

UNITED STATES DISTRICT COURT
Eastern District of New York



Lidia M. Orrego

NOTICE OF APPEAL

Plaintiff(s),

24-cv-7247 (SJB) (AYS)

-against-

Steve Savitsky et al.

Defendant(s).



Lidia M. Orrego

(name all parties

taking the appeal)*

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

Imposing Unlawful Filing Injunction and Deprivation of Rights "retroactive" (describe the order)

entered on September 16, 2025 (state the date that the order was entered).

Plaintiff respectfully appeals from the Order in its entirety and from each part thereof.

Signature

/s/ Lidia M. Orrego

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.

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-7247-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 September 16, 2025, by Honorable Sanket J. Bulsara, United States District Judge.

The filing injunction entered on **September 16, 2025**, was issued sua sponte, without a motion, hearing, or factual findings, thereby violating established procedural and constitutional safeguards. Specifically, it violates **Federal Rules of Civil Procedure 65(b)**. Constitutionally, the injunction infringes on the **First Amendment** right to petition the Court, the **Fifth Amendment** guarantee of due process, and the **Fourteenth Amendment** right to equal protection. It also raises serious concerns under **28 U.S.C. §§ 455(a)** (judicial impartiality) and **453** (judicial oath of office). See annexed Exhibit 1.

Representative Dan Goldman publicly addressed a **comparable situation** in a letter and social media post dated **September 26, 2025** (see **Exhibit 2**), where he described the deprivation of rights as "a blatant violation." This case presents similarly serious concerns, especially given the impact on a self-represented litigant attempting to comply with active Court directives. See annexed Exhibit 2.

The Plaintiff is unlawfully barred from filing papers electronically via the Pro Se Portal. This total denial of access to the Court constitutes a blatant violation of her Constitutional rights. The restriction is not grounded in any finding of frivolous filings but rather imposed precisely because the Plaintiff has been submitting evidence that exposes the Defendants' falsehoods in their filings. Such selective prohibition of access to justice undermines the principles of due process and equal protection under the law.

The Order incorrectly states that Plaintiff's Letter Motion for Leave violated the injunction. This is factually wrong. In this case, **24-cv-7247, Orrego v. Savitsky et al., DE [30]**, Plaintiff filed a 144-page document via the Pro Se Portal, which included exhibits. Additionally, Plaintiff filed in **23-cv-6507, Orrego v. Pasternack Tilker Ziegler Walsh Stanton & Romano LLP et al., DE [103]**, a 10-page document via the Pro Se Portal on **August 15, 2025**, and **August 20, 2025**, respectively. Plaintiff never received any notice or complaint that these filings violated the first unlawful injunction dated **August 14, 2025**. The September 16, 2025, injunction, by barring all filings without exception or cause, prevents the Plaintiff from meeting these deadlines, despite no finding of abusive conduct or procedural violations.

Shockingly, the District Court denied **DE [30]**, which requested alternative service, despite the process server's affidavit establishing that Defendants were **blocking service in bad faith**. Rather than assisting Plaintiff in pursuing her case, the Court's Order protects Defendants from being served and misrepresents the content of Plaintiff's **DE [30] Letter Motion**. See annexed Exhibits 3, 4, and 5.

Exhibit 4 includes the case law *Amalgamated Bank v. JPMorgan Chase Bank, N.A. and Armon Warren, 23-CV-9511 (JMF) (JLC) (S.D.N.Y.)*, which directly supports granting relief where defendants reject service in bad faith.

Instead of applying this precedent to safeguard due process, the District Court has misrepresented the record and obstructed service, thereby shielding Defendants from accountability for fraud that has persisted since November 27, 2018.

The District Court denied service upon Defendants' counsel, **Gordon Rees Scully Mansukhani, LLP ("GRSM")**, **One Battery Park Plaza, 28th Floor, New York, NY 10004**. In direct contrast, the Second Circuit has expressly ordered that all documents related to this matter, including the Notice of Appeal and supporting papers, **must be served upon Defendants' counsel**. By refusing service, the District Court violates **FRCP 4(e)** (requiring proper service of individuals), **FRCP 4(h)** (requiring service upon corporations and associations through their authorized agents, including counsel), and **FRCP 5(b)(1)** (requiring service on a party's attorney once they have appeared). See annexed Exhibits 3, 4, 5.

The District Court erred in denying Plaintiff's request for service on Defendants' counsel, **Gordon Rees Scully Mansukhani, LLP ("GRSM")**, **One Battery Park Plaza, 28th Floor, New York, NY 10004**. Although GRSM is counsel of record in the related action **Orrego v. Knipfing et al., No. 20-cv-3361 (E.D.N.Y.)**, the District Court has refused to allow service through GRSM in the present matter, where Defendants are actively evading service.

First, this denial contravenes **FRCP 4(e)** and **FRCP 4(h)**, which authorize service on individuals and corporations through their officers or authorized agents. GRSM has already appeared on behalf of these same Defendants in the related federal action, and thus plainly acts as their authorized agent.

Second, the denial conflicts with **FRCP 5(b)(1)**, which requires service upon a party's attorney once that attorney has appeared. While the Court attempts to treat the cases as separate, Defendants cannot shield themselves from service in one action by relying on the same counsel in

another. To do so creates a procedural loophole that undermines the rules and facilitates deliberate evasion of service.

