

Case No. 2008-1433 WC

To be Argued by:  
Elena Sassower  
(15 minutes requested)

APPELLATE TERM OF THE SUPREME COURT  
NINTH & TENTH JUICIAL DISTRICTS

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JOHN McFADDEN,

Cross-Appellant,

-against-

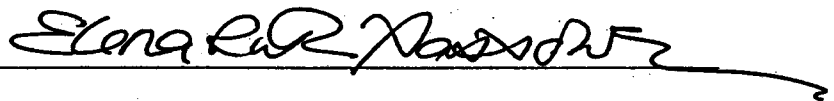
ELENA SASSOWER,

Appellant.

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APPELLANT'S BRIEF\*



ELENA SASSOWER, Appellant *Pro Se*  
16 Lake Street, Apartment 2C  
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Tel: 646-220-7987

**\*Appeal 1: Judge Brian Hansbury's October 11, 2007 Decision & Order  
(Westchester City Court #1502/07)**

#2

## INTRODUCTION

This is an appeal from an October 11, 2007 decision & order that is void *ab initio*. It was rendered by White Plains City Court Judge Brian Hansbury who thereafter recused himself, without explanation or disclosure, by a January 29, 2008 decision & order which simultaneously denied appellant's legally-sufficient motion for his disqualification for demonstrated actual bias and interest and for vacatur of the October 11, 2007 decision & order by reason thereof or upon the granting of reargument – a motion which had additionally requested that he disclose facts bearing upon his impartiality, if disqualification were denied. The January 29, 2008 decision & order is also before this Court on appellant's appeal under #2008-1428-WC, incorporated herein by reference.

As hereinafter shown, the October 11, 2007 decision & order is the product of a flagrantly biased and interested judge. It deprives appellant of relief to which she is entitled, *as a matter of law*: dismissal of the Petition and summary judgment on her four Counterclaims, costs and maximum sanctions against the cross-appellant and his counsel, and their referral to disciplinary and criminal authorities. This Court's granting of such relief is mandated on this appeal – as it is on appellant's accompanying appeal from the January 29, 2008 decision & order.

**QUESTIONS PRESENTED FOR REVIEW**  
**APPEAL 1: #2008-01433-WC**

1. Was appellant's September 5, 2007 cross-motion sufficient, *as a matter of law*, to have required any fair and impartial tribunal to have granted:

- (a) its second branch: dismissal under CPLR §3211(a)1, 2, 4, 5, & 10;
- (b) its third branch: summary judgment pursuant to CPLR §3211(c);
- (c) its fourth branch: an award of costs and maximum sanctions against the cross-appellant and his counsel pursuant to 22 NYCRR §130-1 *et seq*;
- (d) its fifth branch: disciplinary and criminal referrals of the cross-appellant's counsel pursuant to the Court's mandatory "Disciplinary Responsibilities" under the Chief Administrator's Rules Governing Judicial Conduct, 22 NYCRR §100.3D(2)?

*Judge Hansbury's October 11, 2007 decision & order made no factual findings in denying appellant a judgment of dismissal with the conclusory assertion that there were "triable issues of fact with respect to the nature and terms of [her] tenancy"; made no factual findings as to her entitlement to summary judgment; made no factual findings in denying, without reasons, "imposition of sanctions and referral to the Disciplinary Committee", and made no disclosure of facts bearing upon his fairness and impartiality.*

2. Is the October 11, 2007 decision & order contrary to law, fact, and an abuse of discretion in denying the first branch of appellant's September 5, 2007 cross-motion:

to refer the disputed issue raised by the Petition and her Answer as to whether she is protected under the Emergency Tenants Protection Act and other rent regulations to the Office of Rent Administration of the New York State Division of Housing and Community Renewal for determination and, pending same, to hold the proceeding in abeyance?

