

APR 7 1986
REGISTRY

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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PEOPLE OF THE STATE OF NEW YORK, ex rel.,
PUCCINI CLOTHES, LTD.; GEORGE SASSOWER,
and HYMAN RAFFE, a hostage,

Index No. 7527/86

Petitioner,

-against-

Hon. SOL WACHTLER, as Chief Judge of the
Courts of the State of New York; and
JOSEPH W. BELLACOSA, Chief Administrator
of the Courts of THE STATE OF NEW YORK,

Respondents.

-----x
S I R S:

PLEASE TAKE NOTICE, that upon the annexed
petition of GEORGE SASSOWER, Esq., dated March 26, 1986,
the undersigned will move this Court at a Motion Support
Part of the Supreme Court of the State of New York,
County of New York, held at the Courthouse thereof, on
the 14th day of April, 1986, at 9:30 o'clock in the
forenoon of that day or as soon thereafter as Counsel
may be heard for an Order (1) transferring this matter
to a county outside the First Judicial Department; (2)
that respondents and/or their administrative
subordinates be restrained from employing the Attorney
General as their attorney, except upon assurance that
conflicting obligations would not arise therefrom; (3)
removing Administrative Riccobono from any and all

60 Center Street
NY NY
10007

1986

ministerial and supervisory duties and obligations with respect to the petitioners; (4) nullification of all procedures employed with respect to the petitioners which did not comport with the letter, spirit, or intent of the random selection process; (4) compelling respondents to settle an accounting with respect to Puccini, or have someone settle same on their behalf; (5) together with any other, further, and/or different relief as to this Court may seem just and proper in the premises, including restoring constitutional and legal standards and practices in the Supreme Court, New York County, as complained of herein.

PLEASE TAKE FURTHER NOTICE, that answering papers, if any, are to be served upon the undersigned at least seven days before the return date of this motion, with an additional five days if such service is by mail.

Dated: March 26, 1986

Yours, etc.,

GEORGE SASSOWER, Esq.
Attorney for petitioners
51 Davis Avenue,
White Plains, N.Y. 10605
(914-949-2169)

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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Respondents.

-----x
TO THE JUSTICES OF THE SUPREME COURT OF THE
STATE OF NEW YORK:

1a. The respondent, Hon. SOL WACHTLER, is the
Chief Judge of the Courts of the State of New York, and
in his administrative capacity, is ultimately
responsible for the conduct and practices of such
courts, pursuant to Article VI, §28 of the Constitution
of the State of New York.

b. The respondent, Hon. JOSEPH W. BELLACOSA,
is the Chief Administrator of the Courts of the State of
New York, having been appointed to such office by the
respondent, Hon. SOL WACHTLER, pursuant to Article VI,
§28 of the Constitution of the State of New York.

2a. The respondents, in their administrative and supervisory capacities, are ultimately responsible for all trust obligations of courts and justices thereof, in the State of New York.

b. The respondents, in their administrative and supervisory capacities, have the ultimate obligation to assure that the courts of the State of New York, comply with the "supreme law of the land", the Constitution of the State of New York, the laws enacted pursuant thereto, and their own enacted rules and regulations.

3. The principal administrative office of the respondents for the supervision of the Courts of the State of New York, is at 270 Broadway, in the Borough and County of New York, City and State of New York.

4a. PUCCINI CLOTHES, LTD. ["Puccini"], the "judicial fortune cookie", was involuntarily dissolved by Order of the Supreme Court of the State of New York, County of New York, on June 4, 1980, but nevertheless is still a "person" within the meaning of the Constitution of the United States and State of New York.

b. The assets and affairs of Puccini, upon dissolution -- almost six (6) years ago -- became custodia legis, as a matter of law, and the obligation of the respondents, in their administrative capacities.

5a. Since dissolution, no accounting either final or intermediate, has ever been rendered by anyone, primarily because of the corrupt, if not criminal, activities of Administrator XAVIER C. RICCOBONO, the Administrative Judge of the Supreme Court of the State of New York, County of New York, and his sycophants in the judicial system.

b. There is no possible way that a true and correct accounting can be rendered without revealing the massive larceny that took place with respect to Puccini's trust assets, engineered by the law firm of KREINDLER & RELKIN, P.C. ["K&R"], and its clients, CITIBANK, N.A. ["Citibank"] and JEROME H. BARR, Esq. ["Barr"].

c. In this engineered larceny of judicial trust assets by K&R and its clients, they were aided and abetted by the law firm of ARUTT, NACHAMIE, BENJAMIN, LIPKIN & KIRSCHNER, P.C. ["ANBL&K"], now known as NACHAMIE, KIRSCHNER, LEVINE, SPIZZ & GOLDBERG, P.C. ["NKLS&G"], who took a portion of the assets of Puccini, "the judicial fortune cookie".

