

STATE OF MAINE
DISTRICT COURT - YORK, ss. - LOCATION: BIDDEFORD

JUSTIN A. TAHAI, Plaintiff, pro se

v.

AMANDA MORSE, Defendant

IMPLEMENTATION, UNANSWERED-QUESTION, AND COUNSEL-ROLE MATRIX

For the October 8, 2026 Motion to Enforce Hearing

Possible supporting attachment to a narrowly tailored motion in limine concerning the advocate-witness boundary

Docket No. YORDC-FM-2010-00190

Purpose: compress the surviving August 7, 2026 Motion to Enforce into five live implementation issues; identify the specific questions that remain unresolved; map each question to the best proof source; and distinguish issues that can be proved by documents or other witnesses from any narrow issue on which Attorney Patrick S. Bedard could become a necessary witness. This matrix does not treat being copied on an email, declining to respond, or taking a legal position as automatic grounds for disqualification.

Prepared August 20, 2026

PUBLIC-SAFE SOURCE-NAVIGATION EDITION - NOT A COURT RULING OR DISCIPLINARY FINDING

1. Procedural Posture and Strategic Use

The August 14, 2026 Procedural Order dismissed all District Court documents filed by Plaintiff except the August 7 Motion to Enforce and its fee-waiver motion; set the surviving Motion to Enforce for hearing on October 8, 2026; required witness and exhibit lists by September 17; required exhibit exchange by September 24; and expressly allowed motions in limine by September 24. The same order states that Attorney Bedard need not respond to filings other than the August 7 Motion to Enforce. [S12]

Practical consequence: the safer vehicle is not another sprawling, case-wide disqualification filing. The stronger filing is a hearing-specific motion in limine tied directly to the surviving Motion to Enforce, asking the Court to determine before testimony whether Attorney Bedard will remain solely an advocate, will testify on any disputed material fact, or must be replaced for the October 8 adjudicatory hearing if he is actually a necessary witness.

2. Maine Advocate-Witness Standard

- Maine Rule of Professional Conduct 3.7 bars a lawyer from acting as advocate at a tribunal in which the lawyer is likely to be a necessary witness, subject to narrow exceptions.
- A witness is "necessary" only when the proposed testimony is relevant, material, and unobtainable from other sources. Pacheco v. Libby, O'Brien, Kingsley & Champion, LLC, 2024 ME 39, para. 16.
- The moving party must identify both a specific ethical-rule violation and the actual, identifiable litigation prejudice that continued representation would cause. Ethical concern alone is insufficient. Id. paras. 13, 19-20; Morin v. Maine Education Association, 2010 ME 36, paras. 9-11.
- Because October 8 is a bench hearing, the risk of factfinder confusion is generally lower than in a jury trial, but it does not disappear. The concrete concern is counsel shifting between advocacy and firsthand factual narration, forcing Plaintiff to cross-examine the lawyer-adversary, or effectively vouching for counsel's own credibility.
- Rule 3.4(e) separately bars counsel, in trial, from asserting personal knowledge of disputed facts except while testifying as a witness.

3. What the Matrix Does - and Does Not - Establish

- It establishes that there are many live implementation questions, not one.
- It identifies where Bedard's own words are relevant evidence and where the emails themselves are the better evidence.
- It does not claim that every unanswered question makes Bedard a necessary witness.

- It does not seek privileged attorney-client communications or protected work product.
- It supports advance disclosure and an advocate-witness election, with hearing-only disqualification reserved for any topic that is genuinely material and unavailable from Morse, Pierce, school/provider records, native communications, or other evidence.

