

ORIGINAL

UNITED STATES DISTRICT COURT
Eastern District of New York

Lidia M. Orrego

Plaintiff(s),

-against-

Steve Savtisky, Old Westbury LLC,
John Doe, Jane Doe

Defendant(s).

NOTICE OF APPEAL

24 CV 7247 (SJB) (AYS)



Lidia M. Orrego (name all parties
taking the appeal)*

appeal to the United States Court of Appeals for the Second Circuit from the **order**

Injunction Order (DE [29]). (describe the order)

entered on August 14, 2025 (state the date that the order was entered).

Signature

Name

Lidia M. Orrego

Prison ID

Address

9508 Queens Blvd., Apt. 3E

Rego Park, NY 11374

Phone

(347) 453-2234

Email

liorrego@gmail.com

{Note to inmate filers: If you are an inmate confined in an institution and you seek the timing benefit of Fed. R. App. P. (4)(c)(1), complete Form 7 (Declaration of Inmate Filing) and file that declaration with this Notice of Appeal.}

*See Rule 3(c) of the Federal Rules of Appellate Procedure for permissible ways of identifying appellants.

REC'D IN PRO SE OFFICE
SEP 11 '25 PM3:54

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

-----X

LIDIA M. ORREGO,

Plaintiff,

v.

STEVE SAVITSKY, et al.,

Defendants.

-----X

Case No. 24-cv-07247-SJB-AYS

INFORMATIONAL STATEMENT REGARDING INTERLOCUTORY APPEAL

This statement provides background for Plaintiff Lidia M. Orrego's interlocutory appeal to the United States Court of Appeals for the Second Circuit from the pre-filing injunction order entered on August 14, 2025 (DE 29) by Honorable Sanket J. Bulsara, United States District Judge, and the constructive denial of Plaintiff's motion for leave (DE 30, filed August 15, 2025, pending without ruling as of September 11, 2025). The appeal was filed pro se in person on September 11, 2025, within the 30-day deadline under Fed. R. App. P. 4(a)(1), despite court delays and restrictions.

Background and Basis for Appeal:

On August 14, 2025, Judge Bulsara issued an order (DE 29) prohibiting Plaintiff from filing new motions or initiating proceedings in the Eastern District of New York without leave, citing repetitive and meritless motions for reconsideration of a May 6, 2025 denial of service via the U.S. Marshals Service (Dkts. 16, 23, 28). The order limits leave requests to 100 words, bars new requests while prior ones pend, and directs the Clerk to disregard non-compliant filings, except proof of service, following a warning in case 20-CV-3361 on July 8, 2025.

Plaintiff's August 11, 2025 motion (DE 28) and August 15, 2025 leave request (DE 30) introduced new evidence of Defendants' bad faith, including denied access to serve at 2049

Century Park East, Suite 1400, Los Angeles, CA on July 25, 2025 (per David Kalashian's affidavit), and ignored emails to steve.savitsky@gbcm.com and shannon.lew@gbcm.com on July 28, 2025. These facts, supporting a renewed Fed. R. Civ. P. 4(e)(1), 4(h)(1), 4(m), and N.Y. C.P.L.R. § 308(5) service request, were deemed repetitive. The court's failure to rule on DE 30 since August 15, 2025 (27 days) prevents Plaintiff from seeking leave to file an appeal against the injunction, risking forfeiture of rights under Fed. R. App. P. 4(a)(1) by September 13, 2025.

Grounds for Appeal:

1. **Erroneous Repetitive Finding:** DE 28 and DE 30 present new evidence of evasion, distinct from prior motions, justifying alternative service. The repetitive finding is erroneous, as Plaintiff's motions present new facts: evidence of evasion and bad faith by Defendants (including ignored emails to steve.savitsky@gbcm.com and shannon.lew@gbcm.com, and security denial of access at 2049 Century Park East, Suite 1400, Los Angeles, CA on July 25, 2025) supporting claims under 18 U.S.C. §§ 1341, 1343, 1519, 1001, 1962(c) (Civil RICO), 42 U.S.C. § 1981, and state laws (e.g., fraud, falsification of records), and renewed requests for alternative service under Fed. R. Civ. P. 4 after paying for service via credit card (due to debts consuming income)—facts distinct from prior motions, in forma pauperis denial without legal base and ignoring other in forma pauperis granted.

2. Constitutional Violations:

2a. **Due Process and First Amendment Violations:** The 100-word limit and filing bar infringe First Amendment petition rights and Fifth Amendment due process, exacerbated by the court's 27-day delay in ruling on DE 30, obstructing access to justice. This delay violates due process by risking forfeiture of appeal rights, as undue judicial delays have been held to infringe procedural fairness.

2b. **Potential Seventh Amendment Violation:** The order risks violating the Seventh Amendment by obstructing Plaintiff's right to a jury trial on her federal claims (e.g., Civil RICO, § 1981), preventing advancement toward merits adjudication where such a right would apply.

3. **Overbroad Injunction and Appeal Rights Violation:** The injunction's restriction, combined with the unresolved DE 30, violates 28 U.S.C. § 1292(a)(1) and Fed. R. App. P. 4(a)(1) by preventing timely filing of an interlocutory appeal against the injunction itself. The delay and bar on new requests while DE 30 pends lack evidence of vexatious litigation, infringing Plaintiff's statutory right to appeal and constituting an overbroad restriction.

4. **IFP Denial Prejudice:** The December 17, 2024 IFP denial (DE 2) misrepresents Plaintiff's financial hardship (debts forcing credit card service payment), exacerbating prejudice.

Relief Sought:

Plaintiff requests the Second Circuit reverse the injunction, vacate the IFP and service denials, compel a ruling on DE 30 within a reasonable time, and ensure Plaintiff's right to a jury trial and timely appeal are not foreclosed, addressing the due process, statutory, and constitutional violations.

Dated: September 11, 2025
Rego Park, New York



Lidia M. Orrego
Plaintiff Pro Se
95-08 Queens Blvd, Apt. 3E
Rego Park, NY 11374
Phone (347) 453-2234
Email: liorrego@gmail.com

Certificate of Service

I certify that on September 11, 2025, I filed this statement with the Clerk of the District Court in person at the Eastern District of New York.


Lidia M. Orrego
Plaintiff Pro Se

EXHIBIT 1

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
LIDIA M. ORREGO,

Plaintiff,

v.

ORDER
24-CV-07247-SJB-AYS

STEVE SAVITSKY, et al.,

Defendants.
-----X

BULSARA, United States District Judge:

Plaintiff filed a motion on August 11, 2025, seeking, *inter alia*, reconsideration of Judge Shields's order on May 6, 2025, denying Plaintiff's motion for service via the United States Marshals Service. (Dkt. No. 28). This is her third motion for reconsideration of the denial, having filed motions for reconsideration twice before. Plaintiff filed a motion on May 19, 2025. (Dkt. No. 16). Judge Shields denied this order on May 27, 2025. (Order dated May 27, 2025). Plaintiff then filed another motion for reconsideration on June 22, 2025. (Dkt. No. 23). Plaintiff has now filed this third motion for reconsideration. None of these motions have any merit. And it is denied.

Plaintiff has abused her ability to file papers with the Court, by wasting time filing repetitive motions on issues that have previously been denied. The motions seek to relitigate issues already decided, seek reconsideration well after the time to do so has passed, and/or raise issues that can only be resolved by the Court of Appeals following decision on the merits. As the Court previously warned Plaintiff in her other pending case, 20-CV-3361, on July 8, 2025, the Court has no choice but to "prohibit and suspend her . . . filing privileges." Accordingly, Plaintiff may not

make any further filings in this case or initiate new proceedings in the Eastern District of New York without first obtaining leave of the Court. Leave may only be sought in a letter no longer than 100 words that describes the motion Plaintiff intends to file. A second request may not be filed while a prior request is pending. The Clerk of Court is directed to disregard and not to accept any other filing from Plaintiff and any filing that violates the terms of this Order. *See Immerso v. U.S. Dep't of Lab.*, No. 20-4064, 2022 WL 17333083, at *2 (2d Cir. Nov. 30, 2022) ("The court correctly found that [Plaintiffs] acted in bad faith in making numerous frivolous motions and in making egregious and slanderous accusations The filing requirements were an appropriate sanction in this circumstance."); *George v. N.Y. State Division of Parole*, 685 F. App'x 30, 30 (2d Cir. 2017) ("A district court may, in its discretion, impose a filing injunction if confronted with extraordinary circumstances, such as a demonstrated history of frivolous and vexatious litigation.") (quotations and citation omitted)). This injunction does not apply to filing proof of service. (See Judge Shields's Order dated July 13, 2025 (granting extension of time to serve)).

SO ORDERED.