Third, the denial violates Plaintiff's **constitutional right of access to the courts** under the **First and Fifth Amendments**, as recognized in *Bounds v. Smith*, 430 U.S. 817 (1977), and *Tennessee v. Lane*, 541 U.S. 509 (2004). By blocking service through counsel already retained by Defendants in related litigation, the District Court has deprived Plaintiff of a meaningful opportunity to prosecute her claims.

Finally, the District Court's refusal stands in direct conflict with the **Second Circuit's directive** that all documents related to this matter, including the Notice of Appeal and supporting papers, must be served upon Defendants' counsel. A lower court cannot lawfully obstruct or contradict such an order.

The District Court's refusal further undermines Plaintiff's constitutional right of access to the courts under the **First and Fifth Amendments**, as well as due process protections recognized in *Bounds v. Smith*, 430 U.S. 817 (1977), and *Tennessee v. Lane*, 541 U.S. 509 (2004). This inconsistency raises a fundamental question: why is the District Court obstructing justice and punishing Plaintiff, a pro se litigant, for pursuing her case, while the Second Circuit properly recognizes and enforces the obligation of service on Defendants' counsel, GRSM?

This **broad and retroactive ban** effectively amounts to a **complete denial of access to the Court**, applied without due process and lacking the procedural safeguards required under Federal Law. See annexed Exhibit 1.

For these reasons, the District Court's denial of service constitutes clear legal error, facilitates bad-faith evasion of service, and infringes upon Plaintiff's constitutional rights..

Accordingly, immediate reconsideration or vacatur of the September 16, 2025, order is warranted to restore proper access to the Court and preserve the integrity of ongoing proceedings.

Attached Exhibits

Exhibit 1 – Order Email – Activity in Case 2:24-cv-07247-SJB-AYS Orrego v. Savitsky et al. Order on Motion for Leave to File

Exhibit 2 – X Post and Letter dated September 26, 2025 – Rep. Dan Goldman – Deprivation of Rights

Exhibit 3 – Pages 27 of 144 dated August 15, 2025 – DE [30] 144-page Request for Leave to File Motion Clarifying That DE [28] Misrepresented Case 24-cv-7247

Exhibit 4 – Dated August 15, 2025 – DE [30] Exhibit 7 – Case Law Alternative Service – 144-page Request for Leave to File Motion Clarifying That DE [28] Misrepresented Case 24-cv-7247-2

Exhibit 5 – Dated September 18, 2025 – Letter from Pro Se Office

Respectfully submitted,

Dated: September 30, 2025
Rego Park, New York

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

Certificate of Service

I certify that on September 30, 2025, I filed this statement with the Clerk of the District Court in person at the Eastern District of New York.

/s/ Lidia M. Orrego
Lidia M. Orrego
Plaintiff Pro Se

EXHIBIT 1



Lidia Orrego <lorrego@gmail.com>

Activity in Case 2:24-cv-07247-SJB-AYS Orrego v. Savitsky et al Order on Motion for Leave to File

1 message

ecf_bounces@nyed.uscourts.gov <ecf_bounces@nyed.uscourts.gov>
To: nobody@nyed.uscourts.gov

Tue, Sep 16, 2025 at 7:19 PM

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mailbox is unattended.

Additional Security Enhancements Coming Soon For information visit PACER website

<https://pacer.uscourts.gov/announcements/2025/06/27/additional-security-enhancements-coming-soon>

NOTE TO PUBLIC ACCESS USERS Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

Eastern District of New York

Notice of Electronic Filing

The following transaction was entered on 9/16/2025 at 7:19 PM EDT and filed on 9/16/2025

Case Name: Orrego v. Savitsky et al
Case Number: 2:24-cv-07247-SJB-AYS
Filer:
Document Number: No document attached

Docket Text:

ORDER: Plaintiff Orrego has now filed multiple applications seeking leave to file additional motions and/or open new cases. Though the cover letters for these motions comply with the Court's admonition that leave be sought in a short letter with a word limit, the motions attach hundreds, if not thousands of pages of material, which not only violate the filing injunction, but are unnecessarily duplicative material.

The Clerk's Office is directed to return all of this material via first-class mail to Plaintiff. The motions seeking leave, in this case at Dkt. No. [30], are denied. Plaintiff is prohibited from making any further filings on this docket, or using the portal available to pro se litigants, absent further order of this Court (no leave may be sought). The Clerk's Office is directed to terminate Plaintiff Orrego's access to the pro se portal, to reject and promptly return to Plaintiff any motion or document submitted by her, and not to file any submission on ECF or retain custody of such material.

Plaintiff is reminded that her filing of this unnecessary material has simply impeded, delayed, and obstructed the Court's ability to resolve the merits of the case, and its ability to move this case forward, to trial (if appropriate). The Court will lift this filing injunction following resolution of the pending motions in all of her cases, in order to give her an opportunity to object, appeal, or reconsider any decision, or to make any post-decision filings attendant to trial, should the Court determine that the case should proceed to trial or further discovery. But until the Court renders such decisions, the filing injunction imposed by this order will remain in place. So Ordered by Judge Sanket J. Bulsara on 9/16/2025. (LOG)

2:24-cv-07247-SJB-AYS Notice has been electronically mailed to:

