

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----x
GEORGE SASSOWER,

Plaintiffs,

-against-

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

Defendants.
-----x
-----x

File No.
77Civ1447
[JM]

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

File No.
78Civ124
[JM]

GEORGE SASSOWER,

Plaintiffs,

-against-

ERNEST L. SIGNORELLI, ANTHONY MASTROIANNI,
JOHN P. FINNERTY, ALAN CROCE, ANTHONY
GRZYMALSKI, HARRY SEIDELL, and THE COUNTY
OF SUFFOLK,

Defendants.
-----x

File No.
84Civ2989
[JM]

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

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

This short affidavit is made with respect
to the Court's "Memorandum of Decision and Order", dated
November 29, 1984.

1. In deponent's view, the Court's essentially sua sponte procedure does not comport with fundamental fairness and/or procedural due process.

a. The Court's aforementioned determination was not made on grounds advanced by the Attorney General, except in general terms, but based on the Court's own sua sponte arguments raised for the first time.

Thus, the first opportunity deponent had to meet the specific issues raised, was after the Court's determination.

The Court finding no answer from plaintiff on matters never specifically drawn to his attention, then finds his suit and/or motion meritless and awards defendants attorneys' fees.

b. In deponent's view, if a court desires to sua sponte raise an issue, at a very minimum, it should advise counsel and afford him an opportunity to respond, before a decision is even tentatively made.

2a. Examination of the original files reveals that most of the Court's operative facts for its 1977-1978 decision were taken from the Assistant Attorney General's affidavit of August 23, 1977 (Exhibit "A").

Such affidavit was based upon documents and material which the defendants were able to unilaterally fabricate, as suited their own purposes.

In fact, it is deponent's understanding that the Assistant Attorney General was not given the entire Surrogate's Court file, but only pruned, and in some instances, fabricated documents.

b. Annexed is pages 216-229 of deponent's affidavit of June 16, 1982, to the Appellate Division (Exhibit "B"), whose contents were uncontroverted.

Such affidavit, in full, has been in defendants' attorneys possession for more than two years.

By admission and confession almost all exculpatory documents were missing from the Surrogate's Court files or records.

c. Fortunately for deponent, the pruned destruction or secretion of documents was a "Keystone Cops" operation, so that the conclusion was inescapable.

The triumph and vindication of deponent was resounding, to the extent that he was enjoined from publishing its contents.

d. Thus one of the essential issues posed to the Attorney General, which he evaded, as did His Honor, was such 1977-1978 submission to the federal court, false and misleading (Universal v. Root, 328 U.S. 575; Hazel-Atlas v. Hartford, 322 U.S. 238)?

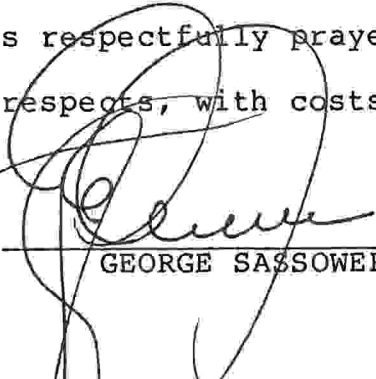
Obviously, neither the Assistant Attorney General nor his clients are willing now to reverify or reaffirm what they stated in 1977 and 1978!

Otherwise stated was there "extrinsic fraud", which would vitiate prior judgments, and render the issues of res judicata and statute of limitations irrelevant?

3. The Sheriff and his deputies in their 1984 examinations before trial, have essentially repudiated their 1977-1978 submissions and representations to this Court.

Clearly, the neither the Sheriff nor his deputies are willing to reverify their prior affidavits or representations upon which this Court relied upon in 1977 and 1978.

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



GEORGE SASSOWER

Sworn to before me this
11th day of January, 1985

KENNETH SILVERMAN
Notary Public, State of New York
No. 24-4608988
Qualified in Kings County
Commission Expires March 30, 1985

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
GEORGE SASSOWER,

Plaintiff,

-against-

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

Defendants.