/s/ Sanket J. Bulsara August 14, 2025
SANKET J. BULSARA
United States District Judge

Date: August 14, 2025
Central Islip, New York

EXHIBIT 2

August 15, 2025
*** Filed ***
07:40 AM, 15 Aug. 2025
U.S.D.C., Eastern District of New York

Honorable Sanket J. Bulsara
United States District Judge
Eastern District of New York
Central Islip, New York
VIA ECF Pro Se Office.



Re: Case No. 24-CV-07247-SJB-AYS

Re: Request for Leave to File Motion Clarifying That DE [28] Misrepresented, Filed Timely on August 11, 2025, Before Deadline, is Not a Repetitive Reconsideration But New Request for Alternative Service Due to Defendants' Evasion, Attached DE [28] - Traditional Service Impracticable BAD FAITH Defendants under notice - Extension Time

Dear Judge Bulsara:

I seek leave to file a motion clarifying DE [28] is a timely new request for alternative service under Fed. R. Civ. P. 4(e)(1), 4(h)(1), 4(m), and N.Y. C.P.L.R. § 308(5), post Judge Shields' July 13 order, based on new evasion evidence. On July 25, server David Kalashian (Affidavit of Non-Service Images Below) was denied access at 2049 Century Park East, Suite 1400. Emails sent July 28 to steve.savitsky@gcbm.com and shannon.lew@gcbm.com were ignored, "BAD FAITH".

Attach DE [28]: Request ALTERNATIVE SERVICE VIA:

Email, certified mail, posting, or drop service first; "Marshal last".

Pro se leniency; cites *Ferrarese v. Shaw*, etc.

Count word: 100.

Respectfully submitted,

/s/ Lidia M. Orrego
Lidia M. Orrego
Plaintiff Pro Se
95-08 Queens Blvd, Apt. 3E
Rego Park, NY 11374
Phone: (347) 453-2234
Email: liorrego@gmail.com

Notice: I have not served this on Defendants, as they remain unserved, per Judge Bulsara's rules (Section VIII.B).

Additional information regarding attempted service, etc:

7/25/2025 4:30 PM: I spoke with an individual who identified themselves as the security and they stated service not permitted. To get an access to elevator, you need to check in with security. After the phone call security told me: - You do not have permission to service.

OLD WESTBURY, LLC
c/o Savitsky Satin Bacon Bucca
2049 Century Park East, Suite 1400
Los Angeles, CA 90067

Case 2:24-cv-07247-SJB-AYS

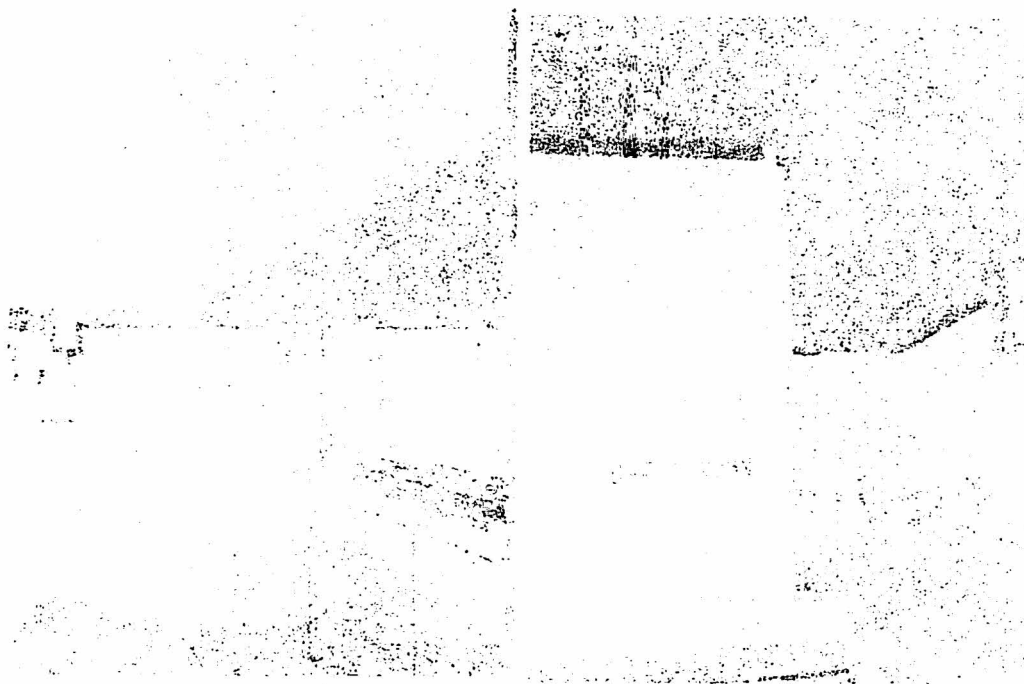
Document 28 Filed 08/11/25 Page 24 of 141 PageID #: 1986



91 7199 9991 7039 2613 3578

Case 2:24-cv-07247-SJB-AYS Document 28





1. The first step is to identify the problem. In this case, the problem is that the company is not meeting its sales targets.

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EXHIBIT 1

EXHIBIT I

*** Filed ***
11:56 PM, 11 AUG, 2025
U.S.D.C., Eastern District of New York

Hon. Sanket J. Bulsara
United States District Judge
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722



Re: Orrego v. Savitsky et al., Case No. 24-cv-07247 (SJB) (AYS)

Letter Motion for Alternative Service Pursuant to Fed. R. Civ. P. 4(e)(1), 4(h)(1), and 4(m), and N.Y. C.P.L.R. § 308(5); Request for Reconsideration of U.S. Marshal Service Under 28 U.S.C. § 1915(d); Resolution of Pending Motions DE [23] and DE [24]; Clarification That Plaintiff's Right to Seek Recusal of Both Judges Remains Unwaived; and Request for Extension of Time to Effect Service

Dear Judge Bulsara,

I, Lidia M. Orrego, Pro Se Plaintiff, respectfully submit this letter motion pursuant to Federal Rules of Civil Procedure 4(e)(1), 4(h)(1), and 4(m); New York Civil Practice Law and Rules § 308(5); and 28 U.S.C. § 1915(d), requesting: (1) authorization for alternative service methods on Defendants Steve Savitsky and Old Westbury LLC, including but not limited to U.S. Marshal service, email, certified mail, posting at the known business address, or drop service; (2) reconsideration of prior denials for U.S. Marshal service or alternative service in DE [14] (filed May 5, 2025), DE [16] (filed May 19, 2025), DE [23] (filed June 22, 2025), and DE [24] (filed June 26, 2025); (3) resolution of my pending motions DE [23] (Notice of Motion to Vacate Order, Renew Application for In Forma Pauperis Status, Authorize Service, and Extend Time to Serve) and DE [24] (Supplemental Letter Motion to Amend DE [23] and for Relief from IFP Denials Under FRCP 60(b)(1), Addressing Unreasonable Order, Involuntary Error, Improper Reliance on Spousal Financial Information, Arbitrary Reliance on Past Payments, Excusable Neglect, Ongoing Hardship, and Prejudicial Disregard of Favorable Facts); and (4) a 30-day extension of time from

the date of the Order on this letter motion to effectuate service of the Summons, Fourth Amended Complaint (filed June 10, 2025, DE [20]), and Exhibits.

This motion is filed as a letter-motion Individual Practand Local Civil Rule 7.1. It is necessitated by Defendants' evasion of service, the unregistered status of Old Westbury LLC, my diligent but unsuccessful service attempts despite financial hardship, and the Court's repeated denials or non-responses to my requests, which obstruct my access to justice rather than facilitating my pursuit of damages. As of August 11, 2025, the current service deadline is August 12, 2025 (following the last Order dated July 13, 2025), underscoring the urgency of this relief as the deadline approaches. I clarify that I am not waiving my prior requests for recusal of both Judge Bulsara and M. Judge Shields, as raised in DE [23] and DE [24], due to concerns about impartiality, the handling of my Pro Se status, financial hardship, and apparent obstruction of justice for an indigent litigant seeking to recover damages. See annexed Exhibit 6 (DE [16]).

Background

I filed the initial Complaint on November 27, 2024, and the Fourth Amended Complaint on June 10, 2025 (DE [20]). The service deadline is August 12, 2025, per the July 13, 2025 Order (DE [15]). Despite diligent efforts, including emails on July 28, 2025, to Defendants at steve.savistky@gcbm.com and shannon.lew@gcbm.com (Exhibit 1), which went unanswered despite verified email validity (Exhibits 7, 8), and a rejected service attempt by ABC Legal on July 25, 2025, at 2049 Century Park East, Suite 1400, Los Angeles, CA 90067 (Exhibits 2, 3), I have been unable to serve Defendants due to their evasion. Old Westbury LLC's unregistered status (Exhibit 9) and security restrictions (Exhibit 1, attachments) further impede service. These efforts, incurring significant debt, exacerbate my financial hardship and occupational disease. Prior

1. The first condition is that the company must be a "qualified company" as defined in the Act. This means that the company must be a company that is registered in the United Kingdom and has a principal place of business in the United Kingdom.

