

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF SUFFOLK

-----X
:
ELENA RUTH SASSOWER, DORIS L. SASSOWER, and:
CENTER FOR JUDICIAL ACCOUNTABILITY, INC., :

Index No. 10-12596

Plaintiffs, :

**NOTICE OF MOTION
TO DISMISS**

- against - :

GANNETT COMPANY, INC., THE JOURNAL NEWS, :
LOHUD.COM, HENRY FREEMAN, CYNDEE ROYLE, :
BOB FREDERICKS, D. SCOTT FAUBEL, KEITH :
EDDINGS, and DOES 1-10, :


Defendants. :

-----X
PLEASE TAKE NOTICE that upon the annexed affidavit of Meghan H. Sullivan,
sworn to October 22, 2010, with exhibits annexed thereto, the affidavit of Emily S. Smith, sworn to
October 22, 2010, with exhibits annexed thereto, the accompanying memorandum of law dated
October 22, 2010 and upon the pleadings and prior proceedings herein, Defendants Gannett
Company, Inc., Gannett Satellite Information Network, Inc., Henry Freeman, CynDee Royle,
Bob Fredericks, and D. Scott Faubel (collectively, "Defendants"), by their attorneys Satterlee
Stephens Burke & Burke LLP, will move this Court, at the Motions Support Office of the
Courthouse located at 400 Carleton Avenue, Central Islip, New York on the 15th day of
November, 2010 for an order (i) pursuant to CPLR 3211(a)(1) and (7) dismissing the complaint
of plaintiffs Elena Ruth Sassower, Doris L. Sassower, and Center for Judicial Accountability,
Inc.; and (ii) for such further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to CPLR 2214(b), answering
papers, if any, are required to be served on the undersigned at least seven days before the return date
of this motion.

Dated: New York, New York
October 22, 2010

SATTERLEE STEPHENS BURKE & BURKE LLP

By: 

Mark A. Fowler

Meghan H. Sullivan

Attorneys for Defendants

230 Park Avenue

New York, NY 10169

(212) 818-9200

TO: James A. DeFelice, Esq.
Sarno & DeFelice LLC
235 West 23rd Street
5th Floor
New York, NY 10011
Attorneys for Plaintiffs

Elena Ruth Sassower
64 Towd Point Road
Southampton, NY 11968