him?

Could it be Snyder represented him in a motorcycle accident?

There's a good chance that after the press puts it's, spin on this article that it will be portrayed just as that. Dylan is the only celebrity that the mainstream media will not publish derogatory statements about. Wonder why? We do to.

Let's call a spade a spade.

You rich girls really got it made. We all drew aces but you drew the spade. Where did that come from? Just a little foreshadowing. Let's go on.

No other client of Mr. Snyder's commands the degree of bodacious secular and iconic respect as Dylan.

In other words Dylan is considered by the entertainment industry as the "Star of Stars". He is simply the most celebrated honored and respected celebrity in the free world.



Amy Blanton of Dartmouth, writes in her scholarly essay Bob Dylan: An Impact on American Society in the 1960's

The 1960s was a decade of liberation for music, public opinion, dance, invention, and the binds of racism. From this generation spawned some of the greatest musical artists of all times—one in particular, Bob Dylan. Bob Dylan is considered to be the greatest influence on popular culture of all time.

Dylan, through his music and songs, was a factor in the revolution of hundreds of thousands of people. He may not have been responsible for the ideologies behind the movements, but he provided the “emotional drive” behind them.

Not only was he an influence on the American public, but also on other rising musicians of that era, such as the Beatles, the Rolling Stones, Joan Baez, Eric Clapton, Van Morrison, Jimi Hendrix, and the list goes on.

Dylan also became the catalyst for cultural change; he has been described as the “most influential popular musician of the twentieth century.

His footprints were so impressionable that a whole generation followed his lead.

Producers, journalists, editors, professors, teacher's actors, directors, musicians, everyone in the entertainment world considers Bob Dylan the pinnacle of intellectualism.

Although the more Dylan downplays the fact that no other celebrity has ever come close to acquiring the admiration of his peers as well as the public as he has the more admiration he receives and the bigger his legacy becomes.

The vagueness of Snyder's representation of Bob Dylan in Snyder's Bio is simply fascinating. However disregarding the vagueness, Mr. Snyder's bio is actually factually inaccurate. You have to wonder is it possible that an attorney of this stature to not even be able to get the facts straight in something as simple as a bio?

Although Mr. Snyder's mistake seems innoxious you can bet that it was intentionally written to be inaccurate and that there is an underlying motive for Mr. Snyder's inaccuracy that he in the past tense had represented Bob Dylan.

You might ask yourself so what's the difference if he had or still does represent Dylan.

The reason Snyder has inaccurately written his bio is that he is hiding the fact from the reader that for the last twenty years Snyder has represented Bob Dylan in an ongoing confidentiality order or "Gag Order" if you will against Plaintiff James Damiano who, filed a plagiarism lawsuit against Dylan.



James Damiano

The court order states that all discovery materials produced during the discovery phase of the lawsuit are designated confidential to the public including Damiano's expert music analysis that states that the common melodic arc of the two songs in question is exact. Damiano's song was copyrighted with the library of Congress nine years before Dylan's

"Steel Guitars" copyright 1982 & 1989 Damiano	<p>2 1 5 6 6 5 3 3 3 1 2 3 2 1</p> <p>1 2 3 3 5 2 5 1 2 3 1</p>	Damiano
"Dignity" copyright December 1991 Dylan	<p>2 1 5 6 1 6 5 3 5 1 2 3 1</p>	Dylan

Paul D. Greene

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- 1995 University of Pennsylvania Ph. D. in the Anthropology of Music.
- 1989 Harvard University B. A. in Music, *Magna Cum Laude*.

Areas of expertise: Ethnomusicology, Cultural Studies, Jazz, Popular Music, Western Classical Music, Indian Music, South Asia, Anthropology of Complex Societies, and Gender Studies.

EMPLOYMENT

- 1979-92 Lecturer, The Pennsylvania State University.
Campuses: Abington-Ogontz Campus
Delaware County Campus

Courses taught: Music 5: Introduction to Western Art Music.
Music 7: Evolution of Jazz.
Music 9: Introduction to World Music.
Integrative Arts 298C: Sociology of Rock 'n' Roll.

Director of the Visiting Musical Lecture Series in World Music at both campuses.
- 1990 Musical Investigator, American Society of Composers, Authors, and Publishers (ASCAP).
Worked for one month (July) in eastern North Carolina investigating music copyright infringements by entertainment and drinking establishments.

Dr. Greene's Resume

Also covered under the "gag order" are all videotaped depositions of all the people who witnessed events that took place during Bob Dylan's

eleven year solicitation of James Damiano Songs.

To boot Bob Dylan accepted The Presidential Medal of Freedom Award from President Obama while the "gag order" was in effect.

Following Snyder's cross-examination in a recent high-profile trial, one article described Mr. Snyder as "the deadliest trial lawyer in tech." which was an extremely odd title for an article about an attorney. It almost appears that Mr. Snyder is trying to send a message to someone. But who?

The Hollywood Reporter consistently names him to its prestigious "Power Lawyer"

From Mr. Snyder's own mouth came the word's "We had a take-no-prisoners approach to the litigation," easily interpreted as "Kill everyone". It seems Mr. Snyder chooses his words thoughtfully.

Mr. Snyder's modus operandi has become even more vicious. Winning against a Plaintiff and applying to the court for sanctions against the plaintiff is not enough for Snyder.

He now files suit against the Plaintiff's Law Firms for malicious prosecution.

This procedure is implemented to send a message to Law firms implying that 'not only will we beat your client but we will come after you also making Law firms more apprehensive to take on litigants.

Most other attorneys and intellectuals find it hard to understand Orin Snyder let alone his enormous success as an attorney. I'm not that impressed with Snyder probably because I understand his modus

operandi.

A better way of describing Snyder's way doing business should be called gangsta law.

Snyder's premise is to use his law degree as a license to commit crime, control by whatever means anyone he believes needs to be controlled, lie to whoever he has to lie to including judges, intimidate and threaten whoever he wants to threaten, and use the clout of his clients to do so.

Mr... Snyder doesn't realize that some of his clients may not want to be represented in the manner that Mr. Snyder is representing them for fear of him ruining their reputations.

Winning is everything to Orin Snyder but some people don't want to win by cheating, or intimidation, or lying. Some people want to win fair. There are still ethical people in the world.

Snyder's modus operandi creates the opposite of what the legal system was put into place for. Instead of creating a civil and equitable solution to conflicts Snyder's way of doing business only creates more hostility and conflict.

That's not the only scenario. Snyder could be brought down no one is above the law. Should Snyder ever be in that position being Bob Dylan's attorney, will not help, him.

I'm sure Orin had to have some intelligence to be able to graduate from law school.

And although it is unknown whether Mr. Snyder had any family clout to get to where he is as fast as he did, I'm sure Mr. Snyder had some sort of natural talent for lawyering but there are many lawyers with the same talent

I'm not at all impressed with Snyder. In order to evaluate a person's true success one must look into the crystal ball and review the end of his career not just his rise to the top.

Snyder has some powerful adversaries. The boom could be lowered on Snyder at any time even despite his conflictive political contributions.

Mr. Snyder has had many victories and we'll get to how he prevailed in those victories later let us now cite some of his defeats.

SNYDER LOSSES AND JUDGE COTE



Judge Denise Cote

Last year, federal judge Denise Cote leveled unprecedented sanctions against Apple and major publishing houses for e-book price-fixing. Here's how an old-school jurist upended the industry with a landmark decision.

One day nearly a year ago, in an unusually crowded courtroom in the Daniel Patrick Moynihan building, in Lower Manhattan, a lawyer named Orin Snyder began a very steep climb: to convince federal judge Denise "Dee" Cote that Apple, Inc., hadn't ripped off the American reading public.

Snyder, a beefy and confident man who'd represented Bob Dylan,

Jessica Seinfeld, Anderson Cooper, and Mark Zuckerberg before defending Steve Jobs' ghost, insisted that Apple hadn't plotted with five leading book publishers to raise e-book prices, as the Justice Department was charging. In fact, in his opening remarks he maintained that the company had liberated the e-books market from the stranglehold of another behemoth—he never uttered the word “Amazon”—which had been peddling 9 of every 10 e-books sold.

But only a couple of minutes into his nearly three-hour presentation, Snyder pivoted away from arcane anti-trust doctrine and the peculiar folkways of book publishing. Suddenly, his sole concern was Denise Cote, who was serving as both judge and jury in the case.

Only 10 days earlier Cote, who sits on the federal trial court in the Southern District of New York, had shared a “tentative view” on the merits of the case with the lawyers, just as she had done in many other cases and as she said she would do here if both sides consented. Stressing it was tentative—as she noted, she had only reviewed the court papers and had yet to hear the testimony and arguments—she said she believed the government would be able to prove that Apple “knowingly participated in and facilitated a conspiracy to raise prices of e-books.”

So now, playing a clearly losing hand in Cote's courtroom, Snyder chose to meet Cote head-on—and challenge her fairness. To a judge who prides herself on her scrupulousness, it was a declaration of war. “No party, big or small, whether the biggest company in the world or an individual defendant, should start trial with the deck stacked against it,” he pleaded. “So we respectfully and humbly ask this Court to erase, hit

the delete button on any tentative view that might exist in the Court's mind today."

As he spoke, Cote—an owlish 67-year-old woman—barely budged, but reddened. And when Snyder attempted to pivot to the substance of Apple's defense, she quickly cut him off. "Excuse me, Mr. Snyder," she began softly, in a voice which, even after four decades in New York, still betrays a hint of Minnesota. "I wouldn't want Apple to begin this three-week trial thinking that it was going to get anything other than a fair hearing." She'd be all ears, she pledged: the deck wasn't stacked against Apple unless the evidence was.

The trial proceeded pretty much as planned, right down to the minute, as things before Cote invariably do. And then, scarcely three weeks after closing arguments, came her opinion, all 160 pages of it. For Cote, such extreme efficiency was standard operating procedure. For Apple, though, it was all a bit too quick, as if parts of it had been preordained. And sure enough, if anything, what she'd heard in court had only hardened her views.

The publishers' conspiracy to wrest e-books out of Amazon's control, she wrote, would not have worked "without Apple's orchestration." It was Apple which, by introducing an electronic bookstore with its new iPad, and meeting with the various publishers, had provided "the vision, the format, the timetable, and the coordination" the publishers needed to raise e-book prices. Cote dismissed the claims of various Apple executives and publishing chieftains that they'd not been in cahoots. Several she essentially labeled liars.

