

Dale Lyn Friedman

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Office Location: Hollywood

A partner in Conroy Simberg's Hollywood office, Dale L. Friedman has earned a solid reputation as a dynamic commercial litigator for clients facing complex legal matters. She has devoted her practice to the defense of a variety of matters, in both state and federal court. In addition to commercial litigation, she has vast experience in employment law, class actions, professional liability, intellectual property, governmental liability, premises liability, and general liability and casualty.

A powerful and persuasive public speaker, Dale has served as the chairperson for the firm's Annual Claims Management Seminar for more than 20 years. The seminar hosts several hundred claims professionals every year and is approved in Florida for continuing education credits for adjusters.

Dale is listed in *The Best Lawyers in America*® for Litigation - Insurance. She holds an AV Preeminent rating by Martindale-Hubbell and is listed as one of the top discrimination, labor and employment, and insurance attorneys by Martindale's Legal Leaders. She has been handling employment law cases since 1992.

Dale earned a juris doctor, cum laude, from the University of Miami School of Law. Prior to becoming an attorney, she was a speech pathologist and audiologist at Hope Center for the developmentally disabled.



Practice Areas:

- Commercial Litigation
- Employment Law
- Professional Liability & Services
- Intellectual Property
- Class Actions
- Directors & Officers Liability
- Governmental Liability
- Premises Liability
- Financial Institutions
- General Liability & Casualty

Admitted to Practice:

- Florida Supreme Court, 1990
- U.S. District Court, Southern District of Florida, 1991
- U.S. District Court, Middle District of Florida, 1993
- U.S. District Court, Northern District of Florida
- U.S. Court of Appeals, Eleventh Circuit

Education:

- University of Miami School of Law, Juris Doctorate, *cum laude*, 1990
 - Member, The Order of the Coif
 - Editor, Entertainment and Sports Law Review

- First Place, 1989 Moot Court Competition
- University of Miami, Bachelor of Arts, 1969

Honors & Awards:

- *The Best Lawyers in America*® for Litigation - Insurance, 2022-2024
- Martindale-Hubbell Peer Review Rating - AV® Preeminent 5.0 out of 5 for the past 12 years
- Named one of the top discrimination, labor and employment, and insurance attorneys in South Florida by Martindale Hubbell's Legal Leaders, Top Rated Lawyers, since 2012
- Named by her peers as one of the top 1.6 percent attorneys, Florida Trend's, Florida Legal Elite, 2004

Publications:

- South Florida's Legal Guide 2005 Annual Edition article on "Insurance Defense of Commercial Cases"
- "Defamation," Conroy Simberg Claims Seminar Publication, 2006
- "It's Time to Find – and Stop – the Fraud," an expose' of fraud in property, PIP and bodily injury claims," Conroy Simberg Claims Seminar Publication, 2012
- "Working 9 to 5, What a Way to Make a Living," an article of employment law issues, Conroy Simberg Claims Seminar Publication, 2012
- "You Done Me Wrong," an article on business torts, misrepresentation, contract interference and unfair competition, Conroy Simberg Claims Seminar Publication, 2010
- "Short Circuiting Electronic Discovery: Maintaining and Discovering Electronic Data," Ft. Lauderdale and Orlando Conroy Simberg Claims Seminars, 2008
- "Employer Employment Law," Conroy Simberg Claims Seminar Publication, 2008
- "Defending Personal and Advertising Injury Claims," Conroy Simberg Claims Seminar Publication, 2007
- "Catch Them If You Can," an article showing how to defeat fraudulent claims using surveillance and other methods to your advantage, Conroy Simberg Claims Seminar Publication, 2005
- "Mold – Simple Life Form, Complex Claims," Conroy Simberg Claims Seminar Publication, 2004

Speaking Engagements:

