Docket No. UWYCV266095780S	:	SUPERIOR COURT
Peters-Hamlin	:	JUDICIAL DISTRICT OF
	:	HARTFORD
V.	:	AT HARTFORD
STATEWIDE GRIEVANCE COMMITTEE	:	
	:	July 8, 2026

APPELLANT'S MOTION TO EXCLUDE AND EXPUNGE EXHIBIT FROM THE SGC'S BRIEF IN OPPOSITION TO THE APPEAL

Pursuant to Connecticut Practice Book Sections 2-35, 2-38 and 4-6, Attorney Kristan Peters-Hamlin ("Hamlin"), the Respondent in the above-referenced grievance matter, does hereby respectfully submit this Motion to Exclude and Expunge from the Record the unnumbered exhibit to the Statewide Grievance Committee's Brief in Opposition to Appeal ("Opposition"), reflected on pages 26-48 of the Opposition. In support hereof, Hamlin submits the attached Memorandum of Law.

Respectfully submitted,

Kristan Peters-Hamlin
Kristan Peters-Hamlin /s/ 418067
Commissioner of the Superior Court

CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing was emailed this 8th day of July, 2026 as follows:

Leanne Larson, Esq.
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Leanne.Larson@jud.ct.gov

Kristan Peters-Hamlin /s/ 418067
Commissioner of the Superior Court

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MEMORANDUM IN SUPPORT OF APPELLANT'S MOTION TO EXCLUDE AND EXPUNGE EXHIBIT FROM THE SGC'S BRIEF IN OPPOSITION TO THE APPEAL

Pursuant to Connecticut Practice Book Sections 2-35, 2-38 and 4-6, Attorney Kristan Peters-Hamlin ("Hamlin"), the Respondent in the above-referenced grievance matter, does hereby respectfully submit this Memorandum in support of her Motion to Exclude and Expunge from the Record the unnumbered exhibit to the Statewide Grievance Committee's Brief in Opposition to Appeal ("Opposition"), reflected on pages 26-48 of the Opposition. In support hereof, Hamlin states as follows:

Attorney Larson, representing the Statewide Grievance Committee ("SGC") in this appeal, improperly filed 22-pages of material related to another matter this case as an attachment to the SGC's Opposition, for the purpose of prejudicing this Court.[1] Such material reflects a different decision dated March 6, 2026 (related to the *Dhir* matter in which another panel imposed no discipline) post-dating both the SGC's 2025 decision in this underlying case and the appeal in this case (which was filed on January 14, 2026). The 22-

[1] The 22-page extraneous material does not have an exhibit number. For purposes of ease of reference, throughout this Motion, Hamlin will refer to it as exhibit A.

pages of exhibit attached to the Opposition (hereafter referred to as "Ex. A," for ease of reference) was improperly filed, never made part of the record, and was never introduced in evidence at the hearing in this case. Moreover, the filing of the extraneous material that was *ex parte* from the record in this case made the SGC's brief 48-pages long, in violation of CT Prac. Bk Rules 4-6 and 2-38(e). For the reasons set forth in greater detail below, the 22-page "exhibit A" attached to the SGC's Opposition should be excluded from the court's consideration and expunged from the record and stricken from the docket, and no argument about it at the hearing should be allowed.

I. THE SGC HAS AN OBLIGATION TO FILE THE ENTIRE RECORD AND CERTIFY IT; "EXHIBIT A" WAS NEVER MADE PART OF THE RECORD AND WAS NEVER INTRODUCED AT THE HEARING BELOW

Rule 2-38(c) states that the SGC, within 30 days after the appeal is filed, "must transmit" the "entire" record from the SGC to the court and it must be "certified" that it is part of the actual record below. The SGC failed to file any part of the record within the required thirty days. Hamlin had to remind the SGC of its overdue obligation to do so. Even then, the SGC failed to move for more time to do so and delayed further. Eventually, the SGC belatedly filed the entire record and certified it.

Nowhere in the certified record can the court find anything that even approximates this 22-page "exhibit A." Indeed, Ex. A post-dated the entire hearing below and even post-dated the Statewide Grievance Committee's review of the underlying *Shipman* matter. In fact, "ex. A" even post-dated the appeal filed in this matter. Ex. A is dated March 6, 2026, and the appeal in this matter was filed on January 14, 2026.