*Judge Hansbury's decision & order asserted that "whether or not the...cooperative apartment is subject to the ETPA involves interpretation of statute/regulation and resolution of this issue is not within the particular expertise of the DHCR", citing*

*Davis v. Waterside Housing Co., Inc., 182 Misc.2d 851 – disregarding that such case had been reversed by the Appellate Division, First Department in 2000 on precisely the point of that agency’s “expertise” – and further disregarding that the coverage question is not limited to “interpretation of statute/regulation”, but involves factual issues such as whether the necessary paperwork had ever been filed with DHCR removing the apartment from coverage. Having so ruled, he did not then adjudicate the disputed and potentially dispositive issue.*

3. Is the October 11, 2007 decision & order consolidating “any prior pending action” with this proceeding contrary to law and reversible, *as a matter of law?*

*Judge Hansbury’s consolidation was without adjudicating, or even identifying appellant’s First Affirmative Defense (“Open Prior Proceedings”); was sua sponte; without specifying the “prior pending action[s]” being consolidated; without giving notice to the parties therein; and without changing the caption to reflect consolidation.*

4. Does the October 11, 2007 decision & order so falsify the state of the record and so violate the most fundamental legal and adjudicative standards as to manifest Judge Hansbury’s actual bias, if not interest – requiring him to have disqualified himself *sua sponte?*

*Judge Hansbury failed to disqualify himself sua sponte and made no disclosure of facts bearing upon his fairness and impartiality, although disclosure was requested by appellant’s papers.*

Case No. 2008-1428 WC

To be Argued by:  
Elena Sassower  
(15 minutes requested)

APPELLATE TERM OF THE SUPREME COURT  
NINTH & TENTH JUICIAL DISTRICTS

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JOHN McFADDEN,

Respondent,

-against-

ELENA SASSOWER,

Appellant.

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APPELLANT'S BRIEF\*



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**\*Appeal 2: Judge Brian Hansbury's January 29, 2008 Decision & Order  
(Westchester City Court #1502/07)**

## INTRODUCTION

This is an appeal from a January 29, 2008 decision & order of White Plains City Court Judge Brian Hansbury recusing himself, without explanation or disclosure, after denying appellant's legally-sufficient November 9, 2007 motion for his disqualification for demonstrated actual bias and interest – a motion also requesting that he disclose facts bearing upon his impartiality, if disqualification were denied.

As hereinafter shown, appellant's motion entitled her to Judge Hansbury's disqualification, *as a matter of law*, as likewise to vacatur of his October 11, 2007 decision & order by reason thereof or upon the granting of reargument and renewal. Vacatur of both his January 29, 2008 and October 11, 2007 decisions & orders are mandated by this appeal.

Also mandated is the granting of the relief the October 11, 2007 decision & order wrongfully denied – and to which appellant is entitled *as a matter of law*: dismissal of the Petition and summary judgment on her four Counterclaims, with costs and maximum sanctions against respondent and his counsel and their referral to disciplinary and criminal authorities. Such is directly sought by appellant's accompanying appeal of the October 11, 2007 decision & order, #2008-1433-WC, incorporated herein by reference.

Finally, based on the clear and unambiguous record underlying the January 29, 2008 decision & order establishing it and the October 11, 2007 decision & order to be “judicial frauds”, this Court's duty is to refer Judge Hansbury to disciplinary and criminal authorities – consistent with its mandatory “Disciplinary Responsibilities” under §100.3D(1) of the

Chief Administrator's Rules Governing Judicial Conduct and the public declaration of New York's highest state judge: "The court system has zero tolerance for jurists who act unethically or unlawfully"<sup>1</sup>

### **STATEMENT OF THE CASE**

The procedural history of this case, spanning from its commencement by Verified Petition dated June 22, 2007 to Judge Hansbury's October 11, 2007 decision & order – the subject of appellant's appeal under #2008-1433-WC – is set forth by her brief therein.

The continued procedural history to Judge Hansbury's January 29, 2008 decision & order – the subject of this appeal under #2008-1428-WC – follows.

#### **The Clerk's Notice of Trial & Sassower's November 9, 2007 Order to Show Cause**

Eight days after Judge Hansbury's October 11, 2007 decision & order, the White Plains City Court Clerk's Office sent a form-notice dated October 19, 2007 to respondent John McFadden [hereinafter "McFadden"] and appellant Elena Sassower [hereinafter "Sassower"] that the case was scheduled for trial on November 20, 2007.<sup>2</sup>

On November 8, 2007, Sassower filed an order to show cause to stay the November 20, 2007 trial pending determination of her within motion:

**"(a) to disqualify Part-Time White Plains City Court Judge Brian Hansbury for demonstrated actual bias and interest pursuant to §100.3E of the Chief Administrator's Rules Governing Judicial Conduct and Judiciary Law**

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<sup>1</sup> *"Court controversies aren't the whole picture"* by Chief Judge Judith Kaye, published by Gannett newspapers, March 22, 2002, underlining added.