AFFIDAVIT

77 C 1447
(J.M.)

-----X
STATE OF NEW YORK)
) SS.:
COUNTY OF NEW YORK)

LEONARD J. PUGATCH, being duly sworn, deposes and says:

1. I am a Deputy Assistant Attorney General in the office of LOUIS J. LEFKOWITZ, Attorney General of the State of New York, attorney for the defendants Ernest L. Signorelli and Leonard J. Pugatch herein.

2. I am fully familiar with all the proceedings heretofore had herein and make this affidavit in support of the instant motion for a judgment on the pleadings.

3. Plaintiff, George Sassower, was appointed preliminary executor of the estate of Eugene Paul Kelly on June 18, 1972. The will of the decedent was admitted to probate on September 9, 1974 and Letters Testamentary were issued to the plaintiff on that date.

4. On October 31, 1974, Edward Kelly, a legatee under the will, presented to the Surrogate's Court a petition praying for judicial settlement of the account of George Sassower as executor of the estate. Upon the decision of the court dated

March 20, 1975 and an Order dated March 27, 1975, George Sassower was ordered to file the requested account within thirty days (A).^{*} The accounting was not filed as ordered.

5. By Order to Show Cause dated September 8, 1975, Edward Kelly petitioned the Surrogate's Court to punish George Sassower for contempt and to remove him as executor of the estate. After repeated adjournments the matter was submitted to the court on January 12, 1976. By decision dated January 28, 1976 and Order dated March 9, 1976 the application to punish the plaintiff herein for contempt and for his removal as executor was granted. Therein, however, George Sassower was given the opportunity to purge himself of contempt by complying with the terms of the Order within thirty days from service of said Order upon him (B, C).

6. Plaintiff commenced a proceeding to judicially settle his account by filing the required account. Thereafter, the court having directed the respective counsel to appear from time to time with respect to the matters at issue, conferences were held. The last of such conferences was on March 17, 1977.

7. At said conference, Ernest Wruck, Guardian ad Litem, in order to continue the administration of the decedent's estate made an application to the court for the appointment of the Public Administrator of Suffolk County as temporary administrator of decedent's estate. The application was granted and the appointment ordered on March 25, 1977 (D).

Objections to the accounting as filed by George Sassower were made by Ernest Wruck, Guardian ad Litem, on March 2, 1977 and by Edward Kelly, a legatee, on March 25, 1977.

^{*} Parenthesized letters refer to the marked exhibits annexed hereto.

8. Subsequently, by Order dated April 28, 1977, George Sassower was directed to transmit to the Public Administrator all books, papers and property of the estate of Eugene Paul Kelly on or before May 5, 1977 (E). Said Order was served personally upon George Sassower in open court on April 28, 1977.

9. Plaintiff appealed the above orders of the Surrogate's Court dated March 25, 1977 and April 28, 1977 to the Appellate Division of the Supreme Court of the State of New York, Second Department. On the motion of Ernest Wruck and Edward Kelly the appeal from the order dated March 25, 1977 was dismissed. Plaintiff's cross-motion to stay enforcement of both orders was denied (F).

10. By Order to Show Cause dated June 6, 1977 George Sassower commenced a proceeding against the Hon. Ernest Signorelli, Surrogate of Suffolk County. The relief requested included, inter alia, that Ernest L. Signorelli be restrained from enforcing the Order of the Surrogate's Court dated March 9, 1976 contending that the court was without jurisdiction to remove plaintiff as executor. Plaintiff further contested the propriety of the Order of the Surrogate's Court dated March 25, 1977 and April 28, 1977. By Decision dated July 1, 1977 and Order dated August 1, 1977 the petition was dismissed (G, H).

11. Thereafter by Decision and Order dated June 8, 1977 a trial date was set for the proceeding in the matter of plaintiff's accounting. By the same Order, George Sassower's application to depose Edward Kelly was granted to the extent that the examination be held at the Surrogate's Court on June 13, 1977 (I).

12. The plaintiff was not present at the Surrogate's Court on June 13, 1977. Nor did the plaintiff contact the court (J2-5).

13. On June 15, 1977 the respective counsel including George Sassower appeared before the Surrogate's Court and the Hon. Ernest L. Signorelli (K). At the commencement of proceedings held that day, Vincent G. Berger, Attorney for the Public Administrator informed the court that the plaintiff had not complied with the Order dated April 28, 1977. Mr. Berger was joined by Ernest Wruck and Charles Z. Abuza, Attorney for Edward Kelly, in his application to the court to remedy the situation (K4-7).