Indeed, nothing about the *Dhir* matter (which is what exhibit A relates to) was ever entered into the record in the below matter, or was discussed at the hearing, before the hearing was closed. Instead, Attorney Larson made mention of *Dhir* on an ambush basis only for the first time in her post-trial brief, unfairly representing the matter in an effort to prejudice Hamlin with the panel. Those unfair post-hearing ambush tactics completely deprived Hamlin of her rights guaranteed under Rule 2-35(h) to be heard on all matters that the panel considers and to call witnesses and cross them regarding all evidence received. *See* CT Prac. Bk 2-35(h)(attorneys "have the right to be heard" and to call and cross witnesses on all evidence received.")

Nonetheless, the panel relied on this *post hoc*, post-trial mention of the *Dhir* case made in Attorney Larson's brief. It was the linchpin of their decision about Hamlin's alleged familiarity with SGC internal procedural Rule 1.1. This in and of itself was preposterous, because the *Dhir* matter had nothing to do with Rule 1.1.[2] Thus, the entire linchpin of the panel's reasoning in its decision was premised on Attorney Larson's ambush tactic of waiting until after the close of the hearing to make improper references to the *Dhir* matter to which Hamlin would have no opportunity to respond. Indeed, the *Dhir* decision had not even been rendered yet, at any time while this *Shipman* case was still pending at the SGC.

Again exhibiting the same unfair ambush tactics, Attorney Larson attached "Ex. A" –the March 6 *Dhir* decision—to her Opposition brief in an effort to prejudice this Court, even though it was never part of the record below and was never made part of the certified record on appeal.

[2] Attorney Larson never introduced any evidence or argument about Hamlin's alleged knowledge or familiarity with the SGC's internal procedural rule 1.1 during the entire case either *before* or *after* the hearing was closed, ostensibly because she also had no idea that the Rule 8.4(3) charge was about an allegation that Hamlin misrepresented Rule 1.1. The SGC never claimed at any time during the pendency of the *Dhir* matter it had anything to do with Rule 1.1.

This unfair ambush tactic of asking the Court to consider something that is not part of the certified record violates Rule 2-38(c), which requires that anything that is part of the record be certified and filed on the docket **before** the appellant (here, Hamlin) is required to file her appeal.

II. RULE 2-38 OF THE CT. PRAC. BK PROHIBITS CONSIDERATION BY THIS COURT OF THE 22-PAGE *EX PARTE* EXHIBIT ATTACHED TO THE SGC'S OPPOSITION BRIEF

CT. Prac. Book Rule 2-38(d) states that this Court's consideration of the appeal "**shall** be confined to the record." Rule 2-38(d)(emphasis added.) *See also, Machado v. Statewide Griev. Comm.*, 93 Conn. App. 832, 841-842 (2006) (review of disciplinary matter must be confined to the record); *Pinsky v. Statewide Grievance Committee,* 216 Conn. 228 (1990)("Appeals to the court from the determinations of administrative, legislative and quasi-judicial bodies are limited to a review of the record to determine if the facts as found are supported by the evidence contained within the record and whether the conclusions that follow are legally and logically correct).

This 22-page *Dhir* exhibit is not part of the record below. Chronologically, it post-dates the *Shipman* case so cannot be part of the record. Any review of the certified record evinces that there is no such decision in the record and that the SGC improperly introduced it as an exhibit to its brief. Moreover, no evidence at all about the *Dhir* case was presented prior to the close of the hearing. Therefore, the panel improperly used it as a linchpin of their supposition about why they supposed Hamlin "may" have had familiarity with Rule 1.1.

Here, the SGC does not argue that there was some procedural irregularity with the record necessitating supplementing the record with a decision that occurred after the record closed. Accordingly, CT. Prac. Book Rule 2-38(d) prohibits consideration of the "exhibit A" submission, which is outside the certified record. The proper cure for the SGC's attempt to prejudice this

Court by improperly including the 22-page *Dhir* decision is to exclude consideration of the decision in its entirety, and expunge the exhibit from the record and the docket. *See Valigorsky v. Winchester Zoning Bd. of Appeals,* 2008 Conn. Super. LEXIS 425, *6 (2008)(where transcript of the hearing below does not mention merits of the application, the court granted the plaintiffs' motion to exclude this item from the record); *see also, Ashford Lake Prop. Owner's Ass'n v. Conservation & Inland Wetland Comm'n*, 2004 Conn. Super. LEXIS3774 *9-10, 12, 15 (2004) (court grants motion to exclude where during agency proceeding, defendant agency failed to introduce certain evidence during the hearing/proceeding.)

