

GEORGE SASSOWER

ATTORNEY AT LAW
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914-949-2169

August 22, 1987

Hon. Rudolph W. Giuliani
United States Attorney
One St. Andrew's Plaza,
New York, New York, 10007

Re: George Sassower
86 Bkcy 20500 [HS]

Dear Sir:

1. I am a Chapter 13 Trustee in the above matter entitled to all the privileges of a trustee, and bring to your attention 18 U.S.C. §3057 and 18 U.S.C. §152 et seq., relating to the Proof of Claim of Lee Feltman, Esq., dated February 24, 1987, "as the Receiver for Puccini Clothes, Ltd.", a copy of same is herewith enclosed.

2a. The Proof of Claim alleges that a judgment against me of \$15,604 against me, as well as an Order directing the payment of \$5,000.

b. It falsely claims that "all payments on these claims have been credited and deducted" and that "these claims are not subject to any valid setoff or counterclaims.

c. I believe you can confirm from the exhibits in the possession of Hon. Howard Schwartzberg that in fact there exists in my favor a judgment against Puccini Clothes, Ltd., in the amount of \$27,912.42, and also that on the aforementioned \$5,000 direction, there were various levies placed on my bank accounts, and that the Sheriff turned over to the Receiver various sums of monies.

3. In short, the Proof of Claim is a product of perjury, and I request a Report issued to His Honor, in addition to a criminal proceeding against Mr. Feltman.

Very truly yours,

GEORGE SASSOWER

cc: Hon. Howard Schwartzberg
Lee Feltman, Esq.
Jeffrey L. Sapir, Esq.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
(WESTCHESTER)

-----x
In re: : Chapter 7
: 86 Bkcy 20500 (HS)
GEORGE SASSOWER, :
: PROOF OF CLAIM
Debtor. :
-----x

1. The undersigned, Lee Feltman, Esq., as the Receiver for Puccini Clothes, Ltd., is the claimant herein and maintains an office at Park Avenue Plaza, 55 East 52nd Street, New York, New York 10055.

2. At the time of the filing of the Petition, the Debtor was indebted to the Receiver in the total sum of at least \$703,973.65, with interest accrued and accruing thereon.

3. The Receiver has obtained the following awards against the Debtor:

(a) a Judgment entered on October 6, 1986 in the United States District Court for the Southern District of New York in an action entitled "Hyman Raffe, individually and on behalf of Puccini Clothes, Ltd. v. John Doe, et al." (84 Civ. 6272 (WCC)), awarding attorneys' fees and costs to the Receiver and against the Debtor in the amount of \$15,604.00 (Exhibit "A");

Exhibit B

Exhibit C

Exhibit D

Exhibit E

Exhibit F

Exhibit G

(b) An Order, dated June 10, 1985, issued in a proceeding entitled "In the Matter of the Application of Jerome H. Barr and Citibank, N.A." pending in the Supreme Court, New York County (Index No. 01816/80), directing the Debtor to pay the sum of \$5,000.00 to the Receiver (Exhibit "B"); and

(c) the Receiver was awarded various additional court costs, fines and attorneys' fees in various actions and proceedings in the New York Supreme Court relating to the dissolution of Puccini Clothes, Ltd. ("Puccini").

The Receiver has agreed to assign such sums to Hyman Raffe. The Receiver's Petition, which seeks an order, inter alia, approving such assignment, is before the New York Supreme Court. The said application is being held in abeyance pending this proceeding.

4. The Receiver also has a claim against the Debtor for damages resulting from the Debtor's vexatious and malicious litigation misconduct in connection with the dissolution of Puccini. Notwithstanding that the Debtor was disqualified from representing a shareholder of Puccini, was permanently enjoined from purporting to take any legal action on behalf of Puccini, and was thereafter permanently enjoined from commencing or continuing any Puccini-related litigation, the Debtor en-

gineered a massive campaign of litigation harassment against the Receiver (and his attorneys as well as against Puccini's shareholders and their attorneys) which includes more than 35 lawsuits, more than 40 proceedings pursuant to Article 78 of the New York Civil Practice Law and Rules, more than 300 motions, and a bar association grievance against the Receiver. The Receivership has paid attorneys fees and expenses totalling \$683,369.65 through the filing of the Petition in this proceeding to defend this litigation onslaught.

5. No judgment has been rendered on these claims except as set forth above.

6. The amount of all payments on these claims have been credited and deducted for the purpose of making this Proof of Claim.

7. These claims are not subject to any valid setoff or counterclaim.

8. No security interest is held for these claims which are general unsecured claims.

Dated: New York, New York
February 24, 1987



LEE FELTMAN

Exhibit B

Exhibit C

Exhibit D

Exhibit E

Exhibit F

Exhibit G