4. Five-Issue Implementation Matrix

Live issue / order term	Plaintiff's implementation request	Bedard / client written position	Documented status	Questions remaining for October 8	Best proof / likely witness
A. Reasonable daily electronic contact Order: opportunity for reasonable daily contact by telephone, video, gaming platform, or other media, at reasonable times convenient to the child. [S1]	Current number and platform; recurring contact window; adult-supported availability; reasonable schedule exceptions; same-day or next-day fallback; no compelled conversation. [S2, S11]	Feb. 16: Bedard deferred contact logistics to Morse. Mar. 18 and Apr. 6: child determines contact / cannot be forced. Apr. 21: contact information had been provided, but child could not be forced to engage. [S3-S6]	A phone number was eventually confirmed. The Aug. 7 Motion alleges that no dependable recurring opportunity or fallback was established and that permission to send messages was treated as the practical implementation. [S11]	What recurring opportunity actually existed? Who supported it? What fallback applied? What attempts succeeded or failed? Was child preference used to eliminate the opportunity itself rather than merely the conversation?	Native emails; phone/text/video logs; Morse; Plaintiff. Bedard testimony ordinarily unnecessary unless he offers firsthand facts beyond the emails.
B. Compliance with paragraphs 1-3 before in-person progression Order: in-person contact contingent on Plaintiff's compliance with therapy, treatment/evaluation, and electronic-contact paragraphs. [S1]	Identify every allegedly unmet condition; identify requested proof; provide a neutral, confidential submission/review process; state what would trigger progression. [S8, S11]	Mar. 18: "no proof" of completion. Apr. 21: proof must be provided and "Amanda and I will review" whether it meets the Order. [S4, S6]	The Aug. 7 Motion alleges that no court-controlled procedure resolved what remained unmet, what proof was required, or who had final authority to assess compliance. [S11]	Which specific condition was allegedly unmet on each relevant date? What evidence was requested, received, or rejected? Who made the decision? What nonprivileged criteria were used? Was a confidential neutral review ever proposed?	Treatment/evaluation records through a protected process; provider testimony if necessary; filing/service records; Morse. Bedard may become relevant only as to his own nonprivileged review acts or firsthand factual assertions.
C. In-person contact progression Order: starting no later than 30 days, subject to compliance, at least two hours over lunch or dinner on at least two days each week, with safeguards. [S1]	Specific dates, times, locations, transportation, appropriate adult/public-place safeguards, alternatives, and a rolling schedule that respects the child without making him the sole decision-maker. [S8, S11]	Mar. 18: child would determine what other contact he wanted. Apr. 6: Morse could not force contact and "nothing more" could be done. Apr. 21: even if proof met the Order, contact remained doubtful because the child might not agree. [S4-S6]	The Aug. 7 Motion alleges that no recurring paragraph-4 schedule was implemented and no neutral determination resolved the prerequisite dispute. [S11]	Were any qualifying visits offered or completed? What dates and durations? What adult-generated alternatives were proposed? Was the child's preference treated as a practical veto? What exact order language supposedly authorized that result?	Calendars; complete email threads; Morse; Plaintiff; Pierce for clinical logistics. Bedard's legal interpretation is in the emails; testimony is needed only if he claims additional firsthand facts.
D. Weekly reunification therapy and make-up logistics Order: weekly joint reunification therapy with Daniel Pierce, LCSW. [S1]	Reliable transport/production responsibility; punctual start and full session; prompt notice; make-up within a definite period when displaced or materially shortened; provider-controlled exceptions. [S2, S11]	Implementation correspondence repeatedly returned the practical burden to the child or to therapy discussion. The record alleges an Apr. 23-25 displaced session and a May 8 late/shortened session, with no standing make-up protocol. [S8, S9, S11]	No consistent written make-up rule is identified in the current record. Individual counseling availability and direct parent access to relevant provider information also remained disputed. [S8, S9]	What was the complete session calendar? Who transported? Which sessions began late, ended early, or were displaced? What make-up occurred? What did Pierce recommend? Was individual counseling made available and with what access?	Pierce scheduling and attendance records; invoices; complete email threads; Pierce; Morse; Plaintiff. Bedard is not the best witness to clinical events.
E. Medical, school, records, prompt communication, and child-as-intermediary issues Order: shared rights; access to medical/dental/school records; major-change information; prompt child-related messages; no disparagement. [S1]	Complete notice with date/time/location/provider; direct school and provider access; releases; insurance/MaineCare information; punctuality plan; adult-only communication of disputed legal restrictions; portal/audit preservation. [S2, S8, S11]	Apr. 6: obtain school records directly. Apr. 21: Morse would inform Plaintiff when she believed she needed to. July 29: Morse said the PFA barred Plaintiff from attending the Aug. 3 physical; that categorical interpretation was disputed with Bedard copied. [S5, S6, S10]	School records reflected serious tardy/absence totals and a mailing address that Plaintiff states was not his. The July 27 medical notice initially omitted time/location. On Aug. 3 the child said he was "pretty sure" Plaintiff should not be there. Portal access and the source of the child's belief remained unresolved. [S9-S11]	Who supplied school contact data? What punctuality plan existed? What provider/dental/insurance records remain missing? What exact PFA provision was relied on? What was communicated to the child and provider? What do portal and demographic audit logs show?	School/provider records and custodians; portal audit data; Morse; Plaintiff; Pierce if litigation exposure arose in therapy. Bedard only if he personally communicated a disputed restriction to a third party or offers personal facts not otherwise available.