EXHIBIT 2

← Post



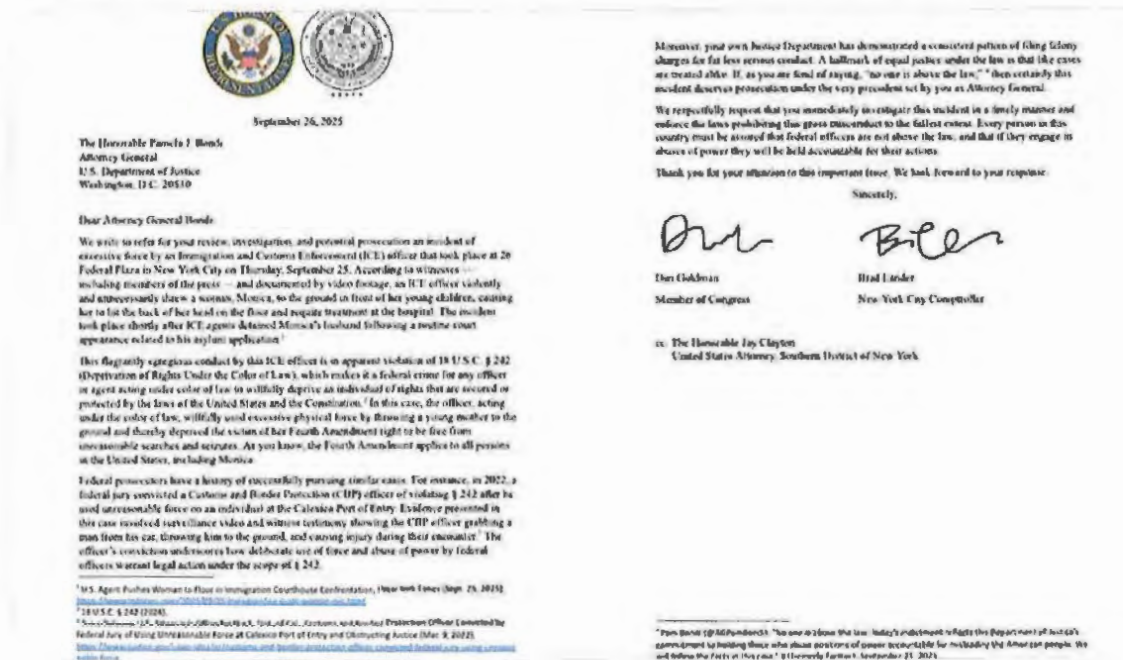
Rep. Dan Goldman
@RepDanGoldman



Yesterday, an ICE officer violently threw a young mother to the ground at 26 Federal Plaza in front of her 2 children—sending her to the hospital.

This assault is a blatant violation of her rights.

@NYCComptroller and I have referred this officer to @AGPamBondi for criminal investigation. New Yorkers seeking asylum deserve safety and dignity, not excessive force from agents outside courtrooms.



3:17 PM · Sep 26, 2025 · 39.8K Views

6012

659

1.9K

39





September 26, 2025

The Honorable Pamela J. Bondi
Attorney General
U.S. Department of Justice
Washington, D.C. 20530

Dear Attorney General Bondi:

We write to refer for your review, investigation, and potential prosecution an incident of excessive force by an Immigration and Customs Enforcement (ICE) officer that took place at 26 Federal Plaza in New York City on Thursday, September 25. According to witnesses — including members of the press — and documented by video footage, an ICE officer violently and unnecessarily threw a woman, Monica, to the ground in front of her young children, causing her to hit the back of her head on the floor and require treatment at the hospital. The incident took place shortly after ICE agents detained Monica's husband following a routine court appearance related to his asylum application.¹

This flagrantly egregious conduct by this ICE officer is in apparent violation of 18 U.S.C. § 242 (Deprivation of Rights Under the Color of Law), which makes it a federal crime for any officer or agent acting under color of law to willfully deprive an individual of rights that are secured or protected by the laws of the United States and the Constitution.² In this case, the officer, acting under the color of law, willfully used excessive physical force by throwing a young mother to the ground and thereby deprived the victim of her Fourth Amendment right to be free from unreasonable searches and seizures. As you know, the Fourth Amendment applies to all persons in the United States, including Monica.

Federal prosecutors have a history of successfully pursuing similar cases. For instance, in 2022, a federal jury convicted a Customs and Border Protection (CBP) officer of violating § 242 after he used unreasonable force on an individual at the Calexico Port of Entry. Evidence presented in this case involved surveillance video and witness testimony showing the CBP officer grabbing a man from his car, throwing him to the ground, and causing injury during their encounter.³ The officer's conviction underscores how deliberate use of force and abuse of power by federal officers warrant legal action under the scope of § 242.

¹ U.S. Agent Pushes Woman to Floor in Immigration Courthouse Confrontation, New York Times (Sept. 25, 2025), <https://www.nytimes.com/2025/09/25/nyregion/ice-push-woman-nyc.html>

² 18 U.S.C. § 242 (2024).

³ Press Release, U.S. Attorney's Office for the S. Dist. of Cal., Customs and Border Protection Officer Convicted by Federal Jury of Using Unreasonable Force at Calexico Port of Entry and Obstructing Justice (Mar. 9, 2022), <https://www.justice.gov/usao-sdca/pr/customs-and-border-protection-officer-convicted-federal-jury-using-unreasonable-force>.

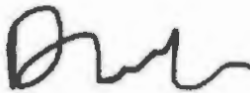
Page 2

Moreover, your own Justice Department has demonstrated a consistent pattern of filing felony charges for far less serious conduct. A hallmark of equal justice under the law is that like cases are treated alike. If, as you are fond of saying, "no one is above the law,"⁴ then certainly this incident deserves prosecution under the very precedent set by you as Attorney General.