<sup>2</sup> The trial notice is Exhibit GG to Sassower's November 9, 2008 order to show cause to stay the trial.

**QUESTIONS PRESENTED FOR REVIEW**  
**APPEAL 2: #2008-01428 WC**

1. Was appellant's November 9, 2007 order to show cause sufficient, *as a matter of law*, for the granting of its requested relief:

(a) to disqualify White Plains City Court Judge Brian Hansbury for demonstrated actual bias and interest based on his October 11, 2007 decision & order and to vacate same by reason thereof, and, if denied, for disclosure by him or any other judge determining the motion of facts bearing upon their impartiality;

(b) to vacate Judge Hansbury's October 11, 2007 decision & order, upon the granting of reargument and renewal;

(c) to transfer the proceeding to another court to ensure the appearance and actuality of impartial justice?

*Judge Hansbury's January 29, 2008 decision & order denied appellant's request for his disqualification, asserting that her motion offered "no basis in fact or law for [his] disqualification"; adhered, upon the granting of reargument/renewal, to his October 11, 2007 decision & order, asserting that her moving papers were "supported by nothing more than conclusory and unsubstantiated assertions, falling short of the standards for a motion to reargue/renew"; and denied "the balance of [her] motion...in its entirety", without reasons and without identifying its requested relief of vacatur of his October 11, 2007 decision & order, disclosure by him of facts bearing on his impartiality, and transfer of the proceeding.*

2. Did the legal sufficiency of appellant's November 9, 2007 order to show cause for Judge Hansbury's disqualification for demonstrated actual bias and interest divest him of jurisdiction to make any substantive determinations other than to disqualify himself—and did Judge Hansbury's recusal, without explanation or disclosure, by his January 29, 2008 decision & order further divest him of jurisdiction to render the substantive determinations he made therein?

*Judge Hansbury's January 29, 2008 decision & order denied the sufficiency of appellant's November 9, 2007 motion for his disqualification, stating that it*



*offered “no basis in fact or law” – and announced his recusal, without explanation or disclosure, after making substantive determinations.*

**3. Do appellant’s November 9, 2007 order to show cause and Judge Hansbury’s adjudication thereof by his January 29, 2008 decision & order require this Court to discharge its mandatory “Disciplinary Responsibilities” under §100.3D(2) of the Chief Administrator’s Rules Governing Judicial Conduct by referring Judge Hansbury to disciplinary and criminal authorities?**

*They surely do.*

Case No. 2008-1427 WC  
Case No. 2009-148 WC

To be Argued by:  
Elena Sassower  
(15 minutes requested)

APPELLATE TERM OF THE SUPREME COURT  
NINTH & TENTH JUICIAL DISTRICTS

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JOHN McFADDEN,

Respondent,

-against-

DORIS L. SASSOWER,

Respondent,

ELENA SASSOWER,

Appellant.

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APPELLANT'S BRIEF\*



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**\*Appeal 3: Judge Jo Ann Friia's July 3, 2008 Decision & Order  
July 21, 2008 Judgment of Eviction  
July 21, 2008 Warrant of Removal**

**\*Appeal 4: Judge Jo Ann Friia's October 14, 2008 Decision & Order**

(Westchester City Court #SP-651/89 & #SP-2008-1474)

## INTRODUCTION

This brief combines two appeals of appellant Elena Sassower [hereinafter “Sassower”]<sup>1</sup>:

**#2008-1427-WC:** Sassower’s appeal of a July 3, 2008 decision & order of White Plains City Court Judge Jo Ann Friia, granting a 16-1/2 year old summary judgment motion of John McFadden [hereinafter “McFadden”] (Exhibit C-1), and the July 21, 2008 judgment of eviction and warrant of removal purportedly based thereon (Exhibits C-2, C-3); and

**#2009-148-WC:** Sassower’s appeal of Judge Friia’s October 14, 2008 decision & order, denying Sassower’s September 18, 2008 motion to ensure that this Court has the documents and information necessary for its appellate review, including proper Clerk’s Returns on Appeals, and to that extent granting, on jurisdictional grounds, the cross-motion of the New York State Attorney General (Exhibit D).

