

Center for Judicial Accountability, Inc. (CJA)

From: Center for Judicial Accountability, Inc. (CJA) <elena@judgewatch.org>
Sent: Tuesday, October 23, 2018 2:12 PM
To: 'Barbara.Underwood@ag.ny.gov'; 'Brodie, Frederick'; 'Paladino, Victor'
Cc: 'Janet.Sabel@ag.ny.gov'; 'Kent.Stauffer@ag.ny.gov'; 'Meg.Levine@ag.ny.gov'; 'Jeffrey Dvorin'; 'Brian.Mahanna@ag.ny.gov'; 'Alvin.Bragg@ag.ny.gov'; 'marty.mack@ag.ny.gov'; 'Matthew.Colangelo@ag.ny.gov'; 'Margaret.Garnett@ag.ny.gov'; 'manisha.sheth@ag.ny.gov'; 'Adrienne Kerwin'; 'Helena.Lynch@ag.ny.gov'; 'Edward Carey'; 'Jane Landes'; 'ad3clerksoffice@nycourts.gov'
Subject: CJA v. Cuomo Citizen-Taxpayer Action Appeal: #527081 -- Notice of Motion to Strike Respondents' Brief, to Declare the Attorney General's Representation of Respondents Unlawful, & for Other Relief
Attachments: 10-23-18-motion-with-exhibits-back.pdf; 10-23-18-notice-of-motion-with-back.pdf

TO: Attorney General Barbara Underwood/ Assistant Solicitor General Frederick Brodie/ Assistant Solicitor General Victor Paladino

As Associate Justice Sharon A.M. Aarons has, without reasons, declined to sign appellants' October 18, 2018 order to show cause to strike your respondents' brief, to declare your representation of respondents unlawful, and for other relief – and it is not possible to submit it to another judge -- I have informed Chief Motion Attorney Ed Carey that appellants will proceed by notice of motion.

The full motion is attached. Also attached, if more convenient for you, is just the 3-page notice of motion with its annexed 3-page declined osc – and a new back. Everything is posted on CJA's website here: <http://www.judgewatch.org/web-pages/searching-nys/budget/citizen-taxpayer-action/2nd/appeal/10-23-18-motion.htm>.

I will be mailing you a hard copy of the notice of motion, with declined osc – and the new back. You already have the moving affidavit and exhibits.

Thank you.

Elena Sassower, unrepresented plaintiff-appellant

On her own behalf, on behalf of the Center for Judicial Accountability, Inc.,
and on behalf of the People of the State of New York and the Public Interest

914-421-1200