III. ATTORNEY LARSON'S IMPROPER INCLUSION OF THE UNFINALIZED *DHIR* DECISION BOTH VIOLATES SGC POLICY AND IS CALCULATED TO PREJUDICE HAMLIN UNFAIRLY

Attorney Larson's submission to the Court of the *Dhir* decision (in which no discipline was imposed) is a violation of the Statewide Bar Counsel's policies. In the attached two emails from Statewide Bar Counsel ("SBC"), Christopher Slack, he indicated that the Statewide Bar Counsel would not provide the *Dhir* decision to any Connecticut state judges and would not publish the decision on the judicial website. *See* April 1, 2026 email (attached as Ex. 1). Yet that is exactly what Attorney Larson did: she published the decision on the Court's website and she provided the decision to this Court in an effort to prejudice the Court and to get the Court to consider it. Such rogue conduct should not be countenanced. Attorney Larson was copied on the correspondence with SBC Christopher Slack and therefore knew that the Head of the SGC had said that the decision should not be published on the Connecticut judicial website and should not be given to any judges. Additionally, SBC Slack stated that it was the policy of the SGC not to publish dismissed cases. *See* March 31 email (contained in Ex. 1). Attorney Larson knowingly violated that policy. Hence, in keeping with the SGC policy, this *Dhir* dismissal should not have

been attached as an exhibit to the SGC Opposition and should be expunged from the record and not considered.

Indeed, even in cases where there is not a finding of 'no discipline' (as there was in the *Dhir* matter), the Connecticut Practice Book rules require a stay of publication pending Requests for Review and/or appeal. *See* CT Prac. Bk. 2-38(b). Hamlin in fact filed a Request for Review with the SGC, which was still pending at the time Larson filed the 22-page panel decision in *Dhir*. Attorney Larson's improper attachment of the "exhibit A" violated CT Prac. Bk. 2-38(b), as well.

Finally, the 22-page Dhir decision is riddled with errors. It is unfair for the Court to consider it without having access to the record in that case (which, *inter alia*, included numerous affidavits from former clients praising Hamlin as an attorney) and without considering Hamlin's response and Request for Review of that decision. *See* Ex. 2. For instance, Hamlin's Request for Review sets forth how the panel allowed Attorney Larson multiple adjournments that amounted to months and years of delay. The panel itself sought numerous adjournments and caused many months of delay. It took eight years for the case to be decided. Yet in a transparently false effort to shift responsibility for the eight-year delay on Hamlin, it cited Hamlin's request for a brief extension for submission of the closing argument brief as the cause of the eight years of delay. As Hamlin's Request for Review of that decision makes clear, the decision was sloppy, inaccurate and unfair, but because the panel determined no discipline was necessary, the panel assumed that review of their decision would never be brought to light.

How can the Court consider "exhibit A" (an unfinalized decision subject to review and appeal) if it does not consider Hamlin's response and Request for Review? (*See* ex. 2; Hamlin's Request for Review.) Why should the Court be burdened with considering the merits of a second

case that was dismissed, when it is not even properly before this Court and is not part of the record? Everything about what Attorney Larson has done here in attaching the panel's *Dhir* decision as an exhibit to her Opposition is unfair -- primarily unfair to Hamlin, but also to the Court.

IV. THE SGC IMPROPERLY FILED AN OPPOSITION IN EXCESS OF THE PAGE LIMITS WITHOUT SEEKING LEAVE OF COURT

The SGC's 22-page exhibit caused the SGC's Opposition Brief to be 48 pages long. The Rules only permit the Opposition to be 35-pages long. *See* CT. Prac. Bk Rule 4-6 and 2-38(e). Once again demonstrating her belief that the rules do not apply to her, Attorney Larson made no effort to seek permission of the Court for filing an oversized brief. *See* Rule 2-38(e)("unless permission given for good cause, briefs shall not exceed 35 pages."

V. CONCLUSION

For all the above stated reasons, it was highly improper for Attorney Larson to append the 22-page *Dhir* decision to her Opposition brief. It is not a proper part of the record and should not be considered. Hamlin respectfully submits that the Court should exclude the decision from its consideration and expunge it from the record.

Respectfully submitted,

Kristan Peters-Hamlin

CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing was emailed this 8th day of July, 2026 as follows:

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