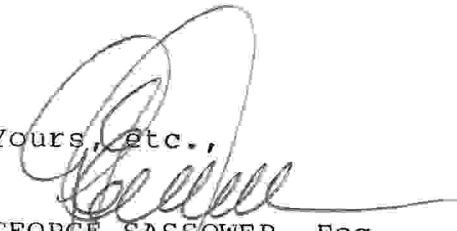


PLEASE TAKE FURTHER NOTICE, that opposing papers, if any, are to be served in accordance with the Rules of this Court.

Dated: November 15, 1987

Yours, etc.,



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Cahn, Wishod Wishod & Lamb, Esqs.

c. Furthermore, where the original judicial determinations were the product of fraud, it is the general rule that security (and similar financial preconditions) are eliminated (e.g. CPLR 6312[b]).

3a. The Constitution of the United States gives to Congress the power, under Article 1, §8, cl. 4, to establish "uniform laws on the subject of bankruptcy".

b. No substantive bankruptcy powers are given to the judiciary.

4a. Congress, by virtue of this Constitutional grant, in 11 U.S.C. §362, automatically stayed all collections proceedings against those who file a petition in bankruptcy.

b. Congress, and only congress, can legislate exceptions, which it did [subdivision "b"].

c. Relief from any "automatic stay" can be granted by the bankruptcy court only after notice and a hearing, which the defendants herein never requested.

5. Congress, by a grant of a cause of action for money damages [subdivision "h"], also provided relief as against those who violate the aforementioned, during the period of such automatic stay [subdivision "c"].

6. The aforementioned is true under penalty of perjury.

WHEREFORE, it is respectfully prayed that this matter be addressed to the merits, together with any other, further, and/or different relief as to this Court may seem just and proper in the premises.

Dated: November 15, 1987



GEORGE SASSOWER