

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

GEORGE SASSOWER, individually, and on behalf  
of all others similarly situated or affected,

File No.  
78 Civ.124  
(J.M.)

Plaintiff,

- against -

ERNEST L. SIGNORELLI, ANTHONY MASTROIANNI,  
BERGER, JR., JOHN P. FINNERTY,  
ALLAN CROCE, ANTHONY GRZYMAŁSKI, CHARLES  
BROWN, LEONARD J. PUGATCH, and THE COUNTY  
OF SUFFOLK,

VINCENT G.

Defendants,

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

MAR 15 1978

TIME X A.M. \_\_\_\_\_  
P.M. \_\_\_\_\_

STATE OF NEW YORK )  
COUNTY OF WESTCHESTER ) ss.:

GEORGE SASSOWER, Esq., first being duly sworn  
deposes, and says:

1. This affidavit is submitted with respect to the  
oral arguments heard by the Court on February 3, 1978 in  
connection with plaintiff's motion.

2. The following is an excerpt from the minutes of  
that day.

THE COURT:

How much time do you want  
to submit an affidavit?

MR. KAY:

\* \*  
...if the Court would like  
papers I would ask for I  
think a week ... I think  
the papers should only show  
whether or not and which  
he admits, whether - that  
the accounting is terminated,  
and just tell me anything  
that is open  
\* \*

MR. KAY:

One week on the papers?  
(S.M. 22-24).

(14)

Obviously after this length of time (six weeks) the defendant, ERNEST L. SIGMORELLI, does not intend to submit any affidavit to this Court.

3. The only material submitted by the attorney for defendant, ERNEST L. SIGMORELLI, is an eviscerated copy of the purported transcript of January 25-27, 1978, and such transcript tends to support plaintiff's motion and reveals that the defendant, ERNEST L. SIGMORELLI, is but a bare-faced liar.

a. Through his attorney, the defendant, ERNEST L. SIGMORELLI, denied that he ever directed plaintiff's wife to appear in his Court. (S.M. 19).

On page 55 of the transcript in Surrogate's Court the contrary to shown.

b. Through his attorney, the defendant, ERNEST L. SIGMORELLI, represented to this Court "that public accounting has been concluded ...the acts might in fact be moot ...there is no present action before the Judge..." (S.M. 18).

Three weeks later, the defendant, ERNEST L. SIGMORELLI, issued, sua sponte, what he called a "Decision", but which was a personal rampage against the plaintiff, his wife, his views of matters in other courts wherein he was a litigant, and gross distortion of the matters in his Court obviously made to prejudice future proceedings involving the plaintiff.

WHEREFORE, deponent prays that this motion be granted in all respects.

MURIEL GOLDBERG  
Notary Public, State of New York  
No. 60-6513474 Westchester County  
Commission Expires March 30, 1979

Sworn to before me this  
14th day of March, 1978.

GEORGE SASSOWER