Both appeals arise from the same 1989 White Plains City Court case, *John McFadden v. Doris L. Sassower and Elena Sassower*, #SP-651/89 – to which, on or about May 30, 2008 – and at the instance of Judge Friia – the White Plains City Court Clerk assigned an additional number, #SP-2008-1474, without notice or explanation.

At that same time – May 30, 2008 – another case, *John McFadden v. Elena Sassower*, #SP-1502/07, was before Judge Friia in a posture requiring any fair and impartial judge to have dismissed McFadden’s Petition therein, *as a matter of law*, and to have granted summary judgment to Sassower on her four <sup>Court/claims</sup> ~~Affirmative~~ Defenses therein, *as a matter of law*.

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<sup>1</sup> This single brief has been authorized by a February 5, 2009 letter of this Court’s Clerk (Exhibit A-3), responding to a January 5, 2009 letter request by Sassower (Exhibit A-1). Both appeals herein are timely (Exhibit A-2, A-4, A-5). For the convenience of the Court, the relevant correspondence and other documents germane to these appeals are furnished in an accompanying Compendium of Exhibits.

Judge Friia, however, was not a fair and impartial judge. Rather, she was a judge intent on using her judicial office for ulterior retaliatory purposes. To that end, she wilfully and maliciously disregarded her duty to disqualify herself based upon the appearance and actuality of her bias and interest and to disclose facts pertinent thereto. As hereinafter demonstrated, Judge Friia's appealed-from decisions & orders and judgment and warrant are flagrant judicial frauds – being indefensible in fact and law and knowingly so. Such requires that this Court refer Judge Friia to disciplinary and criminal authorities pursuant to §100.3D(1) of the Chief Administrator's Rules Governing Judicial Conduct so that her corruption and those complicit and benefiting therefrom may be investigated and prosecuted.

Sassower has already perfected two separate appeals in #SP-1502/07, which she incorporates herein by reference as they are essential background. They are appeal #2008-1433-WC from a October 11, 2007 decision & order of White Plains City Court Judge Brian Hansbury and appeal #2008-1428-WC from Judge Hansbury's January 29, 2008 decision & order, each depriving Sassower of the dismissal and summary judgment to which she is there entitled, *as a matter of law*.

Prior to perfecting the instant two appeals, Sassower sought to dispose of them by motions before this Court, stating:

**“11. No appellate court can uphold a decision awarding summary judgment to a petition alleging that respondents ‘entered in possession [of the subject premises] under a month to month rental agreement’ for which there is not only NO evidentiary proof, but which is rebutted by evidentiary proof. Nor can an appellate court uphold a warrant of removal that ‘completely falsifies’ the allegations of the petition for which summary judgment was given and**

'materially alters' its caption. Nor can it allow a judgment of eviction that 'materially diverges' from the decision it purports to implement, including by omission of respondents' Answer. All these are readily-verifiable from what is now before this Court, making the requested vacatur/dismissal relief of my motion not only immediately appropriate, but matters of elementary law. No appeal is necessary to resolve these straight-forward, documentarily-established issues. They can be resolved expeditious[ly], now." (Sassower's August 13, 2008 affidavit, underlining and capitalization in the original).

The record of these motions – Sassower's August 13, 2008 vacatur/dismissal motion and her October 15, 2008 order to show cause for reargument/renewal & other relief – are also incorporated herein by reference, as they were, and are, dispositive.<sup>2</sup> Indeed, they furnished this Court with the dispositive documents from the record before Judge Friia:

(1) Sassower's July 18, 2008 order to show cause for Judge Friia's disqualification and vacatur of her July 3, 2008 decision & order (Exhibit N)<sup>3</sup> containing a 51-page analysis of the decision & order; and

(2) Sassower's October 10, 2008 opposition/reply affidavit (Exhibit O) containing a 12-page analysis of the cross-motion of the Attorney General that

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<sup>2</sup> This Court's October [1], 2008 decision & order denied Sassower's August 13, 2008 vacatur/dismissal motion without reasons and without reciting any of the facts, law, or legal argument there presented. The Court's November 26, 2008 decision & order denying Sassower's October 15, 2008 order to show cause for reargument/renewal was also without reciting any of the facts, law, or legal argument pertaining thereto. Indeed, its "note" that "a motion to vacate an order must be addressed to the court that issued the order" was altogether inapplicable as Judge Friia had denied Sassower's July 18, 2008 order to show cause for vacatur of her July 3, 2008 decision & order, without signing it, writing on its first page "All issues raised have been previously addressed by the Court/ Appeal(s) may be taken to Appellate Court – no further action by City Court of White Plains to be taken." (Exhibit N).