14. The court inquired of the plaintiff as to whether he had complied with the Order to turn over all books, papers and property of the estate to the Public Administrator (K13). The plaintiff answered that he had not, contending that the Order of the Surrogate's Court was unlawful (K26).

15. The plaintiff was warned that his wilful refusal to obey the order of the court may result in his being held in contempt, fined in the amount of two-hundred fifty dollars (\$250.00) and/or thirty (30) days imprisonment (K31-32).

16. The court asked the plaintiff if he wished to be heard before a determination on the question of contempt was made. Plaintiff responded in the affirmative but offered no defense (K22).

17. The court summarized that as a result of plaintiff's refusal to obey the lawful mandate of the court, plaintiff was interfering with the orderly processes of the court (K35). And again inquired of the plaintiff if he was going to obey the Order (K36). The plaintiff agreed to comply without prejudice and under protest (K38).

18. The court reminded plaintiff that nothing was negotiable and full compliance was expected (K40). And the plaintiff was given a further opportunity to comply with the

order (K45). Full compliance was to be had by June 22, 1977 (K46). The court directed the plaintiff to return on that day (K47, 48).

19. On June 22, 1977, George Sassower did not return to the Surrogate's Court. The plaintiff did not contact the court either (L2). The Deputy Public Administrator of Suffolk County appeared, was sworn and testified that George Sassower had not turned over any assets of the decedent's estate to the Public Administrator (L8).

20. Immediately thereafter the court pursuant to Section 750 of the Judiciary Law adjudged the plaintiff herein to be in criminal contempt of court for unlawful disobedience of the order dated April 28, 1977 and the direction of the court of June 15, 1977 to turn over the books, papers and property of the estate of Eugene Paul Kelly to the Public Administrator of Suffolk County. It was ordered that the plaintiff be imprisoned for a period not exceeding thirty (30) days and that a warrant of commitment issue (L10-11). See also M and N.

21. On June 23, 1977, George Sassower was taken into custody at his home in New Rochelle, Westchester County, New York by representatives of the Sheriff of the County of Suffolk (O6). Plaintiff pursuant to the warrant of commitment was forthwith presented before the court (O2). However, prior to being transported to the court plaintiff was given the opportunity to stop at two banks and the post office (O7). In transit plaintiff requested that he be given the opportunity to present an application for a writ of habeas corpus to the Appellate Division of the Supreme Court of the State of New York, Second Department; the Supreme Court of the State of New York, County of Queens and the Supreme Court of the State of New York, County of Nassau (O4-5).

Upon his arrival at the Surrogate's Court plaintiff

requested that he be given the opportunity to present an application for a writ of habeas corpus to a justice of the Supreme Court of the State of New York, County of Suffolk (04). When brought before the court, the court inquired of plaintiff whether he was going to comply with the Order. Plaintiff expressed his intention to comply with the law as he saw it (09).

22. Plaintiff was informed that as soon as he complied with the order, the court would entertain an application to vacate the order (010). Again, plaintiff was asked if he was going to comply (010). Plaintiff's reply was not responsive to the question.

23. Plaintiff was then remanded to the county jail (011).

24. At approximately five o'clock in the afternoon of June 23, 1977, a petition for a writ of habeas corpus was presented on behalf of the plaintiff to the Hon. Charles R. Thom, a Justice of the Supreme Court of the State of New York, County of Suffolk. A writ of habeas corpus issued returnable at ten o'clock in the forenoon on June 27, 1977 at the Supreme Court of the State of New York in the County of Suffolk before a Special Term, Part I, in the courthouse thereof. Plaintiff was released and bail was set in the amount of three hundred dollars (\$300.00) (P).

25. On June 27, 1977 plaintiff, your deponent, the attorney for the Public Administrator of Suffolk County and the Assistant County Attorney appeared before the court. The matter was adjourned until July 7, 1977.

