

GEORGE SASSOWER

ATTORNEY AT LAW

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December 17, 1985

Robert H. Straus, Esq.
Grievance Committee, Second Judicial Dept.
210 Joralemon Street,
Brooklyn, New York, 11201

Dear Mr. Straus,

1a. I believe it would be appropriate for you to respond in writing to my acceptance of the offer of Hon. Eugene H. Nickerson of a reference by His Honor if I attacked the validity of the time records of Kreindler & Relkin, P.C. again.

b. My own feeling is that you are beginning to doubt the integrity of both Kreindler & Relkin, P.C. and Feltman, Karesh & Major, Esqs.

c. Once the (public) hearings get under way, I will eliminate any and all doubt that you may entertain, because without question, you will be convinced that my accusers are involved in criminal activity of the most egregious kind, who specialize not only in spurious time records, but inter alia, larceny, perjury, and judicial corruption, including the "fixing" of judges and courts!

d. We will, I have no doubt, shortly be on the same side!

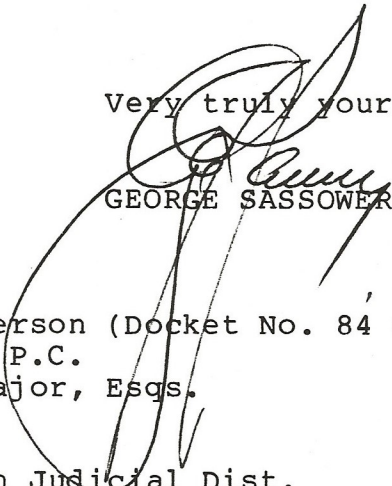
2a. Annexed hereto is a Notice of an Examination before Trial of Kreindler & Relkin, P.C. and its clients set for December 30, 1985, together with a copy of the complaint (without exhibits) under which such examination will be held.

b. My personal belief is that if it was a choice between paying \$500,000 or submitting to an examination before trial in this matter, Kreindler & Relkin, P.C. and their clients would rather pay \$500,000.

Dec. 17, 1985

c. Whatever the outcome of such examination, I will advise you. Of course, you or a representative, are welcomed to attend.

Very truly yours,



GEORGE SASSOWER

GS/h

cc: Hon. Eugene H. Nickerson (Docket No. 84 Civ. 0305)
Kreindler & Relkin, P.C.
Feltman, Karesh & Major, Esqs.
Mr. Hyman Raffe
Sam Polur, Esq.
Grievance Comm.- 9th Judicial Dist.
Att: Gary L. Cassella, Esq.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----x
HYMAN RAPPE,

Plaintiff,

Index No.
8171-1985

-against-

CITIBANK, N.A. and JEROME H. BARR,
individually and as executors of the
Estate of MILTON KAUFMAN, deceased, and
KREINDLER & RELKIN, P.C.,

Defendants.
-----x

S I R S:

PLEASE TAKE NOTICE, that the plaintiff in the above-captioned action will take the oral deposition before trial of defendants concerning the facts and events alleged in the pleadings. Said oral deposition will be conducted at Special Term Part I (Clerk's Office) of the Supreme Court of the State of New York, County of the Bronx, on the 30th day of December, 1985, at 9:30 o'clock in the forenoon of that day. Said deposition will be continued from day to day until completed.

PLEASE TAKE FURTHER NOTICE that, pursuant to CPLR 3111 et seq. the defendants are requested to produce at such examination and permit plaintiff and his attorney to inspect and copy all originals, copies and prior drafts, in the care, possession, custody and/or control of the defendants all documents and communications relevant to the pleadings in this action, including all time records and all related documents.

Dated: December 17, 1985

GEORGE SASSOWER, Esq.
Attorney for plaintiff.
51 Davis Avenue,
White Plains, N.Y. 10605
914-949-2169

To: Kreindler & Relkin, P.C.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
HYMAN RAFFE,

Plaintiff,

Index No.
8171-85

-against-

CITIBANK, N.A. and JEROME H. BARR,
individually and as executors of the
Estate of MILTON KAUFMAN, deceased, and
KREINDLER & RELKIN, P.C.,

Defendants.

