SUPREME COURT OF THE STATE OF COUNTY OF SUFFOLK		
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 ACCOUNTABILITY, INC., Acting <i>Pro</i> : <i>Bono Publico</i> ,		•
	Plaintiffs, :	AFFIDAVIT OF MICHAEL H. GIBSON
- against -		
GANNETT COMPANY, INC., THE JOURNAL NEWS, : LOHUD.COM, HENRY FREEMAN, CYNDEE ROYLE, : BOB FREDERICKS, D. SCOTT FAUBEL, KEITH : EDDINGS, DOES 1-10, :		
	: Defendants. : 	ζ.
STATE OF NEW YORK) COUNTY OF NEW YORK)	ss.:	

MICHAEL H. GIBSON, 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. Attached to this affidavit are certain unpublished decisions and decisions that reported in services other than the West National Reporter System that are cited in Defendants' accompanying memorandum of law, submitted in opposition to the motion of Plaintiff Elena Ruth Sassower for an order (i) disqualifying the Honorable Peter Fox Cohalan, from this proceeding; (ii) granting reargument and renewal, pursuant to CPLR § 2221, of the Court's

September 22, 2011, Order granting Defendants' motion to dismiss and denying Plaintiff's crossmotion; (iii) vacating the Court's September 22, 2011, Order, pursuant to CPLR § 5015(a)(3), on the grounds of fraud; (iv) vacating the Court's September 22, 2011, Order pursuant to CPLR § 5015(a)(4), for lack of jurisdiction; (v) sanctioning counsel for Defendants pursuant to NYCRR § 130-1.1; and (vi) granting Plaintiff's leave to amend her dismissed Complaint.

- 3. Annexed hereto as Exhibit 1 is *Sassower v. The New York Times Co.*, et al. No. 05-19841 (Sup. Ct. West. Co. Sept. 27, 2006).
- 4. Annexed hereto as Exhibit 2 is Sassower v. Commission on Judicial Conduct of the State of New York, slip op. 108551/99 (Sup. Ct. N.Y. County Jan. 31, 2000).
- 5. Annexed hereto as Exhibit 3 is *Mancusi v. New York Post, Inc.*, 6 Media L. Rep. 1784 (Sup Ct. Queens Co. 1980).
- 6. Annexed hereto as Exhibit 4 is *Wilkins v. New York Post*, 32 Media L. Rep. 1566 (Sup. Ct. N.Y. Co. 2003).

MICHAEL H. GIBSON

Sworn to before me this 11th day of January, 2012.

Notary Public

/ PEARL LEUNG Notary Public, State of New York No. 01LE504674B Qualified in Kings County /

Commission Expires July 17, 20