5. Detailed Unanswered Questions

These questions are organized under the five surviving enforcement issues. "Unanswered" means no complete, source-identified answer was located in the reviewed record. A partial answer, denial, or legal position is preserved where it exists; the hearing should determine the factual and legal effect.

No.	Unanswered / disputed question	Why material	Best source	Counsel-role note
ELECTRONIC CONTACT				
1	What telephone number, platform, and recurring availability window governed reasonable daily contact on each period after February 11?	Defines the actual opportunity provided under paragraph 3.	S2-S6, S8, phone logs	Documents/Morse first; Bedard testimony not ordinarily needed.
2	What adult-supported step occurred when no response or connection occurred?	Distinguishes an opportunity from permission to send unanswered messages.	S8, S11, device logs	Morse/Plaintiff.

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3	What same-day or next-day fallback existed for school, work, driving, sleep, illness, or scheduled activities?	Tests whether reasonable flexibility became functional nonavailability.	S11; calendars	Morse/Plaintiff.
4	How many contact attempts and successful contacts occurred, by date and duration?	Provides objective implementation data rather than competing generalizations.	Call/text/video logs	Records custodian/Plaintiff.
5	Was the child's preference applied only to timing/frequency, or used to eliminate the adult duty to create a reasonable opportunity?	Directly addresses the order-language dispute.	S1, S4-S6	Legal issue; emails are primary evidence.
COMPLIANCE PREREQUISITES				
6	Which exact paragraph 1-3 requirement was allegedly unmet on March 9, March 18, April 21, July 13, and August 7?	A private, shifting deficiency cannot operate as an indefinite stay without particularization.	S4, S6, S11	Morse; documentary record; Bedard only for his own personal factual assertion.
7	What proof was requested, when, by whom, and in what form?	Tests notice and ability to cure.	Email threads; service records	Documents first.
8	What proof was actually received, and what item was allegedly missing?	Separates nonproduction from disagreement about sufficiency.	Protected treatment/evaluation records; transmittals	Provider/court process; privilege and confidentiality safeguards required.
9	Who made the sufficiency determination, and who had final authority?	The emails refer to a joint client/counsel review, while the Motion seeks a neutral judicial determination.	S6, S11	Potential Bedard issue only as to nonprivileged personal acts.
10	What nonprivileged criteria were applied in the stated "Amanda and I will review" process?	Potentially material if counsel intends to defend the enforcement posture through his own review.	S6; any written criteria	Possible Rule 3.7 issue if criteria and acts are disputed and unavailable elsewhere.
11	Was any confidential court-approved or provider-to-provider review proposed before contact progression was withheld?	Tests whether privacy and compliance could have been resolved without indefinite delay.	Motions, emails, docket	Documents/court record.
12	On what date would in-person progression begin if the Court found the conditions satisfied?	Necessary for a workable order.	S1, S3-S6	Legal/operational question.

