

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF SUFFOLK

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

Plaintiffs, :

- against - :

**AFFIDAVIT OF**  
**MEGHAN H. SULLIVAN**

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

Defendants :

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

MEGHAN H. SULLIVAN, being duly sworn, deposes and says:


1. I am an attorney admitted to practice before the Courts of the State of New York and an associate in the law firm of Satterlee Stephens Burke & Burke LLP, attorneys for Defendants Gannett Company, Inc., Gannett Satellite Information Network, Inc., Henry Freeman, CynDee Royle, Bob Fredericks, and D. Scott Faubel (collectively, "Defendants").

2. I submit this Affidavit in support of Defendants' Reply Memorandum of Law in further support of Defendants' Motion to Dismiss Complaint pursuant to CPLR 3211(a)(1) and (7).

3. Annexed hereto as Exhibit A is a copy of the e-mail I sent to Plaintiff Elena Sassower and James De Felice on December 5, 2010. Although Ms. Sassower responded that “fully executed signature pages will be forthcoming,” to date, this document has not been provided.

  
MEGHAN H. SULLIVAN

Sworn to before me this  
8<sup>th</sup> day of December, 2010

  
Notary Public

ABIGAIL SNOW  
Notary Public, State of New York  
No. 01SN5082486  
Qualified in New York County  
Commission Expires July 28, 2013

# EXHIBIT A

## Meghan H. Sullivan

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**From:** Meghan H. Sullivan  
**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.

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