For Cote, a figure beloved around her courthouse and in the

fraternity of former federal prosecutors in Manhattan, the decision brought rare attention, and censure: both *The New York Times* and *The Wall Street Journal* accused her of bollixing up the marketplace and protecting a monopolist.

Already Cote had been vilified by the book publishers, a strange twist for one of the most voracious readers in the federal judiciary.

Though coming into the case after three of them—HarperCollins, Hachette, and Simon & Schuster—had settled with the Justice Department (Penguin and Macmillan capitulated later), Cote had to approve the deals with all of them, which she did despite the objections of hundreds of booksellers, authors, agents, and small publishers, who argued that Amazon's dominance endangered them. "Amazon sells books the way it sells diapers and garden hoses—as commodities," wrote one novelist, Roxana Robinson. "Turning over the book industry to Amazon would be like turning over the education system to robots."

The sanctions Cote imposed on the publishers—not only \$166 million to compensate those who bought books at inflated prices but requirements that executives accustomed to cozy lunches at the Union Square Cafe and similarly swanky spots log and report their chats with one another—chilled the book business. As did her unusually pointed insistence that the testimony of two key executives, Carolyn Reidy of Simon & Schuster and John Sargent of Macmillan, could not be believed.

The industry's supine response to Cote's ruling—Reidy and her lawyers have said nothing, while the normally outspoken Sargent has, with considerable difficulty, managed to muzzle himself—reflects the

fear that the judge, who will monitor the publishers' compliance with her order for several years to come, still elicits from the industry. But as three appellate judges weigh Apple's appeal, Cote, too, will be scrutinized. While not appearing explicitly in the appellate briefs, what so many people most admire about Cote—her adamant sense of right and wrong—will be one of Apple's key complaints.

Since introducing the Kindle in 2007—and setting e-book prices at, or more often substantially below, its own costs—Amazon has wreaked havoc, and panic, among publishers. Beyond devaluing lucrative hardcover books, such rock-bottom prices have helped destroy the “brick-and-mortar” stores where books are showcased. Nothing the publishers did—delaying the release of e-books, complaining to Amazon, upping their wholesale prices to the company, or, in the case of one house, Hachette, actually going to the Justice Department to gripe—seemed to work.

But Apple offered salvation. By opening up an iBookstore in tandem with the new iPad, Apple could “trounce” Amazon, Eddy Cue, the Apple executive who'd pioneered iTunes and other Apple content stores, wrote Jobs in late 2009. Jobs quickly signed on. But Cue had to move fast: the iPad was to make its debut on January 27, 2010, and Jobs wanted to unveil iBooks with it. And Jobs himself was dying.

To each of the Big Six publishing houses, Cue offered the same deal: rather than selling e-books wholesale and letting retailers price them, the publishers themselves would set e-book prices; Apple would only be an agent, collecting 30 percent of sales. By January 26, five of the publishers—only Random House refused—had agreed. Amazon, too,

quickly fell in line. E-book prices quickly rose. Soon came the lawsuits—class actions on behalf of consumers; cases filed by various state attorneys general. And then, in April 2012—largely, Apple has charged, at Amazon's instigation—came the Justice Department's case.

All said Apple and the publishers had conspired together in violation of federal anti-trust laws.

Cote had had huge, and hugely important, cases come before her before, but they'd rarely escaped the business pages. Reinforcing her obscurity was her reticence (Cote declined to speak to V.F. for this story), which makes her sometimes seem, even to friends, out of another time and place. Her childhood, in St. Cloud, Minnesota, was one of Cherry Cokes and glazed doughnuts after school.

But the real world—Freedom Riders, Soviet missiles in Cuba, the New Frontier—seeped in. From the Benedictine nuns she learned that everyone deserved love, respect, and freedom. She remembered, too, the promises, and commands, of John F. Kennedy's inaugural address.

She graduated from St. Mary's College in Notre Dame, Indiana, in 1968, earned a master's in history from Columbia, and, for three years, taught Catholic-high-school students in New York. But convinced that the city, sinking into crime and penury, needed her help, she enrolled at Columbia Law School, where she graduated near the top of her class.

After eight years as a federal prosecutor in Manhattan and six years in private practice, she returned to the U.S. Attorney's Office, becoming the first woman ever to lead its criminal division. Upon recommendation and appointment from Senator Daniel Moynihan and

President Bill Clinton respectively, in August 1994, Cote became a federal judge.

Her courthouse has sobered up in recent years—the old eccentric judges who used to people the place are pretty much gone—but even in this newly buttoned-down group, Cote is considered hardworking, disciplined, and meticulous.

During the trial of an Albanian crime crew in which the testimony of one witness was in Greek, the witness recounted one of the defendants shouting “Motherfucker! Motherfucker! Motherfucker!” “Just so the record is clear, the witness said ‘motherfucker’ three times in English,” Cote calmly told the court reporter.

Cote is fast, disposing of 42 consolidated class actions brought by investors in the bankrupt telecommunications giant WorldCom against 17 of the nation's largest banks in short order. In the process, she helped re-write, and strengthen, the obligations of banks to check out the financial instruments they sell.

She's attempting the same thing now in the Federal Housing Finance Agency's effort to recoup \$200 billion in losses from banks that sold Fannie Mae and Freddie Mac shoddy mortgage-backed securities.

She insists that court papers be kept short. She sets firm schedules and, when settlement efforts fail, designates trial dates long in advance. She cherishes, and pampers, jurors. When she reviews precedents, Lexis printouts won't do: she insists on using the classic bound volumes.

One imagines her approaching them with the same reverence as

Jimmy Stewart and Arthur O'Connell had in *Anatomy of a Murder*, savoring that “smell of the old brown books.”

Twice divorced and childless—she rarely speaks of her private life—Cote seems to view her clerks as her children, marrying them off (including, in what may be a first, a pair of her gay law clerks) and guiding their careers.

But she is no ascetic. She goes to the opera and ballet regularly and subscribes to Jazz at Lincoln Center. She kayaks in Alaska, rafts in the Yukon, rides packhorses through Yellowstone, watches wolves in Montana, and, constantly, she reads, usually for book clubs. One is devoted to Shakespeare, a second to fiction, a third to biographies.

The lawyers who do best before her are serious, punctual, prepared, and respectful. She loathes those who wing it or bully or strut.

Some defense lawyers consider her an unduly harsh sentencer and wince when they land before her. To them, she remains the Catholic-school girl, seeing right and wrong and little in between, a worldview which, they contend, deepened while she was a prosecutor. Some of the publishing lawyers think her criminal-law background marked, and marred, her approach to their case.

She viewed it, one complained, as a “whodunit.” Others noted how she'd faulted the “unrepentant” publishers; officially at least, the publishers still maintain they did nothing wrong.

Apple and Denise Cote are not done with one another. A case for damages against the company brought by 33 state attorneys general and an \$800 million consumer class-action case will be heard—in this

instance, by a jury—in Cote's courtroom in July. Meantime, Apple—claiming that Cote misread key components of anti-trust law to penalize an actor that actually increased competition and aerated a stagnant marketplace, and disallowed crucial expert testimony to boot—has appealed her ruling to the Second Circuit.

For that, Snyder has yielded to his partner at Gibson, Dunn & Crutcher, Theodore Boutros Jr., who helped overturn California's gay-marriage ban.

Handicapping what will happen, one must consider the nature of a classic Cote opinion: impeccably constructed, fact-packed, filled with assessments of witness credibility—precisely the sort appellate courts are loath to overturn. “You start reading [her opinions] with the sense that ‘I’m in good hands,’ ” one member of the Second Circuit Court of Appeals told me.

She'll enjoy less deference at the United States Supreme Court, should the case get that far.

Cote has not backed off her harsh impressions of Apple's conduct. In a hearing in January, she reiterated her conviction that it had flouted anti-trust law, and swatted away its complaints that a monitor she'd appointed to oversee its compliance with her ruling was gumming up the company's operations and gouging it with excessive fees. (The lawyer, she noted, was no more expensive than Apple's.)

Her job, Cote has written, is not to decide the wisdom of United States v. Apple, but to apply the law. Still, can one detect in her at times a certain discomfort, or defensiveness, or even sadness, at having

become publishing's most unlikely scourge? One such moment came in September 2012. Approving the publishers' settlement with the government, she cited what was, in a judicial opinion at least, an unusual source: Emily Dickinson. Dickinson's poem bore little relevance to the case—both sides would surely have stipulated that books still matter—but quoting it perhaps gave Cote some solace.

*There is no Frigate like a Book

To take us Lands away,

Nor any Coursers like a Page

Of prancing Poetry—

This Traverse may the poorest take

Without oppress of Toll—

How frugal is the Chariot

That bears a Human soul.*

ORIN SNYDER'S PARTNER IN CRIME

L. PETER PARCHER OF PARCHER HAYES AND SNYDER



Peter Parcher

The following article is about Bob Dylan's Lawyer Peter Parcher who was Orin Snyder's partner At Parcher Hayes and Snyder and who mentored with Orin Snyder on the Damiano Dylan Case

Steel Wrapped in Velvet Forbes Magazine

When Bruce Springsteen, Bob Dylan or the Rolling Stones have a date in court, they call on Peter Parcher

When singer Luther Vandross Luther Vandross was charged with manslaughter after his best friend died in a car accident with Vandross

driving, lawyer-to-the-stars L. Peter Parcher devised a decidedly slick defense: An olive tree had dropped its slippery nuggets precisely where the crash occurred on Laurel Canyon Boulevard. "It might as well have been ice and snow," Parcher says slyly.

Vandross walked. It was classic Parcher handiwork. In three decades he has repeatedly rescued a rogues' gallery of trouble-prone or troublesome stars: the Rolling Stones, Bob Dylan, Bruce Springsteen and Paul Simon, as well as boxer-thug Mike Tyson, author Frank McCourt, the estate of Andy Warhol and titans such as Sony and Time Warner.

Parcher and his key partners, Steven Hayes and Orin Snyder, have gotten star clients out of many a jam—drug arrests, murder charges, sexual harassment allegations and that particularly pernicious evil, copyright infringement.