No.	Unanswered / disputed question	Why material	Best source	Counsel-role note
IN-PERSON PROGRESSION				
13	List every qualifying two-hour visit offered, scheduled, completed, declined, or cancelled after the thirty-day date.	Measures implementation against paragraph 4.	Calendars, emails, logs	Morse/Plaintiff.
14	What dates, locations, transportation arrangements, or appropriate adults did Defendant propose?	Tests adult facilitation rather than abstract willingness.	Email threads	Morse.
15	What public-place, trusted-adult, separate-arrival, or other safeguards were considered?	The Order expressly supplied alternatives.	S1, S11	Morse/Pierce/Plaintiff.
16	What exact order language was relied on to make the child the practical or "sole" gatekeeper?	Central legal interpretation issue.	S1, S4-S6, S8	Documents are primary; not a factual need for counsel testimony.
17	When contact did not occur, what replacement opportunity was offered?	Relevant to prospective enforcement and replacement contact.	Emails/calendars	Morse/Plaintiff.
18	Who communicated to the child that in-person contact was optional, prohibited, or dependent on an unresolved adult legal conclusion?	Relevant to adult-only implementation and non-disparagement safeguards.	Native communications; testimony	Morse/Pierce; Bedard only for any proven direct communication by him.
THERAPY AND MAKE-UP LOGISTICS				
19	What is the complete weekly therapy calendar from February 11 through the hearing?	Establishes expected versus actual weekly participation.	Pierce records/invoices	Pierce.
20	Who was responsible for transport and production for each session?	Identifies operational responsibility.	Emails, attendance records	Morse/Plaintiff/Pierce.
21	Which sessions began late, ended early, were displaced, or were missed, and why?	Tests recurring implementation failures without inferring motive.	Provider records, messages	Pierce.

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No.	Unanswered / disputed question	Why material	Best source	Counsel-role note
22	What make-up occurred for the April displaced session and the May 8 shortened session?	Directly tests remedy and preservation of court-ordered time.	S8, S9, provider calendar	Pierce/Morse.
23	Was there any standing make-up rule or prompt-notice protocol?	Prospective enforcement can eliminate repeat disputes.	S11, emails	Morse/Pierce.
24	Was individual counseling made available to the child; who was the provider; did the child attend; and what parent-access structure applied?	Relevant to child support, adult-conflict burden, and records access.	S8, provider records	Morse/provider custodian.
25	What recommendations did Pierce make about progression, individual counseling, or adult coordination, and what happened afterward?	Connects clinical recommendations to implementation acts.	Pierce records/testimony	Pierce; do not rely on counsel summaries.

No.	Unanswered / disputed question	Why material	Best source	Counsel-role note
MEDICAL, SCHOOL, RECORDS, AND LEGAL MESSAGING				
26	Why were complete provider, dental, insurance, MaineCare, and authorization details not supplied in one usable response after the February 16 request?	Tests practical records access.	S2, S8; provider/insurer records	Morse/custodians.
27	Who supplied the school mailing/contact data showing [private address omitted], and when was Plaintiff's direct information corrected?	Tests direct notice and data integrity.	S9; school audit/history	School custodian.
28	What concrete plan addressed 18.5 absences, 68 tardies, and the reported 63 B1 tardies?	Links school punctuality to child impact and prospective relief.	S9; school records	Morse/school official.
29	What were the current dental provider, recent and future appointment details, treatment plan, and direct records-access path?	A discrete records question carried in the July 1 list.	S8; dental records	Morse/provider.
30	Why did the July 27 annual-physical notice omit time and location, and when were complete details supplied?	Tests completeness and promptness of notice.	S10; Gmail thread	Documents/Morse.
31	What exact operative PFA or family-order language was relied on for the categorical statement that Plaintiff could not attend the medical office?	The legal restriction was asserted as settled and then carried into the child-facing event.	S10, operative orders	Legal issue; documents control.
32	What was communicated to the child before the August 3 call, by whom, and in what words?	The child stated he was "pretty sure" Plaintiff was not supposed to be there; source remains unresolved.	S10-S11; native communications	Morse/Plaintiff; possibly device evidence; do not assume source.
33	Did any adult communicate a purported restriction to the provider, and what did the provider record?	Tests whether the disputed legal position affected healthcare access.	Provider notes, phone logs, audit trail	Provider custodian.
34	What changed in the portal/proxy/demographic record, when, and by what user or system process?	Determines cause of the observed access condition without speculation.	Portal audit logs; preservation request	Provider IT/records custodian.
35	How did the child acquire adult-litigation terminology reflected in counseling or communications, and what safeguards were used to comply with the non-disparagement provisions?	Relevant to prospective adult-only messaging and child burden; causation must be proved, not assumed.	S7-S8; Pierce; native messages	Pierce/Morse; Bedard's May 1 denial is documentary evidence.
36	What single adult-to-adult communication protocol will govern urgent, time-sensitive, and weekly nonurgent implementation questions?	A clear protocol can reduce both nonresponse and excessive correspondence.	S11 proposed order	Prospective judicial determination.

