

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF SUFFOLK

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ELENA RUTH SASSOWER and DORIS L. SASSOWER,
Individually and as Director and President, respectively,
of the Center for Judicial Accountability, Inc., and
CENTER FOR JUDICIAL ACCOUNTABILTY, INC.,
Acting *Pro Bono Publico*,

Index #10-12596

Plaintiffs,

REPLY AFFIDAVIT
in Support of Cross-Motion

-against-

GANNETT COMPANY, INC., The Journal News, LoHud.com
HENRY FREEMAN, CYNDEE ROYLE, BOB FREDERICKS, and reinforced herein
D. SCOTT FAUBEL, KEITH EDDINGS, DOES 1-10,

Defendants.

-----X

STATE OF NEW YORK)
COUNTY OF SUFFOLK) ss.:

ELENA RUTH SASSOWER, being duly sworn deposes and says:

1. I am the first named individual plaintiff in the above-entitled action and fully familiar with all the facts, papers, and proceedings herein.
2. This reply affidavit is submitted in further support of plaintiffs’ November 29, 2010 cross-motion.
3. Due solely to time constraints, I am unable to do more than to swear to the truth of plaintiffs’ accompanying reply memorandum of law, which I incorporate herein by reference.
4. Additionally, as Ms. Sullivan has not annexed my December 6, 2010 e-mail, responding to hers of the previous day, it is annexed hereto as Exhibit 19. The “fully executed signature pages” for plaintiffs’ November 29, 2010 notice of motion and memorandum of law will, as indicated, be “forthcoming” – and certainly before oral argument is had on defendants’ dismissal motion and plaintiffs’ cross-motion. The delay is attributable directly to Satterlee’s litigation

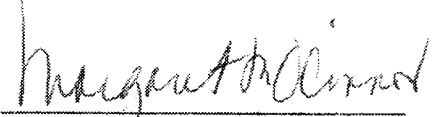
misconduct, which has created unexpected problems and difficulties for Mr. DeFelice in his representation of multiple plaintiffs.

Dated: December 15, 2010



ELENA RUTH SASSOWER

Sworn to before me this
16th day of December 2010



Notary Public

MARGARET M. O'CONNOR
NOTARY PUBLIC, STATE OF NEW YORK
QUALIFIED IN SUFFOLK COUNTY
REG NO 0100S102954
COMMISSION EXPIRES AUG 29, 2013

Center for Judicial Accountability, Inc. (CJA)

From: Center for Judicial Accountability, Inc. (CJA) [elena@judgewatch.org]
Sent: Monday, December 06, 2010 12:33 PM
To: 'Meghan H. Sullivan'
Cc: 'James DeFelice'; 'CJA'
Subject: ~~Sassower v Gannett: plaintiffs' opposition/cross-motion~~
Attachments: 11-29-10-ers-affidavit_0001.pdf; 11-29-10-memo-of-law_0001.pdf

Dear Ms. Sullivan,

Responding to your e-mail, fully executed signature pages will be forthcoming.

Meantime, attached are superseding copies of my affidavit & plaintiffs' memo of law, correcting typos & making non-substantive changes only.

Hard copies will be mailed.

Apologies for the inconvenience.

Thank you.

Elena Sassower

From: Meghan H. Sullivan [mailto:msullivan@ssbb.com]
Sent: Sunday, December 05, 2010 3:14 PM
To: 'Center for Judicial Accountability, Inc. (CJA)'
Cc: 'James DeFelice'
Subject: Opposition Papers

Dear Ms. Sassower-

The Memorandum of Law submitted in opposition to the Motion to Dismiss appears to be signed by you alone, and not by Mr. DeFelice. Please provide us with a fully executed version of your opposition brief as soon as possible. In the absence of opposition papers signed by counsel for all parties, the opposition and the cross-motion for sanctions would, of course, be deemed submitted only on your behalf.

Many thanks.

Meghan H. Sullivan

12/15/2010

EX 19

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF SUFFOLK

x

ELENA RUTH SASSOWER and DORIS L. SASSOWER,
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of the Center for Judicial Accountability, Inc., and
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Index # 10-12596
Justice Peter Fox Cohalan

Plaintiffs,

-against-

GANNETT COMPANY, INC., The Journal News, LoHud.com
HENRY FREEMAN, CYNDEE ROYLE, BOB FREDERICKS,
D. SCOTT FAUBEL, KEITH EDDINGS, DOES 1-10,

Defendants.

REPLY AFFIDAVIT IN FURTHER SUPPORT
OF PLAINTIFFS' CROSS-MOTION

ELENA RUTH SASSOWER, *Pro Se*
Individually & Acting *Pro Bono Publico*

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SARNO & DeFELICE, LLC

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ELENA RUTH SASSOWER, as Director of the Center for
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