He has whipped John Lennon's widow, Yoko Ono, who tried unsuccessfully to reduce the 5%-of-sales fee his client, record producer Jack Douglas, had arranged with Lennon before the ex-Beatle was assassinated in 1980.

In another case Parcher prevented the Boston Celtics from using Yugoslavia's star hoops player because he was under contract in his native land for \$11,000.

Parcher likens his courtroom style to his training in Tai Chi, an eastern martial arts discipline that his instructor describes as "steel wrapped in velvet." Made up of equal parts Clarence Darrow, Sam Spade and Swifty Lazar, Parcher is known for a doggedness that a rival

lawyer once likened to “trying to pull a Rottweiler off your [private parts].”

Says Parcher, ego intact: “I seem to have the uncanny ability to get to where the light is at the end of the tunnel.”

Parcher usually wins on rigorous research and courtroom dramatics. “Put down the law book. Go and meet a witness. Find the housekeeper. Act like a public defender, not a Wall Street lawyer,” he says.

Of course he says that: Parcher, 63, who grew up poor and still holds the street smarts of his native Brooklyn, graduated from St. John's University Law School and started out as a public defender in New York.

He believes celebrities are easy targets for malicious and opportunistic litigation and says they should fight like hell in court rather than shell out hush money. With a secret payoff, “more often than not it comes back to bite them in later cases.”

But even when his clients screw up, Parcher feels no compunction about getting them off the hook. “It's not about innocence or guilt, right or wrong. Sometimes the punishment the other side wants is disproportionate to the purported offense.”

He built a thriving practice by defending stars early and sticking with them for years. Rocker Bruce Springsteen hired Parcher in the 1970s to break a contract with his then-manager, Michael Appel.

In the case, the manager, a former Marine, was depicted as a controlling profiteer who had exploited Springsteen by forming a

production company without giving the singer any equity in it.

Springsteen was freed. "Peter has this unique ability to deeply connect with you, and he became a pivotal figure at a pivotal moment in my life," Springsteen says. He still keeps Parcher on retainer.

When Parcher represented singer Julie Andrews Julie Andrews, who sued her surgeon after an operation on her vocal cords in June 1997, he went to war. Charging an "irreversible loss of vocal quality, permanent hoarseness and vocal destruction," he found evidence to assert the surgeon had, without authorization, operated on a second vocal cord after failing to take a cyst off the first one.

Parcher found another doctor willing to provide potentially devastating expert testimony at trial. The surgeon and his insurance company settled last summer for a sum reported to be near \$20 million. Parcher, for his part, declines to comment.

Even more exhaustive detective work was required to defend talk-show host Montel Williams Montel Williams in 1997, after six women he employed sued him for \$2.9 million, charging sexual harassment. Parcher and Snyder spent months interviewing 75 former and current Williams's employees and learned unflattering details about some of the plaintiffs. Intimidated, they dropped the lawsuit, but Parcher still wanted to inflict a wound. So he convinced the judge that W. Randolph Kraft, the women's lawyer, should be sanctioned for crossing the line of "excessive zeal" and "personal aggrandizement."

Even sympathetic foes sometimes have to be verbally mutilated in court. After Jonathan Larson Jonathan Larson, author of the hit

Broadway musical *Rent*, died of a brain aneurysm in 1996, Lynn Thomson Lynn Thomson, who had received \$2,000 to “clarify” the storyline, claimed co-authorship and demanded 16% of Larson’s royalties, potentially worth millions. Parcher, representing the Larson family, skewered Thomson by asking her to recite the lyrics of the musical’s centerpiece, “One Song Glory.” When she couldn’t, he blasted her claim.

“What does Ms. Thomson say when I ask her to recite the lyrics? She says ‘show me the lyric book, show me the chart, show me Exhibit WWWW, show me Exhibit B, because I can’t do it,’” Parcher thundered in court. If the late Larson were on the stand, Parcher declared, he would “shout it from the rafters as a young man should.”

U.S. District Court Judge Lewis Kaplan wasn’t quite convinced. He asked whether Parcher, likewise, could recall the opening argument of his first case as a public defender three decades ago. Without missing a beat, Parcher boomed out the first lines, so embedded were they in his memory. Case dismissed. After Thomson appealed, Parcher settled it for a modest sum.

Parcher’s identification with his clients is so great that he often memorizes the lyrics of their hit songs. Such immersion paid off some years ago when he first represented Mick Jagger Mick Jagger and the Rolling Stones. In the late 1980s he employed a clever bit of courtroom drama to vanquish charges that Jagger had stolen the hit song, “Just Another Night.”

He played the piano in court with one finger and sang the lyrics in his croaky, Brooklyn accent, purposely leaving out the rhythm of the song.

The result: Though the songs were similar, Jagger's came off as "subtly different." The jury ruled in Mick's favor.

At times, though, Parcher's courtroom tricks are purely accidental, or so he would have you believe. At a Hollywood party thrown by playboy Ken Moss Ken Moss in the early 1990s, Robbie McIntosh Robbie McIntosh, the Average White Band's drummer, dropped dead from a drug overdose. Moss was charged with murder since he had provided cocaine.

By chance, a used-car dealer in Los Angeles, seeing Parcher on television outside the courthouse, called to say he had seen someone resembling McIntosh buy drugs from a well-known dealer. After extensive testing, Parcher argued that McIntosh had died not from cocaine but from a heroin overdose.

In closing arguments, Parcher became so excited he knocked over a pitcher of water. Everyone laughed, underscoring the notion that a drug party in L.A. shouldn't be the cause of a ten-year jail sentence. Moss got off with three months on a work farm in Malibu.

Sony Music czar Tommy Mottola Tommy Mottola consults Parcher when an artist on his roster gets into trouble. Two summers ago rock group Pearl Jam was playing a concert in Denmark when riots broke out. Eight people died in the ruckus, and there was talk of holding the band responsible. Parcher dispatched an investigator to the site and learned that security arrangements at the concert were lax—blame the concert promoters, not the band. Pearl Jam was out of a jam.

How much longer will Parcher make excuses for his celebrity clients?

He has rejected constant merger offers from large law firms wanting an entrée to the entertainment world. He still wants to hold center stage and emulate his heroes, Edward Bennett Williams and Louis Nizer.

Parcher's ambition is to be the man celebrities go to when the chips are down. "Jake Erlich, the great San Francisco trial lawyer, entitled his autobiography Get Me Jake," says Parcher. He wants to hear the refrain: "Get me Peter."

On Wednesday evening, October 9th at Cipriani on Wall Street in New York City, the RENS inaugural fund-raising gala not only made history, but proved to be a fun-filled and thrilling event for the 850 attendees, who donated more than \$1.7 million to the newly formed two-year not for profit!

Governor Andrew Cuomo, a longtime friend and confidante of program founder Dan Klores, presented the evening's first award to honoree John Marino, former Chair of the New York State Democratic Party, giving a witty but heartfelt salute to his trusted advisor.

The Governor was followed by Gary Cohn, President of Goldman Sachs, who presented the evening's second award to Orin Snyder, chief litigator at Gibson Dunn, one of the nation's most prestigious law firms.

Gibson Dunn Represented Chevron in Ecuadorian Rainforest Destruction

SPINNING GIBSON DUNN FRAUD

GIBSON DUNN

GIBSON DUNN REPRESENTS CHEVRON IN THE DESTRUCTION OF THE RAINFOREST IN ECUADOR

NEW YORK, N.Y., May 04 /CSRwire/ - A London-based funder of the historic environmental lawsuit brought by Ecuadorian villagers against Chevron admitted repeatedly in recent weeks that it was planning to sign a false confession required by the oil giant as a condition of withdrawing an increasingly contentious lawsuit in Gibraltar, according to a statement by Steven Donziger, the U.S. legal advisor to the villagers.

Woodsford Litigation Funding, a private London-based company, had been sued by Chevron in Gibraltar after investing roughly \$2.5 million on the winning side in 2013. Woodsford and Chevron announced a settlement of that lawsuit today where no money exchanged hands.

As part of the settlement, Woodsford was relieved of the enormous expense of the lawsuit while Chevron avoided some potentially

embarrassing discovery revelations related to falsification of evidence by a corrupt witness paid \$2 million by the company. For background on how the settlement reflects Chevron's weakening litigation position, see this press release issued April 19 by Hinton Communications.

The settlement also comes at a time when explosive new forensic evidence demonstrates that Chevron's main defense in the case is based on falsified evidence offered by a corrupt witness. See this article from Courthouse News on the expert report of J. Christopher Racich.

Chevron had planned to announce the settlement two weeks ago on the morning of a critical appellate argument in New York. The company canceled that plan when it was exposed the night before in a press release by representatives of the affected communities in Ecuador.

Steven Donziger, for two decades a legal advisor to the affected communities who won a \$9.5 billion environmental judgment against Chevron, issued this statement in response to the Woodsford-Chevron settlement:

"Today's announcement of the Woodsford-Chevron settlement is old news. Woodsford's chief executive informed representatives for the Ecuadorian communities weeks ago that a settlement was in the works because of Chevron's fear of discovery of critical internal documents related to a corrupt witness and Woodford's exorbitant litigation expenses associated with Chevron's lawsuit. He told us that as a condition of settlement Woodsford would be forced to sign a false "confession" required by Chevron in support of the company's self-described demonization campaign targeting myself and other lawyers

for the villagers who won a \$9.5 billion environmental award against the company. The same chief executive, Charles Manduca, also assured our team privately on repeated occasions that he despised Chevron's tactics, believed Judge Kaplan's decision was fatally flawed and the result of a one-sided trial, and that he believed fervently both in the validity of the Ecuadorian judgment and in the integrity of those lawyers who obtained it. I do not accept Judge Kaplan's findings and categorically reject his determination that I engaged in wrongdoing in Ecuador, as my appellate briefs in that case make clear.

Rather than clean up its massive contamination in Ecuador, Chevron continues to pursue a strategy of trying to intimidate supporters of the affected communities by launching retaliatory lawsuits. Given that Woodsford has not funded the litigation against Chevron for two years, the settlement will have no material impact on ongoing efforts by the affected communities to seize Chevron assets in Brazil and Canada to force the company to comply with a judgment that has been unanimously affirmed by Ecuador's Supreme Court in the company's chosen forum."