6. Counsel-Role / Rule 3.7 Screening Matrix

The correct test is not whether Attorney Bedard has relevant information. It is whether his testimony is relevant, material, and unobtainable from other sources - and whether his continued advocacy would cause specific, identifiable prejudice. The matrix therefore separates documentary admissions and legal positions from potentially unique firsthand conduct.

Topic	Bedard's own statement / conduct	Other available sources	Privilege / work-product concern	Rule 3.7 assessment	Recommended treatment
1. Stated counsel/client compliance review	Apr. 21: after proof was provided, "Amanda and I will review" whether it met the Order. [S6]	Email itself; Morse; proof-transmittal records; court filings; treating professionals.	Client advice and mental impressions may be privileged or protected. Questions must be limited to nonprivileged acts, communications to Plaintiff/third parties, and any factual assertion counsel intends to make at hearing.	POTENTIALLY MATERIAL, BUT NOT YET NECESSARILY UNIQUE. It becomes the strongest Rule 3.7 issue only if Bedard personally made the operative sufficiency determination and intends to prove it through facts unavailable elsewhere.	Require prehearing disclosure: Will counsel offer firsthand facts about the review, criteria, receipt of proof, or conclusion? If yes and material, conduct a necessity/privilege hearing and require advocate-witness election.
2. "We have no proof" / evidence-receipt assertion	Mar. 18: Bedard stated there was no proof of completed obligations. [S4]	Emails, attachments, certified mail, eFile/service receipts, providers, Morse.	Whether counsel received documents is generally nonprivileged; why counsel interpreted them a certain way may implicate protected analysis.	USUALLY DOCUMENTARY. Bedard is not necessary if receipt/nonreceipt can be established by transmittal records and the contents of the proof.	Use authenticated service/transmittal evidence. Bar counsel from converting argument into personal testimony. Reserve testimony only if receipt is genuinely disputed and unobtainable elsewhere.
3. Child-controls-contact legal position	Mar. 18, Apr. 6, and Apr. 21 emails state that the child determines contact or cannot be forced, even if compliance is shown. [S4-S6]	Emails; order text; Morse; Pierce; calendars.	Legal advice to client is privileged; the outward position communicated to Plaintiff is not hidden and is preserved in the emails.	NOT A NECESSARY-WITNESS ISSUE BY ITSELF. The writings prove the communicated position. The Court decides the order's legal effect.	Admit the complete emails for context. Ask the Court to prohibit counsel from adding unrecorded personal factual claims while arguing the interpretation.
4. Response-filtering policy	Apr. 21: Morse would not respond to each communication and would inform Plaintiff when she believed she needed to. [S6]	Email; Morse; request-and-response ledger.	Internal advice may be privileged; the policy as communicated is documented.	DOCUMENTARY / MORSE TESTIMONY. No necessity showing merely because counsel authored the message.	Use the email and objective response ledger. Do not predicate disqualification on silence or authorship alone.
5. July 29 medical-exclusion / PFA position	Morse asserted categorical exclusion and copied Bedard after Plaintiff disputed the interpretation. [S10]	Morse; operative PFA and family orders; provider communications; August 3 records.	No adverse inference should be drawn from counsel silence alone. Any client advice is privileged.	NOT NECESSARY ON CURRENT RECORD. The asserted restriction and operative orders are documentary; Morse made the statement.	Focus on exact order language and provider/child communications. Add Bedard only if evidence shows he personally conveyed the restriction to a third party or offers personal facts.
6. May 1 denial of litigation exposure	Bedard wrote that he had confirmed with Morse that the child had not seen or been told anything. [S7]	Email; Morse; Pierce; child-facing communications if lawfully available; device/account evidence.	The underlying client communication is likely privileged; the outward denial is admissibility-dependent documentary evidence.	GENERALLY NOT NECESSARY. Counsel was relaying his client's position, not an eyewitness account.	Use the email as a party-position communication, subject to evidentiary ruling. Obtain facts from Morse, Pierce, or records.
7. Proposed-order / staff-forwarding process	May 13 forwarding shows a draft sent for e-signing and filing. [S13]	Filed version, metadata, staff custodian if genuinely disputed, docket record.	Drafting process and strategy often implicate work product; ordinary staff preparation is not misconduct.	COLLATERAL TO THE OCTOBER 8 ENFORCEMENT ISSUES unless a specific factual representation in a proposed order is itself material to the surviving motion.	Do not lead with this. Use only after identifying exact disputed language, its source, and why the filed document cannot speak for itself.
8. Any personal-knowledge assertion at the hearing	Risk arises if counsel narrates what he personally received, reviewed, decided, told a provider, or learned outside admitted evidence while also examining witnesses and arguing.	Depends on the assertion; many facts should come from emails, records, Morse, Pierce, or custodians.	Privilege must be resolved before testimony. Counsel cannot use privilege as both shield and source of factual advocacy.	STRONGEST BASIS FOR ADVANCE COURT CONTROL. Rule 3.4(e) bars personal-knowledge assertions in trial unless counsel testifies; Rule 3.7 then governs whether he can continue as advocate.	Order an advance election: remain advocate and confine facts to admitted evidence, or identify proposed testimony. If testimony is necessary and contested, require substitute hearing counsel or other tailored relief.