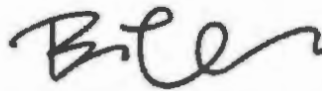
We respectfully request that you immediately investigate this incident in a timely manner and enforce the laws prohibiting this gross misconduct to the fullest extent. Every person in this country must be assured that federal officers are not above the law, and that if they engage in abuses of power they will be held accountable for their actions.

Thank you for your attention to this important issue. We look forward to your response.

Sincerely,



Dan Goldman
Member of Congress



Brad Lander
New York City Comptroller

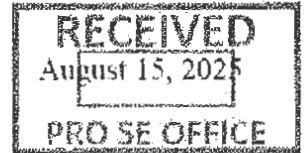
cc: The Honorable Jay Clayton
United States Attorney, Southern District of New York

⁴ Pam Bondi (@AGPamBondi), "No one is above the law. Today's indictment reflects this Department of Justice's commitment to holding those who abuse positions of power accountable for misleading the American people. We will follow the facts in this case," X (formerly Twitter), September 25, 2025, <https://x.com/AGPamBondi/status/1971345371583611099>

EXHIBIT 3

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:

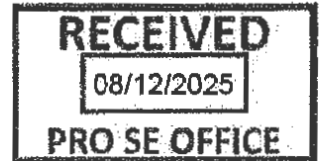
7/25/2025 4:30 PM: I spoke with an individual who identified themselves as the security and they stated service not permitted. To get an access to elevator, you need to check in with security. After the phone call security told me: - You do not have permission to service.



EXHIBIT 1

*** 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

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 Carmesi, 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

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

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

EXHIBIT 1



Lidia Orrego <lorrego@gmail.com>

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

Lidia Orrego <lorrego@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 <lidia.orrego@justiceforlidia.nyc>, Lidia Orrego <orregoprose@gmail.com>, Kuuku Minnah-Donkoh <kmminnahdonkoh@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 lorrego@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.

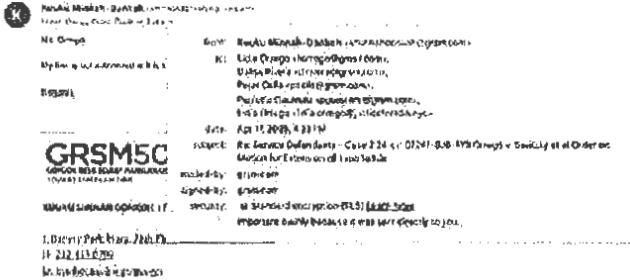
Best regards,

Lidia Orrego
Plaintiff Pro Se

- **Skyler Testa:** Mr. Testa is employed with the Kriplings 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 Kriplings. Any communication with Mr. Testa must be through the undersigned counsel.
- **Steve Savitsky:** Mr. Savitsky is employed as Mr. Kripling's business manager, and has discoverable information concerning Plaintiff's employment with the Kriplings 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

From: Lidia Orrego



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 <lorrego@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.nyc>; 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, 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. Savitsky (<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
- Exhibit1_Email_MinnahDonkoh_4-17-2025.pdf

- 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" <llorego@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/ed

WE HAVE MOVED !!!!

STEVE SAVITSKY

Office: 310.315.6203

Fax: 310.873.5906

OLD WESTBURY, LLC
c/o Savitsky Satin Bacon & Buccell
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 Knipfling'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,



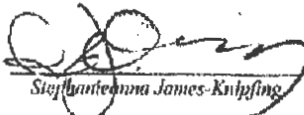
Steve Savitsky,
Business Manager, Old Westbury, LLC

SS/ew

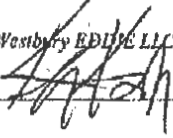
Docket EDNY: 20-cv-03361 letter and DE [17]

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

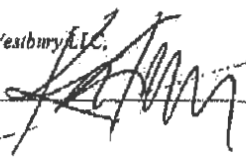

Kevin Knipfing

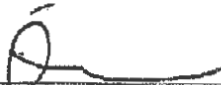

Stephanieanna James-Knipfing

Old Westbury EDDIE LLC,

By: 

Old Westbury LLC,

By: 


Teresa A. Zantua


Steve Savitsky

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

Kevin Knipfing

Stephanieanna James-Knipfing

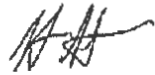
Old Westbury EDDIE LLC,

By: _____

Old Westbury LLC,

By: _____


Teresa A. Zantua


Steve Savitsky



STATE OF NEW YORK

Search

Department of State Division of Corporations

Entity Information

Return to Home Page

Return to Home Page

Entity Details

ENTITY NAME: OLD WESTBURY EDDIE LLC
FOREIGN LEGAL NAME:
ENTITY TYPE: DOMESTIC LIMITED LIABILITY COMPANY
SECTION OF LAW: 2011 LC - LIMITED LIABILITY COMPANY LAW
DATE OF INITIAL DOS FILING: 05/02/2015
EFFECTIVE DATE INITIAL FILING: 05/02/2015
FOREIGN FORMATION DATE:
COUNTRY: NASSAU
JURISDICTION: NEW YORK, UNITED STATES

DOS ID: 166117
FICTITIOUS NAME:
DURATION DATE/LATE BY DATE OF DISSOLUTION:
ENTITY STATUS: ACTIVE
REASON FOR STATUS:
INACTIVE DATE:
STATEMENT STATUS: PAST DUE
NEXT STATEMENT DUE DATE: 05/02/2025
NFP CATEGORY:

ENTITY DISPLAY

ENTITY CODE

ENTITY TYPE

ENTITY STATUS

ENTITY INACTIVE DATE

ENTITY NEXT STATEMENT DUE DATE

ENTITY NFP CATEGORY

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

Name: OLD WESTBURY EDDIE LLC

Address: 1400 PARKWAY EAST, SUITE 200, WESTBURY, NEW YORK 11591, NEW YORK, UNITED STATES, 07591

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))

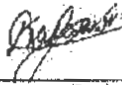
This summons for Steve Savitsky
was received by me on 7/25/2025:

- ☐ 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 2040 Century Park E Ste 1400, Los Angeles, CA 90057; 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



Donor's signature

David Kajashian

I read name and title

43826 Califa st
Van Nuys, CA 91401

Donor'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.