-----X
Plaintiff, by his attorney, GEORGE
SASSOWER, Esq., complaining of the defendant
respectfully sets forth and alleges:

1. At all of the times hereinafter mentioned
the defendant, KREINDLER & RELKIN, P.C. was a
professional corporation licensed to practice law in the
State of New York.

2. At all of the times hereinafter mentioned
the defendant, CITIBANK, N.A., was a national bank,
licensed to operate in the State of New York.

3. At all of the times hereinafter mentioned
the defendants, CITIBANK, N.A. and JEROME H. BARR, were
and still are the executors of the Will of MILTON
KAUFMAN, deceased.

4. At all of the times hereinafter mentioned the defendant, KREINDLER & RELKIN, P.C. were authorized to act on behalf of the defendants, CITIBANK, N.A. and JEROME H. BARR, in an action pending in this Court under Index No. 16792/1980.

FOR A FIRST CAUSE OF ACTION

5. Plaintiff repeats, reiterates, and realleges each and every allegation of the complaint marked "1" through "4" inclusive, with the same force and effect as though more fully set forth at length herein, and further alleges.

6. In an action pending in this Court bearing Index No. 16792, the plaintiff hereinabove served written interrogatories on defendants herein, which included the following interrogatory:

"2. Set forth all attorney's fees incurred by plaintiffs thus far, annexing any and all documentation for same, including all time sheets, bills rendered, and all payments received, including dates thereof." [emphasis supplied]

7. By Order of the Appellate Division, First Department, of August 18, 1983, the defendants herein were supposed to comply with same, within fifteen days after service of a copy of the Order with Notice of Entry, without cost or expense to plaintiff for same.

8. As of December 19, 1984, the same was not fully complied with by defendants, and thus to save further litigation cost and expense, the plaintiff tendered to the defendant, KREINDLER & RELKIN, P.C. a check of \$200 (Exhibit "A"), in order to promptly receive photostatic copies of the documents that had not been received by him for compliance of the aforementioned interrogatory.

9. The aforementioned check was accepted by KREINDLER & RELKIN, P.C. for such purpose and cashed.

10. Notwithstanding the aforementioned, the defendants have not complied with the contractual understanding, resulting in damage to the plaintiff.

FOR A SECOND CAUSE OF ACTION

11. Plaintiff repeats, reiterates, and realleges each and every allegation of the complaint marked "1" through "4" inclusive, with the same force and effect as though more fully set forth at length herein, and further alleges.

12. On or about the 7th day of October, 1980, the defendants in order to cause the defeat of plaintiff's motion, caused to be submitted to this Court an affirmation by KREINDLER & RELKIN, P.C., a portion of which is annexed hereto (Exhibit "B").

13. That the Court relied on such representation, resulting in the defeat of plaintiff's motion.

14. Thereafter, the defendants, in order to defeat plaintiff's appeal submitted a Brief to the Appellate Division, First Department, a portion of which is annexed hereto (Exhibit "C").

15. That the Court relied on such representation, resulting in the defeat of plaintiff's appeal.

16. That the aforementioned were submitted with the intention of deceiving the plaintiff and the courts, and in fact, did so, and as far as defendant, KREINDLER & RELKIN, P.C., were concerned violated, inter alia, the provisions of the Judiciary Law of the State of New York.

17. As a result of all of the aforementioned the plaintiff has been and will be damaged.

WHEREFORE, plaintiff demands judgment against the defendants in each of the aforementioned causes of action in the sum of \$500,000, together with interest, costs and disbursements.

GEORGE SASSOWER, Esq.
Attorney for plaintiff
2125 Mill Avenue,
Brooklyn, New York, 11234
(718) 444-3403