<sup>3</sup> Sassower furnished this original document to the Court on August 13, 2008 in support of her August 13, 2008 vacatur/dismissal motion and in further support of her July 30, 2008 order to show cause for a stay pending appeal. The copy of the July 18, 2008 order to show cause herein annexed (Exhibit N) does not include its voluminous substantiating exhibits. These primarily consist of Sassower's June 27, 2008 and July 8, 2008 orders to show cause in #SP-1502/07 (with their substantiating exhibits), each of which Judge Friia denied, without signing, and Sassower's July 9, 2008 letter to Judge Friia, to which she did not respond. These exhibits are summarized at pages 27-30, 40-47, *infra*, with the July 18, 2008 order to show cause summarized at pages 47-50, *infra*.

Judge Friia's October 14, 2008 decision & order thereafter granted to the extent of denying, on jurisdictional grounds, Sassower's September 18, 2008 motion to compel the White Plains City Court Clerk to provide this Court with the documents and information necessary for her appeals.<sup>4</sup>

### STATEMENT OF THE CASE

#### The Re-Emergence of #SP-651/89 by a Trial Notice from the White Plains City Court Clerk Claiming it to be the "Original #" for #SP-1502/07

The 1989 case, *John McFadden v. Doris L. Sassower and Elena Sassower*, #SP-651/89, was dormant for approximately 15 years and likely dismissed by White Plains City Court for want of prosecution. From this hibernation, if not dismissal, the case popped onto the June 30, 2008 calendar for an "ALL DAY TRIAL" by a typewritten form notice from the White Plains City Court Clerk, dated May 30, 2008<sup>5</sup>. Such typewritten notice, not signed by the Clerk, was also not generated from the 1989 case, but from the separate 2007 case, *John McFadden v. Elena Sassower*, #SP-1502/07. Above its typewritten docket number "SP-2007-1502" was handwritten "SP651/89 (original #)". This handwritten addition was false.

#SP-651/89 is not the "original #" for SP-1502/07. This is immediately evident from their Petitions (Exhibits E, F). Not only do they bear different captions: the 1989 case involving an additional party, Doris L. Sassower, who is not a party to #SP-1502/07, but their Petitions are incompatible.

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<sup>4</sup> Sassower furnished a copy of her October 10, 2008 affidavit to the Court on November 3, 2008 to support her October 15, 2008 order to show cause for reargument/renewal & other relief. [See ¶24 of Sassower's November 3, 2008 reply affidavit therein].

<sup>5</sup> The May 30, 2008 trial notice that Sassower received is Exhibit MM to her July 18, 2008 order to show cause (Exhibit N). Discussion of the trial notice appears at ¶¶15-20 thereof.

**QUESTIONS PRESENTED FOR REVIEW**

**APPEAL 3: #2008-1427 WC**

**APPEAL 4: #2009-148 WC**

1. Was #SP-651/89 closed for lack of prosecution during the approximately 15 years of its dormancy, divesting White Plains City Court Judge Jo Ann Friia of jurisdiction to render her July 3, 2008 decision & order?

*Judge Friia's July 3, 2008 decision & order did not identify or determine the question of whether #SP-651/89 was open, gave a pretext for her decision that was materially false, and concealed that sometime in 2008 (and at her direction) the White Plains City Court Clerk assigned #SP-651/89 an additional docket number, #SP-2008-1474, without notice or explanation – presumably because #SP-651/89 was closed.*

*This Court cannot conclusively determine this question from the Clerk's Returns on Appeals for #SP-651/89 or #SP-2008-1474. Nor can it do so from the Clerk's Return on Appeal for #SP-1502/07, with which #SP-651/89 was allegedly consolidated and for which #SP-651/89 was purported to be the "original #". Available evidence supports the inference that #SP-651/89 was closed.*

2. Does White Plains City Court have jurisdiction and supervisory responsibilities over its own Clerk and was appellant's September 18, 2008 motion sufficient, *as a matter of law*, to have required any fair and impartial tribunal to have granted:

(a) its first branch: to compel the White Plains City Court Clerk to provide this Court with proper Clerk's Returns on Appeals, as well as court records and other information necessary to determining the status of #SP-651/89 and related City Court proceedings;

(b) its second branch: to refer the White Plains City Court Clerk to disciplinary and criminal authorities, *inter alia*, for tampering with court records and false statements to Judge Friia as to the status of #SP-651/89 and related cases and/or her complicity in Judge Friia's misrepresentations as to their status;

(c) its third branch: for such other and further relief as may be just and proper – including sanctions and costs against the New York State Attorney

General and petitioner-respondent's counsel and their referral to disciplinary and criminal authorities?