AO 440 (Rev. 08/12) 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 (i))

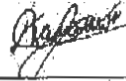
This summons for Old Westbury LLC
was received by me on 7/25/2025:

- ☐ 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 3045 Century Park E Ste 1400, Los Angeles, CA 90087; 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 Kateshian
Printed name and title

13625 Califa st
Van Nuys, CA 91401

Server's Address

Additional information regarding attempted service, etc:

7/26/2025 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 #: 0170490705





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**
997CK

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))

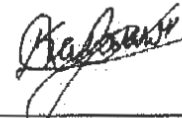
This summons for **Steve Savitsky**
was recieved by me on **7/25/2025**:

- ☐ 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 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 #: 0179490765



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))

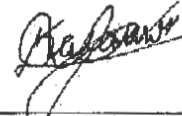
This summons for **Old Westbury LLC**
was recieved by me on **7/25/2025**:

- ☐ 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



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 38 Filed 08/15/25 Page 27 of 141 PageID



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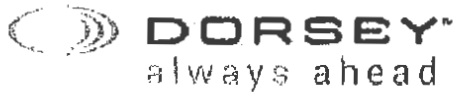


U.S. POSTAGE
ZIP 90067 \$ 005.95
02 1B
0001388942 NOV 27 2015

VIA CERTIFIED MAIL

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

EXHIBIT 4



LANIER SAPERSTEIN
Partner
(212) 415-9385
saperstein.lanier@dorsey.com

March 26, 2024

VIA ECF

Hon. Jesse M. Furman
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Amalgamated Bank v. JPMorgan Chase Bank, N.A. and Armon Warren*,
23-CV-9511 (JMF) (JLC) (SDNY)

Dear Judge Furman:

We represent Plaintiff Amalgamated Bank (“Amalgamated”) in the above-referenced action, and we request permission pursuant to Fed. R. Civ. P. 4(e) and N.Y. CPLR § 308(5) to serve by alternative means the Summons and Complaint, as well as certain other case filings listed in Appendix A, on Defendant Armon Warren. We have sought to serve Defendant Warren at three different addresses, two in Georgia and one in California, without success. Chase has sought to serve its removal papers on Defendant Warren at two addresses in Georgia, also without success.

The extended deadline for us to serve Defendant Warren is April 3, 2024 (Dkt. No. 17), and if the Court grants our request, we request permission to effect service by April 10, 2024.

I. Background

Amalgamated is trying to recover more than \$400,000 stolen by one of Chase’s customers, Defendant Warren, from one of Amalgamated’s customers, a New York-based union representing local workers. Defendant Warren obtained the funds in May 2023 by depositing an altered check into one of his Chase accounts and then drawing down on the funds. On August 3, 2023, more than two months after Amalgamated’s initial request for the return of the funds and after Chase already returned some of the stolen funds, Chase denied Amalgamated’s request. Chase asserted that it was not obligated to return the stolen funds, asserting that the check was counterfeit, not altered.

Amalgamated commenced this case in October 2023, and Amalgamated and Chase are in the midst of discovery. Efforts to serve Defendant Warren at five different locations by both Chase and Amalgamated have been unsuccessful. While we have been unable to serve Defendant Warren by traditional means, Defendant Warren is a social media personality, who can be fairly notified of this litigation through alternate service via email, his social media accounts, as well as his businesses.

II. Traditional Service is Impractical

Pursuant to Fed. R. Civ. P. 4(e), Defendant Warren can be served either in accordance with the federal rules or New York law. Fed. R. Civ. P. 4(e)(2) and CPLR § 308 collectively allow personal service,



Hon. Jesse M. Funnar
March 26, 2024
Page 2

service on an authorized representative, service at an individual's residence, and service at an individual's place of employment.¹

We have been unable to serve Defendant Warren by any of the traditional means. Defendant Warren no longer resided at the address listed on the altered check when we sought to serve him in October 2023. *See Exhibit 1* at 1. In February 2024, after we obtained a copy of Defendant Warren's driver's license from Chase, we sent a process server to the address listed on the driver's license and the process server reported that no one was there and the premises appeared vacant. *See Exhibit 2* at 1. Defendant Warren also does not live at the address of his former significant other, who we identified using a background check. *See Exhibit 3* at 1. Neither Amalgamated nor Chase has been able to serve him by traditional means. *See Exhibit 4* at 1-4 (reflecting Chase's repeated unsuccessful efforts to serve Mr. Warren). Mr. Warren's recent YouTube posts reference him touring potential housing in Florida and California, and indicate that he was recently in Tennessee, but gave no indication of his present location.