d. Thereafter, commencing on or about February 1, 1982, K&R and ANBL&K, were aided in their criminal misadventure by LEE FELTMAN, Esq. ["Feltman"], and his law firm FELTMAN, KARESH, & MAJOR, Esqs. ["FK&M"], now known as FELTMAN, KARESH, MAJOR, & FARBMAN, Esqs. ["FKM&F"].

e. Hereinafter herein, K&R, ANBL&K, NKLS&G, Feltman, FK&M, and FKM&F, or some of them, are described as the "criminals with law degrees", who, de facto, control the courts in the State of New York, Article VI, §28 notwithstanding.

f. Under the larceny engineered by K&R and its clients, they unlawfully dissipated all of Puccini's trust assets, with the exception of about \$500,000 and a portion of the accounts receivables.

g. Although FK&M and FKM&F were not appointed pursuant to 22 NYCRR §660.24 [effective until April 1, 1986], all remaining cash assets were given them for purported legal services and disbursements, despite subd. "f" thereof, and although they followed a consistent course of conduct adverse to the interests of the judicial trust.

h. No effective effort was made by FK&M and FKM&F to collect the assets made the subject of the K&R engineered larceny or to collect the accounts receivables, although the statute of limitations for such collection has expired, or will shortly expire.

6. Petitioner, GEORGE SASSOWER, Esq. ["Sassower"], was and is the attorney for HYMAN RAFFE ["Raffe"], both of whom have judgments and claims against Puccini, in addition thereto, Raffe, the hostage, has a 25% stock interest in Puccini.

AS AND FOR A FIRST CAUSE OF COMPLAINT

7. Petitioners, repeat, reiterate, and reallege each and every allegation of this petition marked "1" through "6" inclusive with the same force and effect as though more fully set forth at length herein, and further allege:

8a. In accordance with the "Uniform Civil Rules", effective January 6, 1986, a "receiver shall file with the court an accounting at least once each year." (22 NYCRR §202.52[e]).

b. Since the "receiver", the agent of the court, has failed and/or refused to file an accounting, then it becomes the obligation of the respondents, his principal, to file or cause same to be filed.

AS AND FOR A SECOND CAUSE OF COMPLAINT

9. Petitioners, repeat, reiterate, and reallege each and every allegation of this petition marked "1" through "8" inclusive with the same force and effect as though more fully set forth at length herein, and further allege:

10. Effective January 6, 1986, assignment of all matters, upon request for judicial intervention, are to be by "random selection" (22 NYCRR §202.3[b]) only, which may not be "waived" or manipulated (22 NYCRR §202.1[b]).

11. It was an open secret that Administrator Riccobono, who clearly had a Judiciary Law §14 and constitutional disqualification, that he would manipulate the IAS system, so that all matters related to petitioners, were assigned to Mr. Justice IRA GAMMERMAN, the only known jurist willing to obey Riccobono's unethical, immoral, and criminal desires.

12. The first request for judicial intervention in the Puccini dissolution proceeding (1816-1980), was a motion returnable January 13, 1986, which requested:

"an Order (1) disaffirming the Report of Referee DONALD DIAMOND, dated June 12, 1985, which, inter alia imposed "costs" of thirty-seven thousand five hundred dollars (\$37,500.00) on Hyman Raffé, Sam Polur, Esqs., and George Sassower, Esq., for making a motion to impose sanctions upon Lee Feltman, Esq., for his failure to attend an examination before trial, pursuant to notice; (2) granting the movant's motion, dated May 1, 1985 in all respects; (3) vacating the reference of Hon. BEATRICE SHAINSWIT to Reference DONALD DIAMOND; (4) declaring the Administrative Order, dated March 26, 1984, to be declared null and void, and/or null and void insofar as it may conflict with constitutional, statutory, and/or principles of law regarding judicial disqualification; (5) together with such other, further, and/or different relief as to this Court may seem just and proper in the premises."

13a. The "random selection" process selected Mr. Justice MARTIN B. STECHER, presiding at IAS 13, who theretofore had never asserted a Judiciary Law §14 or any other disqualification.

b. On information and belief, there is no rule or regulation which permitted Mr. Justice Stecher, or any other jurist, to relieve himself of an assignment under the "random selection process", except for recusal or other reasons specifically provided for by the law.

c. Nevertheless, Mr. Justice Stecher, on information and belief, upon the instigation of Administrator Riccobono, caused himself to be removed from such assignment on the computer records.

