

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----x  
GEORGE SASSOWER, individually, and on behalf of all others similarly situated or affected  
File No. 78Civ124  
[JM]

Plaintiff,

-against-

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

Defendants.

-----x  
S I R S:

PLEASE TAKE NOTICE, that upon the annexed affidavit of GEORGE SASSOWER, Esq., duly verified on the 4th day of October, 1984, and all the pleadings and proceedings had heretofore herein, the undersigned will move this Court, before the Honorable JACOB MISHLER, United States District Judge, at the United States Courthouse, Uniondale Avenue and Hempstead Turnpike, Uniondale, New York, 11554, on the 9th day of October, 1984, at 9:30 o'clock in the forenoon of that day or as soon thereafter as counsel may be heard for an Order vacating the Order of this Court dated April 20, 1978,

together with such other, further, and/or different relief as to this Court may seem just and proper in the premises.

Dated: October 4, 1984

Yours, etc.,



GEORGE SASSOWER  
Attorney for plaintiffs  
2125 Mill Avenue,  
Brooklyn, New York, 112324  
(212) 444-3403

To: Reisman, Peirez, & Reisman, Esqs.  
Robert Abrams, Esq.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
GEORGE SASSOWER, individually, and on behalf of all others similarly situated or affected File No.  
78Civ124

[JM]

Plaintiff,

-against-

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

Defendants.

-----X  
"I have made that  
absolutely clear to you.  
That there was no case, no  
authority, no anything to  
justify what occurred  
twice over in Surrogate's  
Court" (Former Assistant  
Suffolk County Attorney,  
Erick F. Larsen, Esq.,  
Examination Before Trial,  
Sept. 18, 1984, p. 64)

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

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

1. This affidavit is made in support of plaintiff's motion to vacate the Order of this Court dated April 20, 1978, together with any other, further, and/or different relief as to this Court may seem just and proper in the premises.

2a. The events in this action began in 1976, the actionable tortious conduct in 1977, which continues to date, it has only been, with one small exception, since May 16, 1984 that plaintiff has been able to obtain pre-trial disclosure, either in federal or state court, although diligent and relentless efforts have been made toward that end.

b. The tortious conduct complained of by deponent may, for litigation purposes, be marked by four overlapping periods.

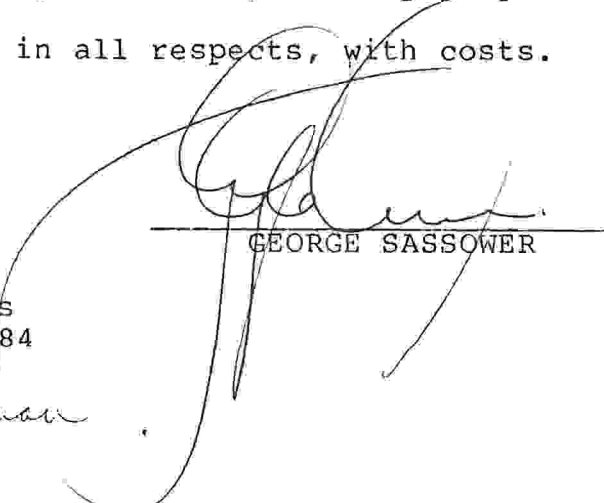
This action deal with the second period, where His Honor required specifics which deponent did not have.

c. One thing is clear -- the facts and/or assertions tendered to His Honor were manifestly false, if not outrightly perjurious.

3. Albeit limited, the new Suffolk County Attorney sensing further disastrous consequences by more disclosure, has now has refused to proceed with such pre-trial disclosure despite orders to complete them.

4. Judicial economy would be served, if the entire factual matter, covering the entire four periods were set forth in one document and incorporated by reference, which plaintiff intends to do within the next few days.

WHEREFORE, it is respectfully prayed that this motion be granted in all respects, with costs.

  
\_\_\_\_\_  
GEORGE SASSOWER

Sworn to before me this  
4th day of October, 1984



KENNETH SILVERMAN  
Notary Public, State of New York  
No. 24-468983  
Qualified in Kings County  
Commission Expires March 30, 1985

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----x  
GEORGE SASSOWER, individually, and on behalf of all others similarly situated or affected File No. 78Civ124  
[JM]

Plaintiff,

-against-

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

Defendants.

-----x  
S I R S:

PLEASE TAKE NOTICE, that upon the annexed affidavit of GEORGE SASSOWER, Esq., duly verified on the 4th day of October, 1984, and all the pleadings and proceedings had heretofore herein, the undersigned will move this Court, before the Honorable JACOB MISHLER, United States District Judge, at the United States Courthouse, Uniondale Avenue and Hempstead Turnpike, Uniondale, New York, 11554, on the 9th day of October, 1984, at 9:30 o'clock in the forenoon of that day or as soon thereafter as counsel may be heard for an Order vacating the Order of this Court dated April 20, 1978,

STATE OF NEW YORK  
DEPARTMENT OF LAW  
RECEIVED

OCT 05 1984

NASSAU COUNTY OFFICE

*Receipt acknowledged  
10/5/84  
Pessman Pessman & Pessman  
by Ann M... ..*