III. Alternate Service will be Sufficient to Notify Mr. Warren of this Litigation

Under New York law, if service is not practicable using traditional methods, service may be effected in any manner that the Court orders. CPLR § 308(5). Alternative service is appropriate when traditional service is impractical and the proposed alternate means of service comply with due process by making it likely that the defendant will receive notice of the lawsuit. *See, e.g., Shanghai Shuoxin Int'l Co., Ltd. v. El Toro Carnesi, LLC*, 23-cv-08496 (ER), 2023 U.S. Dist. LEXIS 194196, *3 (S.D.N.Y. Nov. 30, 2023) (authorizing email service because there was evidence that defendant accessed email account at issue and thus was likely to receive notice).

While Mr. Warren cannot be served through traditional means, we propose serving him through one or more of the five following alternative methods:

First, we can effect service via two email addresses. Mr. Warren shares ones of his email addresses in the public videos he posts via the social media platform, Instagram, including in an October 18, 2023 video (showing ArmoneyBookings@gmail.com email address eighteen seconds into video).² Mr. Warren listed the same email address—armoneybookings@gmail.com—in *Exhibit 6* at JPMC0129.

Mr. Warren also listed a second address, [REDACTED], in *Exhibit 6* at JPMC0261-2. Courts have allowed alternate service via email when a defendant is likely to receive the email because they actively post/advertise about it. *See, e.g., Sulzer Mixpac AG v. Medenstar Indus. Co.*, 312 F.R.D. 329, 332 (S.D.N.Y. 2015) (authorizing email service where email was displayed on company website and thus was likely to receive notice).

Second, we can effect service via Defendant Warren's Instagram account. Defendant Warren is an active Instagram user with more than 2.4 million followers. His username is @armon.warren, and he can

¹ While Defendant Warren does not appear to reside in New York, CPLR § 313 states that a person subject to this Court's jurisdiction may be served anywhere outside the state of New York in accordance with the rules for service within the state.

² *See Exhibit 5*, Screenshot from October 18, 2023 video, available at <https://www.youtube.com/watch?v=1kLzC3cAbRQ>.



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March 26, 2024
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be sent direct messages through his Instagram account. Mr. Warren frequently goes “live” on Instagram and posts videos, including on March 21, 2024, when he went live for 35 minutes 15 seconds. Courts also allow service via social media where, as here, the defendant actively engages on these platforms. *See, e.g., FNTV, LLC v. Starnes Media Grp. LLC*, 22-CV-4042, 2023 U.S. Dist. LEXIS 140036, *3-4 (E.D.N.Y. August 10, 2023) (granting default judgment after agreeing to alternate service on defendant, an active social media user, by “email, Facebook, Twitter, and Instagram”).

Third, we can effect service by sending the documents listed in Appendix A via US Mail to Mr. Warren’s attention care of Ar’mon and Trey LLC at the address of Ar’mon and Trey LLC’s registered agent for service of process. Ar’mon and Trey LLC is a Michigan Limited Liability Company organized by Ar’mon Warren and Treyvion Traylor, with the registered agent Shiquita Hathaway. *See Exhibit 7*. In other words, Mr. Warren and his brother are Ar’mon and Trey LLC’s members, and Mr. Warren’s mother is its registered agent for service of process. Alternate means of service can include serving an entity through an organization in which the defendant has an ownership interest. *See Berdeaux v. Onecoin Ltd.*, 2020 U.S. Dist. LEXIS 13324, *4-5 (S.D.N.Y. Jan. 24, 2020) (upholding service on a defendant through a company in which it had an ownership interest and through other methods because these methodologies, when combined, were “reasonably calculated to apprise interested parties of the pendency of the litigation and afford them an opportunity to appear”).

Fourth, we can effect service by sending the documents listed in Appendix A via US Mail to Mr. Warren’s attention care of ArmoneyMerch LLC through its last known registered agent for service of process. Mr. Warren is the organizer of ArmoneyMerch LLC, which lists the same Peachtree address as on the altered check. A copy of the Certificate of Organization for Mr. Warren’s business is attached hereto as Exhibit 8. ArmoneyMerch LLC was administratively resolved on September 8, 2023 because it violated Georgia’s registration laws, but we believe serving on it would provide notice to Defendant Warren, especially in conjunction with the above efforts. *See, e.g., Platina Bulk Carriers Pte Ltd v. Praxis Energy Agents DMCC*, 2020 U.S. Dist. LEXIS 191351, *6 (S.D.N.Y. Oct. 15, 2020) (holding that, while some of the service methods plaintiff proposed, including serving defendants at an address they no longer appeared to occupy, might fail, the combined method would be “reasonably calculated” to notify the defendants of the lawsuit); *Berdeaux v. Onecoin Ltd.*, at *5.

Finally, we can effect service by sending the documents listed in Appendix A via US Mail to Mr. Warren’s attention at 161 Peachtree Center Avenue, NE Ste 2, Atlanta, Georgia, 30303, the address Mr. Warren provided on the check at issue in this litigation.

* * *

Amalgamated respectfully requests that, pursuant to Fed. R. Civ. P. 4(e) and N.Y. CPLR § 308(5), it be authorized to serve the Summons and Complaint, as well as the other case filings listed in Appendix A on Mr. Warren by one or more of the above methods.