14a. In order to increase the odds for the selection of Mr. Justice Gammerman, ex parte, Administrator Riccobono, caused the "Puccini matter", to be designated as a protracted litigation matter, a designation only justified by the refusal Feltman to file an accounting.

b. This time, the computer selected Mr. Justice MICHAEL J. DONTZIN, presiding at IAS 28, who heretofore never claimed a Judiciary Law §14 or other disqualification in this matter.

c. At this point, the available documents do not show the charted course that was followed, except that on information and belief, the law secretary of Administrator Riccobono advised Mr. Justice Gammerman that he was to handle the matters involving petitioners and gave His Honor his "marching orders".

15. Mr. Justice Gammerman does have a Judiciary Law §14 and constitutional disqualification, and indeed on two previous occasions had effectively recused himself.

16. The aforementioned course leading to the designation of Mr. Justice Gammerman does not comport with the letter, spirit, and intent of the Uniform Rules, indeed is contrary thereto, and violates the law relating to judicial disqualification and administrative intervention (see (Balogh v. H.R.B. Caterers, 88 A.D.2d 136, 452 N.Y.S.2d 220 [2d Dept.], per Titone, J.)), in this matter a violation of constitutional magnitude.

AS AND FOR A THIRD CAUSE OF COMPLAINT

17. Petitioners, repeat, reiterate, and reallege each and every allegation of this petition marked "1" through "16" inclusive with the same force and effect as though more fully set forth at length herein, and further allege:

18. On January 10, 1986, while the aforementioned motion was pending unassigned (see ¶12), a motion was made returnable on January 27, 1986, for:

"an Order directing Lee Feltman, Esq., to file and settle his account; to transfer this [Puccini] matter to Albany County; together with any other, further, and/or different relief, as to this Court may seem just and proper in the premises."

19a. Referee DONALD ["Khadafy"] DIAMOND, the ex parte appointee of Administrator Riccobono, and "lap-dog" of the "criminals with law degrees", who also has a Judiciary Law §14 and constitutional disqualification, "hijacked" the aforementioned motion before it could be entered on the judicial computer.

b. Having "hijacked" the aforementioned motion papers, Referee Diamond, falsely asserted that he was presiding at IAS 13, issued an Order which "directed" the Sheriff of Westchester County, storm trooper style, to "break into" Sassower's premises and seize the word processor that he uses and his soft ware.

c. That [sham] Order, also not entered on the judicial computer, and was forwarded to the Sheriff of Westchester County for execution.

20. The aforementioned does not comport with the letter, spirit, and intent of the Uniform Rules, indeed is contrary thereto, and violates the law relating to judicial disqualification and administrative intervention, of a constitutional magnitude.

AS AND FOR A FOURTH CAUSE OF COMPLAINT

21. Petitioners, repeat, reiterate, and reallege each and every allegation of this petition marked "1" through "20" inclusive with the same force and effect as though more fully set forth at length herein, and further allege:

22. Prior thereto, Feltman substantially simultaneously, commenced three (3) criminal contempt proceedings against Sassower based upon the same allegations and evidence.

a. The first Order of the three to be entered in the Office of the County Clerk, was that of Hon. LESTER EVENS, which reads as follows:

"The motion to hold GEORGE SASSOWER in contempt is denied. With regard to charges of contempt related to Mr. Sassower's motion numbered 145 on the calendar of 12-30-85, that motion has been dismissed and contempt charges are now moot. Those charges relating to Mr. Sassower's purported conduct in matters other than motion #145 are insufficient to support a finding of contempt." [emphasis supplied]

b. The second Order to be entered was that by Hon. MARTIN EVANS, which effectively vindicated Sassower.

c. The third one, wherein Hon. Ira Gammerman had effectively recused himself, is presently sub judice with Hon. SEYMOUR SCHWARTZ.

23a. The Order of Hon. LESTER EVENS was not appealed, assuming it is appealable, and the time to do so has expired.

b. Feltman and his co-conspirators, including IRA POSTEL, Esq. ["Postel"], have appealed the Order of Mr. Justice MARTIN EVANS, which has been perfected for the May 1986 Term of the Appellate Division, First Department.

24a. Within two (2) business days after the service of the aforementioned Order of Hon. LESTER EVENS, with Notice of Entry, Sassower was served with four (4) more motions to hold him in criminal contempt, based on the same allegations and evidence, as the previous three (3) motions.

b. Only one of the aforementioned four, was made returnable in Supreme Court, New York County, and that was of Postel, made returnable before Referee Donald Diamond, to which Sassower responded in writing.