ИЗДАНИЕ ПЕЧАТНОГО СЕРИИ ПО ОБЩЕЙ ТЕОРИИ И ПРИМЕНЕНИЮ

the handling of my Pro Se status. Unethical conduct and apparent obstruction of justice for an
 instant and 21 judge strikes as noted in DE [32] and DE [34] due to concerns about impartiality
 described above. I state that I am not making my prior requests for removal of both judge
 (following the per order dated July 11, 2022) understanding the urgency of this relief as the
 my history of denials. As of August 11, 2022, the court service deadline is August 12, 2022
 denied or non-responses to my requests which obstruct my access to justice under prior judicial
 denial for unnecessary service attempts which prevent timely resolution and the Court's refusal
 to allow me to submit documents or evidence to resolve my pending case. I am

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the state of the subject on the first motion to suppress was not of the "substantial" nature required

motions (DE [14], DE [16], DE [23], DE [24]) for U.S. Marshal or alternative service were denied or ignored, obstructing justice. See annexed Exhibits 1, 2, 3, 7, 8, 9; DE [16], pp. 1-3.

Legal Argument

I. Good Cause Exists for Alternative Service Under Fed. R. Civ. P. 4(e)(1), 4(h)(1), and N.Y. C.P.L.R. § 308(5)

Federal Rule of Civil Procedure 4(e)(1) and 4(h)(1) permit service pursuant to state law, including N.Y. C.P.L.R. § 308(5), which authorizes "expedient" alternative methods where traditional service is "impracticable." Courts in this District routinely grant such relief for Pro Se plaintiffs facing evasion, unregistered entities, or access barriers. See, e.g., *Ferrarese v. Shaw*, 164 F. Supp. 3d 361, 367 (E.D.N.Y. 2016) (authorizing service via email and mail where defendant evaded traditional methods); *J & J Sports Prods., Inc. v. Daley*, No. 06-CV-210 (ERK)(JO), 2007 WL 4162237, at *3-4 (E.D.N.Y. Nov. 15, 2007) (permitting alternative service where defendant avoided process at business address); *Rampersad v. Deutsche Bank Sec., Inc.*, No. 02 Civ. 7311 (LTS)(AJP), 2003 WL 21073951, at *1 (S.D.N.Y. May 9, 2003) (authorizing email and mail service on evasive defendant); *Snyder v. Alternate Energy Inc.*, 19 Misc. 3d 954, 960 (Civ. Ct. N.Y. County 2008) (allowing email service under CPLR § 308(5) for evasive defendant); *Shanghai Shuoxin Int'l Co., Ltd. v. El Toro Carnesi, LLC*, 2023 U.S. Dist. LEXIS 194196 (S.D.N.Y. Oct. 30, 2023) (authorizing alternative service); *Sulzer Mixpac AG v. Medenstar Indus. Co.*, 312 F.R.D. 329 (S.D.N.Y. 2015) (same); *Berdeaux v. Onecoin Ltd.*, 2020 U.S. Dist. LEXIS 13324 (S.D.N.Y. Jan. 28, 2020) (same); *Amalgamated Bank v. JPMorgan Chase Bank, N.A.*, 23-CV-9511 (S.D.N.Y.) (same). See DE [16], pp. 4-5.

Here, traditional service is impracticable: (1) Defendants' emails are valid and in use (Exhibits 7, 8), but requests for voluntary acceptance were ignored; (2) physical service was blocked by security at a confirmed address (Exhibits 2, 3); and (3) Old Westbury LLC's

[illegible]

1. Quidam quidam ex his viatoribus perierat tempore nocturno in loco ubi non erat habitatio et non erat via. Quidam ex his viatoribus perierat tempore nocturno in loco ubi non erat habitatio et non erat via.

[illegible]

unregistered status precludes Secretary of State service (Exhibit 9). Defendants have actual notice of this action via GRSM (DE [14]) and my emails (Exhibit 1), satisfying due process under *Mullane v. Cent. Hanover Bank & Tr. Co.*, 339 U.S. 306, 314 (1950). Alternative methods—email to steve.savistky@gcbm.com and shannon.lew@gcbm.com, certified mail to the Century Park address, posting at the suite entrance, or drop service at security—would be reasonably calculated to provide notice without prejudice. See DE [16], p. 5.

II. Reconsideration of U.S. Marshal Service Under 28 U.S.C. § 1915(d) Is Warranted

Pursuant to 28 U.S.C. § 1915(d), courts must direct U.S. Marshal service for IFP plaintiffs where good cause is shown, even if IFP was previously denied but financial hardship persists. See *Romandette v. Weetabix Co.*, 807 F.2d 309, 311 (2d Cir. 1986) (Marshal service mandatory for indigent plaintiffs unable to serve due to evasion); *Fridman v. City of New York*, 195 F. Supp. 2d 534, 537 (S.D.N.Y. 2002) (considering detailed financials for IFP). My renewed IFP application (DE [16], Exhibit 3) details inability to afford costs, supported by prior approvals in related cases (DE [16], Exhibits 8, 10). Prior denials (DE [14], DE [16], DE [23], DE [24]) overlooked this, despite my Pro Se status and Defendants' evasion, warranting reconsideration under Local Civ. R. 6.3. Marshal service would reduce costs and overcome access barriers, preventing weaponization of procedural rules against vulnerable litigants. See DE [16], pp. 3-4.

III. Resolution of Pending Motions DE [23] and DE [24]

I request an immediate resolution of DE [23] and DE [24], which remain pending and directly impact my ability to proceed. These motions seek relief from IFP denials under FRCP 60(b)(1) for reasons including unreasonable orders, involuntary errors, improper reliance on spousal financial information, arbitrary reliance on past payments, excusable neglect, ongoing hardship, and prejudicial disregard of favorable facts. The Court's delay in addressing them

[illegible]

Temperature 19.32 °C ± 0.01 (°C) control water quality (pH 7.4) dissolved oxygen 6.01 mg/L

purposes arising in the joint conduct of such services or activities -- it could be reasonably anticipated
 to be reasonably foreseeable and preventable -- and could thus be the result of
 negligent or negligent conduct of the services or activities -- it could be reasonably anticipated
 of the action or omission (or both) and the result of the process under
 which the action or omission (or both) was taken (or both) -- it could be reasonably anticipated
 of the action or omission (or both) and the result of the process under

obstructs justice and hinders my case progression. See DE [16], p. 5 (citing Velasquez v. Comm'r of Soc. Sec., No. 24-CV-2035 (E.D.N.Y. June 26, 2024)).

IV. Extension of Time Under Fed. R. Civ. P. 4(m)

Good cause for a 30-day extension from the date of the Order on this letter motion exists due to Defendants' evasion, my diligent efforts, financial constraints, and health impacts, with the current deadline approaching on August 12, 2025. See *Zapata v. City of New York*, 502 F.3d 192, 197 (2d Cir. 2007) (extensions granted for Pro Se plaintiffs facing obstacles); *Baez v. City of New York*, 2012 WL 602614 (E.D.N.Y. Feb. 23, 2012) (same). No prejudice results, as Defendants have notice. See DE [16], p. 5.

Conclusion and Request

I respectfully request:

- Authorization for alternative service via U.S. Marshal, email (to steve.savistky@gcbm.com and shannon.lew@gcbm.com), certified mail, posting, or drop service at 2049 Century Park East, Suite 1400, Los Angeles, CA 90067.
- Reconsideration and grant of U.S. Marshal service under 28 U.S.C. § 1915(d).
- Resolution of DE [23] and DE [24].
- A 30-day extension from the date of the Order on this letter motion to serve.
- Any other relief deemed just.

I have not served this on Defendants, as they remain unserved, per Judge Bulsara's rules (Section VIII.B). Attached are Exhibits 1-10 in a single PDF.