26. Thereafter by Order to Show Cause dated June 27, 1977, returnable at ten o'clock in the forenoon on July 7, 1977, the plaintiff commenced a proceeding pursuant to Article 78 of

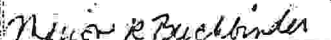
the Civil Practice Law and Rules to nullify the contempt ~~ORDER AND~~ warrant of commitment. The plaintiff again asserted that the the court was without jurisdiction to direct him to transmit the books, papers and assets of the estate of Eugene Paul Kelly to the Public Administrator of Suffolk County.

27. Plaintiff did not appear personally before the court on July 7, 1977. He did submit by mail an affidavit in support of an application for an adjournment of one (1) week. The application for the adjournment was denied. Plaintiff's purported Article 78 proceeding was dismissed for failure to place the motion upon the calendar (22 N.Y.C.R.R. 790.15b). The decision on the writ of habeas corpus was reserved (Q).

28. By Order of the Supreme Court dated July 8, 1977, a hearing upon the writ was set down for July 13, 1977. A hearing was had on July 13, 20 and 21, 1977. By Decision dated July 28, 1977, the writ was allowed and the adjudication of contempt annulled (R).


LEONARD J. PUGATCH

Sworn to before me this
23rd day of August, 1977


Assistant Attorney General
of the State of New York

D. SURROGATE'S COURT UNDER SURROGATE HILDRETH

Surrogate Signorelli testified that the personnel in Surrogate's Court were not very careful or diligent under the stewardship of his predecessor, Surrogate Hildreth. But,

"[U]nder my direction, they are more careful, my personnel in the Law Department, in checking orders to see that they correctly recite all of the papers upon which the order is predicated. [In 1976] [t]hey weren't that diligent. I must confess to the Court. Particularly in 1976. That's when I first became Surrogate". (Oct. 22, 1981, SM 138)

Nevertheless, in reviewing the Kelly proceeding, prior to 1976, while Judge Hildreth was Surrogate, one finds that all papers are in the file, all legal documents were microfilmed, all records are correct, and Orders correctly recite the papers upon which they were made.

E. SURROGATE'S COURT UNDER SURROGATE SIGNORELLI

Under the "improved" conditions of Surrogate Signorelli's tenure, I have compiled three lists of missing documents, stenographic minutes, and records from the files of or pertaining to the Estate of Eugene Paul Kelly, deceased (File No. 736 P 1972) in Surrogate's Court, Suffolk County.

1. Documents, stenographic minutes, and records whose existence is confirmed by other records of Surrogate's Court, Suffolk County, but which are now missing. The Grievance Committee's attorneys should have a substantially similar list.

2. Documents, stenographic minutes, and records whose existence in Surrogate's Court, Suffolk County is confirmed by the testimony and records of Charles Z. Abuza, Esq., but which are now missing. The Grievance Committee's attorneys should have a more complete list than I, since they had access to all of Mr. Abuza's files.

3. Documents, stenographic minutes, and records whose existence in Surrogate's Court, Suffolk County is indicated by my own records and recollection, which are now missing.

All missing documents, stenographic minutes, and records have a common attribute: they either exculpate my wife and myself or incriminate Surrogate Signorelli!

The fair conclusion should not be hard for this Court to draw.

My compilation will be turned over to Mr. Justice Mollen, the Commission on Judicial Conduct, or this Court upon request, after the files in this Estate have been officially inventoried or impounded and a full explanation received from Surrogate Signorelli on this subject.

Surrogate Signorelli and his Court succeeded in misleading the Grievance Committee. In view of the Referee's findings, it is doubtful whether any disciplinary proceeding would have been brought against me or my wife, had his complaint not been so thoroughly fallacious.

During the hearings, Judge Melia heard testimony and saw documentation of a seemingly endless stream of outright lies and misleading statements perpetrated upon various courts by Charles Z. Abuza, Esq. and his law firm.

After listening to such testimony for days, Judge Melia asked Mr. Abuza in a very soft and polite manner whether he believed he had a duty to set forth the truth in crystal clear terms in his statements to the court, when the charges and their consequences were so serious?

This same question should be posed by this Court, the Commission, and by Justice Mollen to Surrogate Signorelli with respect to the information he published, gave to Justice Mollen, and the Grievance Committee.