25a. Based upon a "phantom", non-existent, contempt motion, made at the instance of Postel, who had no standing as a matter of law (infra), without notice or forewarning, Mr. Justice Gammerman, abandoned his own enacted rules, found Sassower to be in non-summary criminal and civil contempt, all without a trial or hearing, and, Judicial Caesar style, ordered all matters related to petitioners to his own personal bailiwick.

b. Purportedly such Order arrogates to Mr. Justice Gammerman, not only cases pending in Supreme Court, New York County, but also pending in Kings, Nassau, and Westchester Counties, and even those where Mr. Justice Gammerman is a named defendant or respondent, and those where he is identified as a Dennis v. Sparks (449 U.S. 24) co-conspirator.

c. Mr. Justice Gammerman, by self-proclaimed ukase, is to be judge, defendant, respondent, and witness, in all matters involving petitioners, the judicial computer and uniform rules notwithstanding, and even where various statutes mandate that the action must be tried in another county, and no other!

AS AND FOR A FIFTH CAUSE OF COMPLAINT

26. Petitioners, repeat, reiterate, and reallege each and every allegation of this petition marked "1" through "25" inclusive with the same force and effect as though more fully set forth at length herein, and further allege:

27. For almost one year, Administrator Riccobono, Mr. Justice Gammerman, and Referee Diamond, based on uncontroverted evidence, have been described in judicially filed papers as the "trio of judicial fixers", in the subject litigation.

28. The overt solicitation of judicial references to themselves from the non-controlable jurists or their "marching orders" to such jurists, prior to January 6, 1986 has been, to say the least, scandalous, and indeed unconstitutional.

29. The intent of the "uniform rules" was to prohibit such improper practices after January 6, 1986, but the "trio of judicial fixers" had their own ideas on the subject.

30. Heretofore, Mr. Justice MARTIN EVANS, although, in the past, succumbing, at times, to the solicitations of the "trio of judicial fixers", has also rejected, at times, their entreaties.

31a. Thus, in one action by Sassower, which although stayed by Mr. Justice Gammerman in early 1985, DONALD F. SCHNEIDER, Esq. ["Schneider"], a partner in FKM&F, has admitted that such action did not violate any order of any court, albeit stayed.

b. Anticipating such sworn testimony by Schneider, petitioner, Sassower, moved on January 18, 1986, for:

"an Order (1) transferring the venue of this action to Westchester County; (2) vacating the Order of February 20, 1985; alternatively, (3) to now permit plaintiff continue the prosecution of this meritorious action, without prejudice to plaintiff's right of damages arising out of the corrupt agreement entered into by and between inter alia the defendants [Schneider and FK&M] and Mr. Justice Ira Gammerman, together with any other, further, and/or different relief as to this Court may seem just and proper in the premises." [emphasis supplied]

c. Mr. Justice Evans, who the judicial computer selected, even before the aforementioned "Judicial Caesar ukase" of Mr. Justice Gammerman (Fourth) Cause of Complaint), referred said motion to the alleged co-conspiring Mr. Justice Gammerman (Dennis v. Sparks, supra), who continued the stay!

d. The aforementioned reference, contrary to basic judicial precepts, is also manifestly contrary to the letter, spirit and intent of the non-waivable provisions in the random selection process.

AS AND FOR A SIXTH CAUSE OF COMPLAINT

32. Petitioners, repeat, reiterate, and reallege each and every allegation of this petition marked "1" through "31" inclusive with the same force and effect as though more fully set forth at length herein, and further allege:

33a. After January 6, 1986, two motions, in two different matters, were properly filed in Supreme Court, New York County, wherein Administrator Riccobono was a named respondent.

b. On both motions, the Attorney General, who represents Administrator Riccobono, defaulted.

c. In both proceedings, the motions were simply not entered on the judicial computer, but instead, disappeared, presumably "hijacked".

34. The aforementioned "disappearance" and/or "hijacking" do not comply "Uniform Rules", in letter, spirit, or intent.

AS AND FOR A SEVENTH CAUSE OF COMPLAINT

35. Petitioners, repeat, reiterate, and reallege each and every allegation of this petition marked "1" through "34" inclusive with the same force and effect as though more fully set forth at length herein, and further allege:

36. The Supreme Court of the United States, interpreting the "supreme law of the land", as well as the Court of Appeals of the State of New York, has made it crystal clear, that except in very limited circumstances, the judicial process is a public matter, not to be held in a "closed, non-public, courtroom" (Judiciary Law §4).

37. Notwithstanding, the aforementioned, Referee Donald Diamond consistently holds judicial proceedings, even in criminal matters, in a private, non-public courtroom, wherein even the accused is prohibited admittance, with the knowledge and approval of Administrator Riccobono.

