

SUPREME COURT OF THE STATE OF NEW YORK
APPELLATE DIVISION: SECOND DEPARTMENT

----- X

In the Matter of George Sassower, :
an attorney and counselor-at-law, :

GRIEVANCE COMMITTEE FOR THE SECOND : AFFIRMATION
AND ELEVENTH JUDICIAL DISTRICTS, :

Petitioner, :

GEORGE SASSOWER, :

Respondent. :

----- X

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

ROBERT H. STRAUS, an attorney admitted to practice in the State of New York, affirms the following under penalty of perjury:

1. I am Chief Counsel to the Grievance Committee for the Second and Eleventh Judicial Districts, the petitioner herein, and I am fully familiar with the relevant facts.

2. This affirmation is submitted in response to respondent's motion for an expedited hearing, immediate disclosure and restrictions upon the appointment of a Special Referee.

3. As stated previously (See Exhibit A, annexed to respondent's motion), petitioner has no objection to any of respondent's requests which would result in an expedited hearing.

4. If there are any discovery materials which respond-

ent does not already possess, petitioner has agreed to furnish them prior to the hearing. However, respondent, for the stated purpose of making additional motions, demands immediate and total discovery, even prior to the appointment of a Special Referee. Respondent fails to set forth any factual or legal basis for his extraordinary request. Instead, he states that "petitioner's counsel has advanced no prejudicial reasons" for not complying.

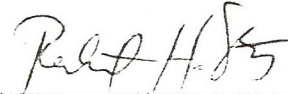
5. Respondent, as its creator, is already in possession of the principal evidence to be introduced against him-- thousands of pages of documents filed by him throughout the courts of this State. He was served with those orders he is charged with disobeying and with those convicting him of criminal contempt and affirming his convictions. As their author or addressee, respondent already possesses all correspondence which might be offered in evidence against him. Virtually all evidentiary materials are identified by the petition served upon respondent and are listed in the schedules annexed to that document. In fact, respondent does not allege that there are any materials to which he is entitled which he does not already possess.

6. In view of the frivolous nature of respondent's discovery request and the enormous volume of the materials involved, it is clearly imperative that any additional disclosure be regulated by the Special Referee.

7. The absurdity of respondent's demand for "a Referee

who, although a lawyer, is associated with the academic field, the clergy, or other non-judicial function" would appear to require no comment.

Dated: Brooklyn, New York
November 26, 1985



ROBERT H. STRAUS

Sir: Please take notice that the within is a (certified) true copy of a duly entered in the office of the clerk of the within named court on 19

Dated,

Yours, etc.

ROBERT H. STRAUS

Attorney for **GRIEVANCE COMMITTEE**
Office and Post Office address

210 Joralemon Street

Borough of Brooklyn Brooklyn, N.Y. 11201

To

Attorney(s) for

NOTICE OF SETTLEMENT

Sir:—Please take notice that an order

of which the within is a true copy will be presented for settlement to the Hon.

one of the judges of the within named Court, at

on the _____ day of _____ 19

at _____ M.

Dated,

Yours, etc.

ROBERT H. STRAUS

Attorney for **GRIEVANCE COMMITTEE**
Office and Post Office Address

210 Joralemon Street

Borough of Brooklyn Brooklyn, N.Y. 11201

To

Attorney(s) for

Supreme Court of the State of New York
Appellate Division — Second Judicial
Department

In the Matter of George Sassower,
an attorney and counselor-at-law,

GRIEVANCE COMMITTEE FOR THE
SECOND AND ELEVENTH JUDICIAL
DISTRICTS,

Petitioner,

GEORGE SASSOWER,

Respondent.

APPOINTMENT

ROBERT H. STRAUS

Attorney for **GRIEVANCE COMMITTEE**
Office and Post Office Address, Telephone

210 Joralemon Street

Borough of Brooklyn Brooklyn, N.Y. 11201
(212) 624-7851

To

Attorney(s) for

Service of a copy of the within

is hereby admitted.

Dated,

.....

Attorney(s) for