F. THE TESTIMONIAL LIES OF SURROGATE SIGNORELLI

As established hereinabove, Surrogate Signorelli's testimony is replete with conscious deception, equivocation, evasion, feigned ignorance, and bald-faced lies.

The thrust of almost every series of questions revealed his difficulty in coming to grips with the truth.

Surrogate Signorelli would be hard pressed to justify some of his testimony, even using Penal Code standards.

1. Could anyone believe that Surrogate Signorelli, a former Assistant District Attorney and County Court Judge, after many evasive answers, would testify that he does not know what an accusatory "charge" is "precisely"?

Yet, that is what he testified to!

2. Could anyone believe that Surrogate Signorelli (a former Assistant District Attorney and County Court Judge) could not answer "Yes" or "No" to the simple question of whether I was charged with criminal contempt prior to the inquest which took place on June 22, 1977?

To this response, the patient Judge Melia stated "Yes, you can, Judge".

3. Could anyone believe that Surrogate Signorelli would repeatedly claim that he followed the requirements of the Judiciary Law, when he tried, convicted, and sentenced me, all in absentia, for an alleged criminal contempt, outside his presence, and wherein I was never "charged" with the crime or given notice of the hearing? That was his testimony!

4. Could anyone believe that Surrogate Signorelli would testify, in response to Judge Melia's inquiry, that I did not have 5th Amendment rights, when I was taken into custody and brought before him? That was his testimony!

As heretofore mentioned, Judge Melia's obvious procedure in these hearings was to permit a point to be made, not to "kill" or "overkill", but I wonder what his thoughts were while listening to such testimony?

One shudders to think what even a paralegal could have done, had further cross-examination been permitted on such testimony.

5. "Audacious" is the most favorable term for Surrogate Signorelli's pretended justification for publishing the lie that I defaulted on the motion returnable before Judge Hildreth on March 17, 1975, when the records show, plainly and undeniably, that I submitted an affidavit in opposition and the very Order incorporates such affidavit in its recitation clause.

The excuse itself was a bald faced lie.

6. Surrogate Signorelli's distortion that I requested three adjournments during Surrogate Hildreth's tenure, when the documents on their face reveal that they were at the request of both sides. Surrogate Signorelli ran out of excuses for this and many other lies.

7. Everyone present agreed that Charles Z. Abuza, Esq. (including the Grievance Committee attorneys) gave probably the worst testimony they had ever heard. It was such an affront to the truth that the Grievance Committee requested dismissal of the charges before completion of his testimony, and denounced him as a liar in no uncertain terms. Judge Melia not only explicitly accepted the diagnosis and recommendation of the Grievance Committee attorneys on those charges, but added his own choice words of excoriation, as the transcript and the Referee's Report expressly show.

With that setting, any witness who followed had to be an improvement.

When Surrogate Signorelli turned out to be worse than Charles Z. Abuza, Esq., one was reminded of the comforting story about the priest who always found kind words for the departed. When an individual with no redeeming features died, the community turned out for the funeral merely to witness the priest at a loss for words. He came through the crisis, however, eulogizing the deceased with the words: "His brother, is worse."

At least, Mr. Abuza had the intelligence to try to excuse his lies to various courts and judges as "mistakes". Surrogate Signorelli, with his incredible brazenness, could never admit he made a mistake, and, thereby, sank as unmistakably as the Titanic.

Surrogate Signorelli's attempts to rationalize his conduct in directing me to sell the property, directing me to perform executorial functions all after the date of his alleged removal of me as executor, were incomprehensible to everyone present and to everyone who has read his testimony.

Clearly, the rationalization is contrived and false.

Having tortuously "explained", in his irrational way, his direction for me to sell the property, although I was then supposedly an executor "defunctus", Surrogate Signorelli was "checkmated" when he had to explain why he had cancelled the contract on the ground that I was unauthorized.

The reason gradually occurred to everyone, even those who still believed in "the tooth fairy". It was crass greed!

When the property could not be easily sold, he was content to direct me to sell. When I had a buyer, he wanted the commission to go to his appointee.

How else does one explain the sale of the property one year later at the same price to the same person. As the Referee noted, the Surrogate's "switcheroo" caused the estate to incur an additional year of expenses maintaining this empty house, not to mention the loss of interest on the money available at prevailing market rates.

