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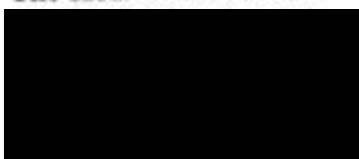
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January 31, 2019

Via Fax and E-filing

The Honorable Valter H. Must, J.S.C.



Re: Farley v. Mathews
Docket No. FM-15-292-19-N

Dear Judge Must,

This firm, and more specifically the undersigned, represents Roger Mathews in the above-captioned actions.

We are shocked and appalled at the outrageous, shameful, and contemptuous misconduct of Plaintiff, Jenni Farley. As the Court is likely now aware, in clear violation of an unequivocal Court Order restraining Ms. Farley from engaging in any harassing conduct towards Mr. Mathews, Ms. Farley uploaded what can only be described as a fictitious and defamatory account of alleged unilateral, abusive conduct that creates a false narrative to provoke and incite her personal followers – well over 10 million people – on the internet in a transparent campaign to extort Roger Mathews to abandon his rights as a father and his legal claims.

Uncoincidentally, the website and social media post were published on the same day as Ms. Farley was pedaling a new “YouTube travel series” – which provides revenue to Ms. Farley directly by monetizing advertising revenue for content creators – and promoting her skin care product, Naturally Woww.

Even more despicable, as if this was not enough, is the shameful exploitation of victims of domestic violence and abuse, which include men and women, through a call to action for such victims to contact Ms. Farley’s personal attorney, Bari Weinberger. This call to action is basically an international advertising billboard that will be seen by tens of millions of people to contact Ms. Weinberger for her to “explain the domestic violence laws” and “what to do to obtain protection for you and your children.” Undoubtedly, Ms. Weinberger was made aware of this post since the undersigned learned about Ms. Farley’s actions from multiple non-attorney colleagues before Mr. Mathews and the attorneys in the firm had even heard about it. The news and media have been broadcasting virtually non-stop on the

issue, yet nothing has been done to delete the website or social media posts that have now been up for nearly a day.

As of the writing of this letter, this post has over 274,000 likes on just her social media Instagram page. This means that more than **a quarter of a million** individuals viewed this page and engaged enough to indicate that they agreed with the sentiment – which does not account for others, potentially millions, who saw it and did not comment.

There can be no doubt as to why the website has not been taken down.

As this Court is aware, it has not even been a month since this firm sent multiple letters to counsel and to this Court to stop Ms. Farley's abusive conduct. We have pointed out in our last letter dated January 4, 2019 that Ms. Weinberger submitted a false certification – filled with complete lies, purportedly from Ms. Farley, which constituted false swearing – in a failed attempt to disqualify the undersigned and this law firm as counsel.

This letter identified multiple lies and intentional inferences in Ms. Farley's application relating to purported wrongdoing by Mr. Mathews' counsel. These lies included references to the fact that Mr. Mathews' counsel, Mr. Cavalli, allowed Mr. Mathews to stay in a home he owned, that it was Mr. Cavalli's personal residence, that Mr. Cavalli met and interviewed the children, that he spoke with Child Protective Services, and that he discussed the case in front of Mr. Mathews' children – all of which were complete fabrications without a single shred of truth.

We tried to resolve the matter peacefully, privately, and outside of the public eye. We submitted the letter to counsel to implore that they correct their errors that, at minimum, constituted false swearing. We have even counseled our client to sit idly as misrepresentations and lies were being hurled at him individually and his counsel.

We at Callagy Law are **GUARDIANS FOR TRUTH TELLERS**. This firm has obtained two top 100 national jury verdicts, including the largest jury verdict in the State of Arizona in 2016, in matters where people tried to lie to win. We have been involved in cases of public corruption, worked with law enforcement to put an attorney that defrauded our client in prison, and have actively attacked lies told to the Court by other attorneys seeking to advance their client's interests unjustly, immorally, and unethically. We run videos about how to deal with liars in litigations within the bounds of the law and ethics.

These are not the kinds of games we tolerate being played.

In response to sending Ms. Farley's counsel this letter, rather than withdraw her application and a false certification, she provided the letter to the Court and doubled down on her position.

At Court, Ms. Weinberger, potentially recognizing the exposure to sanctions and contempt, did withdraw her motion to disqualify. The false certification, however, has remained a part of the Court's record, a permanent reminder of the types of gamesmanship and manipulation Ms. Farley

was capable of and the lengths she would go to satisfy her desperate need for significance even if such behavior was self-destructive.

This letter called for the end of nonsense. It called for the end of gamesmanship to avoid the inevitable circus Ms. Farley was create in this legal matter.

Apparently, Ms. Farley did not get the message.

This time, however, instead of merely perpetrating lies in a certification, she has now violated an unequivocal court order restraining her from engaging in any harassing conduct toward Mr. Mathews and is engaging in extortion. The harassing and extortionist conduct is established by Ms. Farley not only unleashing her vitriol by directly slandering Mr. Mathews, but by her attempts to mobilize over 10 million people, as well as news and media outlets, to carry out her campaign of cyber bullying, harassment, intimidation and embarrassment to coerce Mr. Mathews to "be a man and hold yourself to your word that 'you were never with me for my money, and never wanted my money...' Choose to be an amazing father who recognizes their health, well-being and needs as a priority instead of being in it for yourself." These were Ms. Farley's own words which immediately followed her references to this lawsuit by describing this matter as Mr. Mathew's attempt to try "...to build a child support case" and "... ask[ing] for alimony and child support and you also want to challenge the validity of a 2015 prenuptial agreement that you signed as a valid, binding and enforceable contract ON CAMERA?"

The hypocrisy of Ms. Farley's words cannot be understated since Ms. Farley went so far as to accuse Mr. Mathews of domestic violence for harassing her when he made posts to social media.

Mr. Mathews is imploring this Court to schedule an immediate conference to stop the economic damages, grave risk to Mr. Mathews and his children's' health and well-being from potentially dangerous "fans" of Ms. Farley that were provoked and incited by her words, and intentional infliction of emotional distress.

We further request that this matter be referred for a contempt proceeding.

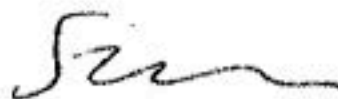
We additionally are seeking a mental evaluation of Ms. Farley since her conduct and "gaslighting" bears all of the hallmarks of personality disorder with narcissistic tendencies.

Finally, we also need to make inquiry into whether Ms. Weinberger and her law firm knew about Ms. Farley's plan to post this matter to the internet because Mr. Mathews may have claims against the law firm.

Pending this conference and referral, Mr. Mathews cannot sit idly while Ms. Farley's message is carried across the internet, irreparably damaging his reputation and image, without comment on the baseless nature of the allegations. This firm intends to issue a message to media

outlets who have been attempting to contact Mr. Mathews before they use his silence as an acquiesce of wrongdoing.

Respectfully submitted,



SEAN R. CALLAGY, ESQ.



MICHAEL J. SMIKUN, ESQ.



CHRISTOPHER CAVALLI, ESQ.

cc: Bari Weinberger, Esq. (via facsimile)
Roger Mathews