

SUPREME COURT OF THE UNITED STATES

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In the Matter of the Application of
 GEORGE SASSOWER,
 Petitioner,
 -against-
LEE FELTMAN and ROBERT ABRAMS,
 Respondent.

Docket No. 93-5127

For an Order compelling the filing
of a verified accounting for the
judicial trust assets for PUCCINI
CLOTHES, LTD., and other relief.
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x-----x
 PETITION FOR A WRIT OF CERTIORARI
 to the
U.S. CIRCUIT COURT OF APPEALS FOR THE SECOND CIRCUIT
x-----x
 x-----x
 PETITIONER'S RULE 23 STAY MOTION
 x-----x

Affirmant, under the penalty of perjury, makes
this motion for a stay in accordance with his Preliminary
Injunction submitted to the Circuit Court (Exhibit "A"), whose
serious allegations of criminal racketeering activities by
members of the judiciary, their bag-men and/or cronies were
uncontroverted, and the relief requested unopposed.

1. The relief in the motion which accompanied Exhibit
"A" reads as follows:

 "(1) a general bias recusal; (2) summary
reversal; and (3) a mandatory (affirmative) stay to
serve, inter alia, compliance with Rule 23.3 of the
Rules of the Supreme Court of the United States.

 A stay in the form of a proposed
preliminary restraining order and a temporary
injunction, made upon notice, is made part of this
motion."

2a. The proposed Order (Exhibit "A") generally tracks
the corruption in the matter of PUCCINI CLOTHES, LTD.
["Puccini"].

b. While not all ordering paragraphs may be appropriate on a stay motion in this Court, affirmant contends that all "ministerially compelling" paragraphs should be granted, and the other paragraphs seriously considered:

"ORDERED, as a matter of ministerial compulsion, not involving any judicial discretion, LEE FELTMAN, Esq. shall forthwith, upon receipt of this proposed Order, and in no event later than September 28, 1992, file with the Clerk of this Court, with a Certificate of Service upon all interested parties, including appellant, a 'verified accounting' for the judicial trust assets of PUCCINI CLOTHES, LTD., accounting for all its assets as of June 4, 1980, and it is further

ORDERED, as a matter of ministerial compulsion, not involving any judicial discretion, RASHBA & POKART, appointed as investigatory accountants by the Supreme Court, New York County, and thus acted under "color of law" in the involuntary dissolution of PUCCINI CLOTHES, LTD., shall forthwith, upon receipt of this proposed Order, and no later than September 28, 1992, file with the Clerk of this Court, with a Certificate of Service upon all interested parties, including appellant, with a statement of (1) the disposition of the judicial trust assets of PUCCINI CLOTHES, LTD., as far as it is aware; and (2) its pre-appointment relationships with KREINDLER & RELKIN, P.C. and/or its clients in this matter, including all monies received from them or on their behalf, including the sources of such monies; and it is further

ORDERED, as a matter of ministerial compulsion, not involving any judicial discretion, Attorney General ROBERT ABRAMS shall forthwith, upon receipt of this proposed Order, and no later than September 28, 1992, make application to the Supreme Court, New York County, with proper service upon all interested parties, including the Clerk of this Court: (1) compelling LEE FELTMAN, Esq., to render an accounting for the judicial trust assets of PUCCINI CLOTHES, LTD.; (2) nullifying and/or disaffirming the 'approval' by Referee DONALD DIAMOND of the 'accountings' of LEE FELTMAN, Esq. on behalf of PUCCINI CLOTHES, LTD. on the grounds of, inter alia, fraud, lack of jurisdiction over appellant, a judgment creditor, and lack of authority; (3) nullifying the discharge of LEE FELTMAN, Esq. and FIDELITY & DEPOSIT CO. OF MARYLAND, as unauthorized and a fraud; and (4) taking such other action as may be deemed necessary to

effectuate the fiduciary obligations of the Attorney General, including compelling the filings of Judiciary Law §35-a Statements by Judge DAVID B. SAXE and Referee DONALD DIAMOND; and it is further

ORDERED, as a matter of ministerial compulsion, not involving any judicial discretion, LEE FELTMAN, Esq. and Attorney General ROBERT ABRAMS, at their own personal cost and expense, shall cause to be published, at least two (2) times, a legal notice in the New York Times and New York Law Journal, to the effect that the previously published legal notice concerning the settlement of a final accounting before Referee DONALD DIAMOND was a fraud, hoax, and is a nullity, and all monies paid or received under the settlement of an 'accounting' from the judicial trust assets of PUCCINI CLOTHES, LTD., be, with interest, returned to PUCCINI CLOTHES, LTD., and it is further