Here is a release with more information about the impending Woodsford-Chevron settlement that provides necessary background on the company's weakening litigation position:

**GIBSON DUNN REPRESENTS CHEVRON IN THE DESTRUCTION OF THE
RAINFOREST IN ECUADOR**



**WHITE IS WHITE AND BLACK IS BLACK FORGET ALL THE LAWYER
WORDS AND LOOK AT THE PICTURES**



A PRESENT FROM CHEVRON AND GOBSON DUNN

GIBSON DUNN REPRESENTS CHEVRON IN THE DESTRUCTION OF THE RAINFOREST IN ECUADOR



GIBSON DUNN DOESN'T CARE



GIBSON DUNN DOESN'T CARE



GIBSON DUNN DOESN'T CARE

Randy Mastro of Gibson Dunn's comment that Cabrera never offered Chevron the opportunity to meet is absolutely incorrect. Chevron chose not to cooperate with Cabrera. Chevron did not submit any information to Cabrera for inclusion into his report. Why? Because the vast majority of the samples taken prior to Cabrera's appointment showed overwhelming evidence of extensive contamination. Even Chevron's samples showed illegal levels of contamination, though their levels were lower than the plaintiffs' tests. We discovered that Chevron (as well as Texaco earlier) falsified their testing levels.



GIBSON DUNN DOESN'T CARE

This is not the first time Chevron has taken comments out of context in order to derail the lawsuit.

Roger Alford (an international and comparative law professor at Pepperdine) adds a further post at OJ responding to Karen Hinton's response as well as a phone call with her in which she told him that plaintiff lawyer Steven Donziger's remarks that "Because at the end of the day, this is all for the Court just a bunch of smoke and mirrors and bullshit" are not a reference to what the plaintiffs' lawyers and the expert are discussing doing, but a reference to Chevron's manipulation of the evidence.

THE MORE FRAUD YOU COMITT THE MORE LIES YOU TELL THE FASTER YOU GET RECOGNITION AND THE HIGHER YOU CLIMB UP THE LADDER.

FIND AN ATTORNEY WILLING TO LIE

New York Attorney General-Elect Appoints Orin Snyder to Transition Committee

November 16, 2010

New York's Attorney General-Elect Eric Schneiderman appointed partner Orin Snyder to serve on his Transition Committee, a bipartisan panel charged with recruiting top legal talent to join the Office of Attorney General Staff and to provide policy recommendations to improve lives of New Yorkers.

The committee is divided into six subcommittees, including: Criminal Justice; Economic Justice; Infrastructure, Technology and Regional

Offices; Public Integrity/Anti-Fraud; Social Justice; and Solicitor General/State Counsel. Snyder will serve as a member of the Economic Justice Subcommittee.

BACK TO BOB DYLAN

The standard contract for an artist signed to a major recording contract is generally ten songs a year which doesn't appear to be to, difficult to achieve however when you add in the factors of public appearances, touring, reading the press clippings about you, dealing with tour managers, producers and the people in your entourage, auditioning musicians to do your next album, recording in the studio, on top of finding, the time to relax and rest the ten song obligation could become overwhelming and difficult to achieve.

To be able to create a song one would have to pick up his instrument and start strumming, until he creates a new melody. Then he would pick up a pen and write words to that melody to create a whole song or vice versa.

When Damiano's lawsuit hit the internet Dylan's work started being scrutinized by music critics and more and more Dylan plagiarisms started to be exposed. Articles of the, same tone as the one below started to appear. Accusing Dylan of plagiarizing literally everything he wrote.

Bob Dylan and Plagiarism

To Catch a Master Thief

by Alexander T. Deley / December 12th, 2013

A tired adage states that: “talent borrows but genius steals.” This has certainly been true of the folk tradition in which homage and the borrowing of ideas has always been an integral part. Folk musicians – most notably Bob Dylan, have always sprinkled their work takings from the tradition, giving their work added depth and imbuing it with a sense of timelessness. Dylan’s work has varied in quality and in subject matter over-time, but has remained firmly rooted within this folk tradition, borrowing the odd-melody here or phrase there, but often creating new work, within new contexts that has often amounted to more than the sum of its parts. Somewhere along the line, and most evident in his album *Modern Times* and his memoir *Chronicles Vol. 1*, Bob Dylan appears to have crossed a line and has resorted to plagiarism.

It can be said that the work of a great artist should be beyond seemingly petty nit-picking, however, when the work of a great artist is no longer truly his own, does that person cease to be a great artist? It can be argued that what Dylan is now doing – namely the naked theft of the work of others – has reduced him in stature. Intellectual and artistic honesty remain some of the most important features within a free society. It is taken as natural that someone should be recognized for the excellence of their work and reap whatever benefits producing said work rewards. Similarly, the naked theft of the work of others, in whole or in part, is to be scorned. It is dishonest in that it represents not only intellectual dishonesty, but also intellectual laziness. Genuine insight and especially the sort of word-craft that alight the senses are difficult to produce with regularity and require not only-talent, but continual work and refinement of craft. It, in the end, plagiarism is so immoral

because it is a form of cheating – hence the vitriol and anger normally directed towards plagiarists upon the discovery of their malfeasance. We all like to think that when someone produces a piece of work, it is their ideas – or at least their perceptions or spin on ideas – that are being represented. Plagiarism's vulgarity stems from the idea that, in accepting work falsely passed off as one's own, it challenges our collective integrity.

The brilliance of much of Dylan's early work is beyond dispute – here was someone who was able to make-up for his utter lack of musicianship through brilliance as a word-smith and managed to root his lyrics deeply in a tradition that added delicious context to his work. Albums such as *Bringing It All Back Home* and later, *Blood on the Tracks* featured brilliant manipulation of folk traditions to produce songs of strong social and personal resonance. He was also a sharp social critic, pointing towards the ills of society in the finest folk tradition with songs such as “The Lonesome Death of Hattie Carol” and “Hurricane”.

His mastery of word-play was absolute and hinted towards numerous literary and poetic traditions more so than towards musical ones. His songs spoke to both the spirit of the times and Dylan (and the artistic persona he created for himself). Dylan's tendency towards self-mythology further strengthened his work by casting him as all the more part of a grand tradition. He became a voice of the ages, not simply of a generation. This bred obsessive, often humorless followers who hung upon Dylan's every word. Despite this, his muse burned bright, and even his self-consciously 'bad' albums, notably – to throw the obsessive's off the scent – including the much reviled *Self-Portrait* brimmed with ideas and intelligence.

Sometime in the late 70s or early 80s – while Dylan was at the height of a drunken depression that eventually saw him 'save'

himself by becoming a 'born-again' Christian, and eventual seeming acquiescent return to Judaism, his muse seems to have dried up. Throughout the 80s and early 90s, Dylan produced a series of poorly received records bearing little resemblance to his old work. The music he produced on albums such as *Infidels* and *Saved* included everything from inane Zionist propaganda ("Neighborhood Bully") to simplistic retellings of Biblical creation stories ("God Gave Names to All the Animals"). While this period saw the odd splash of the old genius (notably the moving "Dark Eyes" on the not so moving *Empire Burlesque* and the funny though admittedly 80s sounding "Brownsville Girl" on *Knocked Out Loaded* – considered by many to be Dylan's worst record) something appeared to be missing.

Dylan appears to have briefly experimented with writing 'list songs', where a theme is repeated down a list (i.e. "Everything's Broken" and "Most of the Time") to some effect on 1989's *Oh Mercy*, which received positive reviews and was heralded as something of a comeback, but this gimmick had already begun to wear thin on 1990's *Under the Red Sky*, which was critically savaged.

Dylan then defied many of his critics by recording two solo albums in rapid succession of old folk and blues standards. *Good As I Been To You* and *World Gone Wrong* were remarkable in that they seemed to show Dylan both re-immersing himself in the material that had inspired him in the early 60s, but also in that his musicianship on the albums appeared to be far more impressive than anything he had previously, or would thereafter, produce. This was followed-up by 1997's intelligent, though slightly morbid – especially in light of Dylan's subsequent near-fatal heart infection that he was treated for around the time the album came out – *Time Out of Mind*.

Dylan remained inactive until 2001 when he released "Love and Theft" - considered by many to be the best album Dylan had

produced in decades and receiving a Five-Star review in *Rolling Stone*, the first of which the magazine had awarded in over a decade. The album's September 11th release date further cemented the importance of the album as many of Dylan's lyrics on the record—largely about loss and renewal—seemed to speak to the immediacy of the tragedy.

“Love and Theft” was also notable as being the first of Dylan's albums in some time where clear literary-lifting was identified. The *New York Times*¹ and *San Francisco Chronicle* identified several lines that Dylan had taken verbatim from the English language translation of Dr. Junichi Saga's 1991 Japanese gangster memoir, *Confessions of a Yakuza*. These lines included: “my old man was like some kind of feudal lord”, “why don't you shove off if it bothers you so much”, “my uncle did a lot of nice things for me and I won't forget him”, and “What's the use if you can't stand up to some old businessman?”. While the *New York Times* article argued that what Dylan did was closer to “cultural collage” than to plagiarism the publication asked more questions with the release of 2006's *Modern Times*.²

Modern Times was notable in that it saw Dylan make considerable use of the poems of Confederate Poet Henry Timrod as lyrical fodder. Many of Dylan's lyrical constructions and exact phrasings were shown to be direct borrows from Timrod, as well as from other sources including the Ovid. Further, the songs seemed to lack focus and felt as though they were simply assembled from snippets of various sources rather than carrying the crisper narratives that characterized Dylan's earlier work.

The liner notes carried no notation or footnotes on sources. Indeed, the songs were credited as “Words and music by Bob Dylan” a point that was particularly glaring as almost every single song on the album was a reworking of an old blues, jazz or R & B number. For

example, "Rollin' and Tumblin'" was little more than the addendum of some new lyrics to the Muddy Waters' arrangement of the blues standard of the same name, "Beyond the Horizon" was identical musically and similar lyrically to "Red Sails In The Sunset", "When the Deal Goes Down" was musically identical to the Bing Crosby hit "Where The Blue of the Night (Meets The Gold Of The Day)", "Thunder on the Mountain" and "When the Levee Breaks" were borrowed Memphis Minnie numbers, "Ain't Talkin'" a remake of the Stanley Brothers song "River of Regret" and so on. While some of this can be thought of Dylan's use of the folk tradition, the decision to credit the songs both lyrically and musically to himself is telling. In light of Dylan's satellite radio program, it is strange that Dylan would not opt to credit this music to its writers, some of whom are still alive if not living in obscurity and likely could stand to earn royalties from their work following its reuse.