Respectfully submitted,

**/s/ Lidia M. Orrego
Lidia M. Orrego
Plaintiff Pro Se
95-08 Queens Blvd, Apt. 3E
Rego Park, NY 11374
Phone: (347) 453-2234
Email: liorrego@gmail.com**

cc: Magistrate Judge Anne Y. Shields (via ECF and mail)

Word Certification: Local Civil Rule 7.1 and is under 1,750 words

List of Exhibits

Exhibit 1 – Dated July 10, 2025 – Gmail - Re: Urgent: Facilitate Service of Complaint – Old Westbury LLC and Steve Savitsky (EDNY Case No. 24-cv-07247)

Exhibit 2 – Dated July 25, 2025 – Proof Non-Service Steve Savitsky TDocument_150152621

Exhibit 3 – Dated July 25, 2025 – Proof Non-Service Old Westbury LLC - TDocument_150152620

Exhibit 4 – Dated November 27, 2018 – ENVELOPE Steve Savitsky - Old Westbury LLC

Exhibit 5 – Letter Termination employer Old Westbury LLC

Exhibit 6 – DE [16] Dated May 19, 2025 – Letter Motion Summons, Renew, Reconsideration Alternative Service

Exhibit 7 – Steve Savitsky email address validator

Exhibit 8 – Shannon Lew email address validator

Exhibit 9 – Old Westbury LLC Department of State

Exhibit 10 – ABC Legal Log Report

Respectfully submitted,

Lidia M. Oniego
Lidia M. Oniego
Plaintiff Pro Se
92-08 Queens Blvd, Apt 3E
Rego Park, NY 11374
Phone: (347) 453-0234
Email: lidiaoniego@gmail.com

cc: Magistrate Judge Anne Y. Shields (via ECF and mail)

Word Count: Local Civil Rule 7.1 and is under 1,750 words

List of Exhibits

- Exhibit 1 – Dated July 10, 2025 – Grant – Re: Urgent Facilitate Service of Complaint – Old Westbury LLC and Steve Savitsky (FDNY Case No. 24-cv-07247)
- Exhibit 2 – Dated July 22, 2025 – Proof/Non-Service Steve Savitsky TJDocument_150125021
- Exhibit 3 – Dated July 22, 2025 – Proof/Non-Service Old Westbury LLC – TJDocument_150125020
- Exhibit 4 – Dated November 27, 2018 – ENVEI OPE Steve Savitsky - Old Westbury LLC
- Exhibit 5 – Letter Termination employee Old Westbury LLC
- Exhibit 6 – DE 116 Dated May 19, 2025 – Letter Motion Summons, Renew, Reconsideration Alternative Service
- Exhibit 7 – Steve Savitsky email address / validator
- Exhibit 8 – Shannon L cw email address / validator
- Exhibit 9 – Old Westbury LLC Department of State
- Exhibit 10 – ABC Legal Log Report

EXHIBIT 1



Lidia Orrego <liorrego@gmail.com>

Re: Urgent: Facilitate Service of Complaint – Old Westbury LLC and Steve Savitsky (EDNY Case No. 24-cv-07247)

Lidia Orrego <liorrego@gmail.com>

Mon, Jul 28, 2025 at 4:12 PM

To: "steve.savitsky@gcbm.com" <steve.savitsky@gcbm.com>, "shannon.lew@gcbm.com" <shannon.lew@gcbm.com>

Cc: Lidia Orrego <liorrego@justiceforlidia.nyc>, Lidia Orrego <orregoprose@gmail.com>, Kuuku Minnah-Donkoh <kminnahdonkoh@grsm.com>

Following Legal Advice:

Response to Email: Service of Complaint – Old Westbury LLC and Steve Savitsky (EDNY Case No. 2:24-cv-07247)

To Mr. Steve Savitsky and Ms. Shannon Lew,

Thank you for your confirmation today, July 28, 2025, Mr. Minnah-Donkoh confirmed that GRSM does not represent **Old Westbury LLC** and **Steve Savitsky** in **24-cv-07247**, despite GRSM's August 1, 2022, document in a related case (20-cv-03361, EDNY) stating, "Any communication with Mr. Savitsky must be through the undersigned counsel."

Per this confirmation, I will communicate directly with the Defendants and will not contact GRSM further unless you file to appear in **24-cv-07247**.

This email is a good-faith effort to facilitate service of a summons and Fourth Amended Complaint in the Eastern District of New York (Case No. 24-cv-07247) against **Old Westbury LLC** and **Steve Savitsky** at 2049 Century Park East, Suite 1400, Los Angeles, CA 90067, with a court deadline of August 10, 2025, and is not harassment. A copy of the complaint is attached; this email is not formal service.

On April 17, 2025, GRSM instructed me to serve you directly (DE [14], Exhibit 1, 24-cv-07247). **Old Westbury LLC** is not registered with the New York and California Secretaries of State, which prevents service via the Department of State. I have incurred debt, including paying ABC Legal via credit card, for diligent efforts.

An affidavit from ABC Legal, dated July 26, 2025, signed by David Kalashian, confirms that security at Suite 1400 denied service on July 25, 2025, at 4:30 PM, stating, "You do not have permission to service," and is supported by pictures. Ms. Lew, you confirmed on May 19, 2025, that Suite 1400 is Savitsky's address (steve.savitsky@gcbm.com), tied to **Old Westbury LLC**, **Old Westbury Eddie LLC**, **Savitsky Satin Bacon & Bucci**, and **Ground Control Business Management**, per DE [14], [16].

To comply with the Court's deadline, I respectfully request from **Old Westbury LLC** and **Mr. Savitsky** by July 30, 2025:

- Confirmation of an authorized agent for **Old Westbury LLC**, or
- Agreement to accept service via email or mail, or designation of a representative at Suite 1400.

Please respond to liorrego@gmail.com.

Without a response, I will file a motion for alternative service, citing **Old Westbury LLC**'s unregistered status, ABC Legal's affidavit, pictures, Lew's confirmation, DE [14], [16], [20], and GRSM's April 17, 2025, directive. ABC Legal will attempt service on July 29, 2025.

Thank you for your prompt attention.

Best regards,

Lidia Orrego
Plaintiff Pro Se

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#18996
Case 2:24-cv-07247-SJB-AYS Document 28 Filed 08/15/25 Page 9 of 41 Filed 08/15/25
150

- Skylar Testa: Mr. Testa is employed with the Knipfings as an assistant, and has discoverable information concerning certain allegations in Plaintiff's Amended Complaint, including, but not limited to, Plaintiff's employment with the Knipfings. Any communication with Mr. Testa must be through the undersigned counsel.
- Steve Savitsky: Mr. Savitsky is employed as Mr. Knipping's business manager, and has discoverable information concerning Plaintiff's employment with the Knipfings generally. Any communication with Mr. Savitsky must be through the undersigned counsel.

Re: Service Defendants - Case 2:24-cv-07247-SJB-AYS Orrego v. Savitsky et al Order on Motion for Extension of Time to File

9/15/25 - 10:03 AM



On Mon, Jul 28, 2025 at 10:12AM Kuuku Minnah-Donkoh <kminnahdonkoh@grsm.com> wrote:
Ms. Orrego,

As I have previously advised you, neither I nor anyone else in my firm is representing any of the defendants in this action. Accordingly, we will not be accepting service on behalf of any of the defendants. Please stop emailing me and the rest of my colleagues about this matter or we will seek sanctions from the court about your persistent harassment.

Thank you.



KUUKU MINNAH-DONKOH | Partner (He/Him)

1 Battery Park Plaza, 28th Floor, New York, NY 10004

D: 212.453.0709

kminnahdonkoh@grsm.com

grsm.com

[vCard](#) | [Bio](#)

From: Lidia Orrego <diorrego@gmail.com>

Sent: Monday, July 28, 2025 10:07 AM

To: steve.savitsky@gcbm.com <steve.savitsky@gcbm.com>; shannon.lew@gcbm.com <shannon.lew@gcbm.com>; Kuuku Minnah-Donkoh <kminnahdonkoh@grsm.com>; Kuuku Minnah-Donkoh <kminnahdonkoh@grsm.com>

Cc: Peter Cella <pcella@grsm.com>; Paulette Guerrero <pguerrero@grsm.com>; VLS_NY Support <VLS_NYSupport@grsm.com>; Elizabeth Velez <evelez@grsm.com>; Lidia Orrego <lidia.orrego@justiceforlidia.ny>; Lidia Orrego <orregoprose@gmail.com>

Subject: Urgent: Facilitate Service of Complaint – Old Westbury LLC and Steve Savitsky (EDNY Case No. 24-cv-07247)

To Mr. Steve Savitsky, Ms. Shannon Lew, Mr. Kuuku Minnah-Donkoh, Ms. Eve Velez, and GRSM NY Support,

I am attempting to serve a summons and Fourth Amended Complaint filed in the Eastern District of New York (Case No. 24-cv-07247) against Old Westbury LLC and Steve Savitsky at 2049 Century Park East, Suite 1400, Los Angeles, CA 90067, with a court deadline of August 10, 2025.

A copy of the Fourth Amended Complaint DE [20] is ~~attached~~ ^{#1887} this email is not formal service.

The Court's requirements have forced me to incur debt, including paying ABC Legal via credit card for service attempts.

To avoid court intervention, I request that by **July 30, 2025**:

- GRSM's acceptance of service for **Old Westbury LLC** and **Savitsky**, per the attached **20-cv-03361** letter and DE [17], or
- Confirmation of an authorized agent for **Old Westbury LLC**, or
- Agreement to accept service via email or mail, or a representative at Suite 1400.

Please respond to liorrego@gmail.com.

Without a response, I will seek court approval for alternative service (e.g., email or certified mail), citing **Old Westbury LLC's** unregistered status, ABC Legal's July 26, 2025, affidavit by David Kalashian, pictures of 2049 Century Park East, Lew's confirmation, [DE 14], [DE 16] with exhibits, the **Old Westbury Eddie LLC** connection, and GRSM's bad-faith rejection despite the **20-cv-03361** letter and DE [17], [65].