AS AND FOR A EIGHTH CAUSE OF COMPLAINT

38. Petitioners, repeat, reiterate, and reallege each and every allegation of this petition marked "1" through "37" inclusive with the same force and effect as though more fully set forth at length herein, and further allege:

39a. Except in one minor situation, the all the judicial papers in every judicial proceeding involved in the Puccini related litigation which passes through Referee Diamond, are not filed with the County Clerk, or made available for public inspection.

b. Those motions or judicial papers which do not meet the fancy of Referee Diamond, are simply destroyed or disappear.

c. Thus, recently, Sassower obtained access to Exhibit "A", a non-filed document, contrived and drafted in secret in Diamond's non-public courtroom, which admittedly proliferates with contrived assertions, and fabricated by Referee Diamond and the "criminals with law degrees" for illegal purposes.

d. Even if the facts stated therein were true, and admittedly so [under oath, confessed to be false], the document would have no legal validity (Moustakas v. Bouloukos, 112 A.D.2d 981, 492 N.Y.S.2d 793 [2d Dept.]).

40. The aforementioned does not comport with constitutional standards of statutory mandate.

AS AND FOR A NINTH CAUSE OF COMPLAINT

41. Petitioners, repeat, reiterate, and reallege each and every allegation of this petition marked "1" through "40" inclusive with the same force and effect as though more fully set forth at length herein, and further allege:

42. As a matter of settled law, a judicial receiver, may not take into his possession assets without a sufficient bond.

43. The bond filed by Feltman was in the penal sum of \$500,000.

44. The direct damages sustained by Feltman's deliberate betrayal of his judicial trust, in one instance alone, to wit., concealing the fact that the papers of K&R and its clients were perjurious, causing a judgment and a liquidated claim over against Puccini in excess of \$500,000.

45. Consequently, at the present time, the Receiver, is in possession of Puccini's assets, without a bond to cause his further losses.

AS AND FOR A TENTH CAUSE OF COMPLAINT

46. Petitioners, repeat, reiterate, and reallege each and every allegation of this petition marked "1" through "45" inclusive with the same force and effect as though more fully set forth at length herein, and further allege:

47. The procedures in the Riccobono fiefdom resemble methods employed in the "dark ages", wherein members of the judiciary extort and peddle indulgences to those who succumb and submit to the "criminals with law degrees" and the "trio of judicial fixers".

48a. Those who succumb, do not have to pay herculian imposed fines or face incarceration for criminal convictions.

b. Those who do not succumb and submit to the desires of the "criminals with law degrees", are convicted and incarcerated, without a trial, for non-summary criminal contempt, albeit contrary to ministerial constitutional mandate, and are made subject to fines and penalties, all without due process of law.

AS AND FOR A ELEVENTH CAUSE OF COMPLAINT

49. Petitioners, repeat, reiterate, and reallege each and every allegation of this petition marked "1" through "48" inclusive with the same force and effect as though more fully set forth at length herein, and further allege:

50a. As a matter of administrative and supervisory obligation, the judiciary owe a due process and equal of the laws obligation to those who cannot defend for themselves.

b. This is particular true of those made incapable of self-protection by reason of judicial action, e.g. Puccini.

51. To protect those corporations unable to protect themselves against the judicial vultures because of a decree of involuntary dissolution, the Attorney General has been assigned by statute to vouchsafe their interests.

52a. Those corporations involuntary dissolved in the Riccobono fiefdom are supposedly protected by Senior Attorney DAVID S. COOK, Esq. ["Cook"] in his one-man unit supposedly for that purpose.

b. Notwithstanding the mandatory and discretionary mandates imposed upon the Attorney General (e.g. Business Corporation Law §§1214, 1216), there exists a sub rosa, unethical, understanding that the Attorney General will not interfere on behalf of those interested in the assets and affairs of involuntarily dissolved corporations in the Riccobono court, except to the extent necessary to protect financial obligations due to the State of New York alone.

c. To assure that Puccini, the "judicial fortune cookie" does not receive any aid or assistance from Cook, the one-man unit, Riccobono commandeered and/or accepted Cook, as his attorney, compelling Cook to abandon his statutory obligations to Puccini.

AS AND FOR A TWELFTH CAUSE OF COMPLAINT

53. Petitioners, repeat, reiterate, and reallege each and every allegation of this petition marked "1" through "52" inclusive with the same force and effect as though more fully set forth at length herein, and further allege:

54. Respondents, in their administrative and supervisory capacity, must make available for public inspection the records and proceedings of the judicial happenings at the private, non-public sessions before or at Referee Diamond, but also the records of Puccini, Feltman, FK&M, FKM&F, and RASHBA & POKART.

55. Referee Diamond, on information and belief gave FKM&F, and FKM&F took, from Puccini, the judicial trust, twice the amount of monies that its privately-held time sheets recorded, when indeed it was entitled to nothing, as a matter of law.