7. Recommended Narrow Motion-in-Limine Structure

Recommended title: PLAINTIFF'S MOTION IN LIMINE FOR ADVANCE DETERMINATION OF COUNSEL'S ADVOCATE-WITNESS ROLE UNDER M.R. PROF. CONDUCT 3.7 AND TO PRECLUDE UNSWORN PERSONAL-KNOWLEDGE ASSERTIONS

1. Tie the motion expressly to the August 7 Motion to Enforce and the October 8 adjudicatory hearing; cite the August 14 deadline allowing motions in limine through September 24.
2. Identify the narrow potentially unique topic: Bedard's own nonprivileged acts in the stated "Amanda and I will review" compliance process, including any firsthand assertion he intends to make concerning what proof was received, what criterion was applied, what conclusion was reached, or what communication he personally made to a third party.
3. State that Plaintiff does not seek privileged communications, mental impressions, or disqualification based merely on authorship, receipt, nonresponse, or advocacy.

4. Ask Defendant to disclose before hearing whether Bedard will testify, the precise topics, and whether Defendant contends those facts will instead be proved through Morse, records, or other witnesses.
5. Ask that, if Bedard remains advocate, he be precluded from asserting personal knowledge of disputed facts, vouching for his own communications, or supplying unsworn factual narration beyond admitted evidence.
6. Ask that, only if the Court finds Bedard is a necessary witness on a material contested issue and that continued representation would cause actual prejudice, he be disqualified from acting as advocate at the October 8 hearing and substitute hearing counsel be required.
7. Request express findings identifying the ethical-rule issue, necessity of testimony, alternative sources, privilege boundary, actual prejudice, and scope of any remedy, consistent with Pacheco and Morin.
8. Attach this matrix as an issue map, not as evidence of every underlying fact. Attach only the few controlling emails and order excerpts necessary to support the motion.