Reasons for the request:

Old Westbury LLC is unregistered with the New York and California Secretaries of State, per search results dated April 17, 2025 (attached). See the email and "letter termination" **dated November 27, 2018, by Steve Savitsky.**

An affidavit from **ABC Legal**, dated **July 26, 2025**, signed by **David Kalashian**, confirms that on July 25, 2025, at 4:30 PM, security at 2049 Century Park East, Los Angeles, CA 90067 stated, **"You do not have permission to service."** and required checking in to access the elevator to "Suite 1400", as shown in the attached pictures, which display access restrictions.

Ms. Lew, on May 19, 2025, at 3:25 PM, you confirmed Suite 1400 as the service address for Mr. Savitsk (<mailto:steve.savitsky@gcbm.com>), phone: (310) 315-6203, tied to **Old Westbury LLC**, **Old Westbury Eddie LLC**, **Savitsky Satin Bacon & Bucci**, and **Ground Control Business Management**, per Docket Entry [14] (May 2, 2025) and [16] (May 19, 2025) in **24-cv-07247**, with exhibits including an email exchange with Mr. Minnah-Donkoh (April 17, 2025), California Secretary of State results, and **20-cv-03361** documents (DE [17], DE [65]). **Old Westbury Eddie LLC**, for which Savitsky is the registered agent, shares Suite 1400.

A letter filed by **Gordon Rees Scully Mansukhani (GRSM)** in a related case (20-cv-03361, EDNY), attached, confirms service for **Old Westbury LLC** and **Savitsky** must be made through GRSM.

GRSM, at One Battery Park Plaza, 28th Floor, New York, NY 10004, received notice of **24-cv-07247** on December 6, 2024, but rejected service on April 19, 2025, in bad faith, per the April 17, 2025, email exchange.

ABC Legal will attempt service at Suite 1400 on or about July 29, 2025.

Thank you for your urgent cooperation.

Best regards,

Lidia M. Orrego
Plaintiff Pro Se
9508 Queens Blvd. 3E
Rego Park, NY
Phone: (347) 453-2234
Email: liorrego@gmail.com

Cc: Kuuku Minnah-Donkoh, Esq. (<mailto:kminnahdonkoh@grsm.com>),
Eve Velez, Esq. (<mailto:evelez@grsm.com>)
GRSM NY Support (mailto:vls_nysupport@grsm.com)

Attachment:

- DE [20] Fourth_Amended_Complaint_2-24-cv-07247.pdf
- NonServiceAffidavit_ABC_Legal_7-26-2025_Kalashian.pdf
- Building_Pictures_2049_Century.pdf
- GRSM_Letter_2-20-cv-03361.pdf
- DE [14] 2-24-cv-07247_5-2-2025.pdf
- ExhibitI_Email_MinnahDonkoh_4-17-2025.pdf

Case 2:24-cv-07247-SJB-AYS Document 28 Filed 08/15/25 Page 14 of 141 PageID
#: 1098

- Exhibit2_CA_Secretary_State_4-17-2025.pdf
- Exhibit3_Stipulation_2-20-cv-03361_DE17.pdf
- Exhibit4_Discovery_Responses_2-20-cv-03361_DE65.pdf
- DE [16]_2-24-cv-07247_5-19-2025.pdf

Lidia M. Orrego-Notice of termination of employment

1 message

Steve Savitsky <ssavitsky@savco.com>
To: "lorrego@gmail.com" <lorrego@gmail.com>
Cc: Charles Stanislaus <cstan@savco.com>

Tue, Nov 27, 2018 at 3:55 PM

Lidia—please refer to the attached letter.

Thanks

STEVE

CS/sd

WE HAVE MOVED !!!!

STEVE SAVITSKY

Office: 310.315.6203

Fax: 310.873.5906

**OLD WESTBURY, LLC
c/o Savitsky Satin Bacon & Bucci
2049 Century Park East, Suite 1400
Los Angeles, CA 90067**

November 27, 2018

VIA CERTIFIED MAIL & VIA EMAIL

Lidia M. Orrego
95-08 Queens Boulevard, Apt. 3E
Rego Park, NY 11374

Ms. Lidia Orrego,

Old Westbury, LLC is ending your employment effective immediately. This decision is based on several factors, including but not limited to:

1. Breach of your Non-Disclosure Agreement, such as:
 - a. Recording a conversation with Rebeca Uzcategui in the presence of a member of the public, and
 - b. Taking recordings and photographs of the Knipping's home.
2. Your statement that you were unwilling to continue working with Rebeca Uzcategui.
3. Our conclusion that you made statements in your complaint that you know to be false.

Your payment of wages through today's date (November 27, 2018) will be paid on the regular payroll date and offset by the nineteen (19) hours you reported were paid incorrectly.

You have health insurance through United Healthcare and the termination of your health insurance is November 30, 2018. You are eligible for COBRA Continuation Coverage and you will be contacted by the carrier directly.

Regards,



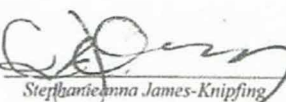
Steve Savitsky,
Business Manager, Old Westbury, LLC

SS/ew

Docket EDNY: ~~20-cv-03361~~ letter and DE [17]

Incoming Counsel for Kevin Knipping,
Stephanieanna James-Knipping,
Old Westbury EDDIE LLC,
Old Westbury LLC, and
Teresa A. Zantua


Kevin Knipping


Stephanieanna James-Knipping

Old Westbury EDDIE LLC,

By: 

Teresa A. Zantua

Old Westbury LLC,

By: 

Steve Savitsky

Incoming Counsel for Kevin Knipping,
Stephanieanna James-Knipping,
Old Westbury EDDIE LLC,
Old Westbury LLC, and
Teresa A. Zantua

Kevin Knipping

Stephanieanna James-Knipping

Old Westbury EDDIE LLC,

By: _____

Teresa A. Zantua

Old Westbury LLC,

By: _____

Steve Savitsky



An official website of New York State | <https://www.dos.ny.gov>



Department of State Division of Corporations

Entity Information

[Return to Results](#) [Return to Search](#)

Entity Details

ENTITY NAME: OLD WESTBURY EDDIE, LLC

FOREIGN LEGAL NAME:

ENTITY TYPE: DOMESTIC LIMITED LIABILITY COMPANY

SECTION OF LAW: 202 LLC LIMITED LIABILITY COMPANY LAW

DATE OF INITIAL DOS FILING: 05/06/2015

EFFECTIVE DATE INITIAL FILING: 05/20/2015

FOREIGN FORMATION DATE:

COUNTY: NASSAU

JURISDICTION: NEW YORK, UNITED STATES

DOS ID: 4761372

FICTITIOUS NAME:

DURATION DATE/LATEST DATE OF DISSOLUTION:

ENTITY STATUS: ACTIVE

REASON FOR STATUS:

INACTIVE DATE:

STATEMENT STATUS: PAST DUE

NEXT STATEMENT DUE DATE: 06/30/2025

NFP CATEGORY:

[ENTITY DISPLAY](#) [NAME HISTORY](#) [POWER HISTORY](#) [AMENDMENT HISTORY](#) [ASSIGNED NAME HISTORY](#)

Service of Process on the Secretary of State as Agent

The Post Office address to which the Secretary of State shall mail a copy of any process against the corporation served upon the Secretary of State by personal delivery:

Name: OLD WESTBURY EDDIE, LLC

Address: C/O GROUND CONTROL, ATTN: STEVE SAVITSKY, 2069 CENTURY PARK EAST, SUITE 1400, LOS ANGELES, CA, UNITED STATES, 90067

Electronic Service of Process on the Secretary of State as agent: Not Permitted

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 2:24-cv-7247 (SJB) (AYS)

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4(f))*

This summons for Steve Savitsky
was recieved by me on 7/25/2025:

- ☐ I personally served the summons on the individual at (place) on (date) ; or
- ☐ I left the summons at the individual's residence or usual place of abode with (name) , a person of suitable age and discretion who resides there, on , and mailed a copy to the individual's last known address; or
- ☐ I served the summons on (name of individual) , who is designated by law to accept service of process on behalf of (name of organization); or
- ☒ I returned the summons unexecuted because Disallowed after attempting service at 2049 Century Park E Ste 1400, Los Angeles, CA 90067; or
- ☐ Other (specify)

My fees are \$ 0 for travel and \$ 75.00 for services, for a total of \$ 75.00.

I declare under penalty of perjury that this information is true.

Date: 07/26/2025



Server's signature

David Kalashian

Printed name and title

13625 Calista st
Van Nuys, CA 91401

Server's address

Additional information regarding attempted service, etc:

7/25/2025 4:30 PM: I spoke with an individual who identified themselves as the security and they stated service not permitted. To get an access to elevator, you need to check in with security. After the phone call security told me: - You do not have permission to service.



