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Rosa M. Salazar

Director

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Re: Vanina Guerrero, EEOC Charge No.: 556-2020-00008

Dear Ms. Salazar,

I am a lawyer that has practiced law or taught law for over 20 years. In 2014, I started at DLA Piper as Professional Responsibility Counsel (“PR Counsel”) and worked from the firm’s office in San Diego, California. For five years, I was responsible for advising lawyers about the rules of professional responsibility as it related to their respective practices. I worked within the Office of General Counsel which is essentially the in-house legal team for all DLA Piper offices located in the U.S. As such, I had intimate knowledge of internal issues concerning DLA Piper lawyers over a wide range of topics, including conflicts of interest, risk management, ethics and anything falling under the umbrella of professional “conduct.” I reported to the Assistant and Deputy General Counsel, and the General Counsel (“GC”), Peter Pantaleo, until he retired in December 2018. Elisha King, the former Deputy GC, succeeded Mr. Pantaleo and became the GC. I resigned on July 28, 2019 -- six months after Ms. King became GC.

**I. Information Relevant to Claims Alleged by Vanina Guerrero**

**A. Louis Lehot is a Textbook Bully**

Many of Vanina Guerrero’s allegations against DLA Piper involve Louis Lehot (“Lehot”), a senior partner in the Silicon Valley practice. I have relevant information about Mr. Lehot because I regularly worked with him in my capacity as PR Counsel. Mr. Lehot joined DLA Piper sometime in 2015 from another large firm and brought with him a number of corporate clients. Mr. Lehot, and lawyers that worked for him, advised emerging technology businesses about a range of issues that included expanding business, obtaining capital investments, and the sales, purchases and mergers of businesses. Because risk management and ethics rules are

involved in providing such legal advice, especially if Mr. Lehot represented both the seller and buyer in a deal, it was common for me to get involved.

Based on my frequent interaction with Mr. Lehot, I have personal knowledge of how he conducted himself in the workplace, including how he interacted with staff, associates and other partners. I am compelled to submit this statement to you because I read the Supplement to the EEOC charge filed by Ms. Guerrero and I know that the way in which the second complainant (“Jane”) described Lehot is correct. Lehot is a textbook bully. There is simply no other way to describe him. He bulldozed his way through DLA Piper like a tank, rolling over anything or anyone in his way. In order to get his way, Lehot yelled, threatened, intimidated and terrorized people around him. I know because I was one of the people around him.

Everyone that worked with Lehot walked on eggshells because no one wanted to be the one that caused him to unleash his vitriol. Because Lehot was so volatile and belligerent, I was assigned (with a conflicts analyst) to be the permanent team to handle the opening of all new files or “matters” for Lehot. We were tasked with creating a system to streamline Lehot’s matters to prevent him from becoming inflamed or upset. It was understood that any “delay” would make Lehot mad. Dealing with him was stressful and exhausting.

### **B. Lehot Acted “Above the Law”**

Lehot believed that he did not have to follow “firm policy” or the laws of legal ethics. Lehot acted as if rules were meant for other people but not him. I experienced this first-hand in connection with opening new matters for Lehot. For example, conflict of interest rules that other lawyers had to follow did not seem to apply to Lehot. Lehot often represented clients in deals with other clients, including potentially adversarial situations. Lehot believed he did not need to obtain the consent or waiver from clients in these situations. Lehot’s idea of a “waiver” seemed outside of what I believed it meant—based upon my years of professional responsibility experience. The conflicts analyst and I learned quickly, however, that asking Lehot to walk through the steps needed for compliance was the same as putting your job on the line. If I dared to suggest to Lehot that I thought extra compliance was needed as per ethics rules, I was on the receiving end of Lehot’s rants about my “incompetence” and his threats to go to the GC to complain about me. For example, one time when I told Lehot that he was not following the ethics rules, in front of other DLA staff, Lehot called me a “**dumb bitch.**” I reported Lehot’s abusive conduct and “loose” interpretation of the ethics rules during our weekly department meetings to my boss, Peter Lindau, Assistant General Counsel, and to Joe Davis, Associate General Counsel. Nothing was done.

Because of my integrity, and despite his reign of terror, I did speak out a number of times when I thought he was in non-compliance with the rules of professional conduct. Lehot would then complain to Ms. King. Many times, Ms. King immediately responded to Lehot’s anger by emailing me or my staff to tell us to do whatever Lehot wanted me to do. Ms. King openly told me, my staff, and others in our positions that there was a “**top ten**” list of partners that we “**should not bother.**” Lehot was at the top of the list. Lehot was at the top of the list because he

brought in more than \$20 million a year in fees. In short, his money generation bought him power at DLA Piper. Lehot abused this power and caused the people around him to suffer his horrific treatment.

### **C. No one Will Challenge Lehot**

I am contacting you because I know no one will dare challenge Lehot. Lehot's insistence on bending the rules as I described above was a regular event. Lehot knew that the GC and other powerful partners at DLA Piper avoided his belligerence as much as everyone else, but also acquiesced in his rule-bending because the equity partners personally gained from Lehot's fee generation. Because no one challenged Lehot, he was free to abuse his power. My interest in submitting this statement is because I feel morally obliged to speak the truth about the power he held and the way in which it was exercised. I do not know Vanina Guerrero. However, the way she described Lehot's manner of conduct, treatment of others and general belief that rules did not apply to him is the truth. When I learned yesterday that Lehot leaked to the media dozens of emails and photos that he believed served his own narrative, to the detriment of Ms. Guerrero, I knew I had to come forward about this bully. I have no doubt he will create a false narrative to serve his personal interests. If the GC and senior partners, mostly men, fear Lehot, then who is going to speak up for Ms. Guerrero or challenge Lehot? If lawyers in positions of power at DLA Piper are afraid to speak out, then junior female lawyers and staff must be even more afraid.

### **D. Contact from Other Women at the Firm**

Female employees at DLA Piper are afraid. After Ms. Guerrero filed her EEOC Charge, I posted a letter online in support for her.<sup>1</sup> Subsequently, three current female employees at DLA Piper reached out to me to express their gratitude for publicly supporting Ms. Guerrero. In sum and substance, they told me:

**“Thank you. [We] wanted to come forward, too, but [we] are too scared.”**

This is unacceptable. No female employee should feel so intimidated and vulnerable that their voices are silenced. More recently, other potential witnesses to Ms. Guerrero's claims have told me they fear retaliation if they speak the truth about what they know. This also is unacceptable. While I am afraid, because DLA Piper is one of the largest law firms and represents clients around the world, as a woman, as a lawyer and as a law professor, I believe it is my duty to do the right thing even when afraid. I hope my courage inspires other people with knowledge about Lehot, his abuse of power and the way he willingly demeans others without hesitation, to contact you and provide information to your investigation.

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<sup>1</sup> [https://medium.com/@leahchristensen\\_40426/letter-of-support-16c713565f2](https://medium.com/@leahchristensen_40426/letter-of-support-16c713565f2).

Please feel free to contact me with any additional questions. Thank you.

Respectfully,

*Leah M. Christensen*

MCCUNE WRIGHT AREVALO, LLP

Professor of Legal Writing  
University of San Diego School of Law

*/s/ Leah Christensen*