

COUNTY OF SUFFOLK



DAVID J. GILMARTIN
COUNTY ATTORNEY

DEPARTMENT OF LAW

April 22, 1983

Doris L. Sassower, P. C.
283 Soundview Avenue
White Plains, New York 10606

Attention: George Sassower, Esq.

Re: D. Sassower vs. Signorelli, et al
Supreme Westchester Index No. 3607-79

Dear Mr. Sassower:

Further to my letter of April 6, 1983, enclosed please find two copies of "Defendants' Response to Plaintiff's Notice to Admit", one verified by Sheriff Finnerty, the other verified by Public Administrator Mastroianni.

As I explained to you in our recent telephone conversation, Sheriff Finnerty has been extremely ill during the last few months. As a matter of fact, I had to arrange for his Notice to Admit to be executed by him at his home.

Also, it is my understanding that you are not expecting a copy of the Notice to Admit to be verified by former Warden Regula. As I also explained to you on the phone, I have not communicated with Warden Regula in the last three years, since he retired from County service and moved south. It is my understanding that he had no personal involvement in any of the Sassower proceedings. However, if in the course of discovery we find he was in any way involved, we will take appropriate measures to allow any and all reasonable discovery, by any of the plaintiffs in the various Sassower proceedings.

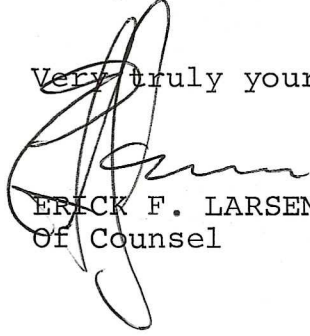
Under these circumstances, I sincerely hope that you will accept my diligent efforts to comply with this particular outstanding discovery demand so as to avoid the necessity of having to make application to the Court.

April 22, 1983

With respect to the outstanding insurance discovery demand, I believe that I have previously advised you that the County is a self-insurer and carries excess policies providing general liability coverage of more than \$60,000,000. Actual County records which disclose this fact are at all times available in the office of Insurance Risk Management in Hauppauge. These self-insurance documents are available to you as Plaintiff in this action, as well as members of the public generally. Since they are voluminous, I hesitate to arrange to have them duplicated and served upon you. I would think that this letter would be sufficient for your purposes.

However, if it is not, under the circumstances, would you kindly advise me what you would deem sufficient compliance with your demand, short of duplicating all of the documents and serving them upon you.

Very truly yours,



ERICK F. LARSEN
Of Counsel

EFL:cas

cc: Hon. Robert Abrams
Abram & Sheidlower, Esqs.