Tracking # 0179490765



AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 2:24-cv-7247 (SJB) (AYS)

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (f))*

This summons for Old Westbury LLC
was recieved by me on 7/25/2025:

- ☐ I personally served the summons on the individual at (place) on (date); or
- ☐ I left the summons at the individual's residence or usual place of abode with (name), a person of suitable age and discretion who resides there, on , and mailed a copy to the individual's last known address; or
- ☐ I served the summons on (name of individual), who is designated by law to accept service of process on behalf of (name of organization); or
- ☒ I returned the summons unexecuted because Disallowed after attempting service at 2049 Century Park E Ste 1400, Los Angeles, CA 90067; or
- ☐ Other (specify)

My fees are \$ 0 for travel and \$ 75.00 for services, for a total of \$ 75.00.

I declare under penalty of perjury that this information is true.

Date: 07/26/2025



Server's signature

David Kalashian

Printed name and title

13625 Califa st
Van Nuys, CA 91401

Server's address

Additional information regarding attempted service, etc:

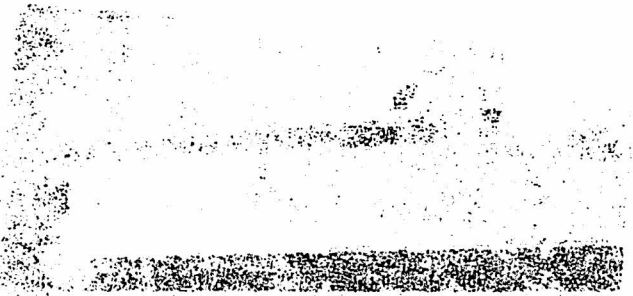
7/25/2025 4:30 PM: I spoke with an individual who identified themselves as the security and they stated service not permitted. To get an access to elevator, you need to check in with security. After the phone call security told me: - You do not have permission to service.

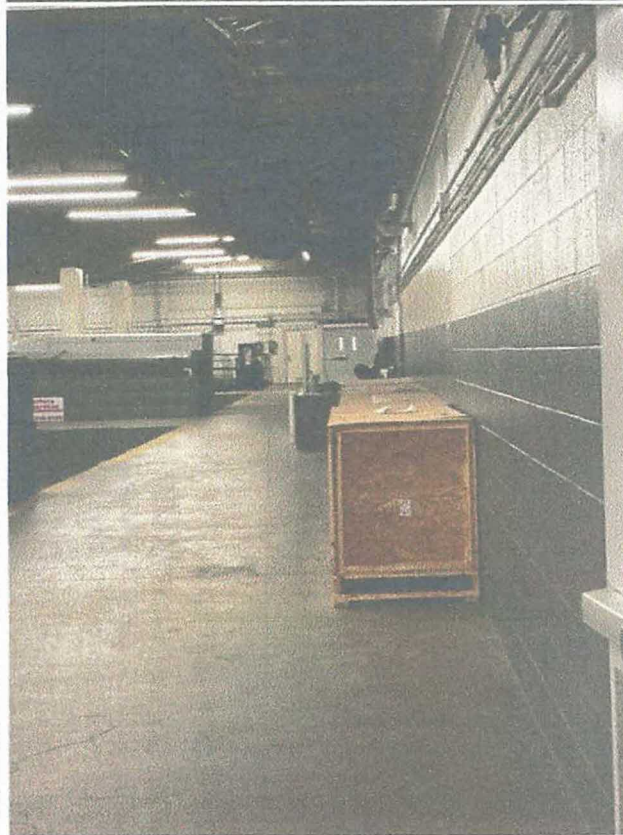


Tracking #: 0179490785











Case 2:24-cv-07247-SJB-AYS Document 30 Filed 08/15/25 Page 28 of 141 PageID
#: 2089

This email communication may contain CONFIDENTIAL INFORMATION WHICH ALSO MAY BE LEGALLY PRIVILEGED and is intended only for the use of the intended recipients identified above. If you are not the intended recipient of this communication, you are hereby notified that any unauthorized review, use, dissemination, distribution, downloading, or copying of this communication is strictly prohibited. If you are not the intended recipient and have received this communication in error, please immediately notify us by reply email, delete the communication and destroy all copies.

GORDON REES SCULLY MANSUKHANI, LLP
YOUR 50 STATE LAW FIRM™
www.grsm.com



Service DE [20] Dated 06-10-2025 Fourth Amended Complaint + EXHIBITS-compressed.pdf
9970K

EXHIBIT 2

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. **2:24-cv-7247 (SJB) (AYS)**

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for **Steve Savitsky**
was recieved by me on **7/25/2025**:

- ☐ I personally served the summons on the individual at (place) on (date) ; or
- ☐ I left the summons at the individual's residence or usual place of abode with (name) , a person of suitable age and discretion who resides there, on , and mailed a copy to the individual's last known address; or
- ☐ I served the summons on (name of individual) , who is designated by law to accept service of process on behalf of (name of organization); or
- ☒ I returned the summons unexecuted because **Disallowed after attempting service at 2049 Century Park E Ste 1400, Los Angeles, CA 90067**; or
- ☐ Other (specify)

My fees are \$ 0 for travel and \$ 75.00 for services, for a total of \$ 75.00.

I declare under penalty of perjury that this information is true.

Date: 07/26/2025



Server's signature

David Kalashian

Printed name and title

**13625 Callfa st
Van Nuys, CA 91401**

Server's address

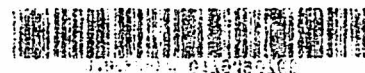
Additional information regarding attempted service, etc:

7/25/2025 4:30 PM: I spoke with an individual who identified themselves as the security and they stated service not permitted. To get an access to elevator, you need to check in with security. After the phone call security told me: - You do not have permission to service.



Tracking #: 0179490765



[illegible]

© 2004 Blackwell Publishing Ltd, *Journal of Internal Medicine* 255: 103–110

Figure 1. The effect of the concentration of the *Agrobacterium* suspension on the transformation efficiency of *Agrobacterium* strains. The concentration of the *Agrobacterium* suspension was 10⁶ cells/ml (A), 10⁷ cells/ml (B), 10⁸ cells/ml (C), and 10⁹ cells/ml (D). The concentration of the *Agrobacterium* suspension was 10⁶ cells/ml (A), 10⁷ cells/ml (B), 10⁸ cells/ml (C), and 10⁹ cells/ml (D). The concentration of the *Agrobacterium* suspension was 10⁶ cells/ml (A), 10⁷ cells/ml (B), 10⁸ cells/ml (C), and 10⁹ cells/ml (D). The concentration of the *Agrobacterium* suspension was 10⁶ cells/ml (A), 10⁷ cells/ml (B), 10⁸ cells/ml (C), and 10⁹ cells/ml (D).

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Environ Biol Fish (2016) 98:757–767

1. *Chlorophyll a* (Chl a) and *Chlorophyll b* (Chl b) are the two main pigments in the photosynthetic apparatus of green plants. They are responsible for the absorption of light energy and the conversion of carbon dioxide and water into glucose and oxygen.

1. The first step is to identify the problem or question that needs to be answered. This involves understanding the context and the specific requirements of the task.

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ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED EXCEPT WHERE SHOWN OTHERWISE

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2150 2007-04

Time at floor above and on disc with eye contact: average of 100 to 120 s at 100 s

SCHOOL OF GERONTOLOGY

Case 4:20-cv-00001 Document 1-1 Filed 07/27/20 Page 1 of 1

10.771 Sec. 10.1 of Article 10.1 of the

EXHIBIT 3

AO 440 (Rev. 06/12) Summons In a Civil Action (Page 2)

Civil Action No. **2:24-cv-7247 (SJB) (AYS)**

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for **Old Westbury LLC**
was recieved by me on **7/25/2025**:



I personally served the summons on the individual at *(place)* on *(date)* ; or



I left the summons at the individual's residence or usual place of abode with *(name)* , a person of suitable age and discretion who resides there, on , and mailed a copy to the individual's last known address; or



I served the summons on *(name of individual)* , who is designated by law to accept service of process on behalf of *(name of organization)*; or



I returned the summons unexecuted because **Disallowed after attempting service at 2049 Century Park E Ste 1400, Los Angeles, CA 90067**; or



Other *(specify)*

My fees are \$ 0 for travel and \$ 75.00 for services, for a total of \$ 75.00.

I declare under penalty of perjury that this information is true.

Date: 07/26/2025



Server's signature

David Kalashian

Printed name and title

**13625 Califa st
Van Nuys, CA 91401**

Server's address

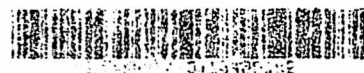
Additional information regarding attempted service, etc:

7/25/2025 4:30 PM: I spoke with an individual who identified themselves as the security and they stated service not permitted. To get an access to elevator, you need to check in with security. After the phone call security told me: - You do not have permission to service.



