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DEPARTMENT OF LAW
NEW YORK CITY OFFICE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----x
GEORGE SASSOWER,

Plaintiff,

File No.
77 C 1447

-against-

ERNEST L. SIGNOREELI, ANTHONY MASTROIANNI,
VINCENT G. BERGER, JR., JOHN P. FINNERTY,
ALLEN KROOS, ANTHONY WISNOSKI, and
LEONARD J. PUGATCH,

Defendants.
-----x

PLAINTIFF'S MEMORANDUM OF LAW.
Rule 12(c).

GEORGE SASSOWER, Esq.
Attorney for plaintiff-pro s
75 Wykagyl Station
New Rochelle, New York, 10801
914-636-4050

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Plaintiff,

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Defendants.
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PLAINTIFF'S MEMORANDUM OF LAW.
RULE 12(c)

STATEMENT.

With respect to plaintiff's second cause of action, the defendant ERNEST L. SIGNORELLI, has admitted all the allegations of said cause and the defendant, ANTHONY MASTROIANNI, has defaulted, thus presenting only a question of law for this Honorable Court.

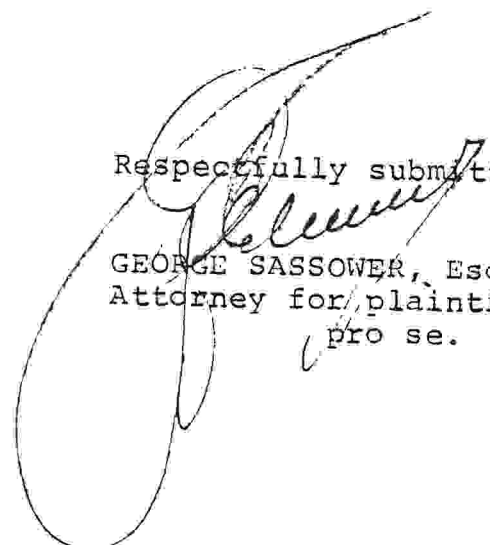
POINT I.

CONVICTED PERSONS IN
SURROGATE'S COURT ARE
DENIED EQUAL PROTECTION
OF THE LAWS UNDER THE
STATUTORY SCHEME IN NEW
YORK.

Under the statutory scheme in New York, a convicted person may apply for bail pending the determination of his appeal (Criminal Procedure Law §460.50), but no such right is given to those convicted in Surrogate's Court, and thus

violates the equal protection clause of the Fourteenth Amendment to the Constitution of the United States (16 Am Jur 2d, Constitutional Law, §539, p. 928).

Respectfully submitted,


GEORGE SASSOWER, Esq.
Attorney for plaintiff-
pro se.