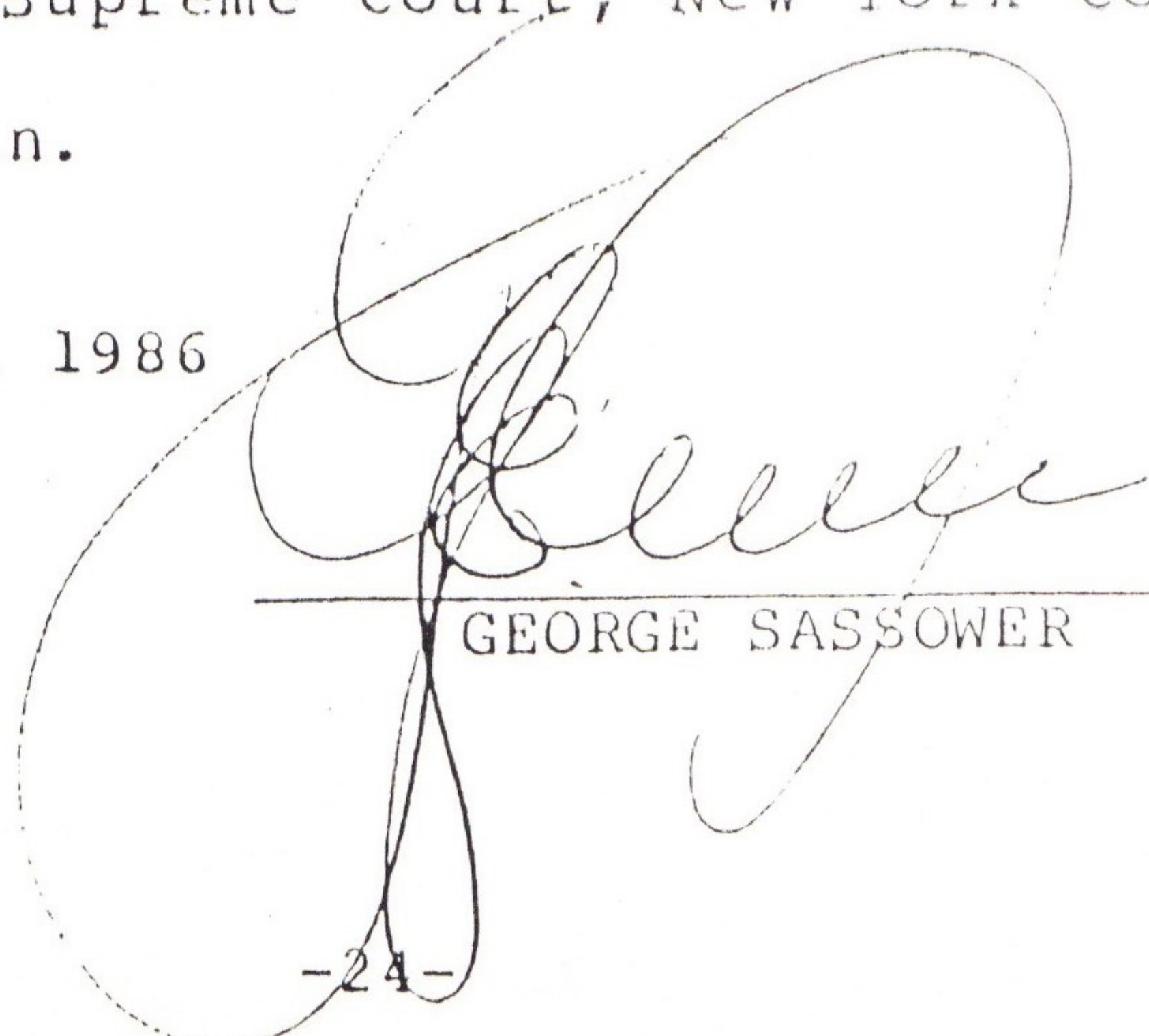
56a. RASHBA & POKART ["R&P"], a firm of accountants, was appointed to investigate the charges made that K&R and ANBL&K had committed larceny against Puccini's judicial trust assets.

b. In fact, but unrevealed at the time of appointment, was that R&P were the accountants for K&R, and/or its clients in this matter.

c. In fact, but unrevealed at the time of appointment, was that ANBL&K had unlawfully taken \$10,000 from Puccini's trust assets, "laundered" same, giving R&P \$6,200 in payment of a bill to K&R, keeping for itself \$3,800 as a "laundering fee".