- "The New Not Normal – Navigating The Covid-19 Legal Landscape," Co-Presenter, Conroy Simberg Webinar, April 2021
- "Strategies for the Defense of Class Action Claims: How to Defend and Evaluate Class Action Claims," Co-Presenter, Conroy Simberg Webinar, May 2020
- "An Employment Related Word or Two From the Supreme Court," Presenter, Conroy Simberg Webinar, June 2018
- "Cannabis Litigation: Clearing the Smoke and Weeds," Co-Presenter, Conroy Simberg Seminar, May 2018
- "R U Smarter Than a Plaintiff? Discussion of Business-Related Claims," Co-Panelist, Conroy Simberg Seminar, April 2015
- "It's Time to Find – and Stop- the Fraud – An expose' of fraud in property, PIP and bodily injury claims," Ft. Lauderdale and Orlando Conroy, Simberg Claims Seminar, 2013
- "Working 9 to 5, What a Way to Make a Living: A Discussion of Employment Law Issues," Ft. Lauderdale and Orlando Conroy Simberg Claims Seminar, 2012
- "You Done Me Wrong – A Discussion of Business Torts, Misrepresentation, Contract Interference and Unfair Competition," Ft. Lauderdale and Orlando Conroy Simberg Claims Seminar, 2010

- "Short-Circuiting Electronic Discovery: Maintaining and Discovering Electronic Data," Ft. Lauderdale and Orlando Conroy, Simberg Claims Seminar, 2008
- "Employer Employment Law," Ft. Lauderdale and Orlando Conroy Simberg Claims Seminar, 2008
- "Defending Personal and Advertising Injury Claims, Ft. Lauderdale and Orlando Conroy Simberg Claims Seminar, 2007
- "Catch Them If You Can - A Discussion of Fraudulent Claims Using Surveillance and Other Methods to Your Advantage," Ft. Lauderdale and Orlando Conroy Simberg Claims Seminar, 2005
- First Annual South Florida P&C Claims Conference, 2005
- "Mold – Simple Life Form, Complex Claims," Ft. Lauderdale and Orlando Conroy Simberg Claims Seminar, 2004

Representative Experience:

- Norelus v. Denny's, Inc.
 - In 2010, in a case that received a significant amount of press coverage, Dale represented one of the defendants in a Title VII action. The defendants collectively moved to dismiss the case on the eve of trial for fraud on the court which the district court judge granted. Subsequently, the defendants moved for their attorneys' fees, expenses and costs. In granting the defendants motion, the district court found that the plaintiff's attorneys continued pursuit of plaintiff's claims amounted to "objectively reckless conduct" that multiplied the proceedings in this case "unreasonably and vexatiously," 28 U.S.C. § 1927. On appeal, the Eleventh Circuit Court of Appeals held that the district court did not abuse its discretion by awarding defendants their fees and also acted within the scope of its discretion by including in the sanctions award the costs, expenses, and attorney's fees incurred by the defendants in obtaining the award. The three defendants were awarded \$387,738.45 of which Dale's client was awarded \$110,950.58. The judgment was satisfied by the plaintiff's attorneys personally. The award to the defendants in this case is recognized as one of the largest awards to defendants in a Title VII action.
 - In 2013, Dale obtained summary judgment in favor of the Palm Beach County School Board in a case where the parents of a mentally handicapped child who suffered from aggressive outbursts and behavior sought damages from the school board for allowing trained staff personnel to physically restrain the child to avoid injury to himself and / or other students and staff. In granting summary judgment on all the federal claims, the Judge found that there was no evidence that the school board's treatment of the child discriminated against him, denied him an education under the Individuals with Disabilities Education Act and/or was "arbitrary, egregious and conscience-shocking behavior."
- Faddis v. City of Homestead
 - In 2013, Dale represented a private investigator in an invasion of privacy claim brought by the former assistant city manager of the City of Homestead, numerous city commissioners and the private investigator it hired to investigate claims of misconduct by the city manager. Although the plaintiff had previously testified in a separate lawsuit brought by the city manager after he was terminated that he had never sexually harassed her, she testified to the contrary in her lawsuit against the city and its investigator. The court, upon motion by the defendants, struck the plaintiff's pleadings for lying under oath and awarded attorney's fees to the

defendants, to be paid jointly by the plaintiff and her attorney. The Third District Court of Appeal affirmed the order striking plaintiff's pleadings because of her misconduct and perjury.