More telling however, is Dylan's outright theft of material in writing his memoir *Chronicles*. The book appears to be a cleverly written account of various points in Dylan's life, including his initial arrival on the Greenwich Village folk circuit circa 1961, where he would go on to become a fixture and shortly thereafter make his name to his time in New Orleans in the late 80s when he recorded *Oh Mercy*. Critics were unanimous in praising Dylan for his recapturing much of the feel of the era as well as his clever turns of phrase. The problem was, many of these turns of phrase were pilfered from sources as diverse as the March 31, 1961 issue of *Time* magazine to novels by Jack London, Sax Rohmer and R.L. Stevenson among others.

Much of this information was turned up by posters on Bob Dylan fan forums rather than through mainstream media sources. The discovery of the below quoted passages from *Time* should all be attributed to Scott Warmuth posting as 'scottw' on the *Expecting Rain* forum, who was able to find them through the use of Google

books.³ While Warmuth turned up a multitude of passages in *Time* that were re-used, with minor changes in *Chronicles*, I will only reprint four here which I feel are particularly telling ones:

Chronicles, p. 88:

Some women wanted to be called 'a woman' when they reached twenty-one. Some sales girls, or women, didn't want to be referred to as 'salesladies.' In churches, too, things were shaking up. Some white ministers didn't want to be labeled 'the Reverend.' They wanted to be called just plain 'Reverend.'

Time, Friday, Mar. 31, 1961: "The Press: The Reporter's Guide"

The Los Angeles Times, concluding that all women aren't ladies, ungallantly applies its conclusion: 'A salesgirl or a saleswoman is not a saleslady, and a washerwoman is not a washlady, so a scrubwoman cannot be a scrublady... ..In the Memphis Commercial Appeal if a minister is white, he is 'the Rev.,' if Negro he is simply 'Rev.'

Chronicles, p. 88:

Reputable psychiatrists were saying that some of these people who claimed to be so against nuclear testing are secular last judgment types — that if nuclear bombs are banned, it would deprive them of their highly comforting sense of doom.

Time, Friday, Mar. 31, 1961: "The Anatomy of Angst"

"For many Bomb worriers, it seems to be a true phobia, a kind of secular substitute for the Last Judgment, and a truly effective nuclear ban would undoubtedly deprive them of a highly comforting sense of doom."

Chronicles, p. 90:

The dominant myth of the day seemed to be that anybody could do anything, even go to the moon. You could do whatever you wanted — in the ads and in the articles, ignore your limitations, defy them. If you were an indecisive person, you could become a leader and wear lederhosen. If you were a housewife, you could become a glamour girl with rhinestone sunglasses. Are you slow witted? No worries — you can be an intellectual genius.

Time, Friday, Mar. 31, 1961: “The Anatomy of Angst”

This leads to a kind of compulsory freedom that encourages people not only to ignore their limitations but to defy them: the dominant myth is that the old can grow young, the indecisive can become leaders of men. The housewives can become glamour girls, the glamour girls can become actresses, and the slow-witted can become intellectuals.

Chronicles, p. 102:

“I don't eat something that's one third rat, one third cat and one third dog. It just doesn't taste right.”

Time, Friday, Mar. 31, 1961: “Races: Recruits Behind Bars”

When pork appears on prison menus, Muslims disdain it... ..— One of Elijah's more fanciful doctrines: the white man, especially the Jew, keeps the black man weakened by selling him the flesh of swine... ..The pig contains 999 specific germs, is actually one-third cat, one-third rat and one-third dog.

The issues seen here are further compounded by further revelations of Dylan's borrowing, highlighted by Edward M. Cook on his *Ralph the Sacred Riverblog*.⁴

Chronicles, p. 167: Below are several passages from the dozens turned up by Cook:

“I cast an embracing glance over the primordial landscape...”

Jack London, *Children of the Frost*, p. 10:

“Rum meeting place, though,” he added, casting an embracing glance over the primordial landscape ...

Chronicles, p. 102: Dylan's description of his friend Ray's girl, Chloe Kiel:

“She was cool as pie, hip from head to toe, a Maltese kitten, a solid viper — always hit the nail on the head. I don't know how much weed she smoked, but a lot.”

Mezz Mezzrow and Bernard Wolfe, *Really the Blues*, p. 167:

“Baby this that powerful man with that good grass that'll make you tip through the highways and byways like a Maltese kitten. Mezz, this is my new dinner and she's a solid viper.”

Chronicles, p. 63:

“He didn't need to say much—you knew he had been through a lot, achieved some great deed, praiseworthy and meritorious, yet unspoken about it.”

Jack London, *White Fang*, p. 298:

“He carried himself with pride, as though, forsooth, he had achieved a deed praiseworthy and meritorious.”

Chronicles, p. 127:

“I bought a red flower for my wife, one of the loveliest creatures in the world of women.”

R. L. Stevenson, Providence and the Guitar, *Complete Short Stories of Robert Louis Stevenson*, p. 203:

As Leon looked at her, in her low-bodied maroon dress, with her arms bare to the shoulder, and a red flower set provocatively in her corset, he repeated to himself for the many hundredth time that she was one of the loveliest creatures in the world of women.

The borrowings discovered there garnered a further response from Warmuth on Expecting Rain who turned up dozens of more cases of direct literary theft from Mezz Mezzrow and Bernard Wolfe's *Really the Blues*:

Chronicles, p. 103:

"Maybe someday your name will get around the country like wildfire," she'd say. "If you ever get a couple of hundred bucks, buy me something."

Really The Blues, p. 241:

I never tried to make a real business out of the gauge, but the demand for it just sprang up by itself, and even after giving the other guys their cut I always had a couple of hundred bucks come the end of the week. I was able to take care of Bonnie and her kid real good, with some new furniture in the house, plenty of clothes, and everything else they needed. My name was getting around the country like wildfire.

Chronicles, p. 47:

"The kind of people who come from out of nowhere and go right back into it — a pistol-packing rabbi, a snaggle-toothed girl with a big crucifix between her breasts — all kinds of characters looking for the inner heat."

Really The Blues, p. 6:

“I found myself running with a literary ex-pug, a pistol-packing rabbi, and a peewee jockey whose onliest riding crop was a stick of marihuana.”

Really The Blues, p. 203:

“These two fly chicks got up on their high-horse when we quizzed them about it – one insisted she was pure Spanish, and sported a crucifix right over her breastworks to prove it...”

Really The Blues, p. 210:

“He had razor legs, snaggle teeth and dribble lips...”

Chronicles, p. 47:

“A frantic atmosphere – all kinds of characters talking fast, moving fast – some debonair, some rakish.”

Really The Blues, p. 212:

“...a light gray felt for me with the brim turned down on one side, kind of debonair and rakish.”

Also noted are several lifted passages from James M. Volo's *Daily Life in Civil War America* and several additional passages from other works including ones by Mark Twain, Marcel Proust and various by Jack London, including *The Call of the Wild*.

Warmuth has written himself about many of these uncovered passages and Dylan's method of work, noting in his piece “Bob Charlatan: Deconstructing Dylan's Chronicles Volume 1” published in the *New Haven Review*.⁵

Sometimes what Dylan has done with material from other sources is witty, crafty, and sly. Other times it's just sloppy. For instance, he works in some delicate touches where he recalls his meeting with the poet Archibald MacLeish, incorporating phrases from MacLeish's poem "Conquistador." In the same passage, though, many remarks that Dylan claims MacLeish made in conversation are lifted from MacLeish's introduction to *The Complete Poems of Carl Sandburg*, where Sandburg's own "Notes for a Preface" also appears. Dylan seems to have conflated the two, perhaps flipping pages and not realizing that MacLeish's words have ended and Sandburg's have begun, with the result that the "conversation" with MacLeish becomes a bizarre mix of the voices of both MacLeish and Sandburg.

In identifying Dylan's tendency throughout the book and then rewrite these stories as anecdotes about himself he further notes:

Of Johnny Cash, for example, Dylan writes, "Johnny didn't have a piercing yell, but ten thousand years of culture fell from him. He could have been a cave dweller. He sounds like he's at the edge of the fire, or in the deep snow, or in a ghostly forest, the coolness of conscious obvious strength, full tilt and vibrant with danger." Almost every word there comes from London's story "The Son of the Wolf," cut, pasted, recast.

Warmuth eventually concludes that what is interesting about *Chronicles* is the huge volume of code seemingly within the book – the 'invisible second book beneath its surface and how Dylan uses this multitude of pilfered influences to create a new persona for himself, and has come to view Dylan's borrowings as enriching to the overall work.

While Dylan is a trickster and much of his persona is quite contrived from external sources, this use of material appears to go well beyond the norms of borrowing or trickery.

Indeed, there is a notion of fair-use, however, many of the contexts used by Dylan are identical to those in the original use for which Dylan has borrowed and he goes further in failing to provide any footnotes, notation or any reference to the borrowed materials anywhere in *Chronicles*.

This then, is a quite sophisticated form of plagiarism in which Dylan actively relied most heavily on obscure materials most likely to avoid being caught. This lends credence to Warmuth's cryptography theory. With the hundreds of passages already noted as lifted, it is hard to say how much of the book Dylan actually wrote. Dylan's self-mythology has always involved the appropriation of the mythologies of others, however, in this case, he appears to have done so with minimal refinement, simply taking the printed anecdotes and passages of others and applying them to himself. While this is, in many ways brilliant in some way, it fails to answer the question as to whether it is ethical.

Many will argue that as a product of the folk tradition, these distinctions should not trouble Dylan. Of the folk tradition, half the reason it works the way it does, with musicians actively borrowing from one another is because everyone, within the context of a folk scene, is familiar with the same body of work, and thus would be able to recognize 'borrowed' material is done so with a nod and a wink. Secondly, social change, rather than commercial remuneration was clearly the reason for many folk songs and thus copyright becomes immaterial.