WHEREFORE, it is respectfully requested that this proceedings be (1) transferred to a county outside the First Judicial Department; (2) that respondents and/or their administrative subordinates be restrained from employing the Attorney General as their attorney, except upon assurance that conflicting obligations would not arise therefrom; (3) removing Administrative Riccobono from any and all ministerial and supervisory duties and obligations with respect to the petitioners; (4) nullification of all procedures employed with respect to the petitioners which did not comport with the letter, spirit, or intent of the random selection process; (4) compelling respondents to settle an accounting with respect to Puccini, or have someone settle same on their behalf; (5) together with any other, further, and/or different relief as to this Court may seem just and proper in the premises, including restoring constitutional and legal standards and practices in the Supreme Court, New York County, as complained of herein.

Dated: March 26, 1986

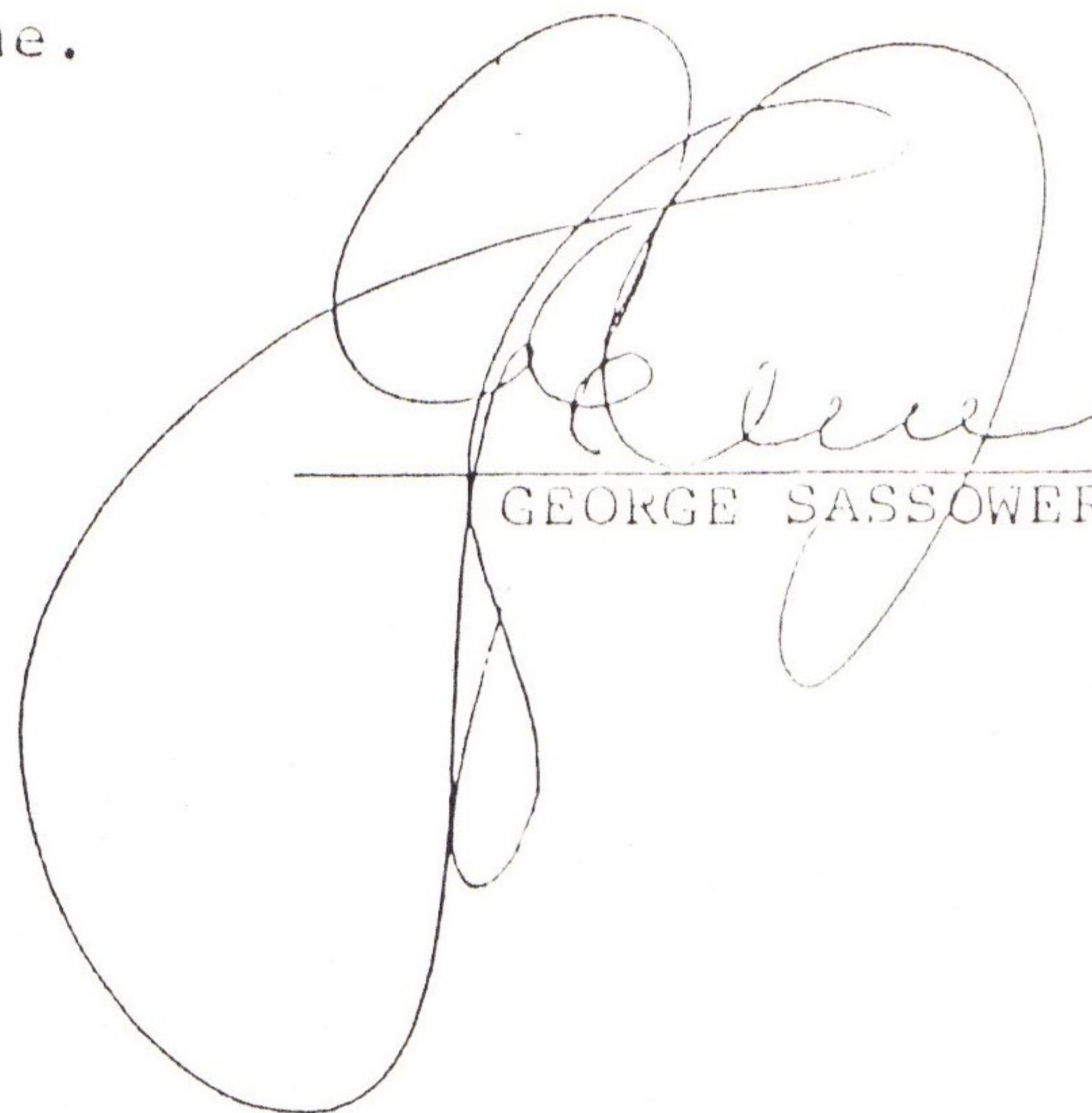


GEORGE SASSOWER

GEORGE SASSOWER, Esq., an attorney, admitted to practice law in the courts of the State of New York, does hereby affirm the following statement to be true under penalty of perjury:

Affirmant is one of the petitioners herein, has read the foregoing petition, knows the contents thereof, and the same is true of his own knowledge, except as to matters stated thereon to be on information and belief, and as to those matters, he believes them to be true.