Tracking #: 0179490785





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EXHIBIT 4

OLD WESTBURY, LLC
c/o Savitsky Satin Bacon Bucci
2049 Century Park East, Suite 1400
Los Angeles, CA 90067

Case 2:24-cv-07247-SJB-AYS

Document 28 Filed 08/14/25 Page 27 of 141 PageID



91 7199 9991 7039 2613 3578



U.S. POSTAGE METRE BOWERS
ZIP 90067 \$ 005.95⁰
02 1N
0001388942 NOV 27 2018

VIA CERTIFIED MAIL

Lidia M. Orrego
95-08 Queens Boulevard, Apt. 3E
Rego Park, NY 11374

EXHIBIT 5

EXHIBIT [03/18/2020] [4000171299]

OLD WESTBURY, LLC "Ghost - Corporation"
c/o Savitsky Satin Bacon & Bucci
2049 Century Park East, Suite 1400
Los Angeles, CA 90067

November 27, 2018

VIA CERTIFIED MAIL & VIA EMAIL

Lidia M. Orrego
95-08 Queens Boulevard, Apt. 3E
Rego Park, NY 11374

Ms. Lidia Orrego,

Old Westbury, LLC is ending your employment effective immediately. This decision is based on several factors, including but not limited to:

1. Breach of your Non-Disclosure Agreement, such as;
 - a. Recording a conversation with Rebeca Uzcategui in the presence of a member of the public, and
 - b. Taking recordings and photographs of the Knipfing's home.
2. Your statement that you were unwilling to continue working with Rebeca Uzcategui.
3. Our conclusion that you made statements in your complaint that you know to be false.

Your payment of wages through today's date (November 27, 2018) will be paid on the regular payroll date and offset by the nineteen (19) hours you reported were paid incorrectly.

You have health insurance through United Healthcare and the termination of your health insurance is November 30, 2018. You are eligible for COBRA Continuation Coverage and you will be contacted by the carrier directly.

Regards,



Steve Savitsky,
Business Manager, Old Westbury, LLC

SS/ew

ORIGINAL

September 11, 2025

Honorable Sanket J. Bulsara
United States District Judge
Eastern District of New York
Central Islip, New York
Filed in Person and ECF Pro Se Office

Case No. 24-cv-07247-SJB-AYS - Orrego v. Savitsky et al.

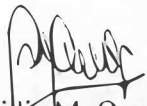
**Re: Request for Leave to File Notice of Interlocutory Appeal of Filing Injunction Order
(DE [29]) Not Covered by Injunction**

Dear Clerk:

I seek leave to file a notice of interlocutory appeal under 28 U.S.C. § 1292(a)(1) of Judge Bulsara's Aug. 14, 2025, order (DE [29] attached) imposing filing injunction, automatically appealable without District Court certification, as it affects substantive rights. Grounds: violates 1st Amendment access to courts, 5th/14th Amendment due process: erroneous as motions not repetitive (DE 28/30 include new service evasion facts); court's non-response to DE [30] (pending since Aug. 15) exacerbates obstruction. This appeal not covered by injunction.

Count word: 79.

Respectfully submitted,


Liora M. Orrego
Plaintiff Pro Se
95-08 Queens Blvd, Apt. 3E
Rego Park, NY 11374
Phone: (347) 453-2234
Email: liorrego@gmail.com



Notice: I have not served this on Defendants, as they remain unserved, per Judge Bulsara's rules (Section VIII.B).

Attachments: Notice of Appeal, Informational Statement, Exhibits 1 and 2. Total 39-Page

REC'D IN PRO SE OFFICE
SEP 11 25 PM 3:24

APPEAL,DJI,MAGAPP,NPROSE,PROSENEF

U.S. District Court
Eastern District of New York (Central Islip)
CIVIL DOCKET FOR CASE #: 2:24-cv-07247-SJB-AYS

Orrego v. Savitsky et al
Assigned to: Judge Sanket J. Bulsara
Referred to: Magistrate Judge Anne Y. Shields
related Cases: [2:20-cv-03361-SJB-AYS](#)
[2:23-cv-06507-SJB-AYS](#)
[2:25-cv-00736-SJB-AYS](#)
[2:25-cv-00769-SJB-AYS](#)

Date Filed: 11/27/2024
Jury Demand: Plaintiff
Nature of Suit: 890 Other Statutory
Actions
Jurisdiction: Federal Question

Cause: 42:1983 Civil Rights Act

Plaintiff**Lidia M. Orrego**

represented by **Lidia M. Orrego**
95-08 Queens Blvd
3E
Rego Park, NY 11374
347-453-2223
Email: liorrego@gmail.com
PRO SE

V.

Defendant**Steve Savitsky****Defendant****Old Westbury LLC****Defendant****John Doe****Defendant****Jane Doe**

Date Filed	#	Docket Text
11/27/2024	<u>1</u>	COMPLAINT against All Defendants Was the Disclosure Statement on Civil Cover Sheet completed –No., filed by Lidia M. Orrego. (Attachments: # <u>1</u> Civil Cover Sheet) (DC) (Entered: 12/06/2024)
11/27/2024	<u>2</u>	MOTION for Leave to Proceed in forma pauperis by Lidia M. Orrego. (DC) (Entered: 12/06/2024)
11/27/2024	<u>3</u>	Pro Se Consent to Electronic Notification by Lidia M. Orrego (DC) (Entered: 12/06/2024)
12/06/2024	<u>4</u>	Clerk's Notice Re: Consent. A United States Magistrate Judge has been assigned to this case and is available to conduct all proceedings. In accordance with Rule 73 of the Federal Rules of Civil Procedure, Local Rule 73.1, the parties are notified that if all parties consent, the assigned Magistrate Judge is available to conduct all proceedings in this action including a (jury or nonjury) trial and to order the entry of a final judgment. Attached to this Notice is a blank copy of the consent form that should be filled out, signed and filed electronically only if all parties wish to consent. Any party may withhold its consent without adverse substantive consequences. Do NOT return or file the consent unless all parties have signed the consent. The form may also be accessed at the following link:

		https://img.nyed.uscourts.gov/files/forms/MJConsentForm.pdf (DC) (Entered: 12/06/2024)
12/06/2024	<u>5</u>	Notice of Related Cases: 20-cv-3361-JMA-AYS and 23-cv-6507-JMA-AYS The Civil Cover Sheet filed in this civil action indicates a related case. (DC) (Entered: 12/06/2024)
12/17/2024	<u>6</u>	MEMORANDUM & ORDER: Presently before the Court is pro se Plaintiff Lidia Orrego's application to proceed in forma pauperis ("IFP"). (ECF No. 2 .) As explained below, Plaintiff's financial status does not qualify her to commence this action without payment of the filing fee. See 28 U.S.C. § 1915(a)(1). Accordingly, Plaintiff's application to proceed IFP is DENIED. Plaintiff is directed to pay the \$405.00 filing fee by January 30, 2025 , for this case to proceed. The Court certifies pursuant to 28 U.S.C. § 1915(a)(3) that any appeal from this Memorandum & Order would not be taken in good faith and therefore IFP status is denied for the purpose of any appeal. <i>Coppedge v. United States</i> , 369 U.S. 438, 444-45 (1962). The Clerk of the Court is directed to mail a copy of this Order to the pro se Plaintiff at her address of record and to note such mailing on the docket. SEE ATTACHED ORDER for details. So Ordered by Judge Joan M. Azrack on 12/17/2024. c/m (LC) (Entered: 12/17/2024)
12/19/2024		Email Notification Test – DO NOT REPLY. (LC) (Entered: 12/19/2024)
01/30/2025	<u>7</u>	CIVIL FILING FEE: \$405.00, receipt number 100018992. (AMF) (Entered: 02/03/2025)
01/31/2025		Case reassigned to Judge Sanket J. Bulsara. Judge Joan M. Azrack no longer assigned to the case. Please download and review the Individual Practices of the assigned Judges, located on our website . Attorneys are responsible for providing courtesy copies to judges where their Individual Practices require such. (LF) (Entered: 01/31/2025)
02/07/2025	<u>8</u>	Summons Issued as to Old Westbury LLC, Steve Savitsky. (AMF) (Entered: 02/10/2025)
02/12/2025	<u>9</u>	Notice of Related Case: 25-cv-00736 The Case was directly assigned as a related Pro Se/Habeas Case. (KS) (Entered: 02/12/2025)
02/14/2025	<u>10</u>	Notice of Related Case: 25-cv-00769 The Case was directly assigned as a related Pro Se/Habeas Case. (KS) (Entered: 02/14/2025)
04/02/2025	<u>11</u>	MOTION for Extension of Time to File <i>to Serve Defendants</i> by Lidia M. Orrego. (AMF) (Entered: 04/03/2025)
04/04/2025		ORDER: The motion for extension of time to effectuate service of process <u>11</u> is granted. Plaintiff is directed to effectuate service of process on Defendant by 5/05/2025 . So Ordered by Judge Sanket J. Bulsara on 4/4/2025. (YEP) (Entered: 04/04/2025)
04/17/2025	<u>12</u>	Letter from pro se litigant, Lidia M. Orrego RE: Clarification on Granted <u>11</u> Motion for Extension. (AMF) (Entered: 04/17/2025)
04/27/2025	<u>13</u>	AMENDED COMPLAINT against Jane Doe, John Doe, Old Westbury LLC, Steve Savitsky, filed by Lidia M. Orrego. (AMF) (Entered: 04/28/2025)
05/05/2025	<u>14</u>	Letter MOTION to Compel <i>for Service by U.S. Marshal or Alternative Service</i> by Lidia M. Orrego. (AMF) (Entered: 05/05/2025)
05/06/2025		ORDER granting in part and denying in part <u>14</u> Motion to Compel. Plaintiff's application is GRANTED in part and DENIED in part. To the extent that Plaintiff seeks an order directing the U.S. Marshals Service to serve the summons and Amended Complaint on Defendants, the motion is DENIED. Similarly, Plaintiff's request to serve Defendants by cost-reducing methods is likewise DENIED. The Court notes that on December 17, 2024, Plaintiff's application to proceed in forma pauperis ("IFP") was denied. Therefore, Plaintiff shall serve the summons and Amended Complaint in accord with the Federal Rules of Civil Procedure. However, Plaintiff's request for a 30 day extension of time to effectuate service of process is GRANTED. So Ordered by Magistrate Judge Anne Y. Shields on 5/6/2025. (DM) (Entered: 05/06/2025)