ORDERED, as a matter of ministerial compulsion, not involving any judicial discretion that forthwith, upon receipt of this proposed Order and in no event later than September 28, 1992, KREINDLER & RELKIN, P.C. and CITIBANK, N.A., shall turn over to the Clerk of the United States District Court for the Eastern District of New York all monies, with interest, received by them from HYMAN RAFFE, including that paid on behalf of appellant, which were payable 'to the federal court' by virtue of the Order of June 7, 1985 in Raffe v. Citibank (84 Civ. 0305), with proof of such payment, including the amount, with notice of same served upon HYMAN RAFFE, appellant, and the Clerk of this Court, and it is further

ORDERED, as a matter of ministerial compulsion, not involving any judicial discretion, that forthwith, upon receipt of this proposed Order, and in no event later than September 28, 1992, KREINDLER & RELKIN, P.C., CITIBANK, N.A., LEE FELTMAN, Esq., FELTMAN, KARESH, MAJOR & FARBMAN, Esq., RASHBA & POKART, and all others receiving monies or other things of value from HYMAN RAFFE, in consideration, in whole or in part, for his not being incarcerated under a criminal conviction by Mr. Justice ALVIN F. KLEIN and/or a Report of Referee DONALD DIAMOND not being brought on for confirmation, with appropriate interest, be turned over to Hon. EDWARD V. REGAN, Comptroller for the State of New York, for appropriate disposition, with proof of such payments, including the amount, with notice of same upon HYMAN RAFFE, appellant, and the Clerk of this Court, and it is further

ORDERED, as a matter of ministerial compulsion, not involving any judicial discretion, that on or before September 28, 1992, Attorney General ROBERT ABRAMS shall serve upon Hon. EDWARD V. REGAN, Comptroller for the State of New York, a preliminary estimate of all cost and expenses caused to be incurred by the State of New York for his representation and the representation of other individuals in their private capacities or where the interests of the State of New York did not comport with the representation of Attorney General ROBERT ABRAMS in the federal courts, and it is further

ORDERED, that Attorney General ROBERT ABRAMS is stayed from implementing any agreement and/or understandings with Presiding Justice FRANCIS T. MURPHY wherein he compromises his fiduciary obligations to judicial trusts or to the STATE OF NEW YORK with respect to such judicial estates however created within the judicial bailiwick of Presiding Justice FRANCIS T. MURPHY, and/or continues to pursue such perfidious practices, and it is further

ORDERED that a copy of this Order be served upon the PUBLIC INTEGRITY SECTION OF THE DEPARTMENT OF JUSTICE, for such action as it deems appropriate, and it is further

ORDERED that a copy of this Order be served on the Foreperson of the Grand Jury of the Southern and Eastern District of New York, with such other information as appellant desires to bring to the attention of those bodies, by delivering same to the U.S. Attorneys for those districts, and it is further

ORDERED, that the Clerk of the U.S. District Court for the Southern District of New York shall forthwith issue process for appellant's filings in this matter, and make a judicial assignment by the normal random selection process; and it is further

ORDERED, that all further proceedings in this matter be determined by the Court and panel hereinafter assigned by another Circuit."

3. Particularly with Chief U.S. Circuit Court Judge JON O. NEWMAN ["Newman"] at the helm, who has involved himself as an active participant in this criminal racketeering adventure, the relief sought herein "is not available from any other court or judge".

WHEREFORE, it is respectfully prayed that this application be granted in all respects.

Dated: July 20, 1993

GEORGE SASSOWER
Petitioner, pro se
16 Lake Street,
White Plains, N.Y. 10603
(914) 949-2169

CERTIFICATION OF SERVICE

On July 21, 1993 I served a true copy of this Petition by mailing same in a sealed envelope, first class, with proper postage thereon, addressed to U.S. Solicitor Attorney, Drew S. Days, III, 10th and Constitution Avenues, Washington, D.C. 20530; Chief Judge Jon O. Newman, Circuit Court of Appeals, Foley Square, New York, NY 10007; Kreindler & Relkin, P.C., 350 Fifth Avenue, New York, NY 10118; NY State Atty. Gen. Robert Abrams, 120 Broadway, New York, NY 10271; Charles L. Brieant, 101 East Post Road, White Plains, NY 10601; Feltman, Karesh, Major & Farbman, Esqs., 152 West 57th Street, New York, NY 10019, and Francis T. Murphy, c/o Appellate Division, 27 Madison Avenue, New York, NY 10010, that being their last known addresses.

Dated: July 21, 1993

GEORGE SASSOWER