With the Dylan of present, neither of these are the case. Dylan's audience is overwhelmingly composed of baby-boomers, reared on rock music and who are unlikely to know many of the songs that Dylan is pilfering. This can be taken even farther with the memoir, in which very few people are capable of remembering the passages borrowed, and no one is expected to remember the contents of

antiquated issues of *Time* magazines. Bob Dylan also does not simply represent 'Bob Dylan' rather he represents a multimillion-dollar empire. The economics of each new release are likely closely considered and Dylan has not been politically active for decades. Thus, his plagiarism involves him profiting enormously from the work of others.

Further, the argument that Dylan does not comprehend copyright, intellectual property or is somehow beyond that is also specious. Dylan has himself been ruthless in pursuing his own copyright claims. He famously sued the group Hootie and the Blowfish for their use of the phrase "Tangled up in Blue" and some lines from the song "Idiot Wind" in their song "Only Want To Be With You" – despite the Blowfish song being clearly written as a tribute to Dylan, stating: "Put on a little Dylan" immediately before delivering the offending lines. The eventual settlement was said to run to several million dollars in Dylan's favor.

Dylan is also no stranger to controversy regarding his work. An 11-year, still-unresolved lawsuit filed against him by songwriter James Damiano is particularly telling. Damiano alleges that Dylan, quite ironically given the title, plagiarized the song "Dignity" from Damiano. Damiano had repeatedly met Dylan and submitted songs to Dylan's parent label CBS. This is especially telling as "Dignity" was Dylan's only 'hit' record of the 1990s and seems quite different from much of Dylan's earlier work or other work that he was producing during that period. The direct song lyric comparisons given in the case appear to hold to Damiano's version of events.

Perhaps a strong precedent is the case of disgraced historian Stephen Ambrose. Ambrose was found to have placed quotation marks in his book about World War II airmen, *The Wild Blue*, identically to passages in Thomas Childers *Wings of Morning*. The misuse of quotations was repeated throughout the work. While in

this case, Ambrose's citation was correct, it was his failure to acknowledge the second hand source from which he had gleaned the material that led to allegations, (arguably rightfully) of plagiarism. With Bob Dylan, this is not even the case. Dylan does not acknowledge any of the multitudes of materials.

This is also similar to the recent case of (then) Harvard undergraduate Kaavya Viswanathan who in 2006 had been found to plagiarize several passages in her debut novel with only minor variations. In both cases, the accused writer was publicly disgraced and in the case of Ambrose, questions were posed about much of his previous work (which unearthed that he had falsified most of the first hand sources that composed his Eisenhower biography).

Whether one feels that Dylan is guilty of plagiarism or of some sort of clever game of literary cryptography, it remains difficult to let his work stand sans correct citation or notation. Moreover, Dylan's willingness to enforce his copyright in cases where he feels his work has been infringed upon, and his attempts to conceal his use of external passages indicates that he is well aware of what he is doing. While crafting a literary memoir rarely requires accuracy of memory; Robert Graves, Vladimir Nabokov, Salvador Dali and others have all crafted memoirs that are clearly as literary as factual, the distinction has been that they all did so using words and imaginings that are firmly their own. One is left to wonder, with Dylan, not only whether what he has done is fair, but whether it is worthy of his own legacy.

by JONNY WHITESIDE 28 Apr 2003

"Bob [Dylan] is not authentic at all. He's a plagiarist, and his name and voice are fake. Everything about Bob is a deception. We are like night and day, he and I." — Joni Mitchell, Los Angeles Times, April 22, 2010

Caterwauling Canuck “folk singer” Joni Mitchell got just about everybody riled up with that sweet morsel of self-serving insight, but the real shock is not that Mitchell is absolutely correct but that someone finally came out and said it. After decades of carefully manicured deification by Columbia Records, brain-dead rock critics and the slimy elite institution that elevated such barely able snake-oil salesmen as Woody Guthrie and Pete Seeger to celestial heights, it’s high time to flout indoctrination and examine Dylan’s track record as a Grade-A phony.

Most Dylan fans would be stunned to realize that his vocal style (for lack of a better term) was high-jacked, in its entirety, from long-dead bluegrass-country singer Carter Stanley. We’re not talking about an influence, like Lefty Frizzell for Merle Haggard, but a total appropriation of Stanley’s highly idiosyncratic approach. A counterfeit from the get-go, once Dylan realized what an advantage his audience’s innate ignorance was, he’s exploited it ever since.

Just type “Bob Dylan plagiarism” into your friendly search engine and a plethora of questionable circumstances pop up, enrobing the singer almost as completely as his years of reflexive media fawning have. Documented from his teenage start, when he submitted a hand written, thinly revised version of country star Hank Snow’s “Little Buddy” for publication as an original poem, to his 1963 pilferage of Irish poet Dominic Behan’s “Patriot Games” melody for the similarly slanted Dylan tune “With God on Our Side” to songwriter James Damiano’s ongoing multimillion dollar copyright infringement suit (alleging Dylan’s Grammy-nominated “Dignity” is nothing but an altered version of Damiano’s “Steel Guitars”) to the naked “Red Sails in the Sunset”

melody heist for the song "Beyond The Horizon" on his Modern Times album, up through the recent Confessions of a Yakuza-Love & Theft plagiarism charges (Love & Theft? Calling Dr. Freud!), the Timrod controversy, even the numerous passages of Proust and Jack London that (re) appear in the text of Dylan's autobiography, it's a deep, dark thicket of thoroughly damning and apparently chronic bootlegging. Naturally, Dylan has said nothing publicly about any of these, but he already spent over three million dollars defending himself against one-time affiliate Damiano—the classic delay-to-destroy court room technique.

Defenders and apologist have an extraordinary array of excuses on Zim's behalf, from use of "literary allusion" to his building a "cultural collage," or that his "borrowing" is "homage," to the more deliciously desperate "he obviously doesn't NEED to do it" (strangely, though, he always has). This instamatic, Clinton-ian excuse making serves only to further polish up the shine on Dylan's Teflon hubris and to underscore the blind, Pavlovian worship which he has long enjoyed. Let's face it: as a lyricist, Dylan is crap, inarguably unworthy beside, say, Hank Cochran, Chuck Berry, Mickey Newbury or Jimi Hendrix ("All Along the Watchtower" plays as a lead balloon even for Hendrix, nearly deflating his Electric Ladyland masterpiece).

While we're endlessly told that "The pump don't work / cause the vandals took the handle" is vintage Dylan worthy of class room study, in truth it's little more than the wordy spew of a peripatetic rhyming dictionary who'll hang any phrase together as long as it fits. Metaphor is convenience, not expression for Dylan. His songs have also treated women quite badly: the entire attitude of "It Ain't Me, Babe" is ugly;

“Just Like a Woman” is nothing short of misogynistic, but, worst of all, Dylan’s sheer verbosity has ineradicably stained American pop music, and we’ve all had to suffer through the post-Dylan legacy of long-winded nonsense (“American Pie,” anyone?).

The real tragedy is that none of these very well-documented and nigh irrefutable plagiarism charges will ever emerge from the shadows, as the Cult of Zimmerman’s hulking form casts a very, very long one. Even when the Hank Snow rip-off stared the world in its face, the strongest reaction was a nervous giggle and murmurs of youthful indiscretion. To capitulate the carefully constructed myth of folk music and Dylan’s subsequent installation as rock & roll’s poet laureate is unthinkable, a hot, hit-the-panic-button nightmare for generations of quiescent “hipsters” never weaned from the million-selling Dylan teat. His socio-cultural mystique is also an industry-manufactured sham, one that very handily diverted attention away from genuine political stink-stirrers like the MC5 or the lysergic guerilla warfare of the 13th Floor Elevators.

As a junta-backed counter-culture figurehead, Dylan is ideal: a harmless, unoriginal patsy, a cute insouciant whose relentlessly self-involved stance never threatened anyone, save for the hazard of the droning lip service endlessly paid him. We should all praise Joni Mitchell for this overdue call-out (just don’t ask us to listen to her records), but it’s unlikely that any in the Zim Cult will even consider the ramifications of her statement. But when you pile it up with all the rest, there’s a single conclusion to be made: Bob Dylan is an artistic (and ethical) fraud, one whose own fear of creativity has long since given way to an apparently lifelong practice of emulating his superiors by vampirism,

siphoning off their intellectual blood and using it to top off his own under-baked efforts. Weirdly, even then, the results have been scarcely palatable.

Snyder is a very unique person with unique personality

Most other attorneys and intellectuals find it hard to understand Orin Snyder let alone his enormous success as an attorney. I'm not that impressed with Snyder and that's probably because I understand his modus operandi. (His, way of doing business)

Snyder's premise is to use his law degree as a license to commit crime, control by whatever means anyone he believes needs to be controlled, lie to whoever he has to lie to including judges, intimidate and threaten whoever he wants to threaten, and use the clout of his clients to do so.

Mr. Snyder doesn't realize that some of his clients may not want to be represented in the manner that Mr. Snyder is representing them for fear of him ruining their reputations. Winning is everything to Orin Snyder but some people do not want to win by cheating, or intimidation, or lying. Some people want to win fair. There are still ethical people in the world.

Snyder's modus operandi creates the opposite of what the legal system was put into place for. Instead of creating a civil and equitable solution to conflicts Snyder's way of doing business only creates more hostility and conflict.

That's not the only scenario. Snyder could be brought down no one is above the law. Should Snyder ever be in that position being Bob

Dylan's attorney will not help him?

although it is unknown whether Mr. Snyder had any family clout to get to where he is as fast as he did I'm sure Mr. Snyder had some sort of natural talent for lawyering however there are many lawyers with the same talent.

I'm not that impressed with Snyder. In order to evaluate a person's true success one must look into the crystal ball and review the end of his career not just his rise to the top.

Snyder has some powerful adversaries. The boom could be lowered on Snyder at any time despite of his political contributions.

THE THREAT FROM ORIN SNYDER OF GIBSON DUNN

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
200 Park Avenue
New York, NY 10166-0193
Tel 212.351.4000
www.gibsondunn.com

Orin Snyder
Direct: +1 212.351.2400
Fax: +1 212.351.6335
OSnyder@gibsondunn.com

March 13, 2015

VIA FEDERAL EXPRESS

James Damiano
217B Laurel Place
Whiting, NJ

Re: Damiano v. Sony Music Entertainment, Inc., et. al.

