

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
(PENSACOLA DIVISION)**

LORRAINE M. PADAVAN,

Plaintiff,

Case No.: 3:25-cv-00034-TKW-HTC

v.

LINDA L. NAUGLE, individually, and
as TRUSTEE OF THE LEONARD J.
PADAVAN AND LINDA L. NAUGLE
REVOCABLE TRUST,

Defendants.

**PLAINTIFF'S RESPONSE TO THE COURT'S
ORDER TO SHOW CAUSE (DOC. 51)**

COMES NOW, Plaintiff, Lorriane M. Padavan (herein "Mrs. Padavan"), by and through her undersigned counsel, and files her response to the Court's Order to Show Cause (Doc. 51) as follows:

After receiving the Court's Order to Show Cause (Doc. 51), the undersigned counsel met with Mrs. Padavan to discuss the Court's Order. Mrs. Padavan confirmed she was the person who was chewing gum at yesterday's hearing and was sincerely apologetic for the gum being placed under the table during the hearing. Mrs. Padavan has asked her undersigned counsel to submit to the Court,¹ and if

¹ Mrs. Padavan personally or through her undersigned counsel is also willing to discuss this matter directly with the Assistant United States Attorney to apologize and discuss payment of any damages caused.

possible, to the Assistant United States Attorney affected by the gum, the letter of apology attached hereto as Exhibit “1”. As noted in the letter, Mrs. Padavan is sincerely apologetic and willing to pay to the Court or to the Assistant United States Attorney sums sufficient to address any damage caused by the gum. If either the Court personnel or the Assistant United States Attorney affected by the incident would like to call the undersigned counsel to arrange for a personal apology from Mrs. Padavan or to discuss resolving any damages caused by this incident, the undersigned counsel’s phone number is below.

Both the undersigned counsel and Mrs. Padavan sincerely apologize to the Court and assure the Court that nothing like this will happen again. Hopefully, this response, Mrs. Padavan’s attached letter of apology, and Mrs. Padavan’s offer to pay for any damages caused by her actions are sufficient to address the Court’s Show Cause Order (Doc. 51).

GRAYROBINSON, P.A.

/s/ John H. Adams

JOHN H. ADAMS

Florida Bar No. 13208

The Florida Bar Board Certified in Civil Trial

The Florida Bar Board Certified Business Litigation

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Attorney for LORRAINE M. PADAVAN

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 13, 2025 and a true and correct copy of
the foregoing has been furnished electronically to:

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SAMANTHA M. FOLKES
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/s/ John H. Adams
JOHN H. ADAMS

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VIA E-FILING WITH RESPONSE
TO SHOW CAUSE ORDER

The Honorable T. Kent Wetherell, II
U.S. District Court
Northern District of Florida
One North Palafox Street
Pensacola, Florida 32502-5665

Re: Hearing on June 12, 2025

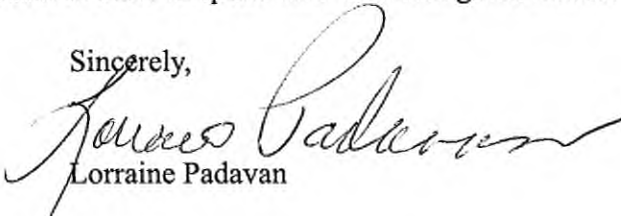
Dear Judge Wetherell:

I write to apologize to you, the Court and to the Assistant United States Attorney referenced in the Court's Order to Show Cause entered on June 12, 2025. I was chewing gum at the hearing on June 12, 2025 on Defendant's motion to stay because I was unable to find a mint. While I intended to dispose of my gum by placing in my purse, I did place the gum under the table where I was sitting.

I sincerely apologize. If appropriate, I would like to call the Assistant United States Attorney referenced in the Court's Order to personally apologize. I would further like to pay for any damage caused including any payment to the appropriate party to compensate the United States District Court to clean the table or take any necessary action to address the placement of the gum. I would further like to pay for any damage caused to the wardrobe of the Assistant United States Attorney referenced in the Court's Order, including any cleaning bill or replacement of the damaged clothing. This attorney may contact my lawyer directly to arrange for me to personally apologize and pay for any damages.

I have great respect for the United States District Court and the United States Attorney's Office and apologize for my actions that gave rise to the Court's Show Cause Order. I further apologize to the Court that the Court has had to spend time addressing this matter.

Sincerely,


Lorraine Padavan

EXHIBIT

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