In our cynical world, there are many who will tell you that this was and still is part of the system. I reluctantly accept this. What I can not accept is the published defamatory accusation by Surrogate Signorelli that I, who never received one cent for any of my considerable legal services and disbursements, caused the estate to incur "needless expense", when, all the while, the Surrogate was scheming for his appointees to be in charge of the till.

To say anything more would belabor the point.

G.

THE RELIEF PRAYED FOR

I was one of the first soldiers to enter Versailles, France, during World War II --tumultuously greeted as a liberator, by faces long since forgotten. One man, whose face I will never forget, who had lost everything during the occupation, simply and embarrassingly asked why it took us so long to wake up to the situation and come to the rescue.

Had Surrogate Signorelli focused his animus only on me, no matter how intensely, that would have inflicted more than pain enough.

He did not. He publicly defamed my wife who he knew was not directly involved in the matter. He spread his lies over the pages of the New York Law Journal, to be read by her colleagues, and the judges before whom she appeared.

He smeared me, my wife and children by lies that he transmitted to a reporter for the New York Daily News.

On March 3, 1978, while my wife cried bitter tears on seeing the publication in the New York Law Journal, I had faith that ultimately Surrogate Signorelli would be properly dispatched by those in authority.

I was prepared for Surrogate Signorelli. But, I was not prepared for those who, albeit, unwittingly, gave him succor.

I did not expect that Justice Mollen would "thank" Surrogate Signorelli when he violated the legal requirement of confidentiality by publishing his professional misconduct charges against me and my wife.

I did not dream that all the letter writers to the New York Law Journal would silently permit this and similar violations of the statutory mandate of secrecy so openly being violated by a member of the judiciary.

I was unprepared that no one was there when Writs of Habeas Corpus were being disobeyed so flagrantly.

I am still unprepared to believe that the Appellate Division, First Department, is unconcerned when an attorney reports to them that he was tried, convicted, and sentenced, in absentia, while on trial in the First Department. What will their response be on June 24th, 1982 when I fight such conviction in the Second Department?

I am still unprepared to believe that the judiciary is unconcerned when I report that my daughter came home for a week-end from Harvard, and found herself incarcerated, along with her mother, because she helped serve a Writ of Habeas Corpus.

I will not request, ask, pray, or plead that this Court confirm the Report of the Referee. Mere confirmation will not begin to compensate for the injury and damages done to me and my innocent family because of judicial transgression of the law.

H.

CONCLUSION

I have demonstrated, unquestionably, the utter frivolousness and malice of the charges levelled at me; Judge Melia -- as this Court's appointee -- meticulously heard the evidence, and sustained my position in every possible respect. It is now this Court's duty to fashion the appropriate remedy to deal with the true subject of this disciplinary matter -- Surrogate Signorelli.

Only a Kafka could adequately describe the nightmare this man created for me and my family in the past five years. The damage he recklessly and wantonly inflicted upon us by his unfounded, publicized accusations has touched every aspect of my and my wife's personal and professional life. Much of that damage is irreparable, uncompensable and frightening to believe that it actually did happen here -- in America.

The law's cumbersome machinery is, perhaps, too often the unintended ally of cynical litigants, who capitalize on delays and obfuscation the legal process can promote. That end is even easier to achieve, however, when the litigant wears a black robe and speaks with all the power and majesty that robe automatically invests in its wearer.

It is just because the real transgression in the matter did so via tragic and despicable misuse of judicial power that this Court -- in its proper use of judicial power -- should resoundingly deal with the case to provide, at least, the partial redress herein requested.

More than seventy years ago this Court said:

"The duty of this court towards the members of the bar, its officers, is not only to administer discipline to those found guilty of professional conduct, but to protect the reputation of those attacked upon frivolous or malicious charges". (Matter of Stern, 137 App. Div. 909, at 910, 121 N.Y. Supp. 948, 949 [1st Dept.])

I await eagerly this Court's venerated "protection". When it comes, I might, like the man in Versailles, ask why it took so long.



GEORGE SASSOWER

Sworn to before me this
16th day of June, 1982



MURIEL GOLDBERG

Notary Public, State of New York
No 60-4515474 Westchester County
Commission Expires March 30, 1983