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March 26, 2024
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Sincerely,

/s/ Lanier Saperstein

Lanier Saperstein

Enclosures

cc: All counsel of record (via ECF)

Plaintiff's letter motion for leave to effectuate service by alternate means pursuant to Rule 4(e) of the Federal Rules of Civil Procedure is GRANTED, substantially for the reasons reflected in the letter motion and the exhibits attached thereto. Plaintiff has made the requisite showing that "traditional methods of service" have proved "impracticable" and that the alternate methods it proposes are, taken together, "reasonably calculated, under the circumstances, to apprise [Defendant Warren] of the pendency of the action and afford [him] an opportunity to present [his] objections." *Sirius XM Radio Inc. v. Aura Multimedia Corp.*, 339 F.R.D. 592, 593 (S.D.N.Y. 2021); *see also, e.g., Vega v. Hastens Beds, Inc.*, 339 F.R.D. 210, 217 (S.D.N.Y. 2021) ("[S]ervice by email alone comports with due process where a plaintiff demonstrates that the email is likely to reach the defendant."). Plaintiff is granted through and until April 10, 2024, to effectuate service on Defendant Warren and shall serve the documents listed in Appendix A, in addition to a copy of this Order, on Warren by each of the five proposed methods of alternate service.

Additionally, Plaintiff's motion to redact portions of its letter motion and maintain under seal Exhibit 6 attached thereto is GRANTED, substantially for the reasons stated in its motion. *See* ECF No. 29; *see also, e.g., Cantinieri v. Verisk Analytics, Inc.*, No. 21-CV-6911 (NJC) (JMW), 2024 WL 759317, at *2 (E.D.N.Y. Feb. 23, 2024) (observing that privacy interests in maintaining PII under seal "weigh heavily in the Court's balancing against the presumption of access" and "the public will not be prejudiced if denied access to this information").

The Clerk of Court is directed to terminate ECF Nos. 29, 30 & 31.

SO ORDERED.

March 27, 2024



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Appendix A

Set forth below is the list of documents that Amalgamated proposes to serve on Defendant Warren:

1. Amalgamated's Summons and Complaint (Dkt. No. 1-1)
2. Chase's Notice of Removal (Dkt No. 1)
3. Civil Case Management Plan (Dkt. No. 17)
4. Confidentiality Stipulation and Protective Order (Dkt. No. 20).
5. Copy of Docket Sheet as of March 26, 2024

EXHIBIT 5

UNITED STATES DISTRICT COURT
FOR THE
EASTERN DISTRICT OF NEW YORK

Brenna B. Mahoney
Clerk of Court

August Marziliano
Chief Deputy, Brooklyn

Ogoro Francis-McLeish
Chief Deputy, Central Islip



Theodore Roosevelt Federal Courthouse
Emanuel Celler Federal Courthouse
225 Cadman Plaza East
Brooklyn, NY 11201
(718) 613-2270

Alfonse D'Amato Federal Courthouse
100 Federal Plaza
Central Islip, NY 11722
(631) 712-6000
Pro Se: (631) 712-6060

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

September 18, 2025

RE: 20-cv-3361-SJB-AYS; 23-cv-6507-SJB-AYS and 24-cv-7247-SJB-AYS

Dear Ms. Orrego,

The enclosed documents are being returned without docketing or consideration for the following reason(s):

- () The docket number and judge's initials are missing.
- () Your signature is required on all papers filed with the Court. Please sign wherever an "X" appears.
- () These papers appear to be intended for another court or agency.
- (X) Other: Pursuant to the enclosed electronic orders So Ordered by District Judge Bulsara on 9/16/2025 "The Clerk's Office is directed to return all of this material via first-class mail to Plaintiff."

Date: 09/18/2025

BRENNA B. MAHONEY
CLERK OF COURT

By: /s/ Pro Se Department

Enclosures: *Electronic order So Ordered by District Judge Bulsara on 9/16/2025 on cases 20-cv-3361-SJB-AYS; 23-cv-6507-SJB-AYS and 24-cv-7247-SJB-AYS;*
Pro Se Electronic Portal submission for 23cv6507 stamped 11:40 am, 21 Aug. 2025 (15 pages printed double sided);
Pro Se Electronic Portal submission for 20cv3361 stamped 10:53 am, 09 Sep. 2025 (229 pages printed double sided);
Pro Se Electronic Portal submission for 20cv3361 stamped 10:23 PM, 15 Sep, 2025 (4 pages printed double sided);
Pro Se Electronic Portal submission for 20cv3361 stamped 1:36 PM, 15 Sep, 2025 (1137 pages printed double sided with 4 pages per side)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Lidia M. Orrego,

Plaintiff,

-against-

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

Defendants.

Affirmation of Service

24cv7247 (SJB) (AYS)

I, Lidia M. Orrego, declare under penalty of perjury that I served a copy of Letter Motion Leave to File, Notice of Appeal Order Dated September 16, 2025, Informational Statement and Exhibits 1-5 attached Dated September 30, 2025 upon the Defendant(s) or attorney whose physical address:

Law Firm Gordon Rees Scully Mansukhani, LLP
One Battery Park Plaza, 28th Floor
New York, NY 10004

Via ECF & Notice has been electronically mailed to: kminnahdonkoh@grsm.com;
kminnahdonkoh@gordonrees.com; dlrivra@grsm.com; pcella@grsm.com

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 30, 2025
Rego Park, New York

