

PLAINTIFF'S FIRST SET OF INTERROGATORIES - COUNTY ATTORNEY

[A36-A42]

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF SUFFOLK

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GEORGE SASSOWER,

Index No.  
78-17671

Plaintiff,

-against-

ERNEST L. SIGNORELLI, ANTHONY MASTROIANNI,  
VINCENT G. BERGER, JR., JOHN P. FINNERTY,  
ALAN CROCE, ANTHONY GRYMALSKI, CHARLES  
BROWN, HARRY E. SEIDELL, NEW YORK NEWS,  
INC., AND VIRGINIA MATHIAS,

Defendants.

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S I R S:

Pursuant to Civil Practice Law and Rules §3130, the following "First Set of Interrogatories" are propounded to defendants, JOHN P. FINNERTY, ALAN CROCE, ANTHONY GRYMALSKI, and ANTHONY MASTROIANNI, some of the defendants herein, are to be answered by them, upon their oath, in accordance with Civil Practice Law and Rules §3134.

1. Separately set forth all instructions given and received by the defendants to whom these interrogatories are being propounded, on June 22 and June 23, 1977, with respect to the plaintiff including (a) who gave such instructions, (b) to whom they were

given, (c) when, and (d) where given, (e) annex a copy of such instructions if written wholly or in part, (f) the substance of same, if oral in whole or in part

2. Set forth who (a) gave and (b) received the instructions, if such was given, that plaintiff was to be taken to Surrogate's Court, Suffolk County and not to the Suffolk County Jail. If such instructions were in writing or partially so annex a copy of same, if oral set forth the substance thereof.

3. Set forth the statutory authority, if any, under which these Deputy Sheriffs operated under in making an arrest of the plaintiff outside of Suffolk County, and in particular in Westchester County.

4. Set forth when, where, and under what circumstances the Sheriff of Suffolk County or his Deputies within the past ten years have made an arrest outside of Suffolk or Nassau Counties, excluding those arrests made in "hot pursuit", authorized by the Governor, or for extradition of a prisoner.

5. Set forth the statutory authority for the Sheriff of Suffolk County or his Deputies to make an arrest outside of Suffolk County without producing the arrested person to a local magistrate, as of June 23, 1977 and June 10, 1978.

6. Set forth the sum and substance of all conversations by and between the Deputy Sheriffs of Suffolk County and Surrogate Ernest L. Signorelli while they had plaintiff in custody in the hallway outside the Surrogate's Court Courtroom on June 23, 1977 and the names of the persons present at such conversations.

7. Set forth any and all requests made to the Deputy Sheriffs by the plaintiff while being detained under arrest outside the Surrogate's Court Courtroom on June 23, 1977 before court proceeding began, and the responses to such requests, if any.

8. Set forth any and all comments and statements made by ANTHONY MASTROIANNI in the presence of ART PENNY between the dates of June 22, 1977 and August 18th, 1977 including (a) when such statements were made, (b) where they were made, (c) copies of all written material given to ART PENNY or shown to him, and (d) who was present at each time.

9. Set forth any and all comments and statements made by others in the presence of ANTHONY MASTROIANNI and ART PENNY between the dates of June 22, 1977 and August 18th, 1977, including (a) when such statements

were made, (b) where they were made, (c) identify all written material given or shown to ART PENNY, and (d) the persons present at each time.

10. Separately set forth all instructions given and received by the defendants to whom these interrogatories have been propounded on and between March 7th and June 11, 1978 with respect to the plaintiff including (a) who gave such instructions, (b) to whom they were given, (c) when, and (d) where given, (e) annex a copy of such instructions if written wholly or in part, (f) the substance of same, if oral, in whole or in part.

11. Set forth the time that plaintiff's wife and daughter requested to see plaintiff on June 10, 1978, all actions taken with respect to such request, and the persons involved with respect to such action or inaction.

12. Set forth the time that plaintiff's attorney-wife requested to see plaintiff as his attorney on June 10, 1978, all actions taken with respect to such request, and the persons involved with respect to such action or inaction.

13. Set forth the time that plaintiff's wife served a Writ of Habeas Corpus on June 10, 1978, all actions taken with respect to such Writ, and the persons involved with respect to such action or inaction.

14. Set forth all actions taken with respect to plaintiff's wife and daughter between the time the Writ of Habeas Corpus was served and the time plaintiff was released pursuant to such Writ.

15. Set forth the time plaintiff was released from the Suffolk County Jail and explain any and all reasons for any delay in such release.

16. Set forth the identities of all members of the judiciary communicated with in respect to the incarceration of plaintiff on June 10-11, 1978 and his release pursuant to the Writ of Habeas Corpus insofar as known or believed by these defendants or those acting on their behalf, including who the communication was made by, to whom, and the substance of the conversation as known to or believed by these defendants.

17. Set forth the person or person spoken to by Hon. ANTHONY J. FERRARO of the Supreme Court of the State of New York at the Suffolk County Jail on June 10-11, 1978, the time, and the substance of such conversation.

18. Set forth a copy of the log and all official records of the Suffolk County Jail for June 22, 1977 and June 10-11, 1978 insofar as it concerns plaintiff.

19. Set forth copies of all official records of the Suffolk County Sheriff insofar as they concern plaintiff.

20. Set forth the dates and times that members of the Suffolk County Sheriff's Office made forays outside of Suffolk County in order to apprehend plaintiff, the place they went, the time of the day, and all reports concerning same.

21. Set forth the substance of all conversations with the plaintiff concerning his arrest between March 8, 1978 and June 10, 1978, the persons involved and the substance of such conversations (insofar as they involved the persons to whom these interrogatories are being propounded or their agents).

22. Set forth a copy of the hospital record of Anthony Grymalski with respect to his purported injuries on June 10, 1978.

23. Set forth a report of the time missed by said Anthony Grymalski as a result of such injuries, if any, and submit a copy of any and all medical reports with respect to same.

24. Set forth all persons consulted by or on behalf of Anthony Grymalski with respect to bringing criminal charges against plaintiff as a result of the occurrences on June 10, 1978.

25. Insofar as these defendants, set forth all members of the judiciary spoken to outside the presence of plaintiff concerning plaintiff from June 22, 1978 to the present date, or members of the judiciary spoken to on behalf of these defendants during such dates. As to any such conversations set forth, as known to these defendants, when, where, by whom, to whom, and the substance of such communication.

PLEASE TAKE NOTICE, that a copy of the answers to the foregoing questions must be served upon the undersigned within fifteen (15) days after service of these interrogatories.

Dated: July 30, 1982

Yours, etc.,

GEORGE SASSOWER, Esq.  
Attorney for plaintiff.  
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