05/18/2025	<u>15</u>	AMENDED COMPLAINT against Jane Doe, John Doe, Old Westbury LLC, Steve Savitsky, filed by Lidia M. Orrego. (AMF) (Entered: 05/19/2025)
05/19/2025	<u>16</u>	MOTION for Reconsideration re <u>6</u> Order on Motion for Leave to Proceed in forma pauperis, and Order on Motion to Compel by Lidia M. Orrego. (AMF) Modified docket text on 5/20/2025 (AMF). (Entered: 05/20/2025)
05/27/2025		ORDER re <u>16</u> MOTION for Reconsideration re <u>6</u> Order on Motion for Leave to Proceed in forma pauperis,,, Order on Motion to Compel,,, filed by Lidia M. Orrego. Upon reconsideration, the Court affirms its prior ruling denying Plaintiff's request for an order directing the U.S. Marshals Service to serve the Summons and Amended Complaint on Defendants, as well as the denial of Plaintiff's request to serve Defendants by cost-reducing methods. However, Plaintiff's new request for the issuance of new Summons based on new evidence identifying Defendant's addresses is GRANTED. Additionally, Plaintiff's request for a 30-day extension of time from the issuance of the new summons to serve the Summons and Third Amended Complaint is likewise GRANTED. So Ordered by Magistrate Judge Anne Y. Shields on 5/27/2025. (DM) (Entered: 05/27/2025)
05/28/2025	<u>17</u>	Summons Reissued as to Old Westbury LLC and Steve Savitsky. (LF) (Entered: 05/28/2025)
06/10/2025	<u>18</u>	Letter from Pro Se Litigant to Pro Se Office dated June 10, 2025 Re: I am writing as a pro se plaintiff in the above-referenced case to confirm that I have not received the original summons issued on May 28, 2025 (DE <u>17</u> , Case No. 24-cv-07247-SJBAYS). (GO) (Entered: 06/10/2025)
06/10/2025	<u>19</u>	Summons Reissued as to Old Westbury LLC, Steve Savitsky. (HM) (Entered: 06/10/2025)
06/10/2025		ORDER: The motion for reconsideration of the denial of Plaintiff's application to proceed <i>in forma pauperis</i> ("IFP") <u>16</u> is denied. Plaintiff's finances have not substantially changed so as to warrant IFP status. <i>See Wrenn v. Benson</i> , 490 U.S. 89, 92 (1989); (<i>see also</i> Order dated June 10, 2025, <i>Orrego v. Kerrigan</i> , No. 25-CV-736 (E.D.N.Y.), Dkt. No. 11; Order dated June 10, 2025, <i>Orrego v. Wilson</i> , No. 25-CV-769 (E.D.N.Y.), Dkt. No. 6). So Ordered by Judge Sanket J. Bulsara on 6/10/2025. (YEP) (Entered: 06/10/2025)
06/10/2025	<u>20</u>	AMENDED COMPLAINT <i>FOURTH</i> against Jane Doe, John Doe, Old Westbury LLC, Steve Savitsky, filed by Lidia M. Orrego. (GO) (Entered: 06/11/2025)
06/10/2025	<u>21</u>	APPEAL OF MAGISTRATE JUDGE DECISION to District Court Re: 5/27/2025 Order, by Lidia M. Orrego (GO) (Entered: 06/11/2025)
06/12/2025	<u>22</u>	Letter MOTION to Compel <i>/Request to Correct Docket Entry Description DE <u>21</u></i> , by Lidia M. Orrego. (GO) (Entered: 06/12/2025)
06/22/2025	<u>23</u>	Notice of MOTION to Vacate Order on Motion for Reconsideration,, <i>RENEW APPLICATION FOR IN FORMA PAUPERIS STATUS, AUTHORIZE SERVICE, AND EXTEND TIME TO SERVE</i> by Lidia M. Orrego. (NF) (Entered: 06/23/2025)
06/27/2025	<u>24</u>	Letter from Lidia Orrego to Judge Bulsara dated 6/26/2025 in Re: Supplemental Letter Motion to Amend DE <u>23</u> . (NF) (Entered: 06/27/2025)
06/27/2025	<u>25</u>	COPY OF <u>24</u> Letter from Lidia Orrego to Judge Bulsara dated 6/26/2025 in Re: Supplemental Letter Motion to Amend DE <u>23</u> . (NF) (Entered: 06/27/2025)
07/11/2025	<u>26</u>	Letter MOTION for Extension of Time to File (<i>To Serve the Fourth Amended Complaint, etc.</i>) by Lidia M. Orrego. (NF) (Entered: 07/11/2025)
07/13/2025		ORDER granting <u>26</u> Motion for Extension of Time to File. Plaintiff's request for a 30-day extension of time to serve the Summons and Fourth Amended Complaint is GRANTED. So Ordered by Magistrate Judge Anne Y. Shields on 7/13/2025. (DM) (Entered: 07/13/2025)
07/21/2025	<u>27</u>	NOTICE from Lidia Orrego RE: Petition for Writ of Mandamus, Motion for Permission to Appeal In Forma Pauperis, and Certificate of Service, submitted to the United States Court of Appeals for the Second Circuit on 7/16/2025 (Attachments: # <u>1</u> Part 2, # <u>2</u> Part 3, # <u>3</u> Part 4) (NF) (Entered: 07/23/2025)

08/11/2025	<u>28</u>	Letter MOTION for Reconsideration <i>Alternative Service Pursuant to Fed. R. Civ. P. 4(e)(1), 4(h)(1), and 4(m), and N.Y. C.P.L.R. § 308(5); Request for Reconsideration of U.S. Marshal Service Under 28 U.S.C. § 1915(d); Resolution of Pending Motions DE <u>23</u> and <u>24</u> ; Clarification That Plaintiff's Right to Seek Recusal of Both Judges Remains Unwaived; and Request for Extension of Time to Effect Service</i> by Lidia M. Orrego. (NF) (Entered: 08/12/2025)
08/14/2025	<u>29</u>	ORDER: The motions <u>23</u> <u>28</u> are denied for the reasons stated in the attached, and Plaintiff is enjoined from making additional filings in this case, absent court order, and as set forth in the attached filing injunction. So Ordered by Judge Sanket J. Bulsara on 8/14/2025. (YEP) (Entered: 08/14/2025)
08/15/2025	<u>30</u>	MOTION for Leave to File Document <i>Clarifying That DE <u>28</u> Misrepresented, Filed Timely on August 11, 2025, Before Deadline, is Not a Repetitive Reconsideration But New Request for Alternative Service Due to Defendants' Evasion, Attached DE <u>28</u> – Traditional Service Impracticable BAD FAITH Defendants under notice – Extension Time</i> by Lidia M. Orrego. (NF) (Entered: 08/15/2025)
09/11/2025	<u>31</u>	NOTICE OF INTERLOCUTORY APPEAL as to <u>29</u> Order on Motion for Reconsideration,, Order on Motion to Vacate, by Lidia M. Orrego. (KS) (Entered: 09/16/2025)
09/11/2025	<u>32</u>	MOTION for Leave to Appeal in forma pauperis by Lidia M. Orrego. (KS) (Entered: 09/16/2025)
09/16/2025		Electronic Index to Record on Appeal sent to US Court of Appeals. <u>31</u> Notice of Interlocutory Appeal Documents are available via Pacer. For docket entries without a hyperlink or for documents under seal, contact the court and we'll arrange for the document(s) to be made available to you. (KS) (Entered: 09/16/2025)