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

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. <u>2</u> .) 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); (see also 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 23 and 24 ; 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 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</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) (Main Document 31 replaced on 9/25/2025) (LF). (Entered: 09/16/2025)
09/11/2025	<u>32</u>	MOTION for Leave to Appeal in forma pauperis by Lidia M. Orrego. (KS) (Main Document 32 replaced on 9/25/2025) (LF). (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)
09/16/2025		ORDER: Plaintiff Orrego has now filed multiple applications seeking leave to file additional motions and/or open new cases. Though the cover letters for these motions comply with the Court's admonition that leave be sought in a short letter with a word limit, the motions attach hundreds, if not thousands of pages of material, which not only violate the filing injunction, but are unnecessarily duplicative material. The Clerk's Office is directed to return all of this material via first-class mail to Plaintiff. The motions seeking leave, in this case at Dkt. No. <u>30</u> , are denied. Plaintiff is prohibited from making any further filings on this docket, or using the portal available to pro se litigants, absent further order of this Court (no leave may be sought). The Clerk's Office is directed to terminate Plaintiff Orrego's access to the pro se portal, to reject and promptly return to Plaintiff any motion or document submitted by her, and not to file any submission on ECF or retain custody of such material. Plaintiff is reminded that her filing of this unnecessary material has simply impeded, delayed, and obstructed the Court's ability to resolve the merits of the case, and its ability to move this case forward, to trial (if appropriate). The Court will lift this filing injunction following resolution of the pending motions in all of her cases, in order to give her an opportunity to object, appeal, or reconsider any decision, or to make any post-decision filings attendant to trial, should the Court determine that the case should proceed to trial or further discovery. But until the Court renders such decisions, the filing injunction imposed by this order will remain in place. So Ordered by Judge Sanket J. Bulsara on 9/16/2025. (LOG) (Entered: 09/16/2025)
09/17/2025	<u>33</u>	ORDER: On September 11, 2025, Lidia Orrego, acting pro se, filed a Notice of Interlocutory Appeal <u>31</u> of this Court's August 14, 2025 Order <u>29</u> , together with an application to proceed <i>in forma pauperis</i> ("IFP") <u>32</u> . However, Orrego used the form application for IFP status in the district court rather than Form 4 of the Appellate Appendix of Forms. Upon review, it is apparent that the present application lacks the information required by Federal Rule of Appellate Procedure 24(a)(1). Accordingly, the application to proceed IFP <u>32</u> is denied without prejudice and with leave to renew on the Circuit Court's Form 4 annexed to this Order. So Ordered by Judge Sanket J. Bulsara on 9/17/2025. (LOG) (Entered: 09/17/2025)
09/18/2025	<u>34</u>	Letter from Pro Se Department to Lidia M. Orrego dated 9/18/2025. The enclosed documents are being returned without docketing or consideration for the following reason(s): Pursuant to the enclosed electronic orders So Ordered by District Judge

		Bulsara on 9/16/2025 "The Clerk's Office is directed to return all of this material via first-class mail to Plaintiff." (NF) (Entered: 09/18/2025)
09/19/2025	<u>35</u>	MOTION for Leave to Appeal in forma pauperis by Lidia M. Orrego. (KS) (Entered: 09/23/2025)
09/23/2025		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: 09/23/2025)
09/25/2025		Second Supplemental 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. (LF) (Entered: 09/25/2025)
09/30/2025	<u>36</u>	Letter MOTION for Leave to Appeal <i>order of the court entered on September 16, 2025</i> by Lidia M. Orrego. (DC) (Entered: 10/02/2025)
09/30/2025	<u>37</u>	MOTION for Leave to Appeal in forma pauperis by Lidia M. Orrego. (DC) (Entered: 10/02/2025)
09/30/2025	<u>38</u>	NOTICE OF INTERLOCUTORY APPEAL as to Order on Motion for Leave to File, entered on 9/16/2025, by Lidia M. Orrego. (DC) (Entered: 10/02/2025)
10/01/2025		ORDER: Pro se Plaintiff Orrego's motion for leave to appeal <i>in forma pauperis</i> <u>35</u> is denied. "An appeal may not be taken <i>in forma pauperis</i> if the trial court certifies in writing that it is not taken in good faith." <i>Romero v. DHL Express, Inc.</i>, No. 15-CV-4844, 2017 WL 2266990, at *1 (S.D.N.Y. May 6, 2017) (internal quotations and citations omitted). The "good faith" standard is objective; and it is not met when a party seeks review of a frivolous claim. <i>See Coppedge v. United States</i>, 369 U.S. 438, 444-45 (1962). Here Orrego seeks to appeal this Court's entry of a filing injunction. As this Court has repeatedly explained, the filing injunction--imposed after notice was provided--was an appropriate sanction given Orrego's repetitive filing of unnecessary material that has impeded, delayed, and obstructed the Court's ability to resolve the merits of the case. (See Order dated Aug. 14, 2025). The Court is prepared to lift the injunction following resolution of the pending motions in all of Plaintiff's cases. (See Order dated Sep. 16, 2025). A frivolous appeal of the injunction only works to further delay the resolution of these cases. The Court has reviewed the record and certifies that an appeal would not be taken in good faith. <i>See Coppedge</i>, 369 U.S. at 444-45. The application to proceed <i>in forma pauperis</i> is denied. Pursuant to Rule 24(a)(4) of the Federal Rules of Appellate Procedure, the Clerk of Court shall immediately notify the United States Court of Appeals for the Second Circuit of this order. The Clerk of Court is also respectfully directed to mail a copy of this Order to Orrego at her address of record and to record such service on the docket. So Ordered by Judge Sanket J. Bulsara on 10/1/2025. (LOG) Modified on 10/2/2025 (EM). (Entered: 10/01/2025)
10/02/2025		Electronic Index to Record on Appeal sent to US Court of Appeals. <u>38</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. (DC) (Entered: 10/02/2025)