Dear Mr. Damiano:

According to the enclosed February 6, 2015 Mount Olive Chronicle article, you have "created" a documentary film "to document [your] case" against Bob Dylan, which you plan to "screen . . . at an unspecified date at the Producer's Club" in New York City. We write to put you on notice that to the extent this film contains confidential discovery materials, as we suspect it does, your screening, posting, sharing, or distributing in any way of this documentary will constitute a clear violation of the Protective Order. In addition, despite being held in contempt by the Court five times, you continue to violate the Protective Order by posting on the internet confidential discovery materials, including videotaped deposition clips. See, e.g., <http://christinejustice.yolasite.com>; videos posted to youtube.com and dailymotion.com by users "virtuefilms1" and "Rockandroll."

In the event that you continue to violate the Protective Order by screening, posting, sharing, or distributing in any way the above-referenced documentary and/or failing to remove all confidential discovery material from the above-referenced websites (and all other websites containing confidential discovery material), we will immediately file with the Court a motion for contempt, seeking all available relief, including but not limited to monetary sanctions. Pursuant to the terms of the enclosed Consent Order, dated January 11, 2008, you will be precluded from opposing any motion for contempt.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

ORIGINAL FILED

NOV 23 1999

WILLIAM T. WALSH, CLERK

JAMES DAMIANO,

Plaintiff,

v.

SONY MUSIC ENTERTAINMENT, INC.
and BOB DYLAN,

Defendants,

Civil Action
No. 95-4795 (JBS)

ORDER

This matter having come before this Court upon motion by defendants, Sony Music Entertainment, Inc. and Bob Dylan, for an order to hold plaintiff, James A. Damiano, in contempt and for related relief; and this Court having considered the parties' written submissions as well as oral argument on October 29, 1999, at which counsel for defendants appeared in person and plaintiff appeared in person by telephone, and on November 18, 1999, at which counsel for defendants appeared and plaintiff failed to appear; and for good cause shown;

THE COURT FINDS as follows:

1. In an order dated October 28, 1999, this Court adjudged plaintiff James A. Damiano in contempt of this Court's protective orders of March 14, 1996 and August 6, 1996, and ordered him to stop publicizing confidential discovery material and to remove that material from existing websites and on-line chat rooms.

ORIN SNYDER IN CHECKMATE

The Bob Dylan Damiano law suit puts Orin Snyder in checkmate.

Damiano's movie "Eleven years is a true human interest story not only about the secret viscous side of Bob Dylan but also about the rising problems of the integrity of the Judicial system holding the Federal Courts captive.

Judges have been repeatedly ambiguous in their decisions. Not only do citizens have the judges to blame for this but the lawyers who lie to the judges as well.

It is impossible to answer yes and no to a definitive question, yet in Damiano vs Dylan the Judge permitted Bob Dylan's witness's to do just that with the help of Orin Snyder.

Orin Snyder is in check mate. He can no longer manipulate the Court. His lies have caught up with him. There is no turning back for Mr. Snyder. He's already committed the crime.

LETTER TO BOB DYLAN PUTS ORIN SNYDER IN CHECK MATE

On June 2nd James Damiano sent a letter to Bob Dylan via Orin Snyder that put Snyder in a check mate.

When a threatening letter from Orin Snyder was written to James Damiano stating that he should remove all materials or be found in contempt James Decided to write Bob Dylan a letter. As you can see the letter has put Orin Snyder in Checkmate casting a shadow on all of Orin

Snyder's other cases.

Bob Dylan aka Robert Zimmerman
Orin Snyder
via
osnyder@gibsondunn

Gibson Dunn
New York Office
200 Park Avenue
New York, NY
10166-0193

RE: Ecuador Rain Forest, Bob Dylan, Gibson Dunn Fraud Upon The Court

Dear Mr. Bob Dylan and Mr. Snyder

I am emailing you this letter through your attorney Orin Snyder's email at osnyder@gibsondunn.com. I'm also copying it to the other email address that we correspond through.

I will also send a hard copy to your PO box in New York. The same box I was sending the songs to next to Jeff Rosen's box.

I'm writing this letter to inform you that your lawyer "Orin Snyder" or Gibson Dunn has committed an abundance of fraud in James Damiano vs Bob Dylan CV 95-4795 (JBS).

I would highly assume he has also committed fraud in other cases like Chevron's Ecuadorian Pollution Case, and the Ceglia Zuckerberg Facebook case represented by Defendants attorney Orin Snyder and Gibson Dunn.

In fact upon reviewing the videos of the Ecuadorian rain forest and reading the pleadings of the case I can safely say without assuming that Gibson Dunn did commit an abundance of fraud.

So to reiterate Mr. Snyder has also committed a fraud upon the court and continues to do so.

Mr. Snyder is making a fool of you Bob in front of the entire legal society.

Every lawyer I talk to tells me that Judge Simandle illegally and unlawfully dismissed my (James Damiano's) lawsuit against as you (Bob Dylan) as of Rule 56 (C) of the Federal Rules of Civil Procedure.

As you well know in our lawsuit James Damiano vs Bob Dylan CV 95-4795 there were "Eleven Years" of documented facts between Defendant and Plaintiff (You and I).

As you also well know there were thirty-five hours of videotaped depositions of witness's to your (Bob Dylan's) solicitation of my songs and also eleven years of correspondence between myself (James Damiano) and people in your (Bob Dylan's) entourage.

There were also blatant admissions of guilt by your own witnesses who testified that they either gave you (Bob Dylan) my material or saw your agents take my material.

Also the verdict was not at all consistent with the facts of the case

In fact the verdict could not have been anymore Inconsistent with the fact of the case than it was.

For the record It has been twenty years and You (Bob Dylan) never filed a counter, slander or libel suit against me (James Damiano) even after your Lawyer Orin Snyder decided to do proceed with the ingenious task of downloading my website and producing it to the court to hold me in contempt for disobeying your [sic] "Gag Order" designating all discovery material confidential including the expert testimony of Dr. Greene who graduated magna cum laude from Harvard.

I might add that all the time Orin Snyder was excepting my emails your other attorney's Steven Hayes, Peter Parcher, Johnathan Liebman, Mary Jo White, Sony House Counsel, etc. etc. were blocking my emails.

The reason these attorneys blocked my emails was because they did not want to implicate themselves in the massive fraud that Orin Snyder was committing.

You the defendant Bob Dylan were never deposed concerning the allegations presented by the suit which was legally required by the rules of civil procedure in order for a Judge to dismiss a case.

Nor have you ever produced an affidavit of denial also legally required in order for a Judge to dismiss a lawsuit in summary judgement. You (Bob Dylan) never even appear in court when subpoenaed through Orin Snyder.

I would look into that one if I were you Bob.

I (James Damiano) am in possession of declarations signed by Mr. Snyder that document the fact that he has perpetrated a fraud upon the Court by lying in said affidavits that possess his signature.

Someone has orchestrated the breaking in of one of my homes in which the only items missing were one hundred and twenty two audio cassette's that I had been making to produce to the court which contained conversations between people in your entourage (Bob Dylan) and myself (James Damiano).

Someone also orchestrated the break in of two of my automobiles in which the driver side door handles and the trunk locks had been broken into

Mr. Snyder as you might know is trying to criminally prosecute Paul Ceglia. Mr. Ceglia is the person who sued the owner of Facebook (Mark Zuckerberg) for working on the production of Facebook while at Harvard University. The suit states there was a contract between Ceglia and Zuckerberg.

It is highly possible that Mr. Snyder has falsified evidence in Mr. Ceglia's case also.

I've been watching the Ceglia Facebook case and it appears to me that "Orin Snyder" of Gibson Dunn fabricated documents like they did in Bob Dylan's Stealing of James Damiano's Songs.

As you well know when people lie to people there is a good chance they may get caught. Especially in today's forensic world.

Mr. Snyder's modus operandi may have worked for him before forensics but it won't work anymore. Mr. Snyder is caught and he knows it. His world is crumbling around him. The court will not be covering up for him any longer.

I have been following and studied Paul Ceglia's case for years. I read all the depositions and news articles and I could not believe my eyes when I saw the media report that he had been arrested. I could not believe that Snyder would stoop to that level.

Now I see that Gibson Dunn is suing DLA Piper and all of Paul's other law firms. I have e-mailed them all the same email I sent you. I copied Snyder and as many of his associates as the program would allow me at Gibson Dunn on all the emails.

I have also mailed 93 copies of my movie (Eleven Years) to all 93 us attorneys and 53 Federal Judges. Only one (Judge Brown) gave the DVD to The Marshall's Service. Everyone else has kept the DVD.

There are some other issues I must tell you about however I cannot tell you about these issues via an email that Mr. Snyder is privy to. I will have to send them via the other email account or the PO Box.

Getting back to Mr. Snyder's fraud may I say that this is not the only time Mr. Snyder has been accused of falsifying evidence?

Orin Snyder was accused of falsifying Evidence in another lawsuit see below.

Mariah Carey has a legal case that won't go away. On Friday, I was faxed papers showing that Christopher Selletti is suing her again over the song

"Hero". He wants \$20 million in damages. Selletti is also suing Carey's attorneys, Orin Snyder and Jonathan Liebman (now with Brillstein Grey Entertainment) and her songwriting partner Walter Afanasieff. He accuses them of falsifying evidence and lying in the "Hero" case.

Selletti has tried suing Carey before over "Hero", only to have his case dismissed. But, as I first reported six years ago, there is a lot of questionable stuff in this case - enough to warrant a real trial with real testimony presided over by an objective jurist. But Judge Denny Chin has consistently done strange things regarding this case and these participants. In the 60-plus page document, Selletti's attorney Jeffrey Levitt cites many of Chin's odd decisions

I have sent the correspondence below to Ceglia's Lawyers, DLA Piper, and other firms associated with your attorney Orin Snyder and will be entering it upon the record of Ceglia's court file as a friend of the court to expose your attorney Orin Snyder's fraud.

I am the Plaintiff in James Damiano vs Bob Dylan CV 95-4795 (Copyright Infringement)

I've been watching the Ceglia Facebook case and it appears to me that "Orin Snyder" of Gibson Dunn fabricated documents like they did in Bob Dylan's Stealing of James Damiano's Songs.

