

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

Index No. 25094/92
Plaintiff designates

DORIS L. SASSOWER

New York
County as the place of trial

Plaintiff

The basis of the venue is

Defendant's residence

against

Summons with Notice

GANNETT COMPANY, INC., GANNETT SATELLITE
INFORMATION NETWORK, INC., NANCY Q. KEEFE,
DEBBIE PINES, ELAINE A. ELLIS, CAROLE TANZER
MILLER, CAMERON McWHIRTER, TOM ANDERSON,
MICHAEL MEEK, LAURIE NIKOLSKI, MILTON HOFFMAN,
DOES 1-15, being Gannett editors, Defendant s

Plaintiff resides at

White Plains, New York

County of Westchester

EVELYN BRESLAW and ABBIE PETRILLO,

To the above named Defendant

You are hereby summoned to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorney(s) within _____ days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded herein.

Dated, October 26, 1992
Defendant's address:

DORIS L. SASSOWER, Pro Se
Attorney(s) for Plaintiff
Office and Post Office Address

to be attached
Notice: The nature of this action is

283 Soundview Avenue
White Plains, NY 10605

Libel, slander, and negligence
(see attached)

The relief sought is

\$10,000,000 compensatory and \$20,000,000 punitive damages

Upon your failure to appear, judgment will be taken against you by default for the sum of \$ _____ see above
with interest from _____ and the costs of this action.

November 15, 19 89

Ex 3a

SASSOWER v. GANNETT: Attachment to Summons with Notice

In or about July 1989 and continuing thereafter, all Defendants negligently, recklessly, and/or intentionally stated and published negative information damaging Plaintiff.

On or about October 22, 1991 and at various other times, Defendants Breslaw and Petrillo negligently, recklessly, and/or intentionally spoke and published concerning the plaintiff false and defamatory words, including the following: speaking of Plaintiff, Defendant Breslaw stated at a public gathering: "I found a woman lawyer with a full-page ad in Martindale-Hubbell. The lawyer did nothing for six months...and for another eighteen months refused to give my papers to a third lawyer." Speaking of Plaintiff, Defendant Petrillo stated at the same public gathering: "That female lawyer ... is Doris L. Sassower."

On or about October 24, 1991, Defendants (other than Breslaw and Petrillo) negligently, recklessly, and/or intentionally published and circulated the aforesaid statements concerning Plaintiff, with knowledge of their falsity and libelous and defamatory nature, further stating in connection therewith that "The audience growled" at the mention of Plaintiff's name, and the statement that Plaintiff "was indefinitely suspended in June from practicing law".

On or about November 18, 1991, Defendants (other than Breslaw and Petrillo) negligently, recklessly, and/or intentionally published Plaintiff's Letter to the Editor in unauthorized edited form, adding the following false and defamatory statement: "Writer Sassower was ordered suspended from the practice of law on June 14 by the Appellate Division, 2nd Department of state Supreme Court for failure to cooperate with a previous order of the court. That suspension is still in force. Additionally, Justice Samuel Fredman found Sassower in contempt of court for not returning papers to her former client, Breslaw, and fined Sassower the costs incurred by Breslaw in retrieving her file."

On or about February 12, 1992, Defendants (other than Breslaw and Petrillo) negligently, recklessly, and/or intentionally published the following false and defamatory statements: "The settlement was made Dec. 13, 1991, after a seven-week trial in which Sassower's former client, Kathleen C. Wolstencroft, sued to get documents involving her case.", and "In addition, Colabella wrote that Sassower still must pay Wolstencroft \$700,000 under the settlement."

On or about February 14, 1992, Defendants (other than Breslaw and Petrillo) negligently, recklessly, and/or intentionally published the following false and defamatory statements: "The court did not overturn his order that she pay Wolstencroft \$700,000 under a Dec. 13, 1991 settlement after a seven-week trial in which Wolstencroft sued to get documents in her case."