8. Proposed Hearing-Safe Relief

- Advance disclosure of whether Attorney Bedard will offer testimony or firsthand factual assertions at the October 8 hearing.
- An order confining counsel's advocacy to evidence admitted through witnesses, authenticated records, judicial notice, and permissible legal argument.
- A limited evidentiary/privilege proffer outside the merits testimony if counsel claims personal knowledge of the compliance-review process.
- Hearing-only substitution of counsel if, and only if, the Court finds Bedard's testimony necessary under Rule 3.7 and finds actual prejudice under Pacheco/Morin.
- No broader firm disqualification unless an independent conflict rule and the required findings are established.

9. Filing and Hearing Deadline Checklist

- By August 24, 2026: complete the certified-mail service required by the August 14 Procedural Order and file the receipt.
- By September 17, 2026: exchange and file witness and exhibit lists.
- By September 24, 2026: exchange exhibit copies and file any motion in limine.
- October 8, 2026 at 8:30 AM: Motion to Enforce hearing, York Combined Court CR 8, 515 Elm Street, Biddeford.
- Plaintiff presentation window stated in the order: 8:30 AM to 10:00 AM.

10. Source Key

ID	Source
S1	Findings and Order dated February 11, 2026, YORDC-FM-10-190 / BIDD-PA-24-1285, especially pp. 12-17: shared parental rights, records access, weekly therapy, electronic contact, in-person progression, prompt communication, and non-disparagement.
S2	Justin Tahai email to Patrick S. Bedard, February 16, 2026, "Implementation of February 11, 2026 Order - Compliance, Notice, and Documentation (Pending Appeal)," requesting contact, therapy, transport, in-person, school, medical, insurance, and authorization logistics.
S3	Patrick S. Bedard response, February 16, 2026, Gmail message 19c683b10d17f776.
S4	Patrick S. Bedard response, March 18, 2026, Gmail message 19d02542a43d3e19.
S5	Patrick S. Bedard response, April 6, 2026, Gmail message 19d63841a5bb511f.
S6	Patrick S. Bedard response, April 21, 2026, Gmail message 19db1ee3dff26d1c.
S7	Patrick S. Bedard response concerning litigation exposure, May 1, 2026, Gmail message 19de566833f85675.
S8	Justin Tahai, "Outstanding Response Items - the child / Implementation / Records Access," July 1, 2026, Gmail message 19f1f7b9a76cdf25; no reply appears in that thread.
S9	June 18-22, 2026 school-record / attendance / parent-access materials summarized in Master Timeline v17B: report-card totals, period-attendance detail, mailing block, and principal-meeting record.
S10	July 27-August 4, 2026 annual-physical and legal-restriction email threads, including Gmail messages 19fac205bc1d9123, 19fade3ff6e88cc2, 19fc808625df0145, 19fcebe5d1881416, and related messages.
S11	August 7, 2026 FM-070 Motion to Enforce service packet: YORDC-FM-2010-00190_RULE_5_SERVICE_COPY_20260807.pdf.
S12	August 14, 2026 Scheduling Notice and Procedural Order: hearing date, surviving filing, response limitation, deadlines, and motions-in-limine deadline.
S13	Patrick S. Bedard forwarding email and attachment amandaobjectiontwo.docx, May 13, 2026, Gmail message 19e22b4fe2c3a864. Included only as a secondary counsel-role screening item; ordinary staff drafting is not itself misconduct.
S14	Maine Rule of Professional Conduct 3.7; Maine Rule of Professional Conduct 3.4(e); Pacheco v. Libby, O'Brien, Kingsley &

ID	Source
	Champion, LLC, 2024 ME 39; Morin v. Maine Education Association, 2010 ME 36.

11. Evidentiary Discipline

- An email proves that a statement was transmitted; it does not automatically prove the truth of every statement, motive, or legal conclusion within it.
- A copied recipient's silence does not, by itself, prove adoption, agreement, ratification, or bad faith.
- The child's August 3 statement proves what Plaintiff reports hearing and the child-facing burden alleged; it does not by itself identify who created the belief.
- School and provider audit records should be used to identify who changed information, when, and through what system process rather than relying on inference.
- Native emails, complete threads, official orders, provider and school records, and the Court's evidentiary rulings control over this source-navigation matrix.