I have also been following the Ecuador Chevron case and I have to say there is no doubt that Gibson Dunn committed an abundance of fraud there again. Gibson Dunn's modus operandi is to lie lie lie and use the clout of their clients to empower those lies. Their day is done. They cannot control the extent of their lies any longer. Nor can they conceal them.

In fact I am in possession of declarations signed by Orin Snyder that document the fact that Orin Snyder will lie to the court at will and falsify evidence.

Dylan's lawyer "Orin Snyder" created so called "Dylan creation materials" when he came to learn that my (James Damiano's) copyright registration predated Dylan's. The "creation materials" defense concocted by Orin Snyder was reviewed by my (James Damiano's) Harvard educated expert

Dr. Greene who dismissed the material as fraudulent and stated that said materials did not at all prove the independent evolution of the melody line of a song Dylan released titled "Dignity".

The facts of this case are totally inconsistent with Judge Simandle's decision to enter summary judgement and that in all major decisions of this litigation, this court continuously chose to honor the opinion of Bob Dylan's counsel Orin Snyder as opposed to plaintiff (Damiano's) true material facts.

No publication of the facts of this case have ever been accurately reported in the mainstream press or by any legal tribune or register however they are starting to be.

Short History

It is publically and judicially uncontested that Bob Dylan and people in Bob Dylan's entourage have solicited song lyrics and music written by James Damiano for a period of over ten years and eleven months

Bob Dylan Admits Plagiarizing His Greatest Hits L.A Times

"Well you have to understand that I'm not a melodist. My songs are either based on old Protestant hymns or Carter Family songs. What happens is, I'll take a song and simply start playing it in my head. That's the way I meditate". "I wrote 'Blowin' in the Wind' in 10 minutes, just put words to an old spiritual, probably something I learned from Carter Family records. That's the folk music tradition – you use what has been handed down. 'The Times They Are A-Changing' is probably from an old Scottish folk Song."...."I'll be playing Bob Nolan's 'Tumbling Tumbleweeds,' for instance, in my head constantly — while I'm driving a car or talking to a person or sitting around or whatever. People will think they are talking to me and I'm talking back, but I'm not. I'm listening to the song in my head. At a certain point, some of the words will change and I'll start writing a song.".....Bob Dylan

On June 16th 2009 the following letter was sent to Bob Dylan's Attorney Orin Snyder written by James Damiano's Attorney in the Bob Dylan

Damiano Plagiarism suit "Robert Church" regarding boxes of James Damiano's songs produced to Orin Snyder during discovery
There were approximately fifteen to twenty five boxes filled with anywhere from 200 to 400 finished and unfinished songs in each box (thirty five years of writing) that were never returned

LETTER FROM ROBERT CHURCH

Dear Mr. Snyder:

I have one other matter. Mr. Damiano informs me that Steven Kramer (James Damiano's lead attorney) had several boxes of songs delivered to Parcher & Hayes during the discovery phase of his case against Dylan. Mr. Kramer never made copies of the documents, since I am presuming he felt pressed to comply with an overdue discovery request. Mr. Damiano informs me that he has never had all the original songs returned to his possession, even though the case is over. If you don't mind, please explain what you can recall about Mr. Damiano's song production. Do you still have songs unaccounted for? Can they be returned?

Sincerely

Robert Church

This motion is in light of that all rulings made by this Court were in favor of Bob Dylan and that all Judge Simandle's findings were based only and solely on the opinion of Bob Dylan's attorney Orin Snyder.

These findings were held as truth over plaintiff's true material facts, which conclusively and entirely reveal the opposite of Judge Simandle's findings.

James Damiano pursuant to U.S.C. Section 1746, declares under penalty of perjury that:

1. No unbiased facts, no unbiased evidence or no unbiased testimony exists to support Judge Jerome B. Simandle's decision to dismiss Plaintiff James Damiano's lawsuit against Bob Dylan for copyright infringement case Number CV 95- 4795 (JBS).

2. The United States District Court District of New Jersey has disregarded eleven years of material facts regarding Bob Dylan's solicitation of James Damiano's songs and has granted summary judgment dismissing all counts of this lawsuit to Defendant Bob Dylan in violation of Fed. R. Civ. P. 56(c).
3. That all statements contained in this motion are true and correct.

It is uncontested by Bob Dylan and or Bob Dylan's law firm Manatt, Phelps & Phillips, Parcher Hayes & Snyder, Gibson Dunn & Crutcher, Hecker Brown & Sherry including Mary Jo White, Steven Hayes, Jonathan Liebman, and Sony House counsel that Bob Dylan and people in Bob Dylan's entourage have solicited James Damiano's songs and music for over ten years.

Orin Snyder accused of falsifying Evidence

Mariah Carey has a legal case that won't go away. On Friday, I was faxed papers showing that Christopher Selletti is suing her again over the song "Hero". He wants \$20 million in damages. Selletti is also suing Carey's attorneys, Orin Snyder and Jonathan Liebman (now with Brillstein Grey Entertainment) and her songwriting partner Walter Afanasieff. He accuses hem of falsifying evidence and lying in the "Hero" case. Selletti has tried suing Carey before over "Hero", only to have his case dismissed. But, as I first reported six years ago, there is a lot of questionable stuff in this case - enough to warrant a real trial with real testimony presided over by an objective jurist. But Judge Denny Chin has consistently done strange things regarding this case and these participants. In the 60-plus page document, Selletti's attorney Jeffrey Levitt cites many of Chin's odd decisions.

After thirty-five hours of video-taped depositions of witness's to Bob Dylan's solicitation of James Damiano's songs, eleven years of correspondence between James Damiano and people in Bob Dylan's entourage, blatant admissions of guilt by Dylan's own witness's, who testified that they either gave Bob Dylan James Damiano's songs or saw Dylan's agents take Damiano's materials, Judge Simandle illegally dismissed Damiano's lawsuit (without prejudice) as per rule 56 (C) of the Federal Rules of Civil Procedure.

For the record it has been twenty years since the suit was filed and Bob Dylan has never filed a counter, slander or libel suit against James Damiano.

Dylan's attorney Orin Snyder decided to do proceed with the ingenious task of downloading Damiano's website containing all mentioned facts herein and produced it to Judge Simandle to hold James Damiano contempt for disobeying Bob Dylan's Gag order designating all discovery material as confidential.

Defendants have been aware of James Damiano's public statements made against Bob Dylan for over twenty years.

The defendant Bob Dylan was not deposed concerning the allegations presented by the suit nor has he produced an affidavit of denial. In fact Dylan never even appeared in court when subpoenaed.

Bob Dylan still to this date June 2nd 2015 utilizes a confidentiality order designating all discovery materials confidential.

So there is no mistake the Department of Justice has a file number on this case U. S. Department of Justice Mail Referral Unit 950 Pennsylvania Avenue, NW Washington, DC 20530-0001Re: DOJ Case No. 2462370 and has reviewed and responded to requests to review the facts

There have been US Marshall's Assigned to my case and I will be discussing, Mr. Snyder's Falsification of Evidence in the Ceglia and Chevron Case with them. I'm not a betting man but one bet I'd make is that Snyder is guilty of the modification of Zuckerberg's hard drives.

GAG ORDER

UNITED STATES DISTRICT COURT
District of New Jersey
UNITED STATES COURTHOUSE
CHAMBER OF JEROME B. SIMANDLE
DISTRICT JUDGE

ONE JOHN F. GERRY PLAZA
PO BOX 888
CAMDEN NJ 08010
[\(856\) 757-5167](tel:(856)757-5167)

December 23, 2002
ORIN SNYDER, ESQUIRE
PARCHER HAYES & SNYDER
500 Fifth Avenue
New York, NY 10110
STEVEN D. JOHNSON, ESQUIRE
HECKER BROWN SHERRY AND JOHNSON LLP
1700 Two Logan Square
18th and Arch Streets
Philadelphia, PA 19103-2769
Mr. James Damiano
Route
NJ 0780
RE: Damiano v. Bob Dylan & Sony Music Entertainment Inc.
Civil No. 95-4795 (JBS)

Dear Litigants:

This will reply to Mr. Snyder's letter of December 18, 2002, which requests an extension of time to respond to Mr. Damiano's motions from December 20, 2002 until January 20, 2003.

Under the circumstances in Mr. Snyder's letter, his request is granted. In my preliminary review of these motions, I have noted that they do not conform to the requirements of the Federal motions, and that the 40-page limit for motions has also been exceeded. Notwithstanding the procedural defects in the motions, and in light of Mr. Damiano's pro se status, I will not dismiss the motions and require rebriefing as I would do if an attorney filed these papers. I will, however limit the length of defendants' opposition to the 40-page limit of L. Civ. R. 7.2, and request that special attention be given to the motion to vacate the protective order. That motion may not be timely to the extent that it seeks relief from an ongoing injunctive order regarding the use of confidential discovery materials. Although the defendants must address all of the pending motions, I would appreciate if

special attention is given by defense counsel and by Mr. Damiano to the current status of the confidentiality order.

The issue arises whether, with the passage of time, the protected materials will continue to have the heightened degree of confidentiality which they were found to enjoy in earlier years. If not, is the future continuation of the injunction against use of the confidential materials warranted? In other words, Mr. Damiano has asked that the court re-examine the continued validity of the protective order against his use of confidential discovery materials, and the court is willing to do so after all parties have had a chance to be heard.

In summary, all motions remain pending, and the defendants' opposition will be due January 20, 2003. Mr. Damiano's reply papers, if any are due 14 days after receiving defendants' opposition papers. Mr. Damiano's reply is also limited by L. Civ. R. 7.2(b) to 15 pages. After all submissions have been received by the court, I will determine whether or not to grant Mr. Damiano's recusal motion and, if recusal is denied, whether to convene oral argument or decide the matter upon the basis of the papers received under Rule 78. Fed. R. Civ. P.

Very truly yours,

JEROME B. SIMANDLE U.S. District Judge

JBS/mm cc: Steven D. Johnson, Esquire 900 Haddon Avenue, Suite 412
Collingswood, NJ 08108-1903

I will be updating my website within the week to provide more information about the Ceglia Facebook litigation.

See Bob Dylan's Stealing of James Damaino's Songs

<http://christinejustice.yolasite.com/>

Sincerely

James Damiano

Bob Dylan's Stealing of James Damaino's Songs

<http://christinejustice.yolasite.com/>

cc Paul Argentieri
Robert Church
Nick Damiano