Dated: March 26, 1986



GEORGE SASSOWER

37 West 26th Street
5th Floor
New York, New York

October 2, 1985

Donald B. Relkin, Esq.
Kreindler & Relkin, P.C.
500 Fifth Avenue
New York, New York 10110

Re: Hyman Raffe

Dear Mr. Relkin:

This letter is sent to induce you to continue and conclude negotiations with Hyman Raffe, 2134 Pacific Blvd. Atlantic Beach, New York, for a settlement of the Puccini related cases.

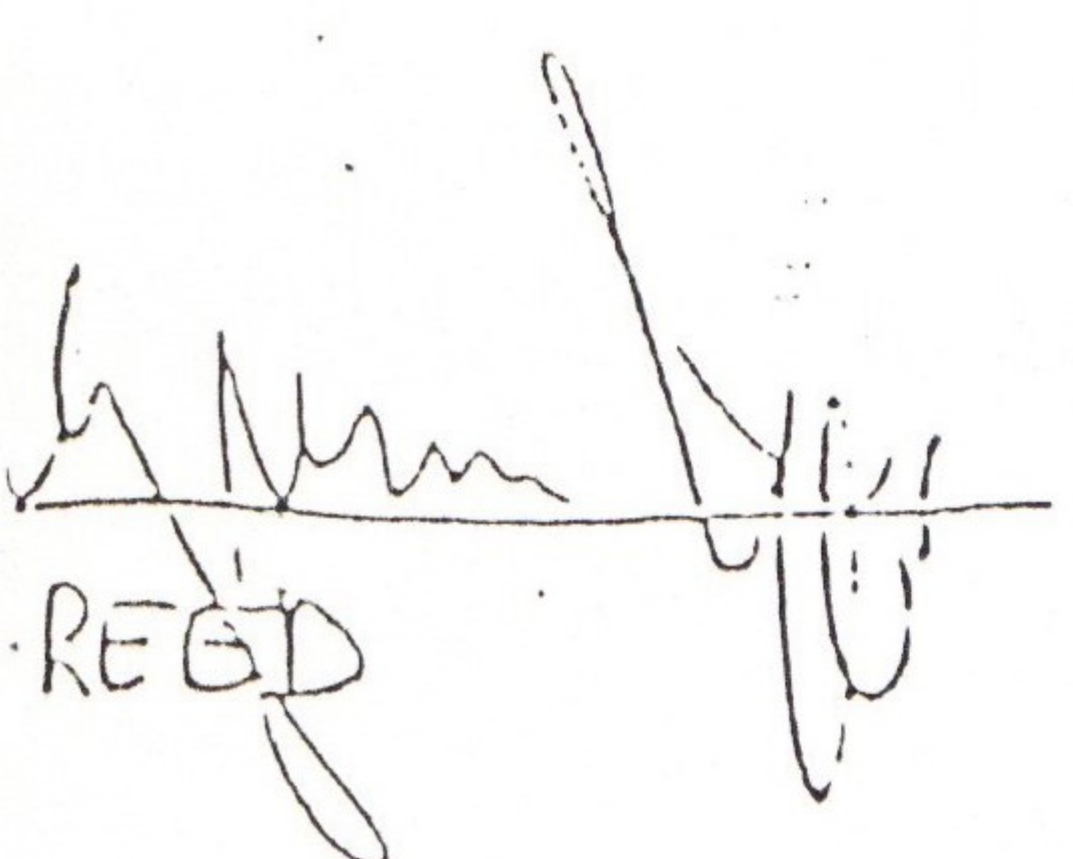
I am writing to confirm that I am, and have been since ~~October 15, 1985~~ ^{July 15, 1985} the attorney of record for Hyman Raffe in all Puccini related cases, including but not limited to those on the annexed schedules, and to further confirm that Mr. Raffe has discharged George Sassower, Esq. and Sam Polur, Esq. as his attorneys in all Puccini related cases, effective ~~July 15, 1985~~ ^{July 15, 1985}.

I further confirm to you that we have requested stipulations of substitution, but have not been able to obtain same from Sassower and Polur. I represent to you that Mr. Raffe has discharged Sassower and Polur, effective as at ~~July 15, 1985~~ ^{July 15, 1985} and they no longer have any authority to act on his behalf or represent him in any Puccini related matter. I further confirm the efficacy of Mr. Raffe's discharge of Messrs. Sassower and Polur and retention of me as counsel in all Puccini related cases, notwithstanding the failure of any party to have heretofore executed a substitution of counsel.

I further authorize you to submit this letter, or a copy thereof, to any court in order to advise any judge thereof as to the aforementioned facts.

Very truly yours,


Ira Postel


REED
Exhibit "A"