

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

Index No. 29094/92

DORIS L. SASSOWER

Plaintiff

against

GANNETT COMPANY, INC., GANNETT SATELLITE  
INFORMATION NETWORK, INC., NANCY Q. KEEFE,  
DEBBIE PINES, ELAINE A. ELLIS, CAROLE TANZER  
MILLER, CAMERON McWHIRTER, TOM ANDERSON,  
MICHAEL MEEK, LAURIE NIKOLSKI, MILTON HOFFMAN,  
DOES 1-15, being Gannett editors, Defendant s

EVELYN BRESLAW and ABBIE PETRILLO,

To the above named Defendant

Plaintiff designates

New York  
County as the place of trial

The basis of the venue is

Defendant's residence

Summons with Notice

Plaintiff resides at

White Plains, New York

County of Westchester

**You are hereby summoned** to answer the complaint in this action and to serve a copy  
of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's  
Attorney(s) within days after the service of this summons, exclusive of the day of service (or within 30 days  
after the service is complete if this summons is not personally delivered to you within the State of New York); and in  
case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded herein.

Dated, October 26, 1992  
Defendant's address:

DORIS L. SASSOWER, Pro Se  
Attorney(s) for Plaintiff  
Office and Post Office Address

to be attached

Notice: The nature of this action is

Libel, slander, and negligence  
(see attached)

283 Soundview Avenue  
White Plains, NY 10605

The relief sought is

\$10,000,000 compensatory and \$20,000,000 punitive damages

Upon your failure to appear, judgment will be taken against you by default for the sum of \$ see above  
with interest from November 15, 19 89 and the costs of this action.

SASSOWER v. GANNETT: Attachment to Summons with Notice

In or about July 1989 and continuing thereafter, all Defendants negligently, recklessly, and/or intentionally stated and published negative information damaging Plaintiff.

On or about October 22, 1991 and at various other times, Defendants Breslaw and Petrillo negligently, recklessly, and/or intentionally spoke and published concerning the plaintiff false and defamatory words, including the following: speaking of Plaintiff, Defendant Breslaw stated at a public gathering: "I found a woman lawyer with a full-page ad in Martindale-Hubbell. The lawyer did nothing for six months...and for another eighteen months refused to give my papers to a third lawyer." Speaking of Plaintiff, Defendant Petrillo stated at the same public gathering: "That female lawyer ... is Doris L. Sassower."

On or about October 24, 1991, Defendants (other than Breslaw and Petrillo) negligently, recklessly, and/or intentionally published and circulated the aforesaid statements concerning Plaintiff, with knowledge of their falsity and libelous and defamatory nature, further stating in connection therewith that "The audience growled" at the mention of Plaintiff's name, and the statement that Plaintiff "was indefinitely suspended in June from practicing law".

On or about November 18, 1991, Defendants (other than Breslaw and Petrillo) negligently, recklessly, and/or intentionally published Plaintiff's Letter to the Editor in unauthorized edited form, adding the following false and defamatory statement: "Writer Sassower was ordered suspended from the practice of law on June 14 by the Appellate Division, 2nd Department of state Supreme Court for failure to cooperate with a previous order of the court. That suspension is still in force. Additionally, Justice Samuel Fredman found Sassower in contempt of court for not returning papers to her former client, Breslaw, and fined Sassower the costs incurred by Breslaw in retrieving her file."

On or about February 12, 1992, Defendants (other than Breslaw and Petrillo) negligently, recklessly, and/or intentionally published the following false and defamatory statements: "The settlement was made Dec. 13, 1991, after a seven-week trial in which Sassower's former client, Kathleen C. Wolstencroft, sued to get documents involving her case.", and "In addition, Colabella wrote that Sassower still must pay Wolstencroft \$700,000 under the settlement."

On or about February 14, 1992, Defendants (other than Breslaw and Petrillo) negligently, recklessly, and/or intentionally published the following false and defamatory statements: "The court did not overturn his order that she pay Wolstencroft \$700,000 under a Dec. 13, 1991 settlement after a seven-week trial in which Wolstencroft sued to get documents in her case."