*Judge Friia's October 14, 2008 decision & order did not identify or adjudicate the motion's threshold assertion that she was disqualified for actual bias and "direct self-interest", did not address any of the facts, law, or legal argument appellant presented as to the City Court's jurisdiction and supervisory responsibilities over its own Clerk, and, without identifying or adjudicating the motion's second and third branches, denied the motion for lack of "subject matter jurisdiction".*

3. Was appellant's July 18, 2008 order to show cause sufficient, *as a matter of law*: (a) for the granting of its requested relief:

(i) to stay enforcement of the July 3, 2008 decision & order pending determination of appellant's underlying motion or, alternatively, pending appeal;

(ii) to disqualify Judge Friia for demonstrated actual bias and interest based, *inter alia*, on her July 3, 2008 decision & order, to vacate same by reason thereof, for transfer, and, if denied, for disclosure;

(iii) for reargument and renewal of the July 3, 2008 decision & order and, upon the granting of same, vacating it;

(iv) to vacate the July 3, 2008 decision & order pursuant to CPLR §5015(a)(3) for "fraud, misrepresentation, or other misconduct of an adverse party", with imposition of maximum costs and sanctions against petitioner-respondent and his counsel;

(v) to vacate the July 3, 2008 decision & order pursuant to CPLR §5015(a)(4) for "lack of jurisdiction to render the judgment or order";

(b) for the granting of its requested "such other and further relief as may be just and proper" – and, specifically,

(i) summary judgment to appellant pursuant to CPLR §3212(b),



dismissing the Petition in #SP-651/89;

(ii) summary judgment to appellant in #SP-1502/07, dismissing the Petition therein, with summary judgment to appellant on her four Counterclaims?

*Judge Friia made no determination as to the sufficiency of appellant's July 18, 2008 order to show cause for any of its requested relief. Instead, she denied it, without signing it, writing on its first page "All issues raised have been previously addressed by the Court. Appeal(s) may be taken to Appellate Court – no further action by City Court of White Plains to be taken".*

*In fact, appellant had never previously moved for reargument and renewal of the July 3, 2008 decision & order and had never moved for its vacatur pursuant to CPLR §5015(a)(3) and (4). As for that branch of appellant's motion as sought Judge Friia's disqualification, transfer, and disclosure, Judge Friia had never "previously addressed" these issues.*

*Based on appellant's July 18, 2008 order to show cause, any fair and impartial tribunal would have granted her summary judgment pursuant to CPLR §3212(b), dismissing the Petition in #SP-651/89 as rebutted by documentary evidence. Such tribunal would have also dismissed the Petition in #SP-1502/07 and granted appellant summary judgment on her four Counterclaims therein.*

4. Is vacatur of Judge Friia's July 21, 2008 judgment of eviction & warrant of removal required, *as a matter of law* – and does Judge Friia's signing them, simultaneous with her not signing appellant's July 18, 2008 order to show cause, further manifest her pervasive actual bias for which appellant was entitled to her disqualification?

*Judge Friia's July 21, 2008 judgment of eviction and warrant of removal, unchanged from the proposed judgment and warrant submitted by petitioner-respondent's counsel, do not comport with the form and content of such documents and materially diverge from her July 3, 2008 decision & order. Her signing them further manifests her pervasive actual bias, entitling appellant to her disqualification – and especially as appellant's July 18, 2008 order to show cause, which she simultaneously did not sign, provided her with a 51-page analysis establishing her July 3, 2008 decision & order to be "a judicial fraud" – indefensible in fact and law and knowingly so.*

5. Do the course of these proceedings require this Court to discharge its mandatory "Disciplinary Responsibilities" under §100.3D of the Chief Administrator's Rules Governing Judicial Conduct by referring Judge Friia and the White Plains City Court Clerk to disciplinary and criminal authorities, as likewise petitioner-respondent's counsel and the New York State Attorney General?

*They surely do.*